

SHEEP DIP POLLUTION REDUCTION PROGRAMME

STEERING GROUP MEETING 17 April 2007 Bristol

ACTIONS

General

EA to send the following presentations to the group.

1. CSL studies by Nick Renn, VMD (action 4 PRP)
2. Environmental Monitoring by Spence Seaman, EA (action 3 PRP).
3. Risk reduction measures by Steve Hallahan, Cross Vetpharm Group Ltd.
4. Scottish findings of on farm study into cypermethrin by Rob Morris, SEPA.
5. Sheep dip usage monitoring in Northern Ireland by Stephen Jess, AFBI.
6. Outcomes of options appraisal study by James Medhurst, GHK Ltd.

Raising Awareness

Alastair Johnson, NFU, to liaise with Steve Hallahan regarding revisions to manufactures guidance leaflet.

Monitoring

EA to investigate possibility of “hot spots” existing across England & Wales.

Options Appraisal

Bill Parish, Defra, to contact researchers and fund a risk assessment study into resistance build up and pressures within UK sheep flocks in the absence or presence of cypermethrin dips. Needs to draw on international experiences. Bill to speak to Nick Renn initially in terms of scoping out.

Environmental Risk

EA to provide some indication of what constitutes an acceptable level of “environmental risk”
EA to pull together actions and costings needed for any regulatory regime under option 2.

PRP Actions

Carmel Jorgensen (S&TA) to send details of unfinished actions within PRP to Spence Seaman.

1. Matters arising

Matters arising from the last meeting were provided as tabled papers along with names of peer reviewers for CSL studies. Meeting agreed the minutes of the last meeting (4 December 2006).

2. Objectives for the steering group meeting

The paper stating the objectives for the meeting was read by the Chairman and agreed by the group.

3. Updates of PRP

- i) Presentation on the 2 CSL studies was provided by Nick Renn (action 4 PRP)

- ii) Presentation on Environmental monitoring was provided by Spence Seaman (action 3 PRP)
- iii) Industry updates: best practice measures by Peter Morris, NSA (action 1.6 PRP), and risk reduction measures by Steve Hallahan. Peter explained that climate change could well present different challenges from ectoparasites. He had held a provisional meeting with the umbrella organisation for Farm Assurance Schemes: Assured British Meat (ABM) and that their technical advisory group will look into incorporating sheep dip facilities into farm assurance schemes. EA/NSA and NFU had all recently been participating jointly in various roadshows in the North West region.

Sheep scab: Scotland is well advanced with work on how to control this and compulsory treatment is on the agenda. At a recent workshop held in London to try and start the same programme for England & Wales there was hot debate regarding the use of showers and jettors over efficacy/Health and Safety concerns.

Blue Tongue: there seems to be a good chance of seeing the disease in the UK this summer. Early indications are that more work needs to be done in understanding the role of dip chemicals in preventing the mosquitoes landing on sheep and that pour ons/showers are not effective.

Peter concluded by highlighting that should worms become resistant to ivermectin products, then certain parts of the country will be no go areas for sheep farming.

Alastair Johnston, NFU, confirmed the intention to mail shot some 60,000 sheep farmers via the BWMB pricing schedule in May with the Stop Every Drop leaflet and that several sheep events this summer provide a further opportunity to disseminate the leaflets.

Risk reduction measures by Steve Hallahan. Steve explained that his presentation should be seen as ideas for discussion on measures that would be needed to make option 2 of the GHK study a sustainable solution. He accepted that cypermethrin posed a very real risk but wished to be part of the solution. Steve then presented his 5 point plan to the group.

- iv) Scottish findings of on farm study into cypermethrin by Rob Morris (SEPA)

Rob updated the meeting on the following:

The Scottish Executive has consulted on General Binding Rules (GBR) that will address sheep dip in the generic sense. Will provide a statutory baseline against which SEPA would expect sheep farmers to work to.

The momentum is being maintained within the Executive and Industry to address the ectoparasite issue. Legislation may be in the pipeline with potential compulsory dipping/treatment.

Angling survey work (similar to the fly life surveys in England) have recently started.

A review of the air, land and water codes is happening and a farm survey report will look at how farmers receive the messages from the code.

Rob explained that the on farm study into cypermethrin looked at 1 farm considered to be adopting best practice and that they planned to do more work this year and possibly with diazinon as well. Rob then presented the findings of the on farm study.

v) Sheep dip usage monitoring in Northern Ireland by Stephen Jess (AFBI)

Stephen explained that AFBI monitors pesticide usage across NI having done survey work in 1997 and 2005 and that Northern Ireland has some 9000 farms and approximately 2.1 million sheep. Stephen then presented the findings of their work.

The Chairman then opened up the discussion inviting comments and questions from the floor.

Guy Linley-Adams, ACA, asked of the SEPA farm survey was it known if the dip in invert quality was due to the dipping event or was it always there? It appeared unclear.

Ceri Evans, Welsh S and T, stated that cypermethrin hits different species harder than others and did the SEPA study find that to be the case? Again it was not clear but SEPA pointed out that the rivers were of high quality.

Alastair Johnston stated he would action himself to speak to Steve Hallahan regarding any revisions to the manufacturers guidance leaflet.

Mark Crane, Watts and Crane Associates, asked where VMD would place the farm chosen for the CSL farmyard study in the spectrum of good to bad. VMD replied: good in respect of infrastructure and quite extreme in terms of geography.

John Fitzgerald, VMD, asked how incidents of sheep scab are registered in NI. Stephen replied that scab is still notifiable in NI and so must be identified and recorded.

John also noted that the monitoring maps suggested clusters; was there something peculiar about those locations? Spence Seaman replied that most were around dipping areas but also some were watercourses that were receiving constant discharges via markets and wool scourers discharging to sewage works. Roger Dawson, AMTRA, commented but a lot of sheep dipping areas showed no clusters. Spence commented that continued use of product through habit may go some way to explain. John felt it was an area to investigate further. See actions.

Peter Morris stated that Dectomax (an ML product) is not suitable for treating lambs with scab as dose is too small at 1ml/33kg live weight.

Matt Shardlow, Buglife, stated that as cypermethrin has an ability to pollute long after it has been applied as shown by previous BWMB studies and given that we know from the CSL studies that EQS failures could still occur some 48hours after treatment; wasn't the 24 hours suggested by Cross Vetpharm too low? There was also the issue of terrestrial impacts from dripping sheep in fields.

Mark Crane said the CSL studies do not demonstrate unequivocally the risks and that 1 animal crossing a stream will not cause a big problem, its lots of sheep that's the issue.

EA commented that whilst the Cross Vetpharm ideas were constructive they felt they were not sufficient to mitigate the risks. Dipping with SPs is inherently risky and education alone has been proved not to be sufficient as the 1999 campaign showed that as soon as the spotlight moved away, the problem returned.

Rob Carr, NFUS, stated he felt the updates had provided a good news story. The number of incidents had dropped and that the Scottish work indicated that if best practice was followed then use of SPs presented no problems.

Jennifer Best, Natural England (NE), stated that the “ditch” as used in the CSL study was a static ditch and therefore didn’t represent worse case and asked how the best practice guidance in Scotland differs from the Groundwater Code of Practice in that they both call for sheep to be kept away from watercourse for 2 weeks post dipping. Was this practical in all areas of UK?

Steve Hallahan replied that he thought it could be achieved through education.

Jennifer then asked why, if cypermethrin is a niche market (as referred to by Steve), was it contributing to such a large proportion of EQS failures?

EA commented that restrictions proposed in Cross VetPharm’s leaflet on cypermethrin would mean only a very small proportion of sheep farms would ‘pass’ – and did this leave the product economically viable?

Steve Hallahan confirmed that they saw the product as that for a niche market but one that was essential for some farmers and was willing to demonstrate that by suggesting that any farm with a dip within 100 meters of a watercourse or a need to ford a watercourse should not be permitted to use the product.

Guy Linley-Adams questioned why anyone should think education would work this time when it failed before.

Mark Crane asked what de minimus level of environmental risk is acceptable to the EA.

EA commented that in the absence of anything else then EQS exceedances of no greater than for any other “approved” product may be acceptable but agreed to investigate further. See actions.

Lunch

4. GHK presented the final report on the options appraisal study.

James Medhurst pointed out that the study suffered from poor data even with all the contributions from the group. He also highlighted that the problem of resistance is such an unknown in terms of time scale and extent that it is one of the major factors as to why the study could go no further in terms of recommending any one outcome. He then ran through some of the issues associated with each option.

Option 2: all environmental factors become positive but how positive and at what cost? Regulatory costs are potentially severe but unclear as to how severe. The positive is that it brings regulators and industry together.

Option 3: potentially if successful has a lot more to offer than option 4. If improved animal welfare is factored in then it could become even more attractive in the long run.

Option 4: the resistance issue if “confirmed” in terms of severity and timescale could be a deal breaker for option 4. However, if you reach option 4 via option 3 then it’s not an issue.

In summary, if you could guarantee success under a scab eradication programme then option 3 would be the best option; if it fails it becomes the worse option. If option 3 is taken out of the picture then the group needs to weigh up the costs of controls under option 2 versus the costs of accelerated resistance build up under option 4.

5. Discussion on options presented

Derek Tinsley, EA, questioned that the report mentions 1 or 2 further pieces of work may be required to reach any firm conclusions; what would GHK consider to be the key areas of work needed? James confirmed that the issue of resistance under option 4 appears key to them. The question was posed that we need to understand whether the risk of resistance is real and at what time scale and what would the potential costs be to industry.

Brian Hosie, BVA/SVS, confirmed the current lack of information. He stated that currently some 60% of flocks exhibit signs of resistance to BZ family of wormers and that some 10-20% exhibit the same signs of resistance to the ML family. He felt that a study could be done but it would take perhaps a year or so.

Huw Rhys Thomas, NFU Cymru, said that the recent worm watch survey in Wales showed that over 80% of farms had resistance to 1 of the 3 families of worms.

Chairman asked whether if it is inevitable, then is it inevitable without the use of SPs?

Industry replied it would accelerate it and explained how a use of a combination of the 3 families of wormers can be used to overcome some current resistance problems. But they stated that in certain areas of Australia they can't keep sheep due to triple resistance problems.

Bill Parish said that resistance in intestinal worms is inevitable if we continue as we are in this country. The questions are really, will withdrawal of SPs lead to increased use of MLs and will increased use of MLs (for scab control) result in increased resistance? He stated that merchants and vets were at the bottom of the learning curve in terms of advice that is best for animal health and that there is a lot to do to get sustainable parasite control on track with or without SPs. A lot of farmers don't use vets, instead relying on SQP's (Suitably Qualified Persons). A critical step has to be getting adequate advice from SQPs.

Phil Stocker, Soil Association, commented that many organic farmers are of the view that they have a sustainable level of sheep parasite populations within their flocks and would not wish to be steered down the ML route.

Chairman asked if anyone was willing to work on the resistance issue.

Bill Parish said that SCOPS (sustainable control of parasites in sheep) need evidence to show that their measures work on UK farms. Defra are funding some of this work and agreed to come up with some ideas of what could be done within a reasonable timeframe and by whom. See actions.

James Medhurst commented that the group could recommend option 4 whilst this research was done, but questioned whether you could get manufacturers to start making SPs again at some time in the future.

EA commented that if that meant option 2 being preferred there was no indication as to where the money would come from as much more than just education was needed, it would require money, commitment and possibly changes in the law.

Chairman asked if the industry had the money to fund option 2 as it would appear foolhardy to recommend that option if they haven't got the money.

Phil Stocker said that the organic sector has a system in place called the organic certification system and that farmers are willing to pay because of the premium for organic products in the market place. He felt this could be looked at to see if it would deliver the necessary measures, but currently only 3-5% of UK sheep farming is organic.

Peter Morris felt farm assurance schemes could be an option for the measures required under option 2.

Guy Linley-Adams reminded the group that option 3 was costly in terms of controls as well.

Alastair Johnston stated that various measures such as CoC, flock health plans and review of animal movements were already looked at as part of farm assurance schemes.

John Fitzgerald asked the question again as to what is an acceptable level of risk to the environment. See actions. He commented that the EA monitoring found the vast majority of sites to be free from cypermethrin contamination and that the "hot spots" need to be further investigated. See actions.

Ivor Llewellyn asked if there was any regional data on cypermethrin usage. No data exists other than annual records for UK sales provided by VMD.

Guy Linley-Adams asked about the manufacturers appeal.

Steve Hallahan confirmed that they are to appeal against the suspension. The appeal will be asked to consider 2 things. Was the decision to suspend correct, and what do we do now based on work and findings of the steering group?

Chairman asked if an industry view was one in favour of option 2. This was agreed as the case.

Ivor Llewellyn asked if the costs of option 2 could be checked or calculated.

Bill Parish said a lot more work was needed to be done before we knew what any regulatory regime would look like. Governments “better regulation” was trying to join up the inspection process wherever possible. How much responsibility would government take and how much would industry and farmers take? Both, he suggested were unknown at this stage and much more work was needed to firm these up. EA agreed to progress as a matter of priority. See actions.

Matt Shardlow felt that cypermethrin was simply too risky a chemical as it stays on the animal so long.

Ivor Llewellyn said that Government would have to bear the responsibility of any impacts on SAC's (special areas of conservation) if SPs were authorised again.

Ceri Evans stated that 33 rivers in Wales had been previously impacted by cypermethrin and that in some cases no impacts were currently being recorded as the river had already been degraded. He added it can take up to 12 years to see a full recovery in a salmon river.

The Chairman then moved the debate to option 3 (the scab eradication option). He asked who would be supportive of the option.

Peter Morris stated that the eradication was ambitious but necessarily so and that his preference would be option 2 before option 3.

Steve Hallahan said that he felt it was not realistic to try and eradicate scab in the UK for a variety of reasons including animal movements and poor bio security practices.

Ivor Llewellyn asked how essential it is to have SPs for a Scab eradication programme and whether the low chance of success was worth the high risk to the environment.

Bill Parish said that controlling the scab problem is all about using the products effectively as well as having a big enough arsenal of products. He pointed out that ticks are becoming a real problem in upland areas and were difficult to treat.

The Chairman concluded the session and summarised as strong views in favour of options 2 and 4 with less strong views in favour of option 3.

He confirmed 3 issues that needed progressing before any firmer decisions could be reached as:

1. Quantify an “acceptable level of environmental risk” by the EA.
2. Investigation into the apparent “hot spot issue” by the EA.
3. Provision of a better assessment of the resistance issue, with or without SPs by Defra.

6. Future of the group

Derek Tinsley stated he found the group to have been useful and that the GHK study in particular had helped separate fact from hearsay, but that he felt the group had perhaps served its purpose at least in the current format.

John Fitzgerald said he felt the meetings had served to highlight what a complicated issue this was. He thanked GHK for a good document which highlighted the problem very well. He stressed the need to get answers to the questions that had arisen during the debate and that once gathered, they should be shared with the group. He felt the group was very important part of the process that would allow VMD to reflect on all the views of the group’s members.

Chairman thanked all the members for their input and pointed out that for the first time we appeared to have a complete cross section present and that everyone had seemingly felt it of sufficient value to attend. He felt that the group should at least stay together even if only by electronic means.

Steve Hallahan expressed his wish to stay involved with the group.

Carmel Jorgensen said there were a number of items in the PRP that needed to be addressed, such as flock management, hotspots and the potential for further breaches from wool scouring plants was unacceptable. She highlighted the problem of monthly sampling for EQS compliance and stressed EA were only ever likely to find the “tip of the iceberg”.

Chairman asked that she e-mail to Spence Seaman any issues that she felt had not been sufficiently addressed.

Guy Linley-Adams asked what the timetable was for reporting to Ministers.

John Fitzgerald said there was no Regulatory timetable and that he had no particular timetable in mind. His view was that certainly more answers were needed before any report would be sent to Ministers.

Derek Tinsley thanked Philip Rees for acting as Chairman throughout the steering group meetings.

The meeting closed at 15:30.

Attendees – see **Annex 1**

Agenda - see [Annex 2](#)

Steering group meetings to date: 30 September 2005
21 August 2006

notes

04 December 2006

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Hyperlinks needed to enable navigation between meeting

Annex 1

List of Attendees at Sheep Dip Steering Group meeting 17 April 2007 Bristol

Chair: Philip Rees

Industry

| | |
|-------------------|---|
| Alastair Johnston | NFU |
| Rob Carr | NFU Scotland |
| Huw Rhys Thomas | NFU Cymru |
| Ben Underwood | Country Landowners & Business Association |
| Peter Morris | NSA |
| Roger Dawson | AHDA & AMTRA |
| Brian Hosie | SVS /BVA |
| Steve Hallahan | Cross Vetpharm Group Ltd/NOAH |
| Mark Crane | Watts & Crane Associates |

Conservation Angling & Wildlife Groups

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|------------------|----------------------------------|
| Matt Shardlow | Buglife |
| Carmel Jorgensen | Salmon & Trout Association |
| Guy Linley-Adams | Angling Conservation Association |
| Tim Hoggarth | Countryside Alliance |
| Ivor Llewelyn | Atlantic Salmon Trust |
| Ceri Evans | Welsh Salmon & Trout Association |
| Phil Stocker | Soil Association |

Regulators

EA

Derek Tinsley

Rob Robinson
Jo Kennedy
Spence Seaman

| | |
|-------------------|-------------------------------|
| Bill Parish | Defra |
| John Fitzgerald } | |
| Nick Renn } | VMD |
| Paula Huckle } | |
| Rob Morris | SEPA |
| Jennifer Best | Natural England (formerly EN) |
| Joanne Glen | WAG |
| Stephen Jess | AFBINI |
| Alastair Mitchell | HSE |

Consultants GHK

James Medhurst

Apologies received from:

| | |
|----------------------|---|
| Rhian Nowell-Philips | Farmers Union Wales |
| Mary Bradley | SEERAD |
| Mike Madden | Enco |
| Rob Morris National | Asociation of Agricultural Contractors NAAC |
| Jim Densham | RSPB |
| Stephen Dawson | NOAH |
| Bob Merriman | |
| & Ian Johnson | EA |

Annex 2

Agenda

Meeting on: Meeting of the Sheep Dip Pollution Reduction Programme Steering Group

Date: Tuesday 17th April, 2007

Time: 11:00am – 3:30pm

Location: Armada House Conference Centre Telephone Avenue, Bristol BS1 4BQ.
Tel: 0117-9152601. A map is available at
<http://www.armadahouse.co.uk/findus/index.htm>

Agenda

Teas coffees 10.30-11:00

- I. Introductions & matters arising from the last meeting 4 December 2006 (Philip Rees, 11.00am)**

- 2. 11:10 Objectives for the steering group meeting.**

- 3. 11:20 Update on actions within PRP.**

- I) CSL studies by Nick Renn VMD (action 4 PRP)**

- ii) **Environmental monitoring by Spence Seaman (action 3 PRP)**
- iii) **Industry updates: best practice measures by Peter Morris, NSA (action 1.6 PRP) and Risk reduction measures by Steve Hallahan, Cross VetPharm Group Ltd.**
- iv) **Scottish findings of on farm study into cypermethrin by Rob Morris (SEPA)**
- v) **Sheep dip usage monitoring in Northern Ireland by Stephen Jess (AFBI)**

Lunch (13.00 – 13.30pm)

- 4. **13:30 Final report on options appraisal study by GHK Ltd (action 2 of PRP)**
- 5. **Discussion on evidence presented and the options identified in the GHK study.**
- 6. **Discuss future of Steering group.**

Close 3:30pm latest

Location map is available at: <http://www.armadahouse.co.uk/findus/index.htm>