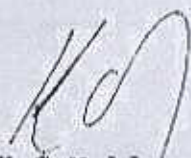


Reference

**SHEEP SCAB CONTROLS**

1. The Parliamentary Secretary (Mr Soames) will wish to see and consider the attached minute from Mr Lowson and the submission.
2. Sheep scab was reintroduced into the UK in 1972 and since that time we have been unable to eradicate the disease despite a great deal of effort which has been expended by the sheep industry, the Ministry and local authorities. The submission explains the background to the present review and considers four options for the future. The submission invites Ministers to agree to the complete deregulation of sheep scab control.
3. From a veterinary viewpoint complete deregulation has considerable attractions. Although sheep scab can be a serious and debilitating disease and can cause a severe welfare problem if left untreated it can be eradicated very simply by the farmer by the use of sheep scab approved dips. Indeed the disease is no different to many others which can be cured simply and effectively by the use of a licensed medicinal product. To that extent the remedy is in the farmer's own hands. To that should be added the concern expressed vociferously by a number of farmers that compulsory dipping with organophosphorus dips should not be required because of adverse human reactions. This issue is addressed in some detail at paragraph 7(iii) of the submission.
4. My advice is that sheep scab can be controlled on a farm by proper dipping of the affected flock in a licensed product and there is no need for Ministry intervention. I would also offer the advice that the welfare effects of sheep scab are no more serious than many other animal diseases which are susceptible to a simple treatment regime.
5. I therefore recommend that Ministers should agree to the complete deregulation of sheep scab control.



K C Meldrum  
29 April 1992

**[REDACTED]** PS/Parliamentary Secretary (Mr Soames) + 1

cc's overleaf

Reference

cc Private Offices

[REDACTED]



Reference

OKR-4- 7/23/4

SHEEP SCAB CONTROLS

1. The Minister decided last summer that he wanted to reconsider the future of our policy in relation to scab in the light of the 1991 autumn dip. The attached submission reflects the outcome of an examination of the position by a Working Party of Agricultural Departments officials chaired by Mr K Taylor, and also takes account of the position in Northern Ireland and of a number of comments made by SLS Division.

2. Ministers' attention should however be drawn to continuing concerns expressed by the commodity division. They point out that, if industry bodies are pressing for the continuation, or even the reinforcement, of controls, this presumably reflects a belief that the burdens on them as a result of abandoning compulsory controls will be greater than maintaining them. They fear that deregulation, in fact, could increase the economic burden on the industry. Perhaps the answer is to look at more effective enforcement of existing measures - perhaps by diverting the resources used in dealing with outbreaks to more effective enforcement of the national dip, i.e. option g (iii) in the paper.

3. There can be no doubt that many in the sheep industry, the local authorities, and the veterinary medicines industry, will be critical of a decision to eliminate the compulsory controls. But I think that balance of the argument still favours complete deregulation; there is no realistic prospect that we will eradicate the disease, even if we did so we could not stop it being reintroduced, and, most important, individual farmers are well able to deal with it, if it is worth their while, without State intervention. I should add, finally, that under Community rules the presence of scab carries with it no consequences for our trading status; Mr Lebrecht fears that there is a small risk that other Member States might use the absence of controls as a pretext to introduce illegal trade restrictions, but I know of no evidence that this might be the case; and as our control measures have failed to stop the disease spreading they have had such a pretext for some time without using it.

4. Clearly we ought to ensure in putting the paper forward that SLS Division's concerns are properly exposed. The best way of doing so might be to forward this paper to the Parliamentary Secretary with this minute and your comments.

Robert Lawson

ROBERT LOWSON  
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13 April 1992

Mr Meldrum

c.c. [REDACTED]



## SHEEP SCAB - FUTURE POLICY

### Introduction

1. The policy for the control of sheep scab was last reviewed in 1988. Since then compulsory dipping has been required once per year instead of twice and measures to deal with outbreaks of disease, placing greater reliance on self-regulation by farmers, were introduced in January of this year. Ministers undertook that policy would be reconsidered following the 1991 Autumn compulsory dip. This submission considers the results of that further review.

### Background

2. Sheep scab is caused by a parasitic mite which lives on the skin surface. The feeding activities of this mite cause considerable irritation, pain and distress. The condition is highly contagious but can be controlled by effective dipping. Great Britain was free of sheep scab between 1953 and 1972. Since its reintroduction then by imports from Ireland a variety of control strategies have been followed, all based on compulsory dipping of affected or exposed flocks, accompanied at times by national or area dipping. Annex I shows the number of outbreaks and the pattern of dipping since the disease was reintroduced to Great Britain in 1973.
3. Concern has been expressed about the reaction of some individuals when exposed to sheep dip. In January 1992, however, the independent Veterinary Products Committee (VPC) completed the initial phase of its review of the sheep dip products, as part of the wider review of pharmaceutical products under EC rules to ensure that modern standards of safety, quality and efficacy apply. It concluded that there was currently no clear evidence that sheep dips carried any unacceptable level of health risk to humans when used in accordance with the label instructions. Nevertheless the VPC went on to note that certain aspects of the products needed further evaluation. The companies concerned have accordingly been given the remainder of 1992 to provide further data.

### Current control measures

4. The policy for the control of sheep scab consists of;
  - (a) provisions to deal with known outbreaks of the disease set out in the Sheep Scab Order, 1992. SVS and local authority involvement in sheep scab outbreaks is much reduced by comparison with previous strategies; dipping of infected flocks is no longer supervised and farmers are now required to take action themselves and to return an owner's declaration to confirm the disease has been eradicated from the flock by dipping. Input by veterinary officers into tracing the origin and potential spread of the disease has also been reduced;
  - (b) compulsory national dipping campaigns each autumn designed to deal with undisclosed infection.

### Current costs

5. The main costs fall to the industry for both the national dip and dealing with outbreaks. It is estimated that the costs falling on the industry as a whole could amount to some £16m per annum. Only a proportion of this is the result of compulsory controls - perhaps some £5m per annum: the rest is what farmers could be expected to spend anyway, to safeguard their own flocks or to deal with other parasitic conditions which are controlled or prevented by dipping. MAFF costs depend on the number of outbreaks which, as indicated in Annex I, are increasing. Current annual costs (pay and non-pay running costs) are estimated at some £250,000. It was estimated in 1987 that if sheep scab was to spread uncontrolled it could cost the industry £90-£200 million over ten years. It is, of course, impossible to say to what extent the disease would spread in practice if compulsory controls were removed, as this would depend on the extent to which the industry was prepared to act to protect its own interests.

6. Local Authority costs will have fallen with the reduction in supervision of the national dip. However some costs will still be incurred by the need to supply declaration forms and certificates and, by the conscientious minority, in pursuing flock owners who fail to make statutory returns.

#### Discussion

7. The following considerations need to be borne in mind in deciding future control measures.
  - (i) Disease control:
    - (a) Major changes in the size and organisation of the sheep industry, and lack of commitment by farmers, have meant that successive attempts to eradicate scab have failed although measures taken have exercised a measure of control. It is clear that eradication is no longer a realistic objective.
    - (b) Control of sheep scab on individual holdings is possible provided that effective acaricidal compounds remain available. By following a sensible purchasing policy farmers can ensure they do not introduce it to their flock and can dip it out if they do. There is a problem on shared grazing where there would be practical difficulties in the absence of any organisation willing and able to exercise control. However it is always open to farmers to cooperate on a voluntary basis in dealing with an outbreak.



- (c) The economic impact of the disease has reduced as the value of wool has decreased in comparison with the value of meat produced. The main effect of sheep scab is wool loss, although there is also loss of condition which can have a serious economic impact if steps are not taken to deal with disease. Today sheep are bred mainly for meat and sheep scab represents no more of an economic threat than diseases such as orf, footrot, blowfly miasis or lice infestation.
- (d) Sheep scab can present a major welfare problem in an affected flock. The disease can spread rapidly and have a distressing effect on infested animals. But legislation exists to take action against farmers who fail to deal with welfare problems in their flocks.

(ii) Intra-Community trade

Sheep scab is not a notifiable disease under EC legislation and is not covered by the harmonised controls under the Directive on trade in sheep and goats. Once it comes into force we will not be able to require guarantees from other Member States to support our control measures. (Our main imports of 110,000 head are from Ireland which has a similar sheep scab problem.) This would not of course prevent a prudent farmer requiring sheep brought into his flock to be free of infestation. At the national level we cannot keep it out; and there are no significant export benefits from disease freedom, unless another EC member state illegally uses the presence of disease as a pretext for trade restrictions.

(iii) Public health considerations

The disease itself represents no risk but the risk to farm workers of adverse reactions to organophosphorus dips, and concerns about environmental pollution following careless or illegal disposal of spent dip, have caused increasing public concern in recent years. The Veterinary Medicines Directorate is responsible for analysing data on suspected adverse reactions. In the period January 1985 to 26 April 1992, 235 reports have been received concerning 319 people. 174 of these reports have been sent in since 1 January 1991. An Appraisal Panel comprising experts from the Veterinary Medicines Directorate, Health & Safety Executive and Department of Health meets periodically to assess these returns. A summary report in due course will be put to the VPC for their consideration.

With or without compulsory dipping, farmers would still need to dip not only for sheep scab but to control other parasites and to prevent fly-strike. There are also two scab approved non-organophosphorus dips currently licensed. Up to now, only plunge dip products assessed as providing 100% protection against sheep scab for twenty-one days have been licensed for control of this disease. There are, however, other products licensed for other purposes, including some pour-ons, injectables and showers, which could ensure that the sheep scab mite was destroyed but which would not provide such a long lasting residual effect.



(iv) Results of the 1991 national dip

Following poor support by the industry for the 1990 dip both Ministers and the NFU emphasised the importance of showing more commitment to the 1991 dip. But the 1991 results repeat the disappointing pattern set in 1990 with a large proportion (28%) of the dipping declaration forms not being returned by farmers. A significant number of local authorities and local MAFF offices considered that the absence of notification of intention to dip, and lack of supervision made the Order unenforceable or they found that self certification did not work.

(v) Consultation

Interested organisations are virtually unanimous in agreeing that the current arrangements are not working. While many farmers wish to abandon the national dip because of the burden it places on those who have not got the disease, others, concerned at the steady increase in the number of outbreaks in recent years, wish to retain the dip because of the risk of their flock becoming infested. Almost all the organisations consulted have finally come down on the side of retaining both compulsory notification and the national dip and many are in favour of returning to a more rigorous and closely supervised regime. Local authorities have found the current system largely unworkable. As expected, organisations concerned with the problems of adverse reactions or pollution wish to see the end of the national dip - although as indicated above this would not by any means bring about the end of dipping.

## Conclusion

8. Changes in the structure of the national flock, the absence of Community cover for measures to keep out scab, and the absence of commitment from at least a substantial minority of farmers, mean that eradication of the disease is not a realistic objective. It follows from this that a substantial increase in the resources devoted to dealing with the disease would not be justified, and it is questionable whether it is justified to maintain even the existing level of MAFF and local authority input with its attendant burden on those farmers who do keep to the rules. Scab generates passions among sheep farmers out of all proportion to its economic importance, but there can be no doubt that there would be widespread criticism from farmers of a decision to further relax compulsory control measures. Adequate means exist to enable farmers who wish to do so to deal with infection (by contrast with many other notifiable diseases where Government intervention is required to control spread). Welfare problems can be adequately dealt with by welfare legislation.
9. The options for the way forward are, broadly:
  - (i) to deregulate completely - i.e. to leave control to individual flock owners, with no Government interference except via prosecutions in serious welfare cases;
  - (ii) to continue current arrangements for dealing with disease outbreaks but abandon national compulsory dipping;
  - (iii) to retain the annual national compulsory dip but remove all other controls; and
  - (iv) to continue our current approach.



The decision to be reached is not whether or not to control the disease - it is whether control measures available to all farmers should be backed up by compulsion. The key issue to be considered is whether, in view of the factors in paragraph 8, it is worth maintaining compulsion in any form in order to achieve what would undoubtedly be some measure of control (it is impossible to say how much) on the number of outbreaks, at the cost of a continued burden on the industry, resource requirements in MAFF and local authorities, and criticism from those who object to the use of organophosphorus dips. There have been important developments since this issue was last reviewed - notably agreement on Community trading rules on sheep and goats and the demonstration that self-regulation will be only partially effective - which lead to the conclusion that the right course is complete deregulation. The intermediate options ((ii) and (iii) in paragraph 7 above) both have little appeal. The continuation of compulsory dipping without taking action to deal with individual outbreaks would reduce the burden on MAFF without affecting the burden on farmers; while directing compulsory action only at known outbreaks would fail to deal with unknown foci of infection, and would therefore increase the number of cases requiring action and hence the MAFF input.

10. If complete deregulation is pursued there could be considerable adverse reaction from parts of the industry. But the NFU have privately expressed the view that they see little sense or logic in pursuing a control policy for sheep scab; they believe that because the industry have been dipping for so long they fear the idea of change rather than seeing any real benefit in statutory control. It also must be admitted that announcing further changes only weeks after the publication of a new Order laying down rules for the control of outbreaks will be seen as evidence of indecision on the part of HMG. But it is well known that policy is under review and, if Ministers accept the arguments in this note, it would be pointless to delay a change.

### Other departments

11. Parallel submissions are being made to the Secretary of State for Wales and the Parliamentary Under Secretary of State, Scottish Office. The situation in Northern Ireland is still under consideration; any changes there will need to take account of the approach adopted by the Irish Republic.

### Recommendation

12. Ministers are invited to agree to the complete deregulation of sheep scab control.

### Timing and presentation

13. Interested parties are expecting an early announcement and the dip manufacturers in particular need to know what the future holds for them. The form and timing of an announcement will need to be considered further, but could be on the lines of the attached draft. (Annex II) Officials will follow this up with a letter to all those bodies consulted and produce a guidance leaflet on how to safeguard against scab and what to do if scab is suspected.



ANNEX I

SHEEP SCAB OUTBREAKS

Year	Number of outbreaks	(Number of counties involved)	Number of compulsory national or area dips
1973	42	(9)	NIL
1974	17	(8)	NIL
1975	103	(24)	NIL
1976	101	(25)	1
1977	54	(13)	1
1978	43	(9)	1
1979	65	(7)	1
1980	33	(16)	1 - South-west England only
1981	66	(26)	1 - England & Wales
1982	94	(22)	1
1983	157	(28)	1
1984	131	(29)	2
1985	74	(22)	2
1986	55	(13)	2
1987	38	(14)	2
1988	36	(17)	2
1989	66	(18)	1*
1990	95	(31)	1**
1991	116	(28)	1**
1992 [ to 29.4.92]	76	(26)	
Total no. of outbreaks	1,462		

Dipping throughout Great Britain unless otherwise stated.

- \* One compulsory national dipping period with prior notification to local authorities by owners of intention to dip sheep.
- \*\* One compulsory national dipping period each year with no prior notification to local authorities.

## ANNEX II

## SHEEP SCAB: DRAFT ANNOUNCEMENT

The Government has decided that compulsory measures to control sheep scab are no longer justified. While this is a disease which can undoubtedly cause distressing symptoms and some economic loss, it can be readily controlled by individual farmers and it is right that they, rather than the Government or local authorities, should have the full responsibility for doing so as is the case with most other diseases. There will therefore be no compulsory dipping of sheep this autumn, and as soon as the necessary legislation changes can be made the disease will cease to be notifiable and the mechanism of compulsory controls when infection occurs will be dismantled.

Good husbandry will continue to require many farmers to deal with scab and similar conditions in their flocks. But this measure of deregulation will undoubtedly reduce the burden of unnecessary expense and dislocation and should ensure that dipping products are used only when necessary.

Sheep scab is both preventable and treatable. Individual farmers must take the necessary precautions to avoid infestation and deal promptly with outbreaks in their flock. The disease can spread rapidly and have a distressing effect on infested animals. Legislation exists to protect the welfare of animals and farmers who do not deal promptly and satisfactorily with outbreaks in their flock will be prosecuted.

Advice on how to safeguard against scab and guidance on what to do if scab is suspected will be issued to all sheep farmers.

The Government is committed to lifting the burden of unnecessary regulation and this change represents an important step in this process.



## ANNEX

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