

UK REACH: Public Consultation on Lead in Ammunition
Response from Lead Ammunition All-Party Parliamentary Group Co-Chair

8 December 2023

To HSE,

As Co-Chair of the Lead Ammunition All-Party Parliamentary Group (APPG), I am writing to express support for the consultation proposal to restrict the sale and use of lead shot in live quarry shooting.

The APPG was formed in 2022, with the intention of bringing parliamentarians together to understand better the impacts of lead ammunition use. Over the past eighteen months, we have heard from academics, retailers, conservationists and shooting businesses, who have set out how a lead shot restriction effectively would remove acute risks both to ecological and human health, to the overall benefit of society and the economy.

Two testimonies presented to the APPG are of particular note about the socio-economic impact. Dr Niels Kanstrup of Aarhus University, an academic, former board member for the Federation of Associations for Hunting and Conservation of the European Union and a keen shooter, spoke to the APPG about the 1996 Danish ban on lead shot. He confirmed that the non-toxic alternatives were effective and that the lead shot ban did not lead to a decline in the number of shooters and that shooting is now more popular than ever in Denmark.

Amy Willcock from the Warter Priory shooting estate in Yorkshire set out an English precedent for transitioning away from lead, sharing with us the estate's experience of going lead free from the 2021/22 shooting season. She said that the change had been motivated by the estate's desire to supply healthy and sustainable lead-free game meat for people. She told parliamentarians that the switch has not reduced demand for shooting on the estate, with shoots booked to capacity. She said that customers had experienced no trouble in accessing and using non-lead ammunition.

Also, we have heard extensive evidence on the unnecessary, painful deaths pollution from lead ammunition causes among wild bird populations and on the health risk lead-contaminated meat poses to consumers. With the [Shot-Switch](#) project showing that the voluntary ban has not had the desired effect, a legal restriction is required to adequately control these environmental and human health risks. It is clear from the evidence presented to the APPG that this restriction could be implemented without undue impact on the shooting community.

The limited disruption caused by restricting the sale and use of lead shot for live quarry shooting, compared to the consequent environmental and human health improvements that will emanate from it, will result in net, social and economic gains. The public whom parliamentarians represent want to see nature flourishing, avoid unnecessary suffering for animals and to be reassured that the food they feed their families is poison-free. Only a restriction would deliver this.

It is important that such a restriction is delivered within a shorter time period than the five years consultation proposal. The 18-month transition initially proposed would be more appropriate. Five years will only prolong environmental pollution and health risks from a highly toxic substance for which there is no safe threshold. As the experience of the Warter Priory shooting estate demonstrates, a switch to non-lead ammunition effectively can be made now with minimal disruption. The galvanizing impact of an imminent legal restriction, coming after four years during which a restriction has looked probable, would help to assure supplies of non-lead ammunition at the required level.

Additionally, that APPG is concerned that lead bullets for live quarry shooting will not be restricted under the current proposal. Without a restriction, scavengers, predators and people will remain at significant risk from lead. A ban on lead bullets for hunting would improve the health of some of our most iconic wildlife species, bringing an array of social and economic benefits. It would bring certainty to a lead-free game supply chain which will benefit both game suppliers and consumers, providing nutritious, healthy food, uncontaminated by a highly toxic heavy metal already banned in pipes and petrol.

Thank you for your consideration of the above, I should be grateful if this support for the restriction of lead shot in live quarry shooting, with an 18-month transition period, and for a restriction on lead bullets, could be recorded as a consultation response.

Yours sincerely,

Lord Browne of Ladyton
Co-Chair of the Lead Ammunition All-Party Parliamentary Group

Minutes of Lead Ammunition All-Party Parliamentary Group meetings, including the evidence sessions referenced above, can be found here: <https://leadammunitionappg.org/resources/>

This letter is also supported by the following parliamentarians:

Baroness Bennett of Manor Castle

Lord Goldsmith of Richmond Park

Professor Lord Trees of the Ross, Fellow of the Royal College of Veterinary Surgeons