

# Letter from RSPB / WWT to the Secretary of State

October 2009

Dear Secretary of State

We wish to draw your attention to new evidence about the risk to the health of humans and wildlife in the UK caused by the use of lead ammunition for the hunting of wild game.

Poisoning due to lead from ammunition sources has been known to kill birds for more than a century. Wildfowl and terrestrial game birds such as partridges are poisoned after ingesting spent lead gunshot whilst feeding in any areas that have been shot over. Birds of prey are poisoned after ingesting lead from gunshot or bullets when scavenging unretrieved game, or preying upon animals that have been shot but survived. Many countries have enacted legislation to protect wildlife from lead, including nationwide bans on the use of lead ammunition for hunting. Legislative controls on the use of lead gunshot for shooting wildfowl or over wetlands in the UK countries have been introduced, primarily to reduce wildfowl mortality. However, wildfowl continue to be poisoned by lead, probably due to poor compliance in wetlands, the fact that many wildfowl graze agricultural land where lead ammunition can still be used legally, and because spent lead gunshot deposited prior to the legislation can remain available to feeding birds for decades. Importantly, existing UK legislation does not restrict the use of lead ammunition in terrestrial habitats. As a result, game birds and birds of prey continue to die from lead poisoning where lead ammunition is used.

Until recently, poisoning from lead ammunition sources in birds was thought to result only from the ingestion of whole gunshot or large pieces of bullets. Humans eating game generally avoid swallowing whole shot or large fragments of shot and bullets. However, recent evidence shows that both bullets and gunshot often fragment upon impact with the flesh or bone of a shot animal, leaving tiny lead particles in the tissues, sometimes widely distributed away from wound canals. Lead from these small particles has been experimentally shown to be bioavailable to mammals that eat food contaminated with them, and recent studies have found positive associations between blood lead concentrations in humans and levels of game consumption. This new evidence coincides with the publication of results from long-term studies in the UK and USA on the impacts of chronic low level lead exposure upon children, a group uniquely susceptible to the effects of lead, and with calls from experts on heavy metal toxicity for a halving of existing action thresholds for blood lead concentrations.

Being involved in the management of land and game animals and proponents of sustainable use, our organisations are concerned about the potential impacts of lead ammunition on wildlife and people. We enclose a short summary of the well-established threat posed to wild birds by lead from ammunition, and a review of recent published evidence on potential impacts of lead from ammunition on human health. We also enclose unpublished results from our recent study designed to measure lead concentrations in meat from game birds and wild deer in the UK. Our study shows that a high proportion of samples of game shot in the UK had lead concentrations that exceed the EU Maximum Level (ML) of 100 ppb wet weight for lead in non-game meats, frequently by more than an order of magnitude. No ML has been set for game.

We note that international commitments require that strategies be developed by the UK Government to restrict the use of lead products that may result in ingestion of lead in food, and to replace them with less dangerous alternatives. Such alternatives to lead ammunition exist and are widely used by hunters, including waterfowl hunters in the UK. International commitments also recognise the need to make special efforts to protect those groups in society that are particularly vulnerable or highly exposed to lead. We note that wild-shot game is now widely available in UK supermarkets, and that consumption levels have increased and are projected to increase further. The enclosed report suggests that recent assessments of the risks to humans of consuming game shot with lead ammunition, including those of the FSA and VLA, contain flaws and were not sufficiently rigorous. We consider that a thorough and quantitative analysis of the potential risks to human health from the consumption of game shot with lead ammunition is now needed.

We contend that the evidence that lead poisoning from ammunition sources poses a risk to both wildlife and human health is compelling and requires urgent attention by Government. In the 1990s, the Lead in Gunshot Working Group was convened to address the evidence for lead poisoning in wildfowl in wetlands and to advise Government on potential solutions. We strongly recommend that a wider group of interested stakeholders be convened by Government to address the evidence for lead poisoning of both wildlife and humans, with a mandate to make whatever recommendations it sees as necessary for the protection of the environment and human health.

We are providing this information to [Defra/Department for Health] due to the implications for [wildlife/human health] and to your counterparts in the devolved administrations.

We look forward to your reply.

Yours sincerely

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Enc.

Cc.

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