

**Summary of response by English Nature on behalf of Scottish Natural Heritage, the Countryside Council for Wales and the Joint Nature Conservation Committee to Veterinary Medicines Directorate / Environment Agency's joint consultation on A draft sheep dip pollution reduction programme.**

1. The pollution reduction programme must include a clear statement of the risks and impacts on the environment that it is intended to address, with clearly stated protection goals.
2. The pollution reduction programme must contain a detailed analysis of the problems associated with the use of sheep dip products and what current programmes, initiatives and guidance is in place.
3. The overall objective of the pollution reduction programme must be to reduce the environmental burden posed by sheep dip. The strategy must include clear objectives to reduce the risks and adverse impacts on the environment.
4. The pollution reduction programme should take fully into account that it is not only the veterinary medicines regulatory system that affects how products are used. Agriculture and environmental policies and initiatives, domestic and EU agriculture schemes and farm and quality assurance schemes influence sheep dip product use.
5. The pollution reduction programme only addresses the use of sheep dips. We would advocate the need for a consistent approach for all pesticides including veterinary medicines, biocides and plant protection products. However whilst this should inform monitoring and other programmes for example, pesticides, this should not delay progress on the veterinary medicines and the pollution problem.
6. It is also apparent that in the future in order to determine environmental and ecosystem risk there will be a requirement for the development of integrated risk indicators.
7. Current and future monitoring needs improvement in two areas. There is a need to refine environmental monitoring confirm that the approvals process is adequately assessing environmental risk. Secondly, where conditions are placed on approval improved monitoring is needed to ensure that these conditions are being adhered to in practice and that they are reducing risk.
8. English Nature as the Lead Agency on behalf of the statutory conservation agencies (Countryside Council for Wales, Scottish Natural Heritage) and the Joint Nature Conservation Committee wishes to play a full part in the risk reduction programme, especially in relation to management of risks to designated sites and populations of vulnerable species.

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