

## Response to open letter from RSPB and WWT (April 4, 2022)

The UK Government, through UK REACH, is currently investigating the requirement for legal restrictions on the use of lead ammunition for live quarry shooting. A public consultation is expected to be announced at the end of this month.

While we do not wish to pre-empt that process, any recommendations may well follow the EU process and move towards a statutory ban on lead ammunition alongside derogations to cover circumstances in which a total ban is not yet feasible.

While that UK REACH process is underway, the signatory organisations to this letter remain wholly committed to a transition away from lead shot for live quarry shooting and are moving our community towards change.

Indeed, as your letter illustrates, we first called for a transition away from lead shotgun ammunition for live quarry shooting in February 2020.

Since the publication of a joint statement by many of our organisations, significant progress has been made towards a transition. This is not a straight-forward process. Lead has been used in shooting for hundreds of years, so wholesale change takes time.

In our opinion, a five-year transition was a reasonable, achievable timeline with completion due in 2025, only a year later than the date suggested in your letter for ending the use of lead shotgun ammunition. We are a little over two years into that voluntary transition.

However, there have been clear and obvious difficulties caused by the Covid-19 pandemic and Brexit. To ignore those obvious challenges does considerable dis-service to the people, companies and organisations trying to make this change. Indeed, failure to acknowledge such obstacles in your letter is a disappointing omission and risks entrenching views further.

Please be assured that research and development into alternatives to lead continue at pace; but there should be no under-estimation of the seriousness of issues affecting global supply chains. The availability of raw materials, components, tools and machinery continues to be affected in the aftermath of the pandemic, increased demand in the USA and also increased demand in Europe ahead of an imminent “wetlands ban” in February 2023.

Despite these difficulties, we remain wholly committed to our voluntary transition and will use our knowledge and practical experience of the sector to continue driving the change. Furthermore, our sector remains firmly committed to best practice and upholding existing laws in relation to the use of lead ammunition.

Our organisations do not support further regulatory constraint, nor do we judge it necessary. If, however, Government feels it necessary to bring forward further legal restrictions on the use of lead ammunition, we are committed to ensuring that any such proposals are robustly scrutinised, evidence-led and, most importantly, proportionate to any identified risk with appropriate transition periods to allow manufacturers the time to scale-up production of viable alternatives to lead.

The priority is to ensure sufficient supplies of non-lead ammunition and to ensure that risks to land, food and fauna are adequately controlled. The shooting community is calling for UK REACH to work with manufacturers and assemblers to plan a route-map for adequate supplies of sustainable ammunition. RSPB and WWT support for this would be welcome.

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