

Nicky Jones  
Air & Chemicals Policy  
Environment Agency  
Block 1 Government Buildings  
Burghill Rd  
Westbury-on-Trym  
BS10 6BF

28 February 2006

Dear Ms. Jones

### **Consultation on Draft Sheep Dip Pollution Reduction Programme**

Wildlife and Countryside Link (Link) brings together voluntary organisations concerned with the conservation, enjoyment and protection of wildlife, countryside and the marine environment. Our members practice and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of over eight million people in the UK and manage over 476,000 hectares of land.

This letter is in response to the 'Draft Sheep Dip Pollution Reduction Programme' as we believe the technical information included in the document provides evidence of the profound damage that synthetic pyrethroid (SP) sheep dip causes to sensitive aquatic ecosystems. Link disagrees with your proposed programme of reduction and we believe that withholding the licence to use SP in sheep dipping is the only viable approach to bring the level of destruction down to an acceptable target.

#### ***Failure of the current approach***

The current approach of extensive, repeated production of guidance/recommendations to reduce SP sheep dip pollution has failed to protect the environment and Link believes that this draft approach will continue to prove incapable of reducing SP sheep dip pollution. In 1998, Environment Agency research calculated that even a 1% failure among sheep farmers to follow the sheep dipping code would be "unacceptable" and would result in extensive damage to 5,000 km of rivers nationally.

The underlying problem is that sheep dipping, showering and jetting are methods that use large volumes of pesticide inefficiently. The success or failure to keep SPs out of the aquatic environment has been reliant on the behaviour of sheep themselves and rainfall over an indeterminate time period. Link believes that, given the difficulty in controlling the destination of chemicals applied using these methods, it is unreasonable to expect land managers to prevent SP sheep dip pollution. Yet ADAS was recently fined in a court of law after causing serious SP sheep dip damage to two rivers.

#### ***The existence of alternatives***

Viable alternatives exist in the form of pour-ons and injectables, and while these chemicals are unpleasant, the damage they can cause is significantly less than that for SP sheep dip.



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"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Hilary Allison, Director: Alexia Wellbelove

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The harm caused by SP sheep dip far outweighs the benefits derived from using this particular chemical and given the proven success of injectables and pour-ons, Link calls for the phased cessation of SP sheep dipping at the earliest possible opportunity.

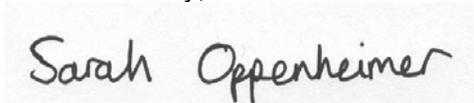
***The need for clear ecological targets***

The draft sheep dip pollution reduction programme presumes the best approach is to further invest in the existing tactics despite these having failed to date. This suggests there is a clear risk that any target set after that presumption will be under ambitious as it will be set within the context of a chosen methodology that has proven to be ineffective. Thus, Link agrees with a target-led approach to pollution reduction but believes the target for each chemical should be set prior to assessing the risk of failure and/or cost.

Given the principle that veterinary medicines, including SPs, should be applied at low volume in a controlled manner, and the lack of control over sheep behaviour and weather patterns, Link urges proper consideration of the replacement of all dipping practices with pour-ons and injectables. This measure would contribute significantly to the delivery of the Government's targets to Halt Biodiversity Loss by 2010 and to the achievement of Good Ecological Status under the Water Framework Directive.

In light of these considerations, Link supports the less risky, more cost effective, and environmentally sound application methods of pour-ons and injectables, and also calls for the indefinite withholding of the licence to use SP in sheep dipping. We support the Agency's continued expansion of its chemical monitoring programme and request vigilance for the illegal use of agricultural SPs as sheep dip.

Yours sincerely,



Sarah Oppenheimer  
Chair, Wildlife and Countryside Link Water Task Force

cc. John FitzGerald, Veterinary Medicines Directorate  
Derek Tinsley, Environment Agency  
Colin Bayes, SEPA  
Jennifer Best, English Nature  
Simon Bareham, CCW

**On behalf of the following organisations:**

- Association of Rivers Trusts
- Buglife - The Invertebrate Conservation Trust
- The Herpetological Conservation Trust
- Pond Conservation: The Water Habitats Trust
- RSPB
- The Wildlife Trusts
- WWF-UK