



14 September 2016

The Rt Hon Andrea Leadsom MP  
Secretary of State for the Environment Food and Rural Affairs  
Nobel House  
17 Smith Square  
London SW1P 3JR

Dear Secretary of State,

The summer break now over, I write in response to the letter dated 12 July that your predecessor, the Rt Hon Elizabeth Truss MP, posted for me on the Defra website. Her letter concerned the work of the [Lead Ammunition Group](#) established by Defra and FSA in 2010 to advise Government on the risks, impacts and options for mitigation of the continued use of lead ammunition in shooting.

Her letter responded briefly to the detailed advice we had submitted to her a year previously in June 2015 and effectively restricted itself to improving observance of the current wildfowling regulations on lead shot. We stress that such a policy falls far short of addressing the scale and diversity of the problems we identified and documented so painstakingly.

We appreciate that you may have bigger issues to address but believe you should be aware of the following.

The Lead Ammunition Group reviewed all the significant risks and impacts of lead ammunition currently used in game and duck shooting with shotguns, as well as for deer control with rifles. These activities result in the yearly dispersal of some 6,000 tonnes of toxic lead into the environment, and this is known to prejudice the lives and welfare of hundreds of thousands of wild birds and other animals, many of them living outside wetlands.

In addition, there are risks to human health from lead, and especially for some ten thousand children who may be regularly eating sufficient lead-shot game to suffer irreparable harm. This is not being alarmist: it is what the evidence tells us.

The letter from Elizabeth Truss included a further significant misunderstanding in its assertion that our Report *“does not provide evidence of causation linking possible impacts of lead ammunition with sizes of bird populations in England”*.

First, the narrow test of “evidence of causation of population-size effects” is not the only or indeed most appropriate measure of avoidable harm for risk assessment: the indiscriminate and wasteful deaths of many thousands of birds, as well as the welfare effects for much larger numbers, and the wider risks to food quality and consumer health must also weigh in consideration.



Second and additionally, when we wrote our Report we were all agreed as our report and published minutes of meetings demonstrate, that the extent of lead exposure in some species suggests the potential for effects on population size, although the detailed studies necessary to establish this (had) not been undertaken in species found in the UK.

Since then two studies have been published that shed further light: firstly, scientists<sup>1</sup> have recently modeled population effects for three European/UK bird species (grey partridges, buzzards and red kites) resulting from their exposures to lead ammunition residues and other poisons.

A second study<sup>2</sup> of which Defra was also informed, documents the very strong correlation between population trends in British wildfowl and their exposure to ingested lead shot.

Both the above in combination with earlier studies not mentioned here, strengthen the likelihood of causal links between lead ammunition and the sizes of bird populations (in England). They deserve more careful attention, as it is likely that more such studies will follow.

Finally, Elizabeth Truss's letter suggests that the LAG proposed that the Government "ban the use of lead ammunition". This is wrong because we made clear, as stated in our report on page 83, that it was not for our Group to judge between the pro and anti lead replacement camps. We recommended development of an action plan to address the conclusions we set out – and moreover listed the headings that a plan should cover.

In short, Elizabeth Truss's brief and hasty response was deeply unsatisfactory for these reasons, and by doing nothing more effective the significant damages will continue to be an issue of active conservation and health concern that will plague Government (and shooting sports) until it is gripped.

We therefore encourage you to think again and look forward to your considered response.

With best wishes and encouragement in your new role.

Yours sincerely,

John Swift  
Chairman Lead Ammunition Group

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<sup>1</sup> Meyer CB, Meyer JS, Francisco AB, Holder J, Verdonck F (2016) Can Ingestion of Lead Shot and Poisons Change Population Trends of Three European Birds: Grey Partridge, Common Buzzard, and Red Kite? PLoS ONE 11(1): e0147189.  
doi:10.1371/journal.pone.0147189

<sup>2</sup> Green, R. E. and Pain, D. J. (2016), Possible effects of ingested lead gunshot on populations of ducks wintering in the UK. Ibis. doi:10.1111/ibi.12400