CONSULTATION ON THE DRAFT SHEEP DIP POLLUTION REDUCTION PROGRAMME

RESPONSE FROM
THE COUNTRY LAND AND BUSINESS ASSOCIATION

The Country Land and Business Association’s (CLA) 40,000 members are involved in all aspects of rural land management and business. They manage approximately 5 million hectares of rural England (and Wales), including: landscapes designated as National Parks and Areas of Outstanding Natural Beauty; land in Countryside Stewardship and Environmentally Sensitive Area agreements and Sites of Special Scientific Interest. CLA members provide land and capital for investment in farming or other rural businesses, including agriculture, forestry, fisheries, tourism, recreation and other rural industries. They are stewards of countryside resources, landscapes, biodiversity – maintaining and enhancing our greatest national asset for this and future generations.

The rural economy makes a major contribution to the national economy. Land-based businesses, within the rural economy, provide the environmental and recreational benefits in the countryside that are valued by the population as a whole. The best security for rural areas is a successful and sustainable rural economy allied with flexible, integrated and sustainable policies that all pull in the same direction.

Introduction

The CLA has a position that is unique when compared to many other NGO’s. Our membership encompasses both those with livelihoods based on sheep production and riparian owners that gain financially from fishing lets. Therefore the CLA want to see a strategy that ensures that considerations for both parties are taken into consideration.

We accept the substantial impacts on invertebrates and the knock on effects to fish stocks in relation to use of both cypermethrin and diazinon and acknowledge that it is unacceptable. However while sheep are kept and have a covering of wool, we have to face the fact that such a covering, which contains natural oils to protect the sheep, is the ideal breeding and growing ground for external parasites. It is vital that the strategy and those taking it forward understand that such infestations are contrary to the good health and welfare of the animal and, as keepers of such animals; farmers have a clear duty to safeguard that welfare.

The big question that needs to be addressed in order to be fair to sheep farmers and to riparian owners is whether any farmer can be expected to use either chemical in a real life farmyard situation (not in a lab or a theoretical lecture room) without their being a high risk of pollution? Perhaps a comparison should be made to a worker at Imperial Chemical Industries (ICI). Would ICI allow any of its workers to work outside a controlled environment with a chemical potentially damaging as cypermethrin or diazinon? If not then why should a worker in the agricultural sector be allowed to do so. This begs the question; is it really fair on the agricultural worker to expect him to be able to handle such poison safely? The best managers of natural resources and those best able to deliver environmental services are the very people who manage the land, its landscape and habitats. With sufficient alternatives no farmer would actively choose a product that causes possible harm to their health let alone the surrounding environment.
The programmes of measures are positive and the CLA firmly believe that increased awareness alongside a level of competence is better than the introduction of any rigorous legislation. However the overarching solution to this issue would be to ban the use of the substances in question altogether and the strategy seems to avoid this. Whilst we would encourage the demise in use of OP and SP’s, this cannot be done until suitable alternatives are developed or existing alternatives are sufficiently promoted. A revised action plan is essential in the interim.

Greater effort needs to be made to investigate and promote alternative chemicals which are effective in controlling all external parasites while at the same time having no damaging effects either on the broad environment or on human or animal health. This has been requested by the industry on numerous occasions. We would be in favour of a time limited ban being imposed (say five years), allowing both farmers and more importantly manufacturers to be fully aware that a substitute will soon be essential. Unless there is a deadline for banning it, we do not see any chance of the manufacturers making the investment to push further alternatives.

**The Reduction Programme**

It is positive that the programme takes into account; short, medium and long term actions and that the action plan is considered a live document, with actions being open to refinement. With the recent introductions of decoupling, cross compliance and the new agri-environment scheme portfolio, farmers are more environmentally aware than ever and this should be taken into account and not underestimated. Pressures on the industry are ever changing and striking the right balance of consideration of the short run and long run in determining appropriate environmental policy is difficult but a very important challenge.

Whist this document is a positive step we would not like the action plan to be interpreted as a solution and as a result prolong much needed product reviews and further promotion of less toxic alternatives to cypermethrin and diazinon. Anything that discourages the investigations into alternatives would be counter productive and would not be supported by the CLA.

**Do you agree with the actions that have been identified?**

I think one has to ask the question again – can such harmful chemicals in reality be used on sheep with no damage to the environment? There have already been inspections of sheep dip facilities, public meetings, farm visits, and articles in the farming press and yet still incidences of environmental damage occur. Therefore action 20 (*Continue investigations into alternative sheep dipping products*) needs to be the main driver for this action plan. If this were to be achieved then a number of actions in the plan would become unnecessary however we accept that this will not happen over night and a number of these measures are required in the interim.

Whilst action 11 (*Review existing flock management and biosecurity initiatives and how these might be expanded to all sheep farming areas in the UK*) may be effective in some instances and has proved successful in Scotland it isn't just sheep scab and scab mites that are controlled through dipping. It also prevents fly strike, 'wicks' and similar problems which can become chronic during certain summer months. We are slightly concerned that everything seems to be considered in terms of scab. Scab is just one of the problems dipping deals with. With regard 'wicks' there is no possibility of controlling things by biosecurity measures and if scab were eliminated sheep would still need to be treated because of this fly strike problem.
**Action 3** *(Produce interim guidance for contractors and farmers on the use of showers and jetters)* should be encouraged, and the economic and environmental benefits of using showers and jetters promoted. It uses less actual dip than immersion dips. Anything that discourages people from using them would be counter productive.

We do not agree with the proposal in **action 16** *(Review the role Cross Compliance can play in the management of sheep dip pollution)*. We believe this is impracticable as a way forward. If cross compliance is to be enforceable it must be clear, recognisable and auditable. The level of variation on each site and the diffuse nature of incidences would render this impracticable.

The Voluntary Initiative has been a positive move for the industry, jolting the current orthodoxy that the best way to tackle environmental problems is through more regulation. However we feel that **action 17** *(Consider whether setting up a Voluntary Initiative for sheep dip would be worthwhile and how this would work)* would only be an extension of what is being developed through this strategy and would run the risk of delaying the further introduction of alternative substances that should be the primary objective.

**Implementation and delivery**

The CLA deem it essential to represent its members, both sheep farmers and riparian land owners on the steering group. If the action plan is decided upon than we would suggest that the steering group is reactive in terms of meeting up. Regular updates on progress via email would allow meetings to be drawn together as and when the steering group feel there are matters to discuss.

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