

Gillian Martin MSP
Acting Cabinet Secretary for Net Zero and Energy in the Scottish Government
Sent by email

6th January 2025

Re: Lead ammunition ban

Dear Acting Cabinet Secretary,

We are writing to highlight an opportunity to tackle pollution, boost nature recovery and protect public health. We understand that you have recently received the final recommendations from the UK REACH process established in 2021 to consider a possible ban on the use of lead ammunition in Scotland, Wales and England.

As you review these recommendations, alongside your counterparts in the Welsh and UK Governments, we ask that you consider closely the impact upon nature of lead ammunition, both shot and bullets. Up to [100,000 waterbirds](#) are estimated to die painful, lingering deaths every year from accidentally ingesting lead shotgun pellets, due to their resemblance to seeds and grit. This scale of mortality affects the future of several species. The State of Nature [report](#) 2023 highlights that the species abundance of wintering waterbirds has fallen by a third over recent decades, with lead poisoning from discarded shot being one of the factors involved. Birds of prey also suffer from lead poisoning. As apex predators, their populations are particularly [vulnerable](#) to additional deaths caused by lead embedded in the prey they consume, including carrion from mammals shot with lead bullets (which shatter on impact, spreading across the carcass). This affects the viability of raptor species that are still hovering perilously close to extinction.

An end to these threats to species, through a swift and comprehensive ban on the use of lead ammunition for outdoor shooting, would boost your efforts to recover nature in Scotland. Such a ban would help protect people as well as wildlife by removing a contaminant in the human food chain that has been shown to affect maternal health and the IQ of children, as well as to heighten the risk of cardiovascular and kidney disease for consumers of game. A comprehensive ban would deliver an effective, lasting solution to these risks while avoiding the compliance issues created by only [partial restrictions](#).

It is for these reasons we urge you to accept the recently submitted UK REACH recommendation to ban the use of lead shot and large calibre lead bullets in hunting. We also urge you to go further. We are concerned that overall the UK REACH assessment of lead ammunition risks has been delayed and distorted by a disproportionate focus on the potential burdens a ban would impose on the operation of shooting and ammunition businesses. Due to the [\(failed\)](#) four year attempt at a voluntary transition from lead shot, the rapid growth in the manufacture and efficacy of alternatives to lead ammunition and the above-average wealth of the customer base for shooting businesses, these burdens are likely to be limited.

Regardless of the extent of the economic burden of a ban on a select group of businesses, it is dwarfed by the burden that ongoing pollution from lead ammunition imposes on the whole of society. Consumers of lead-shot game are ingesting a poison, long since banned from pipes and paint in buildings and petrol in cars. Pet owners run the [risk](#) of beloved dogs and cats consuming extremely high levels of lead in contaminated pet foods containing game meat. Veterinarians and wildlife rescues bear the costs of looking after poisoned wild animals. We all bear the cost of the wildlife lost to this unnecessary contaminant.

The previous UK Government failed to act on the recommendations of a substantive [report](#) to Defra and the Food Standards Agency in 2015 to ban lead shot and bullets. Now the UK REACH process has failed to fully consider these impacts, and the role pollution from lead ammunition plays in the environmental decline which threatens society-wide impoverishment. This failure, and a misplaced focus on limited impacts on niche businesses, has led to UK REACH recommending an excessive five-year transition period for the proposed lead shot ban and failing to recommend a ban on small calibre lead bullets.

In order to swiftly and effectively remove significant threats to nature recovery, we ask you to introduce an 18 month transition period for the recommended lead shot ban, as UK REACH originally consulted on, rather than the 2029 or later date now proposed. This should be achieved through regulations introduced in the next few months so a ban can be in place for autumn 2026 (the start of the shooting season). We also ask you to accompany the lead shot ban with a ban on small calibre lead bullets, to protect not only human health but the threatened raptor species at risk from eating carrion contaminated by lead bullet use. This would also align with proposed lead ammunition restrictions in the EU. These interventions to protect threatened wildlife would significantly boost nature recovery in Scotland, as well as protecting public health. Further information on the case for this package of actions, and further interventions, can be found in the enclosed briefing.

At this opening of the year, you and colleagues in the Welsh and UK Governments have the opportunity to turn the page on years of environmentally damaging delay, to address the last remaining significant source of lead pollution in the UK. We hope this opportunity can be seized, to the benefit of threatened species, wider nature recovery efforts and society as a whole.

Thank you for your consideration of the above.

Yours sincerely

Deborah Long, Chief Officer at Scottish Environment LINK
Anne McCall, Director RSPB Scotland
Sarah Fowler, CEO, WWT
Richard Benwell, CEO, Wildlife & Countryside Link
Mark Avery, Ruth Tingay & Chris Packham, Co-Directors, Wild Justice
Dr Anna Watson, Director of Policy & Advocacy, CHEM Trust

Replies can be sent to matt@wcl.org.uk

Letters have also been sent to the Cabinet Secretary for Climate Change and Rural Affairs in the Welsh Government and the Secretary of State for the Environment, Food & Rural Affairs in the UK Government.