

27<sup>th</sup> LAG Meeting

11th July 2022

## Minutes of the 27<sup>th</sup> Lead Ammunition Group Meeting

11<sup>th</sup> July 2022

14:30pm – 16:00pm

Teleconference

### **Attendees:**

Mr John Swift (JS) (Chair)  
Mr David Stroud (DS)  
Dr Huw Golledge (HG) (UFAW)  
Dr Julia Newth (JN) (WWT)  
Prof Len Levy (LL) (University of Cranfield)  
Mr Alick Simmons (AS)  
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 Debbie Pain and Professor Rhys Green.
- The draft agenda was confirmed.

#### **2. Discussion of the UK REACH restriction proposal public consultation**

- Consensus among the group is that the HSE Restriction Dossier for Lead Ammunition is thorough and evidence based.
- LL: pleased that science submitted by the LAG PERA subgroup was accepted by the HSE.
- No members have any major concerns with any of the science presented, but agree that there are evidence gaps which need to be addressed.
- RC notes that there is little on animal welfare impacts of lead ammunition (similar to the ECHA dossier), and believes this should be raised during the public consultation.
- HG: with the introduction of the Animal Welfare (Sentience) Act (2022), politicians should have animal welfare in mind during all future legislative processes. Agreement on impacts could be garnered among a group of experts on the subject.
- AS: suggests, as for other issues, using scientific proxies for pain to build a scientific consensus could be valuable. This could be in the form of primary research which LAG could support, or on our current knowledge of sub-acute/sub-lethal effects of lead poisoning in farm animals and people (i.e. their experiences provide us with enough evidence to extrapolate the effects for wild animals).

- AS: suffering can also be inferred from an animal's inability to express its 'behavioural needs' due to compromised fitness during the time period between lead poisoning and death (e.g. inability to hunt effectively) or recovery.
- AS notes that there are different societal and legal 'tolerances' for suffering endured by wild and captive animals, but their capacity to suffer is exactly the same.
- LL: noted that if you wanted to research the effects of feeding animals lead in a laboratory study, you would be denied a license because we already know its effects and it would cause unnecessary harm.
- RC: there is also no mention of welfare (and other) impacts on poultry. Lack of consideration of welfare means that harms to released gamebirds are not considered in the latter parts of the dossier as they don't have conservation value. There are no data given on the number of gamebirds compromised/killed by lead poisoning, but they should still be considered.
- JN notes the upcoming publication of a book written by AS on animal welfare, and asks if AS should submit a response to the consultation individually which references evidence presented in the book.
- LL notes the importance of the avoidance of 'unnecessary harm', and JS agrees that the LAG response should highlight the 'unquantifiable benefit' of removing this source of suffering from the environment.
- **ACTION 27.1:** HG will contact the RSPCA about potentially submitting a response to the public consultation.
- **ACTION 27.2:** RC to collate sections of the HSE dossier which reference animal welfare to help inform LAG response.
- **ACTION 27.3:** HG and AS to submit individual responses to the public consultation.
- Question raised about the lead ammunition buy-back scheme proposed in the dossier and suggested that more evidence/research was needed to support its feasibility. JS and LL are not aware of any research on this topic to date or similar schemes that have been implemented in the past.
- JS suggests contacting an environmental lawyer to ask their opinion on how a buy-back scheme might operate and whether there is a precedent for such a programme. Moreover the Danish experience might be valuable and enquiries would be made.
- JS: it could be useful to identify examples of industries that have had to adapt after the introduction of government restrictions.
- DS: is there any data available for how much shot the average shooter uses per year? JS: there will be some unreliable data, but the amount of shot a shooter will use is highly variable. Target shooters use substantially more, and many shooters will buy seasonally etc. making it hard to estimate.
- JS informs the group that LAG has been invited to observe the Lead in Ammunition Restriction Challenge panel on the 20th July as an Accredited Stakeholder Organisation. The group decides that JS will represent LAG at the meeting.
- **ACTION 27.4:** JS to enquire about discrepancy in BASC data for lead deposition in the environment.
- **ACTION 27.5:** JS to attend HSE the Lead in Ammunition Restriction Challenge panel on the 20th July as the representative for LAG.
- 

### 3. Quick review of other possible processes if anything to say

- a. Food Standards Agency
  - Nothing to report.
- b. Scottish Deer Working Group
  - Nothing to report.

- c. English Nature, NatureScot, Natural Resources Wales and Northern Ireland Environment Agency
    - Nothing to report.
  - d. Lead ammunition APPG
    - JN: in collaboration with Wildlife Countryside Link, WWT has set up an All Party Parliamentary Group (APPG) on Lead Ammunition to promote awareness and support for a ban on lead ammunition within parliament.
    - The APPG held its inaugural meeting on the 18<sup>th</sup> of May, which received coverage in the Guardian. The next meeting is scheduled for September.
  - e. Progress and monitoring the Shooting Organisation statement to replace lead shot within 5 years incl “Shot-switch” Project
    - Nothing to report since last meeting.
  - f. Processors and retailers incl National Game Dealers Association announcement
    - Nothing to report.
  - g. “Go-compare” Project
    - Nothing to report.
  - h. UK Woodland Assurance Standard (UKWAS)
    - RC: There is a possibility of derogations for lead bullets used for grey squirrel control in limited circumstances.
  - i. Other initiatives being undertaken
    - Nothing to report.
4. Review relevant international and UK processes
- a. European Commission, ECHA and REACH
    - RC: The EU REACH wider ban on lead ammunition and fishing weights 60-day socioeconomic consultation period is currently open. RC encourages members to submit any relevant information.
  - b. Convention on Migratory Species Lead Task Group and AEWA
    - RC: there will soon be a call for participants for the Intergovernmental Lead Task Force with the expectation of the group being set up before the next CMS COP.
    - RC: the next AEWA Meeting of Parties is later this year, and there are plans for a side-event on lead ammunition to highlight both implementation of the EU wetlands ban and the wider restriction.
- 5. Website update (including new scientific and other studies)**
- JN: the website and publication list are up to date.

**6. Any other business**

- HG draws the group's attention to a recent publication on waterfowl crippling rates before and after the lead ammunition ban in Illinois, USA:  
*Ellis, M.B. and Miller, C.A. (2022), The effect of a ban on the use of lead ammunition for waterfowl hunting on duck and goose crippling rates in Illinois. Wildlife Biology, 2022: e01001.*
- DS notes two targets of the Post-2020 Biodiversity Framework that are highly relevant to the lead ammunition campaign:
  - Target 5) Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human use.
  - Target 7) Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste health.
- **ACTION 27.7:** JS asks members of the group to forward any suggestions for new LAG members to JN.

## 7. Next meeting

- Date TBC.