

Minutes of the 11th Lead Ammunition Group meeting

16 April 2014

WWT, Slimbridge, Gloucestershire

Attendees

Mr John Batley

Mr Ian Coghill

Mr Jeff Knott

Dr James Kirkwood

Dr Debbie Pain

Mr John Swift (Chairman)

Mr Mark Tufnell

Sir Barney White-Spunner

Secretariat

Dr Matt Ellis - (British Association for Shooting and Conservation)

Observing

Mrs Elaine Kendall - (Defra)

Mrs Kate Fouracre - (Defra)

1. Welcome and introductions

1.1. Apologies were received from Dr Kevin Hargin Prof. Len Levy, Mr Stephen Crouch and Mr Ashley Smith.

2. Minutes of the 11th meeting

2.1. There were no further comments on the published minutes.

3. Progress report to Defra/FSA (Action Point 6.2)

3.1. The Chairman reported that he had drafted a structure and started to write the introductory and risks sections for a progress report to Defra/FSA. He would write the mitigation options assessment sections as the mitigation subgroup progressed. His aim is to enable the report to be available in draft form as soon as appropriate.

3.2. The four risk assessments will potentially be included as appendices to the report unless they make the report too large.

4. New papers to be included in the Primary Evidence List (Action Point 6.3)

4.1. The group discussed the need to complete this Action Point. It was felt that as there were several hundred new references, and that they were all clearly evidenced and referenced in the risk assessments that relisting them in the Primary Evidence List (PEL) was no longer necessary.

4.2. It was commented that the papers in the PEL were classified according to geographical scope and relevance, whereas the papers included in the risk assessments were not. However, it was decided that the comprehensive structure of the risk assessments resulted in a de facto assessment of the references.

4.3. The group decided to remove this Action Point, but that it could be reinstated if there was a clear need in the future. The PEL will remain on the website in its current form, but that the primary evidence sources used in the risk assessments will include the PEL and other relevant papers of suitable quality that emerged during the process.

5. Finalisation of the risk assessment reports (Action Point 9.4)

5.1. Completed

6. Publication of the four risk assessment reports (Action Point 10.5)

6.1. The group widely agreed that the risk assessments should be published as soon as possible in view of the need for transparency, and that any further delays were unhelpful. However, there was a split of opinion over whether the risk assessments should be published immediately or whether the publication should wait until the mitigation options assessment and action plan could be released as well.

6.2. The group agreed, with some reservations, that there was sufficient progress that publication of the risk assessments should be put on hold until the further progress has been made.

7. To receive a report on the calculations used to estimate the quantity of lead ammunition dispersed annually in to the environment (Action Point 10.1)

7.1. The gun trade representative presented a report underpinning the numbers already published in the minutes of the 9th and 10th meeting.

7.2. It was reported that the wildlife risk assessments have been adjusted accordingly. However, it was stated that this had no material effect on the risk assessments, as the estimates within the risk assessments for human health or wildlife which are based on the percentages of birds containing ingested lead shot, or the level of lead in game eaten by humans, not on the quantity of lead discharged into the environment.

7.3. The point was made that regardless of the absolute quantity of lead discharged, it was widely agreed that it was at least some thousands of tonnes per annum. However, it was pointed out that the precision of the estimates does have considerable relevance when looking at quantities of lead deposited over longer time frames.

8. To receive a report outlining the methodology and actions of the WWT compliance monitoring study (Action Point 10.2)

8.1. The Chairman thanked Dr Cromie for circulating this report.

8.2. There were no questions on the report.

9. To receive a report and minutes from the mitigation subgroup meeting (Action Point 10.3 and 10.4)

9.1. The Chairman of the subgroup apologised for the group not being able to produce as sufficient a report as required. However, he stressed that the minutes of the meeting had been used as the basis for producing the short report that some of LAG had seen (since circulated to the whole group). This focused on three key points:

- Voluntary changes (A code of conduct and communications)
- Statutory changes (including enforcement)
- Further work

Action Point 11.1. Circulate the minutes of the first mitigation subgroup meeting and the draft report.

9.2. There was a feeling that the subgroup meeting had been a useful first discussion.

9.3. The aim of the subgroup had been to produce a “straw man” to stimulate discussion, rather than to arrive at a report outlining the costs and feasibility of options.

9.4. It was agreed that in order to aid understanding and transparency the mitigation subgroup should list the risks as described in the risk assessments, identify possible options for their mitigation, and then weigh them up, and propose the most appropriate steps in the form of an action plan. The approach needs to be structured, and consider all options from no change, to complete replacement of all lead ammunition. This could be done in a tabular form.

9.5. It was suggested that part of this process may cover the benefits of using lead shot over other materials. But it was argued that if there are no material benefits then it would be difficult to support its continued use, given the risks identified in the risk assessments.

9.6. It was questioned whether LAG might consult external experts in ballistics and toxicity, especially from other countries which have experienced full or partial replacement of lead ammunition, and from those who, having banned lead ammunition, are now reintroducing it

9.7. Many of the points raised by the subgroup were focused on increasing compliance with the current regulations as it was felt that the risk assessments identified wildfowl as experiencing the most urgent on-going risk.

9.8. It was suggested that the mitigation subgroup might usefully form a list of actions that could be undertaken immediately, and that there was merit to discuss them in turn. It was stressed that these should however be taken up by stakeholders as opposed to LAG. LAG could still include them in its report and recommendations in due course.

9.9. It was suggested that the Code of Good Shooting Practice committee be approached by the shooting representative to make changes to the code to highlight the penalties for non-compliance and to point out in precise terms the possible risks of eating lead shot small game and poorly prepared lead shot large game.

9.10. The possibility of withdrawing insurance for shooters who illegal used lead ammunition was also discussed. However, it was felt that this would be technically very difficult to achieve.

9.11. It was clarified that the outstanding FSA guidance on consumption of game shot with lead was based on work conducted in Scotland, but that the advice applied to the whole of the UK. It was felt that this guidance needs to be more clearly communicated in precise terms to those at risk (and those who produce food for those at risk), and that the knowledge on how to handle game to minimise exposure to lead is currently very low.

9.12. There was discussion over the need to demonstrate the viability of non-lead shot types when shooting wildfowl. There was a general feeling that most non-lead shot types were not viewed to be as effective as lead, and that a series of demonstration events could be a useful way to show effectiveness and variety of other ammunition types and how best to use them.

9.13. It was suggested that the illegal use of lead shot might be used as grounds for refusal to grant a firearms certificate. However, it was pointed out that the only valid reasons for revoking a certificate were if the holder was a danger to the public or the peace. The shooting interest groups agreed to look in to this.

9.14. There was discussion over the need to convince retailers of game meat products to voluntarily collect traceability information to enable identification of people contravening the regulations. Once traceability is collected it would be possible to identify those people who "cause(s) or permit(s) another person to contravene [the Regulations]". It was clarified that the police in this instance would be responsible for enforcement of the regulations. Shooting groups

indicated a desire to call a meeting with game dealers, providers and producers to seek to obtain this agreement over the need to enforce traceability.

9.15. The group agreed that it would be beneficial to label all game sold that has been shot with lead with “May contain lead shot”. There was discussion over the need to go into detail, such as the risks associated with ingesting lead, and also the need to include context. This will be discussed with the FSA.

9.16. Several issues were raised requiring clarification with regard to steel shot. These included:

- Ballistics and effectiveness of steel shot in the field
- The possible impact of steel shot in forestry
- The possible toxicity of steel shot when ingested
- The toxicity of steel shot in the environment
- Any possible increase in sepsis in birds wounded by steel shot
- Possible danger to people who retained steel shot in their gut and require an MRI scan
- Any possible benefits of encapsulated lead shot to reduce risk to wildlife, human consumers or the environment
- Possible additional dangers associated with ricochet of steel shot
- The development and availability of biodegradable shot cups for loading steel shot

These issues will be taken up and reported back to the group.

9.17. It was agreed that the mitigation subgroup will meet again in May (date to be fixed). The Group’s chairman and a Defra observer will attend.

10. To receive a tidied-up version of the PERA text outlining areas of agreement concerning risks to wildlife

10.1. Completed

Action Point 11.2. Send the consensus wildlife risk assessment statement to the group

11. To receive a progress report on new data on consumption levels of wild shot game

11.1. The survey report is in the process of being finalised.

Action Point 11.3. Send the game consumption report to the group once completed

11.2. The survey estimated in UK that 5,500 – 12,500 under eight year olds consumed game once a week or more, and that 27,000-62,000 adults eat game more than once a week.

11.3. A question was asked about the percentage of pregnant women in the sample. This question was not explicitly asked, but an attempt will be made to estimate the likely number.

12. Any other business

12.1. No other business was brought to the group.

13. Date of the next meeting

11.1 A date and venue will be sourced for the next meeting of LAG. This will be in June.

Action points carried forward

Action Point 6.2. Progress report after one year will be submitted April 2013.

Carried forward

Action Point 6.3. The Primary Evidence and Risk Assessment Subgroup will compile a list of all new papers for inclusion on the PEL. These papers will be categorised according to geographical scope and relevance and tabled at the next meeting of the Lead Ammunition Group for approval prior to posting on the website.

No longer necessary

Action Point 9.4: PERASG to finalise the wildlife risk assessments

Completed

Action Point 10.1. A report to be prepared and circulated to the group outlining substantiating the calculations used to estimate the quantity of lead ammunition dispersed annually into the environment for internal circulation to LAG

Completed

Action point 10.2. Dr Cromie to produce a report outlining the methodology and results of the compliance monitoring study for internal circulation to LAG

Completed

Action point 10.3. An email address will be created specifically for the purpose of compiling possible mitigation measures and will be circulated to the group.

Not necessary

Action point 10.4. The mitigation subgroup will hold its first meeting in London on 26th March, in time to report to the next LAG meeting.

Completed

Action Point 10.5. The decision on publication of the risk assessments to be revisited at the next LAG meeting

Completed

Action Point 11.1. Circulate the minutes of the first mitigation subgroup meeting and the draft report.

Action Point 11.2. Send the consensus wildlife risk assessment statement to the group

Action Point 11.3. Send the game consumption report to the group once completed