



26 March 2016

Rory Stewart OBE MP
Parliamentary Under Secretary for Environment and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

Lead Ammunition Group Report and Risk Assessments

In conjunction with Professors Levy and Newton I write to thank you for meeting us on 22nd March.

We were pleased to be able to discuss some of the outcomes of the process Defra and FSA set up in 2010 i.e. the Lead Ammunition Group. As you appreciated, this ambitious process represents an extraordinary amount of work by a broad range of stakeholders, specialists and independent experts over the last six years; focused on tackling the growing societal risks posed by lead ammunition.

It was appreciated that Professor Levy was able to reassure you about the rigour of the Lead Ammunition Group's risk assessments for human health and wildlife, as well as the stakeholder consensus and support for them when the Group agreed their publication.

Professor Newton underlined the significant scale of mortality in wildlife as the result of lead ingestion, numbering at least tens of thousands of waterfowl and other birds per year; figures that he emphatically reassured you are not exaggerated.

We welcomed that you distanced yourself from the report of our erstwhile colleagues on the Lead Ammunition Group to which George Eustice had referred during the Westminster Hall debate.

It was gratifying that no questions were raised regarding the science or evidence underpinning the Group's report, risk assessments and risk mitigation analysis.

You raised one question concerning the likelihood of a child consuming sufficient game meat to cause them harm. As I explained (the exact figures are on page 135 of the Group's report) the evidence points to 40-70 grams of gamebird meat per week being enough to give measurable reduction in IQ levels, while 12.7-20.4 grams is enough to bring measurable reduction in performance in SATs writing tests. This is not a large amount for a child to eat in a week.

As also cited in the Group's report, there are almost certainly in the order of 10,000 children growing up in shooting households where they could be eating sufficient game to potentially cause them neurodevelopmental harm.

You challenged us to consider the "risk" of sugar in the diet or eating a bacon sandwich and, lead in game meat. The obvious rejoinder is that there is a dietary benefit to both sugar and a bacon sandwich as part of a balanced diet (hence FSA advice) whereas, there is absolutely no health or dietary benefit to any amount of lead in the diet and in fact, quite the opposite and any unnecessary and readily avoidable amount of lead contributes to potentially harmful effect, particularly in children.

We have, furthermore, found no evidence that current publicity has so far penetrated the market place for game to any depth or affected game-eating habits. The removal of avoidable dietary exposure to lead as well as the protection of vulnerable groups, especially children for whom diet is not 'a voluntary choice', therefore remain significant issues, which can be resolved with relative ease by transition to non-lead ammunition.

We appreciate your suggestion that discussion of these public health issues, should now be taken forward with Public Health England as well as the Committee on Toxicity and the Group's contacts in FSA.

It was helpful that we were also able to introduce you to the emerging new data from tomography studies of ammunition-derived lead in gamebirds. These confirm the microscopic fragmentation of lead pellets in lead-shot game and the inescapable consequence of its elevated lead content. We welcome that Government officials will give this further consideration.

We noted your confidence in the likely response of the Hazardous Substances Advisory Committee to the environmental risks from lead ammunition, and will take that contact forward in parallel to the discussion you requested with PHE.

Our Group will meet again soon to plan the way forward in the light of your political advice. Given the growing range of audiences now concerned about these risks to human and wildlife health, we will be considering how best to ensure that the fruits of the Group's labours can be effectively communicated to the many experts and practitioners involved in advising Government on policy or who are responsible for operational delivery of public goals.

To that end we look forward to maintaining constructive contact with your officials, working with them and keeping you informed as appropriate.

Thank you once again for your time and advice,

Yours sincerely,

John Swift
Chairman

JOHN SWIFT CONSULTANCY
Telephone Office 01948 780596
Mobile [REDACTED]
E MAIL [REDACTED]

