Here is a draft response to the Natural Resources Wales (NRW) consultation on updating the groundwater protection code for sheep dip, framed from the perspective of the **National Sheep Association (NSA) Wales Region**.

Consultation Response: Updating the Groundwater Protection Code for Sheep Dip

Submitted by: National Sheep Association (NSA) Wales Region

Consultation Closing Date: 29th October 2026

Overview and General Position

The NSA Wales Region welcomes the opportunity to comment on the proposed updates to the *Groundwater Protection Code: Sheep Dip*. Members broadly welcomed the revised document, recognising that it is shorter, clearer and more practical than previous versions. We recognise the vital importance of protecting Wales' groundwater resources and maintaining a healthy natural environment. However, any updates must balance environmental protection with practical, economic and animal welfare realities for commercial sheep producers.

NSA Wales supports a proportionate, risk-based approach rather than fixed requirements applied regardless of local circumstances. Guidance should distinguish clearly between legal duties and recommended good practice, and should account for site-specific factors including topography, drainage pathways, farm infrastructure and actual pollution risk.

Key Responses to Proposed Changes

1. Removal of References to New Environmental Permits for Land Disposal

- **NRW Proposal:** Removing references to new environmental permits for disposing of waste sheep dip to land, as these are no longer issued in Wales (while honouring existing permits).

- **NSA Wales Position:** Phasing out or blocking accessible routes for land disposal without a viable, cost-effective, and lawful alternative leaves sheep farmers in an impossible regulatory trap. NSA Wales has long highlighted that

high regulatory hurdles and prohibitive costs associated with waste dip management act as a double blow to producers. If standard land-spreading permits are no longer issued and alternative disposal routes (such as commercial waste tankers) are prohibitively expensive or geographically unavailable, farmers are left without a practical means to complete a legally required animal health task (controlling sheep scab). An affordable alternative disposal option needs to be in place before stripping out existing options.

2. Existing Dipping Facilities and Separation Distances

NSA Wales Position: A site-specific, risk-based approach is required.

- Many established dip baths have operated for decades without causing pollution incidents.
- Existing infrastructure should not be disadvantaged by standards intended for new installations.
- A blanket 50-metre separation distance does not adequately reflect topography, drainage pathways or actual pollution risk.
- The code should explain what evidence determines that a facility is beyond repair and when replacement is expected.

We understand that the proposed 50-metre distance was drawn from Scottish guidance. The final code should distinguish between new and existing facilities and permit site-specific risk assessment, supported by proportionate mitigation where necessary.

2. Advising Against Repairing Damaged or Leaking Dip Baths

- **NRW Proposal:** Advising against repairing damaged or leaking dip baths and recommending replacement with a new dip bath or the use of a mobile dipping unit.

- **NSA Wales Position:** Recommending the wholesale replacement of fixed concrete or permanent dip baths, or mandating a shift to mobile dipping units, ignores the severe economic pressures currently facing Welsh hill and upland sheep enterprises. Installing a brand-new, compliant concrete or bunded dipping facility involves significant capital expenditure. For many tenant farmers or smaller family farms, this is entirely unfeasible. Rather than blanket discouragement of repairs, the guidance should define when a bath is beyond repair and provide approved specifications for professional lining, sealing and repair. Replacement should be expected only where a competent assessment shows that safe remediation is not reasonably achievable.

3. Practicality of Mobile Dipping Units

- **NRW Proposal:** Promoting mobile dipping units as an alternative.

- **NSA Wales Position:** While mobile contractors play a valuable role, mobile dipping units are not a universal panacea. Availability can be severely restricted during peak seasonal windows, and they may be entirely unsuited to remote, fragmented, or highly inaccessible hill terrain common across Wales. Reliance on mobile units cannot be treated as the default replacement for properly maintained farm infrastructure unless contractor availability and regional coverage expand significantly. The code should reference the SCOPS Code of Practice for Mobile Dippers and set clear expectations for containment, operator competence and waste handling.
- **Plunge dip must not be applied through sprayers or jetters.** These methods are ineffective for controlling sheep scab and present unacceptable operator health and safety risks.

4. Watercourse Exclusion After Dipping

NSA Wales Position: The environmental objective is supported, but the advice must be evidence-based, clearly advisory and practicable.

- A three-week exclusion period presents serious difficulties for upland farms reliant on natural water sources.
- Where alternative drinking supplies are unavailable, rigid application could create animal welfare risks.
- Unrealistic expectations may cause farmers to disengage from otherwise valuable, good practice.
- The evidence supporting the change from two weeks to three weeks should be explained transparently.

Suggested wording: "Keep sheep away from wells, springs, boreholes, watercourses, ditches and wetlands for as long as possible following dipping. Monitoring has detected dip compound residues in watercourses up to three weeks after dipping, highlighting the importance of preventing access to sensitive water features during this period."

5. Holding Areas and Practical Mitigation

Holding areas for recently dipped sheep could reduce environmental risk while protecting welfare. The code should include practical, system-specific advice on temporary holding areas, covered accommodation after dipping where heavy rainfall is forecast, suitable drainage and containment, and provision of alternative drinking water.

4. Updating Weather and Manufacturer Advice on Rain Forecasts

- **NRW Proposal:** Updating advice from manufacturers on how long to wait when rain is forecast.

- **NSA Wales Position:** We support alignment with up-to-date, evidence-based manufacturer guidelines regarding weather forecasts. However, given the unpredictable nature of Welsh microclimates and rapid weather shifts, guidance must remain pragmatic to prevent farmers from being trapped in narrow compliance windows that compromise animal welfare or scab-control schedules.

5. Removal of References to Enzyme Treatment (Waste Exemption T27)

- **NRW Proposal:** Removing references to enzyme treatment under waste exemption T27 as the product never materialized and the exemption is invalid.

- **NSA Wales Position:** We note this housekeeping change, but it underscores the ongoing frustration of the industry: biological or technological innovations that could have offered sustainable solutions for waste disposal failed to reach the market, leaving farmers with restricted toolkits.

6. Dip Disposal and Future Technologies

The consultation does not provide sufficient clarity on lawful, affordable disposal routes. The final code should:

- Acknowledge the very limited disposal options currently available.
- Recognise emerging technologies, including Clear Dip, while ensuring references reflect validated evidence and regulatory approval.
- Be sufficiently future-proofed to accommodate new treatment technologies without major revision.
- Reference relevant industry guidance where appropriate.
- Provide a route for considering evidence from trials of biofilters, biobeds and other alternative treatment systems.

7. Legal Requirements and Recommended Good Practice

Farmers must be able to distinguish statutory obligations from advisory good practice. The final document should use consistent labels, formatting and plain language to identify what is legally required, what is recommended and what represents optional risk-reduction practice.

8. Emergencies and Pollution Reporting

Suggested wording: "If there is a risk that surface water or groundwater has been polluted, or if an actual pollution incident has occurred, you must report it to Natural Resources Wales. Reports can be made online, by email, or by calling 0300 065 3000."

9. Waste Classification

The code should clarify the distinction between hazardous and non-hazardous waste classifications for diluted dip wash, including the circumstances in which waste code 02 01 09 applies and the evidence or analysis required to support classification.