

NRW Consultation on regulatory fees and charges for 2023/2024

Welsh Lamb & Beef Producers Ltd (WLBP)

WLBP is a cooperative of 7,000 Welsh livestock farmers. It owns and manages the Farm Assured Welsh Livestock scheme (FAWL) amongst other activities.

WLBP is concerned that the proposed charges to be introduced by NRW in April 2023 are exorbitant, excessive, and regressive, especially for sheep farmers. These levels will completely undermine any effort to eradicate sheep scab, in particular. It will make plunge dipping of sheep so expensive that some farmers may fail to treat their flock and may have the unintended consequence of increasing resistance to important medicines.

The consultation offers no justification for the increases, no evidence for why they are necessary and no argument as to why other alternatives could not have been presented.

The proposals set out in the consultation do not warrant allowing NRW to make a full cost recovery. There is no analysis of costs to allow proper scrutiny of the increases to establish whether NRW will be delivering value for money. There is no impact assessment provided to determine the additional load to be imposed upon the farming industry and its supply chain. There is no attempt to show that efforts have been made to improve current practices within NRW to identify waste and inefficiency, no attempt explain that every effort has been made to minimise cost.

Agriculture and the whole of the food supply chain is currently having to absorb substantial increases in costs, far higher than the current CPI or RPI inflation indices. At the same time, we're beginning to witness a fall in farm gate prices. These extraordinary proposals will further erode profitability and confidence.

WLBP is particularly concerned by the astronomical and exorbitant increase for an application for sheep scab dip disposal which is to rise from £402 to £3728. This level of cost is unacceptable and as noted, no attempt is being made in the consultation to explain or justify it. Furthermore, farmers may be required to undertake a habitat assessment, which could be charged at £1670. Sizeable charge increases are also proposed for variations to bespoke permits. Administrative charges are going to be increased from £77 to £352.

7,000 Welsh farmers are members of WLBP's FAWL scheme: they are required to undertake annual health and welfare reviews with their veterinary surgeons. WLBP assessors visit some 5,000 Welsh farms annually and identify the efforts being made by farmers and vets to control a range of diseases, including sheep scab.

By encouraging farmers to work with their vets, WLBP is promoting a diagnostic-led approach to disease control and management. This is especially important when it can be hard to distinguish between some parasites, such as scab and lice. Some active ingredients for parasite control, such as the injectable group 3-ML for wormers, are licensed for scab but not lice. It is therefore essential that farmers have the option to use OP sheep dip as an effective alternative as it can tackle both.

There is also some further concern about the use of 3-MLs. 3-MLs are a broad-spectrum parasite treatment that can also target gastrointestinal worms. When used to treat scab, internal worms are also inadvertently targeted as well. Where only low worm burdens are present (typically during high scab season), this creates conditions for the development of resistance to macrocyclic treatment. Resistance of gastrointestinal worms to the 3-MLs has increased rapidly in recent years in line with increased use for scab, and cases of resistance in scab mites to MLs have now also been recorded. Sheep farm productivity has already been devastated by anthelmintic resistance. It is imperative that the industry makes every effort to minimise the threat of resistance to 3-MLs – which is why maintaining the use of plunge dipping as an alternative for scab treatment is so important and why the proposed new charges by NRW are such a threat to the health and welfare of sheep in Wales.

Finally, it seems quite extraordinary that, at a time when the Welsh Government has announced support for a sheep scab eradication programme, NRW is proposing to introduce these new charges which may completely undermine the eradication programme. It demonstrates a total lack of coordination, suggesting that one hand doesn't know what the other is doing.

WLBP cannot accept that the proposed increases are justifiable and fair. They represent a threat to attempts to eradicate sheep scab from the Welsh sheep flock. We firmly believe that they need to be reconsidered and replaced by more reasonable and equitable ones.