

Natural Resources Wales.



Environment  
Agency

## Management system template for operators who have a permit to discharge used or waste sheep dip to land



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### Introduction

Sheep dip compounds are highly toxic to aquatic life and to groundwater. Small quantities can have devastating effects on fish and drinking water supplies. Uncontrolled disposal (discharge) of used or waste sheep dip on land will contaminate the land and groundwater. Good sheep flock management techniques reduce ecto-parasite infestation and so the need for chemical treatments.

Your permit controls the discharge of sheep dip on your land because of the particular risk to groundwater. It's good practice to also think about pollution prevention wherever you're handling sheep dip. Always follow the *Defra Groundwater Protection Code - Use and disposal of sheep dip compounds August 2001* (reprinted June 2006) You can download this from the Defra website:

<http://archive.defra.gov.uk/environment/quality/water/waterquality/ground/documents/sheepdip-code.pdf>

If you don't have internet access speak to your local Environment Agency officer to help you find the documents you need. Phone 03708 506 506 and ask to be put through to your local office.

### About your permit

Your permit gives details of what you must do when you're discharging used or waste sheep dip on your land within the permitted area.

The first condition of your permit says that you need to have a written management system. This is to help you discharge your used or waste sheep dip without causing pollution. To comply with this condition and the others in your permit you **must** keep good records so we know **what you are discharging, how much and where**. You may use the form on page 4 to help you keep your discharge records and change it as you need for your circumstances. Or you can write your document based on this.

Planning for accidents for accidents and emergencies is part of pollution prevention. You must have an **accident management plan** to explain how you'll avoid accidents that might cause pollution and what you'll do if something goes wrong. We've provided guidance about this and a table of common accident risks and actions which you can adapt for your needs. See pages 5-10. PPG 21, incident response planning contains information on how to produce an incident response plan to deal with an environmental incident on your site.

Keep your permit, discharge records and any other related paperwork in a safe place. Make sure anyone who works on sheep dipping on your farm has access to it. If we, the Rural Payments Agency (RPA) or Rural Inspectorate Wales (RIW) visit you, we are likely to ask to see your records to make sure you are complying with this permit.

If you want more explanation about the permit conditions you can find this in our document *How to comply with your environmental permit*. See the guidance page:

<http://www.environment-agency.gov.uk/business/topics/permitting/32320.aspx>

You also need to be aware of the following information.

### Training

The Veterinary Medicines Regulations (VMR) require that if you want to buy sheep dip, you must hold a certificate of competence in the use of sheep dips. The dipping must also be carried out by, or under supervision and in presence of a person who holds either a certificate of competence in the safe use of sheep dips, or a NPTC level 2 award in the safe use of sheep dip. We've provided a summary of training requirements in Appendix 1.

### **Pollution prevention**

Having the right infrastructure in place and maintaining it will help you prevent pollution. The *Groundwater Protection Code - Use and disposal of sheep dip compounds* gives advice about the checks and maintenance you need to do before and after you dip. These help you reduce the risk of discharging sheep dip in the wrong place and avoid the financial costs of lost chemicals.

Ensure you select the correct product for the job. The product must be licensed for use as a sheep dip by the Veterinary Medicines Directorate. Plunge dips are not authorised for use in showers, jettors or similar equipment to treat sheep scab.

It's useful to keep a record of the substances you use and what maintenance and operations work you've done. If something does go wrong having good records can help you show us what you've done to prevent pollution, and help you understand what you may need to improve. We've provided tables you may use for this in Appendix 2.

### **Health and safety information**

Sheep dip chemicals can be dangerous to health. The Health and Safety Executive offer advice on working safely on farms including information on sheep dipping and storing chemicals. See their website

Sheep dipping, advice for farmers and others involved in dipping sheep. Download this from the following link: <http://www.hse.gov.uk/pubns/as29.pdf>

Guidance on storing pesticides for farmers and other professional users. Download this from the following link: <http://www.hse.gov.uk/pubns/ais16.pdf>

## Management system contents

1. Record of discharge to land of used sheep dip
2. Accident management
3. Records of accidents, other incidents or near misses

### 1. Record of discharge to land of used sheep dip

If we or RPA or RIW visit you to check how you are complying with your permit we will ask to see these records.

Site name:

Permit number:

Contractor name and address if applicable:

For each discharge fill in one column. Make sure you put the discharge date at the top.

Required records	Discharge date:	Discharge date:	Discharge date:
<b>Location, substances and equipment</b> Location of discharge area. State the field number or <u>national grid reference</u> and location within the field. Or cross refer to an attached map showing the location. <b>Note:</b> You may only discharge at specified areas within the discharge area as stated in your permit.			
Spreading equipment used			
Licensed brand name or chemical composition of dip			
What, if anything are you using to dilute the used dip (For example, slurry or water)			
<b>Discharge volumes – (cubic metres)</b> a. Volume of undiluted used/waste sheep dip			
b. Volume of water or slurry added to the dip			
c. Total volume discharged (a+b)			
d. Area of land used for discharge in hectares			
e. Application rate of sheep dip to land (c ÷ d)			

## 2. Accident management and records of near misses, accidents or incidents

It's good practice to think about what you would do if there was an accident or incident that could pollute the environment. It will help you know what you need to do if something goes wrong.

It is a good idea to consider near misses and what you could do to stop them happening again so that you reduce the risk of things going wrong. This will help you prevent pollution and comply with your permit conditions.

You can use this template to create an accident management plan for using and discharging sheep dip and any other high risk activities on your farm. If there's a near miss or something goes wrong keep records about what happened and think about what you can do to prevent it happening again. If there's a pollution incident on your farm or a breach of your permit conditions we may want to look at these records.

Created by: \_\_\_\_\_ Date: \_\_\_\_\_

### Accident management plan contents

A – Site plan

B – Preventing accidents and what to do if they happen.

C – Key site and emergency contacts

### A – Site plan

Keep a plan of the farm and the permitted area within the farm. It should show where the following things are:

- **Permitted area for sheep dip discharge**
- **Site entrances and exits** available to the emergency services and maintenance contractors
- **Buildings**; the buildings and other main constructions, including dipping bath
- **Drainage**; including
  - Foul or contaminated drainage (marked in red),
  - Clean surface water drainage (marked in blue)
- **Accident and emergency response items**; for example, spill kits, sand bags, first aid kit.

**Vulnerable receptors.** These are the things on site or nearby that could be affected by site operations; for example watercourses, springs, boreholes, ecologically sensitive sites, residential properties. MAGIC is a web based interactive map service to bring together environmental information from across government. It can help you find local vulnerable receptors. <http://www.magic.gov.uk/>

## B - Preventing accidents and incidents and what to do if they happen

The following table contains examples of the potential environmental risks from a facility used to discharge sheep dip. It doesn't cover everything that might happen, and you need to consider what else particular to your site that could cause a problem. If a point doesn't apply to your activity delete it. Add any site specific issues to the list. The table also describes what we expect you to do to reduce the risk of an accident and what should be done if one actually occurs.

Have a spill response procedure to ensure that any spillages are dealt with correctly. Attach it to this document. Ensure spill kits and any other equipment referred to are readily available.

Make sure that any contractors or farm workers know about the accident management plan, where to find it, and what it contains. It's important that they know how to prevent accidents and what to do should an accident occur. Remember, if an accident does happen, follow the plan in this table.

You may need to review this accident management plan following an incident, accident, or if the Environment Agency asks you to do so. Add more lines to cover any other potential accidents or incidents you think may occur.

Possible accident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
<b>Inappropriate conditions</b>			
Spreading dip onto frozen, waterlogged or cracked land	Runoff of dip into local water courses or pollution of groundwater	Dip must only be spread onto land which is in an appropriate condition to receive it. In the event of unsuitable spreading conditions store the dip securely in an appropriate container until spreading can occur	

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Possible accident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
<b>Spillages</b>			
Spillage during transfer, of the sheep dip to the farm		<p>Ensure dip and other chemicals are transported in a drip tray or similar container large enough to hold spillages and secured to avoid tipping.</p> <p>Ensure that the sheep dip concentrate storage area is of sound construction, is well maintained and located where it is unlikely to be damaged by vehicles.</p>	<p>Follow the spill response procedure.</p> <p>It describes what to do in the event of a spill and where the kit is kept.</p> <p>Environmental pollution must be reported to the Environment Agency.</p>
Spillage of dip during storage before use.	Contamination of land, drains, groundwater and watercourses.	<p>Ensure dip is stored away from drains and in a secure tray or bund to contain any spillage</p> <p>Store dip concentrate in a properly constructed farm chemical store or approved steel cabinet in accordance with HSE Agriculture Information Sheet A/S16</p> <p>If spillages occur soak them up with an absorbent material and dispose of through a registered waste carrier.</p> <p>Ensure fencing is adequate so sheep cannot escape.</p>	
Recently dipped sheep escaping from the holding pen and running through watercourses, over boreholes, springs and so on.			
<b>Overfilling</b>			
Spillages of dip when transferring to a slurry tanker or vacuum tanker prior to spreading	Contamination of land, drains, groundwater and watercourses	<p>Ensure the tanker is filled with either water or slurry before adding the waste or used dip. Ensure that you know the capacity of the tanker and that all pipes used to transfer the dip from the bath to the tanker are free of leaks.</p>	<p>Spill response procedure as described above</p>

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Possible accident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
<b>Failure of plant or equipment</b> Leakages; due to faulty pipe work, holes in the dipping bath and so on.	Contamination of land, drains, groundwater and watercourses.	Visual inspection of the dipping bath, pipe work and vacuum tanker, slurry tanker prior to use.  Testing of the integrity of the dipping bath and pipe work by running water through them prior to dip and completion of inspection checklist.  Preventative maintenance regime.	Spill response procedure as described above.



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### C – Key site and emergency contacts

Use this table for the information and contacts you may need in an emergency (adjust it to suit your site).

#### Site details

Location:

Postcode:

Site access grid reference:

#### Site contacts

Office hours (specify)

Out of hours

Owner:

Farm manager:

Tenant:

#### Emergency services

Office hours

Out of hours

Emergency

999

999

Medical:

Police:

Fire:

#### Regulators

Office hours

Out of hours

Health and Safety Executive (HSE)

Local authority:

Environment Agency

03708 506 506

EA (24 hour emergency hotline)

0800 80 70 60

0800 80 70 60

Natural England/CCW

#### Utility and key services

Office hours

Out of hours

Pesticide use advisor

#### Other key contacts

Office hours

Out of hours

Adjacent landowners:

Neighbours:

Specialist advisors/ contractors:

### 3. Record of accidents, other incidents or near misses

Keep a record of accidents, other incidents or near misses that could impact on the environment. for example accidents might be: spillage of polluting liquids onto the ground or into a drain or watercourse.

'Other incidents' covers impacts on the environment that are not accidents, for example failing to empty the dipping bath and it being filled up by rain and over flowing causing an uncontrolled release of a hazardous substance.

It's good practice to record near misses – for example 'there was a leak in one of the sheep dip containers but it was stored in an approved steel cabinet so all the dip was captured'.

If there's an accident, incident or near miss that could impact on the environment, keep the following records:

- the date and time of the accident, incident or near miss;
- explain what happened and what the cause was. If you can't find the source of the problem contact a suitably qualified person to do so and record who they were and what they found;
- describe how you fixed the problem and what you'll do so it doesn't happen again;
- note if there is any significant pollution, for example spillage of polluting liquids onto the ground, into a drain or a watercourse.

If there's significant pollution you must tell the Environment Agency as soon as possible. Phone 0800 807060. Note the date and time of the call and the incident number we give you.

## Appendix 1

### Training requirements

Make sure everyone involved in sheep dipping has been trained in personal health and safety, animal welfare and environmental impacts. We've ticked what we think is likely to be the case for a sheep farm but you can change it for your circumstances. You may find it useful to keep records of training people have received particularly if you have a number of people working with you.

		Farmer/site manager	Farm help	Sheep dip contractor
<b>Environmental awareness</b>	Certificate of Competence in the safe use of sheep dip	✓		✓
	Safe disposal of sheep dip	✓	✓	✓
	Check weather forecasts for rain	✓		✓
	Awareness of accident management plan, how to prevent accidents and avoid areas that may be particularly vulnerable to pollution, such as swallow holes; areas of fissured bare rock etc.	✓	✓	✓
	Dipping bath and drainage area maintenance		✓	✓
<b>Maintenance/operations</b>	Livestock holding period during dripping	✓	✓	✓
<b>Accidents and emergency</b>	Fire procedure	✓	✓	✓
	Spill response procedure	✓	✓	✓

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### Appendix 2

#### Maintenance and operations checks and record

You can use the following list to help you keep track of what checks and maintenance you have done. We've put in some examples of the routine checks we would expect you to complete before you dip. You can find more examples in the code of practice.

Check or maintenance job	Summary of actions taken and who did them	Completed on
Check dipping bath for cracks, holes and leaks. Do this by filling the bath with clean water, leave overnight and if the water level is unchanged add dip concentrate ready for dipping operations. If the water level has fallen overnight, leaks must be located and permanently sealed before any dipping is done.		
Inspect the draining pens for potential leaks, cracks, holes etc. Seal any that are found.		
Check all pipes and transportation equipment for example, vacuum tankers, are free from leaks.		

## List of substances and storage facilities

You can use this list to help you with pollution prevention.

The following is a list of liquids, powders and so on that are stored on the farm and could be harmful to the environment if they escape.

Material	Maximum quantity	Type and size of storage	Type and size of secondary containment
<i>Sheep dip brand name</i>	<i>10 litres</i>	<i>Farm Chemical Store constructed in accordance with HSE Agriculture Information Sheet A/S16</i>	<i>Bund integral to chemical store</i>
<i>Pesticides brand name/chemical</i>			

