



Representing Agricultural and Amenity Contractors

Ref 248

4 January 2023

To: sroc@cyfoethnaturiolcymru.gov.uk

Dear Sir/Madam

Consultation on our regulatory fees and charges for 2023/2024

Thank you for the opportunity to comment on the above consultation.

Founded in 1893, the National Association of Agricultural Contractors (NAAC) represents land-based contractors, providing a voice for the industry and supporting professional contractors who are leading the industry, showcasing innovation and sustainability, whilst helping farmers reach optimum productivity and profitability. Members services include all general agricultural operations, land drainage, fertiliser application, spraying, livestock, mobile seed and feed, potato storage and amenity. The NAAC represents members across the UK.

I will comment on behalf of our membership and focus on the questions relevant to our membership:

Water quality and management is very important in agriculture and to the wider community. The NAAC is involved in numerous projects to try and protect water, whilst allowing a productive and efficient farming industry. The NAAC is active in projects across the UK such as the Voluntary Initiative on responsible use of Plant Protection Products, slurry application projects and Welsh and English Sheep Dip Groups. Of relevance in this consultation are the proposed increases in land-spreading charges.

Appendix 7: Land spreading of sheep dip and pesticides.

The NAAC represents both sheep dipping and sheep shearing contractors. This is a professional sector of the industry, seeking to ensure high standards of animal welfare. We also represent spraying contractors.

Charges

The current cost increases do not appear to have a well described reasoning to justify the huge hike and there does not appear to be an impact assessment on the effect of this rise on farmers.

It is therefore a serious concern that the charges proposed under the Water Quality Discharge (Landspreading) would see a new application for sheep dip disposal rise from £402 to £3728. This seems a vast rise – many times over the current inflation rate

The proposed charges will also take Wales significantly above previous increases introduced in England.

Ultimately it will be sheep welfare that will suffer most if this charge is introduced – as farmers are deterred from using plunge dipping due to cost.

Sheep Dipping

In recent times, sheep scab has become an increasing problem in the UK and there are significant efforts to educate and provide guidance to the industry to ensure that this can be controlled and eradicated. The NAAC is very concerned that this proposed ten-fold increase in land spreading charges will cause significant disruption to these on-going efforts, preventing progress and potentially cause farmers to avoid plunge dipping – which is the most effective method of scab treatment.

Confirmation of resistance in sheep scab mites to the injectable macrocyclic lactone (ML) scab treatments, coupled with increasing concern that the use of these products is accelerating resistance to the MLs in gut-worm populations, means more and more sheep farmers have been turning to OP dipping for the treatment of sheep scab. In contrast, the number of farmers with their own dipping facilities has continued to fall, due to tighter regulation of the purchase, use and disposal of OP dipwash. This means they have increasingly been turning to professional mobile dipping contractors – highlighting the need for support to those service providers.

Mobile Dipping

The NAAC is involved in projects in Wales and England to try and ensure that dipping is carried out professionally, without risk of pollution. We firmly believe that this should be an operation carried out by skilled operatives who are fully aware of the potential risks and know how to manage dip to keep it out of water courses. This can be achieved by mobile dipping contractors, using well maintained machines and following necessary protocols.

The NAAC was also key in bringing together a [Code of Practice for Mobile Sheep Dipping](#) for farmers, mobile sheep dippers and prescribers. This was produced with an extensive industry stakeholder group and has recently been translated into Welsh.

We are also on stand-by if further assurance to prove the professionalism of contractors is required. The NAAC already runs an independently audited '[Assured Land-Based Contractor](#)' (ALBC) scheme that could be expanded to include dipping contractors, based on the Code of Practice for Mobile Sheep Dipping. However, this could only be successful if all dipping contractors needed an audit, otherwise it would likely be the already professional operators that comply, whilst other, less scrupulous operators avoid the extra audit costs.

Contractors and Sheep Dipping

The NAAC supports farmers in using contractors to dip sheep. This helps to promote professional standards and gives greater accountability (a contractor's calling card is the previous job he has completed!)

The NAAC is working with Government and industry to try and ensure contractors can obtain dip legally and then can safely dispose of spent dip. Where possible, waste contractors can be used but this does involve transport of spent dip in bulk away from farm and waste contractors who will dispose of the dip are in short supply, particularly in Wales and dip is being transported over the border.

It is a valuable option to allow farmers to dispose of spent dip to land— provide they comply with all necessary standards. However, the economics for farmers, with the massive increases in charges, will make this impossible for many sheep farmers.

This will risk serious welfare problems from scab if dipping is avoided. The NAAC is also concerned that farmers or contractors may illegally use OP in showers and jetties (resulting in less spent dip) and further risk of resistance due to inadequate dosing.

Policy on Scab

Sheep scab is hugely challenging for our industry, as a highly infectious diseases which will cause serious animal welfare and productivity problems.

The Welsh Government recently funded Coleg Sir Gar £8 million pounds for a three-year contract to work on eradicating sheep scab in Wales. This is a breakthrough moment, as the industry and policy teams come together and work towards eradicating scab from the national flock.

The NAAC is enthusiastic about working with Government and stakeholders to try and ensure that all contractors are professional and it is vital that the sheep scab initiatives across the UK have Government support to help eradicate the disease.

However, we have serious concerns that to introduce such a huge hike in disposal charges in Wales will be a backwards step that will undermine farmer confidence and therefore enthusiasm for the project.

As part of the Wales Sheep Scab Industry Group, the NAAC was part of discussions with Natural Resources Wales. As a direct result, the group is currently commissioning gap analysis research on current and potential future collection and disposal availability for Welsh sheep farmers and to consider the feasibility of options to incentivise viable and sustainable market led solutions.

In addition, we are aware that Bimeda, the manufacturers of Golden Fleece Sheep Dip (diazinon active ingredient) are currently engaging with potential manufacturers to develop a detoxification product, which would denature and render spent dip less harmful.

It is suggested that at the very least, increases in charges should be delayed until other viable options can be put forward for the industry to safely disposal of dip to protect the environment and animal welfare.

With this in mind, the NAAC would request a three-year moratorium on EPR Water Quality Discharge (Landspreading) fee increases.

Summary

1. Scab is presenting a challenge to sheep welfare.
2. Plunge dipping is currently the best option to treat scab.
3. The industry and Government must work together to eradicate scab, whilst protecting animal welfare and the environment.
4. The significant proposed increase in charges for land spreading sheep dip will deter partnerships and trust. This will make it much more difficult for the £8 million three-year contract to eradicate sheep scab in Wales to be a success.
5. Professional sheep dipping contractors are integral to responsible use and disposal of sheep dip.

6. The NAAC would request a three-year moratorium on EPR Water Quality Discharge (Landspreading) fee increases until alternatives can be developed or become economically viable to safely dispose of spent dip.

The NAAC is keen to engage in any policy changes that impact on agricultural contractors, and we would be keen to be contacted if there are any further questions or we can assist in any way.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jill Hewitt', with a stylized flourish at the end.

Jill Hewitt

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