

# P-06-1184: Immediately ban the use of toxic lead in all ammunition in Wales... lead is killing our wildlife!

Y Pwyllgor Deisebau | 20 Medi 2021  
Petitions Committee | 20 September 2021

Reference: SR21/0634-3

Petition Number: P-06-1184

**Petition title:** Immediately ban the use of toxic lead in all ammunition in Wales...lead is killing our wildlife!

**Text of petition:** Lead is a toxic metal and a very strong poison yet more than 6,000 tonnes are fired at game birds each year in the UK. If any citizen deliberately dumped thousands of tonnes of poison into the Welsh countryside they would rightly find themselves facing prosecution in a Court of Law!

Birds often mistake tiny shot pellets for grit or seeds, and ingest them, and so suffer painful deaths. Dying birds are usually taken quickly by predators - making their deaths unseen and invisible to the public.

Most ammunition -bullets, shotgun pellets and airgun pellets have traditionally been made with lead.

Lead affects most body systems in animals, including the nervous and circulatory systems, and low levels of exposure can affect a birds immune system and behaviour. In some circumstances, swallowing even a single lead pellet can kill a bird.

A consortium of shooting organisations now support a switch to ammunition that is free of lead by everyone taking live quarry with shotguns in the next five years.



We welcome this recognition of the damage lead is doing to our environment but believe the ecological emergency demands that we impose an immediate ban on lead ammunition of all kinds. We also believe that the ban must include clay shoots and not just "live quarry" as the wasted lead shot still ends up in the environment.

Barry Action is a small volunteer conservation group based in the South Wales coastal town of Barry.

## 1. Background

The UK, Welsh and Scottish governments have initiated work to further restrict the use of lead under the UK Registration, Evaluation, Authorisation & Restriction of Chemicals (UK REACH).

UK REACH is the UK's new chemical regulation system which aims to allow decisions to be made on the regulation of chemicals based on the best available scientific evidence, ensuring chemicals remain safely used and managed. It replaces the EU REACH system.

In March 2021, the UK Government requested the Environment Agency, together with the Health and Safety Executive (HSE), to start a two-year process to: review the evidence; launch a public consultation; and propose options for restrictions of lead.

The UK Environment Minister, Rebecca Pow, said:

Addressing the impacts of lead ammunition will mark a significant step forward in helping to protect wildlife, people, and the environment.

This is a welcome development for our new chemicals framework, and will help ensure a sustainable relationship between shooting and conservation.

There are currently some restrictions in Wales under *The Environmental Protection (Restriction on Use of Lead Shot) (Wales) Regulations 2002* on the use of lead shot for shooting with a shotgun.

The petition text refers to a campaign by shooting and rural organisations (launched February 2020) which calls for a voluntary ban on all single use plastics, (including cartridge wads and cases), as well as a voluntary ban on lead shot, all within 5 years.

Four major shotgun cartridge manufacturers responded to say an end to lead and plastics in ammunition would be 'impossible' within five years.

At an EU level, a regulation amending EU REACH was introduced on 25 January 2021 banning lead shot around wetlands. This will come into effect from 15 February 2023. The amendment bans a list of activities involving the use of lead shot in or within 100m of wetlands.

The British Association for Shooting and Conservation (BASC) has described the EU's restriction as 'utterly unenforceable' and a risk to the voluntary transition to sustainable ammunition taken forward by the shooting organisations described in the petition text.

The UKShooting website sets out lead shot bans that exist in other countries.

The Wildfowl and Wetlands Trust (WWT) reports that lead can be poisonous to animals and between 50,000 to 100,000 wildfowl die every year from ingesting lead from used pellets.

The Food Standards Agency has warned that consumption of lead is harmful to humans and that anyone who eats lead-shot game should be aware of the risks posed by consuming large amounts of lead, especially for children and pregnant women.

The National Game Dealers Association (England) committed (March 2020) to sourcing all feather and fur game as well as venison and wild boar from lead-free supply chains from July 2022.

Some supermarkets, such as Waitrose, have committed to no longer sell game meat contaminated with lead ammunition.

There are currently four main alternatives to lead shot:

- Steel;
- Bismuth;
- Tungsten Matrix; and
- 'Mixes' such as Bioammo.

The briefing '[Steel shot and the alternatives to lead](#)' provides further details.

## 2. Welsh Government action

[In answer to a written question](#) in March 2021 the then Minister for Environment, Energy and Rural Affairs, Lesley Griffiths, said:

The Welsh Government is concerned by the harm being done through the deposition of lead ammunition over both land and water, both to wild animals and to humans ingesting meat contaminated with lead shot. We are, therefore, working with the other GB administrations to initiate a restriction on the use of lead shot in the first work programme of the new UK Registration, Evaluation, Authorisation & restriction of Chemicals (REACH) regime, which replaces EU REACH.

The Climate Change Minister's letter relating to this petition (September 2021) reiterates this position and highlights the lead shot restriction process initiated through this year's [UK REACH work programme](#).

## 3. Welsh Parliament action

There hasn't been any significant Senedd action in this area.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.