

## Minutes of the 25<sup>th</sup> Lead Ammunition Group Meeting

20<sup>th</sup> April 2021

10:00am – 12:30pm

Virtual Meeting

### Attendees

Mr John Swift (JS) (Chair)

Prof Len Levy (LL) (University of Cranfield)

Prof Debbie Pain (DP) (University of Cambridge)

Prof Rhys Green (RG) (University of Cambridge)

Dr Ruth Cromie (RLC) (WWT)

Dr Julia Newth (JLN) (WWT)

David Stroud (DS)

Dr Huw Golledge (HG) (UFAW)

Mr Jeff Knott (RSPB)

### 1. **Welcome and apologies**

1.1 Apologies received from Mr Simon Roch and Prof Ian Newton

### 2. **Confirmation of agenda**

2.1 The draft agenda was confirmed

### 3. **Chairman's introduction**

3.1. The Chair (JS) noted that there had been significant developments in terms of reducing risks from lead ammunition over the past year.

### 4. **Matters arising from 24<sup>th</sup> LAG meeting**

4.1 None.

### 5. **Government processes in relation to lead ammunition**

5.1 The group reviewed government processes underway.

#### (a) Environment Bill (EB)

- In September 2020 an amendment to the EB was tabled by Daniel Zeichner MP regarding lead ammunition used for the taking of wild quarry using shotguns. The LAG provided a [written submission](#) to the Public Bill Committee of the EB.
- It was noted that the political debate on the proposed amendment indicated cross-party support for phasing out lead ammunition. It was also noted that Rebecca Pow MP was particularly supportive, suggesting that the amendment did not go far enough.
- There may be other opportunities for tabling another amendment.

#### (b) UK REACH

- In March 2021 DEFRA [announced](#) that newly established [UK REACH](#) will consider restricting the use of lead ammunition. A 2 year process will follow whereby the evidence will be reviewed. It is believed that DEFRA will start the UK REACH process imminently.

- Opportunities to use LAG's expertise to contribute to the UK REACH process were discussed. There are two main routes: as an Individual Expert or as an Accredited Stakeholder Organisation.
  - *Individual experts*: Experts will be recruited to the REACH Independent Scientific Expert Pool (RISEP) – their remit includes developing opinions for authorisation applications and restrictions. RISEP will work with HSE and other government agencies. RISEP experts will be invited to participate in Challenge Panels and sometimes Case Teams.
  - *Accredited Stakeholder Organisation (ASO)*: ASOs represent their fields of competence in the UK. ASOs may contribute their scientific and technical expertise and may bring with them perspectives from their organisation's collective experience.
- It was agreed that the LAG fulfils the criteria to be an ASO and should apply.  
**Action 5.2:** JS to apply for the LAG to be an ASO on behalf of LAG.
- It was suggested that a roundtable with EA and HSE could help clarify some outstanding questions about process, roles and contribution.  
**Action 5.3:** Members will investigate and share their findings.

(c) Scottish Deer Working Group

- In March 2021 the Scottish government has [responded](#) to the Working Group's [report](#) on the management of wild deer. In its response, the Scottish government confirmed its wish to phase out the use of lead bullets to cull deer in Scotland. There is no commitment to introduce legislation to achieve this although legislation will be considered further.
- During discussions on this agenda item, it was noted by RG that there will be a new Minister.  
**Action 5.4:** LAG to write to the new Minister (when in post) and consider offering technical expertise in non-lead bullets. JK to consider appropriate timing to send a letter.

**6. Non-governmental processes in relation to lead ammunition**

6.1 Progress with and monitoring of the [shooting and rural organisations' intention to replace lead shot within five years](#) was reviewed.

- (a) The Group reflected on the announcement of the voluntary ban in February 2020. Although believed to be positive and valuable for igniting the conversation on the need for change within the shooting community, it appears that no robust monitoring scheme has been established by those involved, aside from the surveying of members' opinions. Furthermore, communication from some organisations has been inconsistent with mixed messages released by BASC.
- (b) The [SHOT-SWITCH project](#) (designed by RG and DP) was launched. The project will monitor progress with the five year transition by testing wild-shot pheasants purchased from retailers across Britain and determining if they have been killed using lead or non-lead shotgun ammunition. Results for 180 pheasants shot during the 2020/21 shooting season were [published in Conservation Evidence](#) and found that

99% had been killed using lead shot. The authors conclude that the shooting and rural organisations' joint statement, and their subsequent promotional actions, have not yet had a detectable effect on the ammunition types used by shooters supplying pheasants to the British game market. The paper attracted widespread media coverage. Monitoring of shot types used for pheasant shooting will be undertaken annually until the 2024/25 shooting season and will provide a clear measurement of success of the voluntary ban.

- (c) It was noted that Wild Justice has initiated a [project to test lead levels in wild game](#) purchased from Sainsbury's with results due in spring 2021. [Subsequently [published on their website](#) in May 2021].
- (d) There is evidence from the USA of efficacy of non-toxic shot swap projects and there was some discussion around the value of these in the UK to encourage shooters to move from lead to non-lead shot ammunition.
- (e) JS noted that removing lead ammunition from the market is what would drive the market in non-lead ammunition.

## 7. Processors and retailers

7.1 Recent developments on food processors and retailers moving away from lead ammunition were reviewed.

- (a) A significant development from the National Game Dealers Association (NGDA) which has [committed to sourcing all game \(including wild boar and venison\) from lead-free supply chains](#) from 1 July 2022.
- (b) DP and RG suggested that a BULLET-SWITCH project was needed to monitor progress with commitments made by the NGDA, Waitrose (and any other outlets) to go lead-free. This would involve the assessment of lead levels in meat.
- (c) It was noted that the Veterinary Medicine Directorate (VMD) no longer report lead levels in game meat and there were queries about when this stopped and why.  
**Action 7.1:** RG, DP and LL to email their respective contacts to determine when the VMD stopped reporting lead levels in game meat. LL to contact the FSA if not successful.  
**Action 7.2:** All to consider whether a Parliamentary Question could be asked on the matter (perhaps by Daniel Zeichner).
- (d) It was agreed that Rebecca Pow should be alerted to any emerging evidence of non-compliance going forward.
- (e) As many agencies and organisations are moving to lead free ammunition it was felt that it would be useful to keep track of such developments.  
A new [page](#) for organisational policies, position statements and letters has now been created on the Lead Ammunition Group website.

**Action 7.3:** All to review the policy page and inform JLN of any additions or updates.

## 8. Relevant international processes

8.1. Latest developments on two EU REACH restriction processes discussed.

### (a) REACH Restriction on the use of lead gunshot in wetlands

The European Commission published the [final text](#) of the lead shot ban in wetlands, starting date is 15 February 2021 (20 days after publication). This means that Member States need to implement the ban by 15 February 2023 at the latest. The only exception is when >20% of a Member State is wetland. These countries need to implement the ban by 15 February 2024 at the latest. There were delays at several points along the process, particularly at the REACH Committee stage with some suspect tactics including an objection raised to the online voting system at the last moment. Two objections (one mainly from the far right) were not supported at both the ENVI Committee and the European Parliament stages. Overall RC felt that the discourse was framed by a “stop poisoning” vs “it’s bad law” narrative.

- DP suggested that the restriction may apply to Northern Ireland (NI) due to the NI Protocol and Scotland may also choose to implement.

### (b) [REACH restriction on lead in ammunition and fishing weights](#)

- RLC reported that ECHA published its draft [dossier](#) in January 2021. On the 24<sup>th</sup> March, the dossier was published for [public consultation](#) (which closes on 24<sup>th</sup> September 2021).
- Proposals include a transition period of five years for gunshot and five years for rimfire and smaller calibre bullets. For >5.6cm calibre, the transition will be 18 months.
- As well as environmental impacts the dossier considers human health as impacted by inhalation of lead during shooting activities, exposures via livestock, consumption via game meat and from contaminated land and water.
- Sports shooting creates some complexities to the dossier due to rules used in international shooting competitions hence the possibility for some derogations as long as shooting ranges implement risk reduction measures (i.e removal of >90% of lead from shooting sites noting that these measures are expensive).
- There was discussion about the Olympic standards presenting a fundamental blockage to reducing risks from lead ammunition.
- Knowledge gaps in the dossier include risk pathways for mammals (including domestic dogs) and poultry. There is also limited information within the dossier on distribution of lead shot over agricultural land, uptake by crops and associated impacts.
- The LAG agreed to submit a response to the public consultation, with a focus on the risk pathways noted above and welfare aspects.

**Action 8.1:** LAG to submit response on some of the issues raised.

- ### (c) AEWA and Convention on Migratory Species (CMS) Lead Task Force.
- Other than the terms of reference for the Task Force to be considered at the next CMS Standing Committee there was no progress to report. AEWA is representing CMS for some of the REACH processes.

9. Matters arising from LAG 24

- Nothing to resurrect.

10. The LAG website update

- All agreed that there was value in continuing the website. The [Resources](#) page in particular was important for flagging new evidence since the original LAG report as it became available.
- Key updates will occur twice a year with urgent updates uploaded on an *ad hoc* basis when necessary.

11. Any other business

- JS sends Emily Strong his regards.
- It was agreed informally to sound out several names associated with shooting stakeholder knowledge, who might liaise with LAG.

12. Next meeting

- All agreed that an annual LAG meeting is sufficient.