

# Minutes of the Lead Ammunition Group teleconference October 2 2012

## Attendees

Mr Ian Coghill - (Game and Wildlife Conservation Trust)  
Mr Jeff Knott - (Royal Society for the Protection of Birds)  
Prof Len Levy - (Institute of Environment and Health)  
Dr Debbie Pain - (Wildfowl & Wetlands Trust)  
Mr John Swift - (Chairman)  
Ms Kasia Kazimierczak - (Food Standards Agency - Scotland)  
Ms Katherine Mulholland - (Food Standards Agency)  
Mr Gavin Shears - (Food Standards Agency)

## Secretariat

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

## Observing

Mr Christopher Graffius - (British Association for Shooting and Conservation)

## 1. Welcome and introductions

1.1. Apologies were received from James Kirkwood, John Batley and Stephen Crouch.

1.2. Christopher Graffius was invited to sit in on the teleconference and agreed to be bound by the FSA embargo and LAG confidentiality agreements. No objections were raised to his presence.

## 2. Discussion of the FSA documents

2.1. FSA confirmed that the following documents will be made public:

- [“Advice on eating game shot with lead”](#)
- [“Advice to regular consumers of lead shot game”](#)
- [“Harris Interactive \(2011\) Habits and behaviours of high-level consumers of lead-shot wild-game meat in Scotland. Food Standards Agency in Scotland Project number FS421005”](#)

2.2. It is not the practice of the FSA to publish the risk assessments, only the advice derived from them. FSA stressed they are an open and transparent organisation and the full risk assessment, titled “Risk to human health from exposure to lead from bullets and shot used to shoot wild game animals” though not published, would be technically available to anyone requesting it.

2.3. Several concerns were raised about the risk assessment and consumer advice documents:

- It was felt by some members that the consumer advice was significantly more restrictive than the conclusions from the risk assessment, and by others that it was balanced and proportionate.
- Some members took the view that the advice notices from FSA were appropriate and timely, but this was disagreed by others who stressed that the advice notices would cause confusion.
- Some members of the group felt that the consumer advice did not provide sufficient information to allow consumers to make informed decisions and that the level of information presented in the risk assessment would be more appropriate.
- Concerns were raised about the possibility of public scare and consumer backlash when the consumer advice was made public without the risk assessment to provide a solid backing.
- It was noted that as the risk assessment was not a publicly available document the LAG would not be able to include it in its development of advice to Defra and FSA due to the group's public commitment to transparency.

2.4. The FSA explained that:

- The advice seeks to identify and inform the at risk people. It is not the FSA's intention to prescribe appropriate levels of game consumption, but, in light of the lack of a safe exposure level to lead, to inform consumers of the level of game consumption which would result in a significant increase in lead exposure levels.
- They have a duty to produce advice for user groups identified to be at risk (frequent consumers of game meat in this instance). Frequent consumers of game are identified in the EFSA report as being at risk.

2.5. Further to the above, the FSA acknowledged the lack of clarity in the final paragraph of the document titled "Advice to regular consumers of lead-shot game". This paragraph is intended to highlight the increase in exposure to lead, not the increase in risk from the increased exposure. This paragraph has been changed to read:

"From estimates of dietary exposure, occasional consumption of lead-shot game birds (about twice a year), or monthly consumption of lead-shot venison will have a minimal effect on overall exposure to lead"

2.6. It was noted that the current advice is similar to that issued by food standards authorities in Germany, Sweden and Spain.

2.7. It was noted that the Harris Interactive study has been peer reviewed both internally by FSA and externally by an unnamed specialist sociology academic.

2.8. It was stressed by FSA that although the Harris Interactive study was conducted in Scotland, the risk assessment, also using data from other sources, sought to address the potential risks to consumers of game shot with lead throughout the UK.

2.9. It was questioned whether it would be possible for the FSA risk assessment to be fed in to the LAG process to allow a reasonable amount of time for stakeholders to provide input and ensure the advice issued was proportionate. FSA stated that this was not their usual process and that they are neutral on the issue of lead ammunition. FSA were not clear on whether the embargo would be lifted as planned on Wednesday 3 October, or if further consultation would take place.

2.10. The Chairman requested FSA to give due consideration to this warning and to withhold publication pending further consultation. He urged the FSA to consider publication of the risk assessment alongside their advice notes or to refer the Harris research, risk assessment and draft advice to LAG so that it could follow the process that Defra and FSA had put in place. He pointed out that the Harris report had been available to FSA since February.

2.11. FSA said they could give no assurance but thanked the members for their helpful comments.

2.12. It was questioned how the AVHLA/FSA study currently being conducted by Chris Low fit into the current FSA process. FSA will forward more details on this study shortly.