

## Minutes of the 26<sup>th</sup> Lead Ammunition Group Meeting

14<sup>th</sup> March 2022

14:30pm – 16:30pm

Teleconference

### **Attendees:**

Mr John Swift (JS) (Chair)  
Mr David Stroud (DS)  
Prof Rhys Green (RG) (University of Cambridge)  
Dr Huw Golledge (HG) (UFAW)  
Dr Julia Newth (JN) (WWT)  
Prof Len Levy (LL) (University of Cranfield)  
Prof Debbie Pain (DP) (University of Cambridge)  
Dr Ruth Cromie (RC)  
Mr Simon Roch (SR)

### **In attendance:**

Ms Lucy Jupe (LJ) (WWT) (Secretariat)

#### **1. Welcome, apologies and confirmation of agenda**

- Apologies received from Prof Ian Newton and Mr Jeff Knott.
- The draft agenda was confirmed.

#### **2. Chairman's introduction**

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

#### **3. Review governmental and agency processes**

- The group reviewed government processes underway.

##### **a) DEFRA (including MP Rebecca Pow's initiative)**

- No updates to report.

##### **b) UK REACH (HSE and Environment Agency)**

- JS noted that the UK REACH timeline is still somewhat unclear. RISEP is yet to hear any updates regarding the release date of the dossier. A restriction dossier is due to be published by the end of April. JS's understanding is that there will be no delay in starting the public consultation once the dossier is released.

- The group discussed the role of RISEP in the production and subsequent scrutiny of the dossier. LL clarified that HSE and EAP write the dossier, RISEP doesn't directly contribute. RISEP members among the group confirmed that they were not approached to help write the dossier. RISEP members volunteer to be part of the panel, the HSE does not nominate members.
- RG notes the two-phased involvement of RISEP in the UK REACH process:
  1. Invited to review dossier
  2. Challenge process: RISEP members asked to test/challenge the scientific evidence.
- DP notes that the HSE wants the UK REACH process to be the same as EU REACH, including a purely scientific/evidence based approach when producing the dossier (i.e. no politics involved).
- LL highlighted the importance of the socio-economic analysis aspect of the dossier. Engagement of environmental economists was seen as additionally important given the nature of some of the harms. RC also highlighted the need for a strong animal welfare response to the dossier. JS noted that DEFRA has animal welfare responsibility and welfare standards for farming. Could be worth highlighting. JS also notes the need for evidence to counter the anecdotal argument that steel shot has a higher propensity to wound animals. Good idea to highlight the pain and suffering caused to wildlife by lead poisoning.
- RG suggests bringing in other animal welfare experts, and looking at how DEFRA handled welfare aspects of badger cull. HG suggests that former UFAW chair, Alick Simmons, could provide welfare expertise.

**Action point 25.1** Recruit socio-economic expert(s) to LAG.

**Action point 25.2** HG to help with welfare LAG response to dossier, and to make introduction to Alick Simmons.

- i. Role for LAG
  - JS notes that there is still ambiguity regarding LAG's role in the HSE process, but LAG will begin to plan a response to the dossier once it is released.

**Action 25.3** LJ and JN to schedule LAG meeting once the dossier is released.

#### c) Food Standards Agency

- JS notes that the FSA has no set standards for lead shot game meat. Their reasoning is that there is very high variability of lead levels in lead shot game from particulates, and that it should instead be covered by consumer advice.
- The groups' consensus is that this explanation is quite perplexing and requires further clarification from FSA.
- RG speculated that the probable reason for no historic lead levels for game meat is that the EU had no stated lead thresholds in its directive. LAG members note that the adoption of a UK lead safety level for game meat should now seriously be considered post-Brexit.

- Analysis of lead levels in small game undertaken by DP & RG indicates that lead concentration is variable among individuals in a sample, but the sample means do not vary (i.e. lead concentrations are homogenous across populations and species on the whole). Lead concentrations in small game are also consistent across different EU countries, except for Denmark, which has much lower levels compared to the rest of the EU. This research has already been submitted for peer-review.
- DP notes that CODEX will be including an advisory on safe lead levels in game despite maximum lead levels for game not being set.
- JS notes that the FSA has a new chair, and suggests it may be worth ensuring they are up to date with evidence on lead levels in game meat.
- DS offers to the draft letter, which will then be circulate among LAG members for input, before being signed and send on behalf of LAG by JS.

**Action point 25.4** DS to draft letter to new FSA chair, ensuring they are aware of latest data on lead levels in meat. All to comment and JS to send.

d) Scottish Deer Working Group

- No updates to report.

e) English Nature, NatureScot, Natural Resources Wales and Northern Ireland Environment Agency

- The group discusses whether there is any scope for collaboration with these organisations during this phase of the UK REACH process.
- DS has held correspondence with Minister Rebecca Pow (Parliamentary Under-Secretary, Department for Environment, Food and Rural Affairs), who acknowledged the problem with compliance to current lead ammunition restrictions in England. Wales, Scotland and Northern Ireland have also admitted to compliance problems.
- The group acknowledges that these organisations do not have the resources or remit to enforce compliance with the current regulations.
- RC notes that Northern Ireland is covered by EU regulations. Ireland is currently attempting to adopt an alternative definition of wetlands to the Ramsar definition adopted by REACH, to restrict the scope/impact of the EU ban on the use of lead shot over wetlands. They are currently looking to exclude peatland from their definition. There is concern that Northern Ireland may employ a similar tactic.

#### 4. Review non-governmental processes

a) Progress and monitoring the Shooting Organisation Statement to replace lead shot within 5 years (including 'ShotSwitch' project).

- JS notes that it is encouraging to see all organisations making positive statements on the transition from lead shot.
- RG provides a ShotSwitch project update: 2<sup>nd</sup> report published on 24/02/22 (anniversary of the date that shooting organisations committed to voluntary ban in 2020). In the 1<sup>st</sup> report, 180 pheasants were sampled, of which 179 were found to have been shot with lead. Results from the 2<sup>nd</sup>

report are similar; 214/215 pheasants sampled were found to have been shot by lead. All birds were purchased from retail outlets. Indicates that there is no compliance with the voluntary ban. GWCT, in partnership with Savilles, conducted a survey of 2500 readers, which revealed a higher level of 'claimed' compliance with the voluntary ban; 34% of respondents claimed to have transitioned from lead shot to alternative ammunition types. BASC refutes the results of the ShotSwitch project, claiming the sample is too small and the results are not reliable. BASC and GWCT are invited every year to be involved in project, but have so far declined on both occasions.

- DP notes that a previously conducted analysis of compliance levels across Europe show that the only effective measure is a full ban on the sale of lead shot.
- RC notes that there has been a recent uptick in positive promotion of the transition by BASC and GWCT (e.g. producing resources for shooters on transitioning). GWCT has created a 'lead ammunition hub'. JN will provide links to BASC and GWCT resources for transitioning from lead ammunition to sustainable alternatives on the LAG website

**Action point 25.5** JN to upload links to BASC and GWCT resources for shooters looking to transition from lead shot to alternative ammunition on the LAG website.

- SR notes that there has been a perceived marked improvement in attitudes towards non-lead ammunition use in the deer stalking world.

#### b) Processors and retailers including National Game Dealers Association announcement.

- DS notes that most supermarkets are promising action on lead in game meat. Last October, DS wrote individually to each major UK supermarket enquiring about their progress on this issue, but received no responses. Plans to elevate up to chief executive level.

**Action point 25.6** DS to write to Chief Executives of the major UK supermarkets to press them on their commitments to lead-free game meat.

- RG notes that big venison supplier 'Highland Game' is giving indications that they are going to switch to non-lead shot/farmed venison, but there have not been any announcements so far. They are the main supplier of venison burgers for Tesco. DS plans to follow up with them.
- DP notes that 'Highland Game' provided an official statement with their planned commitment for a recent publication. DP has a contact at the company who is very responsive, and will pass their details on to DS. DP will forward their stated commitment to for upload to the 'Go-Compare' website.

**Action point 25.7** DP to pass on contact at Highland Game to DS, who will follow up with the company regarding their commitment to supplying lead-free venison

**Action point 25.8** DP to send JLN/LJ Highland Game's pledge to supply lead-free venison for upload to the 'Go-Compare' website.

c) "Go-Compare" project.

- No updates to report.

d) UK Woodland Assurance Standard (UKWAS).

- UKWAS is an independent verification standard for certifying sustainable woodland. They review the standard every 5 years (this year is the latest round), and there will be a public consultation on that review. It contains strong language on banning lead ammunition in UKWAS certified woodlands, which suggests it will likely recommend a lead ammunition ban. If confirmed, this can be uploaded to the "Go-Compare" website. JN will update the group on the outcome of the consultation.

**Action point 25.9** JN to circulate the outputs of the UKWAS independent verification standard consultation among LAG.

e) Other initiatives being undertaken.

- No updates to report

## 5. Review relevant international and UK processes

a) European Commission, ECHA and REACH

- Update on ECHA process: ECHA to release opinions in June, consultation to last 2 months.
- JS suggests that LAG writes a response.

**Action point 25.10** LAG to submit response to upcoming ECHA consultation.

i. Wetland restriction: an update

- No updates to report.

ii. Wider restriction: role of LAG

- No updates to report.

b) Convention on Migratory Species Lead Task Group and AEWA

## 6. Matters arising from LAG 25 minutes

- None.

## 7. Website update (including new scientific and other studies)

- A large number of publications on issues around lead ammunition have been published since the last LAG website update including these – which will be added to the Resources section.

**Action point 25.11** All members to please notify LJ of any other relevant papers for uploading to the LAG website. LJ to upload them.

## 8. Next meeting

- The group will await the publication of the HSE dossier before scheduling the next meeting.