

# Minutes of the 23<sup>rd</sup> Lead Ammunition Group meeting 12<sup>th</sup> February 2019

11.00am – 1.00pm

David Attenborough Building, University of Cambridge

## Attendees

Mr John Swift (JS) (Chair)  
Prof Rhys Green (RG) (University of Cambridge)  
Dr Robert Hubrecht (RH) (UFAW)  
Dr Debbie Pain (DP) (WWT)  
Dr Ruth Cromie (RC) (WWT) (Secretariat)  
Prof Ian Newton (IN) (NERC)  
Prof Len Levy (University of Cranfield) – telecon

## In attendance

Ms Emily Strong (ES)

### 1. Welcome and apologies

1.1. Apologies were received from Mr Jeff Knott and Mr Simon Roch.

### 2. Confirmation of agenda

2.1. The draft agenda was confirmed.

### 3. Minutes of the 22<sup>nd</sup> Lead Ammunition Group meeting

3.1. No comments were made on the published minutes of the 22<sup>nd</sup> Lead Ammunition Group meeting on the 21<sup>st</sup> February 2018.

3.2. Matters arising:

**Action Point 22.1** LAG members to check access to missing primary scientific literature and forward to DP for inclusion in LAG Updated Report.

Complete.

**Action Point 22.2** RC to check references in the LAG Update Report against the ECHA report and those on the LAG website.

Complete.

**Action Point 22.3** RC to contact BIAZA (British and Irish Association of Zoos and Aquariums) regarding guidance on game meat and captive carnivores.

Complete.

**Action Point 22.4** DP to restructure LAG Update Report to refer back to conclusions drawn from the 2015 LAG Report, and add summaries for each section highlighting how new evidence relates to previous work published in 2015 LAG Report.

Complete.

**Action Point 22.5** DP to produce the first redraft of the Executive Summary of the LAG Updated Report before the 8<sup>th</sup> March 2018, to be circulated for comment to other members.

Complete.

**Action Point 22.6** LAG members to provide comments and feedback on the LAG Update Report and Executive Summary before the 4<sup>th</sup> April 2018.

Complete.

**Action Point 22.7** Once LAG Update Report is complete, JS to confirm full LAG membership agreement and support.

Complete.

**Action Point 22.8** RC to facilitate upload of the Executive Summary onto LAG website when agreed.

Complete. Please see [Executive Summary of the Update Report from the Lead Ammunition Group](#) to download the summary.

**Action Point 22.9** On completion, JS to provide LAG Update Report to Defra and FSA, and DP to send copy to ECHA.

Complete.

**Action Point 22.10** LAG members to determine point of contact with FSA to send LAG Updated Report.

Complete.

**Action Point 22.11** LAG members to liaise with Richard Benwell to discuss next steps.

Complete.

**Action Point 22.12** DP to contact Vernon Thomas about developments in biodegradable wadding.

Complete.

**Action Point 22.13** JK to enquire about the position of the SNH on lead in species other than deer.

Complete. See Agenda item 5.

**Action Point 22.14** All LAG members to check LAG membership page and inform RC of any further updates required.

Complete.

**Action Point 22.15** JK to provide a short biography for LAG membership page.

Complete.

**Action Point 22.16** JS to discuss with LL and consider possibilities for inviting other human health experts about potential LAG membership.

Complete.

**Action Point 22.17** RC to organise meeting in October 2018 for the coming year (unless pressing matters require an earlier date).

Complete.

**Action Point 22.18** LAG members to organise meeting/teleconference to discuss how the LAG Updated Report is used once finalised.

Complete.

#### 4. Receive Chairman's report

- 4.1. The Chair (JS) noted that significant progress had been made over the past 12 months, specifically making interested parties aware of the evidence of continuing risks to wildlife and health from ammunition lead, particularly following the publication of the LAG Update Report. The Chair felt that awareness of the evidence would continue to grow.
- 4.2. The meeting noted a listing of actions and developments that had occurred during the year and members were invited to suggest others so as to provide a check list for future meetings.

**Action Point 23.1** JS to summarise the main developments arising over the past 12 months.

#### 5. Responses to the LAG Update Report

- 5.1. A discussion of some of the developments followed, notably:

##### a) Scottish Natural Heritage

RG reported that since publication of the LAG Update Report, a written document had been received giving SNH's future policy for using non-toxic ammunition for deer management. It was agreed to ascertain if there is a citable version of this.

**Action Point 23.2** RG to request a published version of SNH's policy on the use of non-toxic ammunition for deer management.

RC reported that SNH were planning to switch to non-toxic shot, likely following concerns about lead use for the widespread goose control on Islay. However, this had not yet been confirmed and no written account of SNH's position yet received.

RG noted that various RSPB reserves are intending to switch to non-toxic ammunition for grouse shooting when shoot licences are renewed.

**Action Point 23.3.** RG to follow up on SNH position on use of non-toxic shot and for RSPB position for grouse shooting on SSSIs and RSPB reserves.

##### b) Forest Enterprise Scotland

The Chair reported that FES had made a statement on current and future use of non-toxic ammunition. This statement was currently being discussed in the press and reflects a certain amount of concern among some parties. At an SNH Deer Management Round Table meeting, however, attended by the Chair and deer management stakeholder groups, there had been overwhelming support for

switching to non-toxic ammunition. This support was based on practical user-experience and recognition of the need for venison products to be lead-free. Hence the Chair believed that change would continue.

A discussion followed regarding the position of other organisations regarding their use of and requirement for non-toxic ammunition. A number of organisations were identified as considering change and which might be interested in further information.

It was agreed that a register of confirmed organisational positions favourable to change would be valuable and could be published on the LAG website to allow for sharing of experiences with those organisations yet to change.

DP and LL emphasised the importance of differentiating between a policy and a position statement as the two are not interchangeable.

**Action Point 23.4.** RC to compile a list of organisations committed to using non-toxic ammunition, to be published on the LAG website.

It was agreed that a letter might be sent to FES commending their progress and IN agreed to undertake this task in his capacity as a Fellow of the Royal Society of Edinburgh.

**Action Point 23.5.** IN to write a letter to FES to commend their transition to non-toxic ammunition.

#### c) **Environment Agency/Defra**

The Chair reported that Dr Peter Fox of the Environment Agency had responded to the LAG Update Report, and had offered to meet in November with him and LAG experts along with EN experts and representatives from Defra. The object of the meeting had been to share new information, discuss the remits of Government and agencies, and identify possible developments. It had been agreed that the meeting was informative for all parties, and that a further discussion should take place in the New Year. The Chair suggested that a further meeting would be most helpful when information is available on the current European Commission and REACH process.

**Action Point 23.6** JS to contact Dr Peter Fox when further information on the European Commission REACH process is available.

#### d) **Other responses**

The Chair thanked LAG members for actively disseminating the outputs from the LAG Update Report. RC and DP had given various presentations to other stakeholder groups. IN had written an article for British Wildlife Magazine which LL commended as well balanced and informative from the human health perspective. DP, RG and RC had written a masterclass in ecotoxicology for the BTO magazine.

DP reported that the journal *Ambio* (a journal of the human environment published by Springer in cooperation with The Royal Swedish Academy of Sciences) will soon publish a Special Issue on lead ammunition and hunting. Several LAG members are first authors or co-authors for contributory papers. DP has written two papers that have been accepted for publication: one on the economics of lead ammunition in

Europe, and the other on wildlife health. This includes a review of the impact of lead on raptors as there has been considerable progress in this area. RG and RC are first authors on two papers on human health and change theory respectively. The papers are being published individually as they become available and a number have already been published on the LAG website.

It was agreed that the release of the Ambio Special Issue will represent a significant development which should be communicated widely. It was further agreed to schedule a LAG meeting in September 2019 (see Agenda item 13 for information on the date of the next meeting). It was noted that the release of the LAG Update Report Summary had clarified which contacts would most interested to know about the Ambio publication.

**Action Point 23.7** Consideration by all regarding recipients most interested in being made aware of the Ambio Special Issue.

## **6. Review new evidence received since the 22<sup>nd</sup> LAG meeting and its inclusion on the website, including progress on work studies, papers, and articles in press**

6.1. The Chair proposed that the Group clarify the criteria for deciding what new primary and grey literature should be uploaded/cited on the LAG website, and how best to ensure the criteria are applied consistently. A discussion followed:

a) DP noted that an up-to-date list of references is included in the above-mentioned Ambio wildlife health review, and these could be cross-referenced with the list on the website.

**Action Point 23.8** RC/ES to cross-reference the resources on the LAG website with those in the Ambio paper wildlife health review.

b) RG noted that, in order to ensure the selection process was consistent, a simplified version of the methods used for meta-analyses could be employed i.e. dictate which search terms are used, explain the selection process and reasoning behind omissions.

c) LL noted that he undertakes a quarterly review of the literature recently published in his field. Given his expertise in this area, he would be able to provide advice on the best way in which to conduct a review of the literature on a periodic basis.

d) DP noted that a global lead email group circulates new publications relevant to the topic from both primary and grey literature. She reported that she reviews the literature periodically to ensure she is up to date.

e) RH noted that he was familiar with systematic reviews as the result of his editorial responsibilities, and would be able to provide a brief explanation of methodology for the LAG website.

**Action Point 23.9** RC/ES to follow up these suggestions and RH to send RC/ES a brief methodology for possible use on the LAG website.

6.2. It was agreed that defining a method was the most appropriate way to ensure a consistently balanced selection process for the resources published on the LAG website.

The Chair suggested, and all agreed, that a set of search terms and the criteria for exclusion should be decided upon. The website could then be updated on a periodic basis, ensuring new resources are made clear.

**Action Point 23.10** RC/ES to establish criteria for the selection of primary and grey literature (including search terms, rationale for inclusion and omission, and periodicity) and update the LAG website on a quarterly basis.

- 6.3. Members further agreed that, in the event that a piece of evidence is overlooked, the LAG website should contain a submission form which would allow visitors to submit suggestions of relevant literature or provide feedback.

**Action Point 23.11** RC/ES to ensure the LAG website is equipped with a submission form to allow visitors to submit suggestions of relevant literature.

## 7. Review relevant international and UK processes

- 7.1. The Chair provided an update on various international and UK based processes, including:

### a) European Commission, ECHA and REACH

In line with mandates from the European Commission, ECHA has now produced a restriction proposal on the use of lead shot over wetlands, which was currently being taken forward by the Commission according to REACH process. ECHA has also produced a report summarising evidence of harm to health and the environment outside wetlands in terrestrial habitats, and has concluded that a further restriction process would be justified. The Commission is expected to take a decision mandating ECHA to take that forward, most likely when a new Commission has been appointed following the upcoming European elections.

The Chair reported that he had written a letter jointly with Dr Yves Le Cocq and Mr Angus Middleton (previous FACE Secretary Generals), to Jean-Claude Juncker (President of the European Commission) and the Director Generals of the DGs, encouraging them to go ahead with the restriction proposals. The Head of Unit at DG Grow had responded on behalf of the President of the European Commission, and informed them that they would be taking their experience into account. The Chair felt the letter was polite, friendly, and appreciative.

RC enquired as to whether it would be appropriate to make the letter and its response public on the LAG website, and it was agreed that it would be. (See Appendix).

**Action Point 23.12** JS to check that this is acceptable and RC to add the letter and its response to the LAG website in the form of an Appendix to the 23<sup>rd</sup> LAG meeting minutes.

DP also suggested that the consensus statements from [American](#) and [European](#) scientists are made available on the LAG website, along with other conference proceedings and the recent European Scientists' open letter to the European Commission.

**Action Point 23.13** RC/ES to add the Scientists' Consensus Statements (European and American) and the recent European Scientists' open letter to the European Commission to the LAG website, plus conference proceedings.

**b) Convention on Migratory Species' Lead Task Group and AEWA**

RC reported that she had attended an AEWA Meeting of the Parties (MOP) in December 2018. She had organised a lead side-event which brought together the representatives of governments and stakeholders. During the side-event strong statements were made including from shooting representatives, in support of tougher policies for restricting the use of lead ammunition.

The Convention on Migratory Species' Lead Task Group was yet to hold its first face to face meeting.

**c) FACE Ammunition Working Group and World Forum for Sport and Shooting Activities**

The Chair reported that FACE has recently published well-balanced [guidance on the use of lead ammunition](#). He agreed to provide further updates on this matter as it develops, but stressed that as a member of the FACE Ammunition Group he must respect the need for its discussions to be confidential.

The World Forum for Sport and Shooting Activities had held a meeting the week previously, and the Chair reported his understanding of the gun and ammunition trades and stakeholder interests active within the Forum. The Forum has historically been outspoken in support of continued use of metallic lead for ammunition as well as lobbying to prevent restrictions on lead going forward.

**d) UK Government and agencies**

The Chair reported that he and DP met with Lord Randall of Uxbridge in April 2018, who had had some ideas about tackling the problem of lead ammunition that he undertook to take up with his contacts.

RC also noted that Caroline Lucas had put down an [early day motion on the use of lead ammunition](#) following the publication of the [People's Manifesto for Wildlife](#). So far, the EDM has received some 20 signatories.

Although EDMs have limited immediate impact, they are read by most MPs and therefore raise awareness - even if few are moved to sign up to them for whatever reason.

**8. Review other processes ensuring that evidence is properly considered for the good of wildlife, health and the environment**

8.1. The Chair reported two other concerns which had been brought to the attention of the Group, namely:

**a) Waitrose labelling of game meat products**

In November 2018, it had been brought to the Chair's attention that food labelling on Waitrose game meat products was misleading. The labels state:

*“WARNINGS: May contain shot. It is recommended that vulnerable groups such as toddlers, children, pregnant women and women trying for a baby do not eat more than one portion of wild game a week due to the possible presence of lead shot”.*

The principal grounds for concern derive from the evidence of risks to human health, supported by the Food Standards Authority advice and the [NHS England guidance](#), which says lead-shot game should be avoided in pregnancy (not eaten up to weekly as Waitrose labels suggest). Neither supports advice that vulnerable groups may eat lead-shot game weekly without harm.

The Chair felt this needed to be urgently addressed and had written to both Waitrose and the Food Standards Agency to inform them of the issue. FSA’s response had been circulated to members.

It was noted that discussions have taken place between Waitrose, DP and RG. It is understood that the Waitrose labelling will be changed, and there is a likelihood of further discussions.<sup>1</sup>

There was no further progress from Waitrose or FSA to report and the issue would continue to be given close attention.

**b) British Game Alliance and GWCT brief on lead**

The Game and Wildlife Conservation Trust’s dated guidance as published on their website was mentioned when considering sources of information that retailers can access and may rely on. This advice is currently cited by the British Game Alliance, a relatively new initiative promoting the consumption of game meat notably by supermarkets, gastropubs, hotel chains, and other retailers.

A discussion followed regarding the best approach to be taken:

- a) It was agreed that GWCT ought to be contacted regarding their representation of FSA guidelines, recognising that the FSA guidelines are not prescriptive.
- b) The Chair noted that the GWCT’s outputs as published on their website were somewhat dated and merited careful review if they are to be regarded as authoritative in the light of current evidence. He suggested that all LAG members look critically at the GWCT’s guidance so that a proper analysis of the text could be completed.

**Action Point 23.14** LAG members to review and comment on the advice provided on the GWCT website.

- c) It was agreed that the Group should write to GWCT and encourage them to reassess their guidance. It was suggested to offer help and potentially include the FSA in the conversation.
- d) It was agreed that, as RG is still a member of the GWCT Scientific Advisory Committee and IN used to be its chair, any correspondence should be written by them.

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<sup>1</sup> Since this meeting was held, it is understood that Waitrose have changed the labelling of their pigeon products and have committed to changing labels on partridge and pheasant from the start of the next season.

**Action Point 23.15** When Action point 23.14 has been completed RG and IN to write a letter to Teresa Dent addressing the concerns raised.

- e) RC informed the group of a [Taste of Game and the Game Changer Project initiative](#) which, with the Food Teachers Centre, aimed to teach 60,000 schoolchildren to cook game by 2020 with game being promoted as healthy and sustainable. RC suggested it may be worth a human health expert sending a letter to them to raise this issue and warn against the potential impacts on young children of exposure to elevated levels of dietary lead.
- f) RC had been in discussion with academics about veterinary lead surveillance who had colleagues involved in the psychology of food labelling. RC was due to have a meeting soon with the possibilities of a multidisciplinary project which could include how the general public might interpret misleading guidance, and how this would relate to interpretation of the current FSA guidelines. Although this would be a longer term project, it could provide some useful insights. LL agreed, noting that it could be provided as an example for public understanding of science.

Members also felt that in due course it would be beneficial to send a letter to the FSA to bring their attention to misinterpretation or misuse of their advice. A discussion followed regarding the best way to go about this.

- a) LL suggested using Waitrose as an example to illustrate to the FSA how their advice could be misused, and needs to be rephrased to be less ambiguous.
- b) DP suggested compiling a list of food standard advice from other European health agencies to bring to the attention of the FSA.

**Action Point 23.16** DP to send RG a compiled list of advice provided by other European health agencies on the consumption of game.

**Action Point 23.17** RG to draft a letter to the FSA bringing to their attention the misinterpretation of their advice (presumably used by Waitrose), the advice provided by other European health agencies, and noting that there are initiatives aiming to get young people to eat more game.

- c) RC suggested emailing the Taste of Game and Food Teachers Centre a copy of the letter sent to the FSA to bring the LAG's concerns to their attention.

**Action Point 23.18** JS to forward a copy of the FSA letter to the Taste of Game and Food Teachers Centre.

- d) IN asked whether any action regarding the British Game Alliance, which is aiming to push more game onto the market, would be considered.
- e) RC suggested this would be something to mention to the FSA, in order to encourage them to review their evidence.
- f) DP noted that the FACE advice states that "research in Sweden has shown that proper handling of game shot with lead ammunition can effectively eliminate the risk". This was based on a Swedish report which looked at the removal of game meat around shot wounds in crows to reduce lead concentrations. The

study compared the use of sport shot and game shot. The results suggested that birds shot with sport shot still had elevated lead concentrations after carcasses were cleaned, while in birds killed with game shot, cleaned carcasses had reduced concentrations. However, mean lead concentrations remained high and the Swedish report does not appear to show that the risk of lead contamination can be almost entirely eliminated if birds are cleaned appropriately.

## 9. Keeping Defra and FSA appraised

- 9.1. It was agreed that the date of future meetings should involve Defra, FSA and the Environment Agency.

## 10. Consider other instances where the need for communication of the evidence may be appropriate

- 10.1. RH suggested writing an article for the Vet Record due to its readership. He noted that they publish both scientific articles and letters. However, he felt he was not the most appropriate person to write the letter as his field of expertise lies in welfare rather than toxicity.
- 10.2. DP noted that there is growing evidence of the impact of lead poisoning in domestic and captive settings. RH suggested DP could talk to Simon Roch and consider writing a letter to Vet Record.

**Action Point 23.19** DP to consider writing a letter to Vet Record on lead poisoning.

## 11. LAG website update

- 11.1. RC provided a brief update on the LAG website, thanking ES and noting that visitation had remained constant since the last LAG meeting. Changes included adding the LAG Update Report alongside new references.

## 12. Any other business

- 12.1. LL noted that he had attended an Interdepartmental Group on Health Risks from Chemicals conference which focuses on the health risks of chemicals in both humans and more recently the environment. He noted the group provided a good platform between environmental and human concerns, as well as a range of expertise in both scientific and policy areas. He noted they could be good contacts regarding the lead poisoning issue.

## Action Points carried forward

**Action Point 23.1** JS to summarise the main developments arising over the past 12 months.

**Action Point 23.2** RG to request a published version of SNH's policy on the use of non-toxic ammunition for deer management.

**Action Point 23.3.** RG to follow up on SNH position on use of non-toxic shot and for RSPB position for grouse shooting on SSSIs and RSPB reserves.

**Action Point 23.4.** RC to compile a list of organisations committed to using non-toxic ammunition, to be published on the LAG website.

**Action Point 23.5.** IN to write a letter to FES to commend their transition to non-toxic ammunition.

**Action Point 23.6** JS to contact Dr Peter Fox when further information on the European Commission REACH process is available.

**Action Point 23.7** Consideration by all regarding recipients most interested in being made aware of the Ambio Special Edition.

**Action Point 23.8** RC/ES to cross-reference the resources on the LAG website with those in the Ambio paper wildlife health review.

**Action Point 23.9** RC/ES to follow up these suggestions and RH to send RC/ES a brief methodology for possible use on the LAG website.

**Action Point 23.10** RC/ES to establish criteria for the selection of primary and grey literature (including search terms, rationale for inclusion and omission, and periodicity) and update the LAG website on a quarterly basis.

**Action Point 23.11** RC/ES to ensure the LAG website is equipped with a submission form to allow visitors to submit suggestions of relevant literature

**Action Point 23.12** JS to check that this is acceptable and RC to add the letter and its response to the LAG website in the form of an Appendix to the 23<sup>rd</sup> LAG meeting minutes.

**Action Point 23.13** RC/ES to add the Scientists' Consensus Statements (European and American) and the recent European Scientists' open letter to the European Commission, plus conference proceedings to the LAG website.

**Action Point 23.14** LAG members to review and comment on the advice provided on the GWCT guidance concerning the consumption of game meat, in order to determine whether it is fair, reasonable and accurate

**Action Point 23.15** When Action point 23.14 has been completed RG and IN to write a letter to Teresa Dent addressing the concerns raised.

**Action Point 23.16** DP to send RG a compiled list of advice provided by other European health agencies on the consumption of game.

**Action Point 23.17** RG to draft a letter to the FSA bringing to their attention the misinterpretation of their advice by Waitrose, the advice provided by other European health agencies, and noting that there are initiatives aiming to get young people to eat more game.

**Action Point 23.18** JS to forward a copy of the FSA letter to the Taste of Game and Food Teachers Centre

**Action Point 23.19** DP to consider writing a letter to Vet Record on lead poisoning.

## **Appendix**

The following correspondence includes a joint letter written by the Chair (Mr John Swift) and previous Secretary Generals of FACE to Commissioners of the appropriate Directorate Generals in support of the REACH restriction proposal. The response and follow up to the letter is included below.

30<sup>th</sup> October 2018

Ms. Elzbieta Bieñkowska  
Commissioner Internal Market, Industry, Entrepreneurship & SMEs  
Avenue d'Auderghem,  
BE-1040 Brussels,

cc. Michael Flueh, Head of Unit REACH

**Subject: Current REACH consideration to restrict lead in wetlands – this can and should be done**

Dear Commissioner Bieñkowska,

We write to you as life-long hunters and former heads of national and European hunting organisations and conservationists. We are in the privileged position of being able to speak freely while understanding hunting in Europe, whether that be game biology, conservation, ballistics, legislation, culture, tradition, socio-economics, business, membership, finance, industry, politics, ethics or public relations. Our opinions are based on intimate knowledge of the dossiers and broad experience of issues surrounding lead in hunting ammunition. Having dealt with this particular topic at first hand, we know how, where and why obfuscation may arise.

It is our firm opinion, one evidently shared by those who studied the issue from an independent and dispassionate perspective in ECHA, including their expert committees, that lead shot requires complete restriction and replacement. This is for the long-term good of wildlife, human health and hunting. For well over a quarter of a century duck hunters in America have embraced a ban on lead shot and successfully used lead free alternatives. Our Danish, Dutch and Flemish colleagues have done likewise. We fully concur with the more recent findings of ECHA that non-wetland use of lead in ammunition (shot and bullets) contains sufficient risk to justify additional measures.

We know and appreciate that lead is ballistically attractive, that hunters are familiar with it and that the gun and ammunition industry have built up to use and supply it. However, the wide availability of effective, safe and affordable alternatives means that it can no longer be acceptable from the perspective of ecological and human health and ultimately our collective vision for sustainability.

There will no doubt be strong lobbying from those wishing to maintain the status quo and unpick the robust ECHA proposal, but we know that it is not a matter of if lead ammunition will be restricted in the future, it is a matter of when. This issue has dragged on for decades and it is time to act.

We therefore urge you not to succumb to suggestions that it is not possible to change. It is.

The direction of travel on the problems of lead in ammunition is clear. For our part we strongly believe that hunting is and should remain integral to the fabric of our society and a critical tool for conservation and to do so it must be sustainable.

The European Commission now has an opportunity to show leadership on this issue and place the EU once again at the forefront of conservation, innovation and sustainability. We urge you to act.

Yours sincerely,

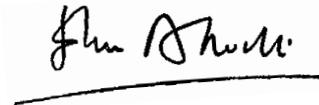
Yves Lecocq, DVM (1)



Angus Middleton (2)



John Swift (3)



(1) Retired Secretary General (1983-2012) and Senior Policy Advisor (2012-2014) of the European Federation of Associations for Hunting and Conservation **FACE**  
President of the International Union of Game Biologists **IUGB** (2011-2013)  
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(2) Previous Chief Executive Officer and Secretary General of the European Federation of Associations for Hunting and Conservation **FACE**  
Current Executive Director of the Namibia Nature Foundation.  
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Eros, Windhoek, Namibia

(3) Retired Chief Executive of the British Association for Shooting and Conservation **BASC** (1988-2013).  
Previous Board Member, Bureau Member and Treasurer of the European Federation of Associations for Hunting and Conservation **FACE** and Chair of its Lead Ammunition Working Group.  
Current Chair UK Lead Ammunition Group (2010 to present) and previous Chair of UK shooting industry's ad hoc Lead Shot Technical Working Group.  
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## EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP  
AND SMES  
Consumer, Environmental and Health Technologies  
REACH

Brussels, **26 NOV. 2018**  
GROW.D.1/KH/al  
grow.ddg1.d.1(2018)6669286

Mr Yves Lecocq  
[ylecocq@wilduse.eu](mailto:ylecocq@wilduse.eu)  
Mr Angus Middleton  
[agm@nnf.org.na](mailto:agm@nnf.org.na)  
Mr John Swift  
[johnanthonyswift@gmail.com](mailto:johnanthonyswift@gmail.com)

**Subject: Current REACH consideration to restrict lead in wetlands – this can and should be done**

Dear Mr Lecocq,  
Dear Mr Middleton,  
Dear Mr Swift,

Thank you for your letters of 30 October 2018 to President Juncker and Commissioners Bieńkowska, Vella and Andriukaitis, to which I have been asked to reply.

We are grateful to you for sharing your opinion that, for the long-term good of wildlife, human health and hunting, lead shot requires complete restriction and replacement and that non-wetland use of lead in ammunition entails sufficient risk to justify additional measures.

As you are aware, the Commission received the opinion of ECHA's Committees for Risk Assessment and for Socio-economic Analysis in mid-August. We are in the process of carefully assessing its content, with a view to deciding upon appropriate measures. In this context, as well as in the context of the possible follow-up to be given to ECHA's Annex XV Investigation Report on lead in shot used in terrestrial environments, due consideration will be given to your input.

Yours sincerely,

Michael FLUEH  
Head of Unit

17<sup>th</sup> August 2019

**To:** Commissioners of Directorates General of the European Commission

**Cc:** Donata Meroni (CHAFFEA)

**Subject: REACH restriction on lead shot in wetlands**

Dear Commissioner,

I write to remind you of the letter (attached hereto) sent in October 2018 from the three of us erstwhile heads of European Hunting institutions, which was kindly replied to on your behalf by Michael Flueh of DG GROW (copy attached), and which we hope will still be of value to you. It relates to the current REACH opinion to restrict the use of lead shot for hunting and shooting over wetlands. We understand that the REACH opinion is currently under active consideration by the European Commission and REACH Committee. We have sent a similar letter to the President of the European Commission and relevant Directorates General.

Our letter is written by three people who have many years of deep and direct relevant experience on these matters; and who see this as a unique opportunity for the European Commission to provide essential leadership that will help resolve an issue that has dragged on for decades.

We would be grateful if this letter could be shared with those dealing directly with the restriction proposal.

We would be glad to provide further assistance to your team if that would be helpful.

Yours faithfully,

John Swift with Yves Lecocq, Angus Middleton