

# Minutes of the 17<sup>th</sup> Lead Ammunition Group teleconference – 22<sup>nd</sup> January 2016

9am-10am

Attendees

Mr. John Swift (Chair)  
Dr. James Kirkwood (Universities Federation for Animal Welfare)(retired)  
Prof. Rhys Green (RSPB)  
Dr. Debbie Pain (WWT)  
Ms. Sarah Hardy (FSA)(joined at 9.30am)(SH)

Secretariat

Dr. Ruth Cromie (WWT)

## 1. Welcome and apologies

Apologies were received from Prof. Len Levy (Institute of Environment and Health) and Mr. John Kilner (Defra).

## 2. Minutes of the 16<sup>th</sup> meeting on 23<sup>rd</sup> November 2015

2.1 There were no comments made on the published minutes of the 16<sup>th</sup> meeting/teleconference.

2.2 Matters arising from those minutes:

**Action Point 12.2** To request FSA to review their guidance on consumption of game and venison in the light of the LAG risk assessments.

Action carried forward until FSA have considered the LAG report (and see agenda point 17: 3.4 – 3.8).

**Action Point 13.3** Prof. Len Levy to contact Public Health England to help identify most appropriate contacts (in relation to FSA communication experts). It was felt that this was a task for FSA once the report had been accepted, rather than the LAG, but would be carried forward.

**Action Point 15.3** Defra/FSA to inform LAG of progress on consideration of LAG report. Carried forward.

**Action Point 16.1** Prof. Levy to inform the LAG of the current CLP and REACH processes involving metallic lead. Carried forward.

**Action Point 16.2** RC to investigate which of these new pieces of evidence could be posted on the LAG website (due to copyright issues etc.) and it was agreed to post those listed above where copyright permits.

It was agreed that emerging pieces of research would be circulated amongst LAG members. If considered of direct relevance to the LAG report these would be posted as appropriate in the information section.

**Action Point 16.3** RC to find suitable date for next meeting. Completed.

### 3. To receive Chairman's report and progress reports from Defra and FSA

3.1 A Westminster Hall debate on lead ammunition was held on 8<sup>th</sup> December 2015: The Chair had been invited to attend the debate and had been concerned by some of the interventions regarding evidence and the impact of consumption of lead from game meat on human health (in particular the repeated statements relating to 'absence' or quality of evidence and 'no-one dying of lead poisoning'). The Chair reported that he had written, in a personal capacity, to Mr. Geoffrey Clifton-Brown (Chair of the All-Party Parliamentary Group on Shooting and Conservation) who had also expressed such views, offering to meet. Mr. Clifton-Brown had replied that he would be pleased to do so.

3.2 The meeting noted that in summing up of the debate, the Minister of State, Department for Environment, Food and Rural Affairs, (Mr. George Eustice MP standing in for Rory Stewart MP) had referred to a report submitted from four of the resigned members of the LAG. He intimated that this was receiving consideration alongside the LAG report and concluded that there was, therefore, 'no expert consensus about the impact of lead ammunition on wildlife or on human health'.

Members expressed surprise at the Minister's statement as the LAG Human Health Risk Assessment (HHRA) had been agreed and signed off by all subgroup members and received with opportunity for questions by the LAG main committee. The two Wildlife Health Risk Assessments (WHRA) had resulted in consensus conclusions developed and agreed by all subgroup members, which the main committee had also agreed subsequently in detail. During this process no members of the LAG had presented evidence refuting or contradicting the agreed the HHRA or the WHRA consensus conclusions.

It was also noted that in the LAG meeting of the 13<sup>th</sup> August 2015 that a Defra official had recognised that this 'unseen' report from resigning members was independent of the LAG process.

The meeting noted that this unseen report had also been referred to in the government response to a petition to 'keep all lead ammunition'.

3.3 As a result of the foregoing the Chair had formally requested a meeting with the Minister, Mr. Rory Stewart MP, and John Kilner had informed the meeting by email that a response was on its way.

[Sarah Hardy joined the teleconference and was updated]

3.4 When asked, SH confirmed she had not reviewed the 'shooting resigners' report' but someone in FSA had. There had been no formal comment on it. As the Committee on

Toxicology had reviewed the human health aspects of the LAG report, it was questioned what sort of evaluation the 'shooting resigners' report' had had. SH will consider whether a formal FSA evaluation of the resigners report is appropriate.

**Action Point 17.1** SH to ask FSA if they should undertake a formal review of the 'shooting resigners' report'.

3.5 With respect to the current FSA consumer advice on game and lead levels, there was concern that although it was accurate so far as it went, the lack of precision was leaving it open to misinterpretation. As an example of the kinds of statements that might reduce misinterpretation, the LAG minutes of 2nd October 2012 were highlighted. In these the FSA stated that "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." The FSA had intended in its advice to game consumers to include the statement: "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". While this statement is useful in highlighting the levels of consumption that would be unlikely to (and by corollary those that might) result in more than a minimal increase in overall annual dietary exposure to lead, it was not ultimately included in the final FSA guidance. However, such statements would likely help to reduce misinterpretation of the existing advice.

SH explained that the FSA was a non-ministerial department and therefore did not need a formal response from ministers on the LAG report prior to considering its advice/guidance to consumers. The FSA are happy to meet with members of LAG to discuss the precision and context of the current advice. SH explained that FSA has currently two key actions. Firstly, to put the risks into context e.g. understanding numbers of people in at risk groups and impacts of long term exposure. Secondly, they need to raise awareness of the current advice amongst the at risk groups noting that the location of the current advice i.e. the NHS Choices website, may not be targeted enough.

3.6 SH explained that as part of routine sampling the FSA can target e.g. small butchers for lead levels in meat entering the market. Although the lack of EU regulation on levels of lead in game meat was highlighted, SH explained that FSA can undertake such surveillance and a subsequent risk assessment even if no EU regulations are in place. Existing VMD data were highlighted as another source of surveillance data.

It was explained that some venison would not be expected to contain high levels of lead as it was from game farms or cuts of meat distant from the part of the body where wild-shot deer had been shot. However, there was a lot of venison going onto the market from wild deer (which would have been shot 'normally' in the heart/lung area). It was suggested that some of the venison from these parts of the body going into burgers, patés and sausages might be expected to contain higher levels of lead.

3.7 The FSA are interested in where game meat is being sold so that advice can be given at that point of sale e.g. were there regions of the country and types of outlet where advice could be targeted. The FSA had apparently been misinformed that the supermarkets were not selling game shot with lead ammunition. This was corrected.

The routes by which game gets to the consumer were explored. It was explained that work with the VMD on the route by which red grouse get to the consumers (in relation to antihelminthics) was available and might be valuable to the FSA for deciding upon sampling locations. Much game consumption is undertaken by the shooters and shoot employees and their families and following informal transfer of carcasses to other consumers.

3.8 The LAG would be happy to help the FSA in targeting their guidance. SH suggested a meeting between LAG members and the FSA to include FSA's Chief Scientific Advisor, Guy Poppy, plus Diane Benford the FSA head toxicologist. It was confirmed that progressing this advice is independent of government decisions about the LAG report's recommendations.

**Action Point 17.2** SH to arrange a meeting of LAG members and FSA in relation to current consumption of lead in game meat and current FSA advice.

3.9 SH was asked about the current REACH processes and she believed HSE and Defra were the likely bodies dealing directly with these.

**Action Point 17.3** SH to enquire about who in HSE and Defra are involved in the REACH processes from a UK perspective.

#### 4. LAG website: to review visitor data

4.1 The website appeared to be continuing to serve its purpose.

#### 5. Date of next meeting

**Action Point 17.4** RC to find a date following the meeting with Rory Stewart.

#### 6. Action points carried forward

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