

Rebecca Pow MP
Parliamentary Under Secretary of State, Department for Environment, Food & Rural Affairs

By email

24 February 2021

Dear Minister Pow,

Re: New evidence on lead shot

Thank you for your comments at Environment Bill Committee Stage, recognising the importance of restricting the use of lead shot, and for asking your officials to look further into the most effective options for tackling the issue. It was very positive to hear this matter being taken seriously in the House. I am writing on the one-year anniversary of the commitment by many shooting and rural organisations to end the use of lead shot to present new evidence on the efficacy of this voluntary transition.

The environmental organisations Link represents are in full agreement with the shooting sector on the need for the use of lead shot for hunting live quarry to end. Lead shot poisons many bird species, including predators and scavengers, and does so in a range of habitats. Lead poisoning kills an estimated 75,000 waterbirds every year and there is evidence that it may affect the population size and trend of some waterbird species. Lead is known to affect all physiological systems in animals, causing a range of sub-lethal impacts and substantial suffering in avian taxa.

Lead shot also presents health risks to people who frequently eat wild-shot game. This is especially significant for vulnerable groups, especially children and pregnant women, a risk now recognised by the Food Standards Agency and NHS England.

Consumers, as well as predatory and scavenging birds, wildfowl and other terrestrial birds need the voluntary transition away from lead shot to work. Unfortunately, the evidence suggests that it is failing to do so. According to a new paper:

In the first shooting season after the commitment by shooting and rural organisations, the results of a study across Britain, has found that this had had no detectable effect on the shot types used, with 99% of the pheasants purchased having been killed with lead shot (Green et al. 2021).

The paper has been published today in Conservation Evidence and a copy is attached to this letter.

The failure of voluntary action to end the use of lead shot is not surprising. Voluntary, industry-led action is rarely an effective means of achieving environmental or health goals, even where intentions are good.¹ Indeed we have direct experience of former voluntary bans on the use of lead shot during the 1990s, the failure of which led to the introduction of wetlands-focused regulations.

¹ See for examples the 'New Plastics Economy Global Commitment', aiming to grow the use of re-usable packaging by industry by 2025, which recorded a 0.1% increase in re-usable packaging last year. Within the UK, a voluntary target to end the use of peat in the professional gardening sector by 2030 achieved a 1% reduction in usage last year. A linked voluntary target to end the use of peat in the amateur gardening sector by 2020 has already been completely missed.

The new evidence from Green et al. suggests that, with 20% of its timeframe already past, the 2025 voluntary target for an end to lead shot will - like other voluntary targets - also be missed. This prospect suggests that it is necessary to shore up the good intentions of the voluntary commitment with regulation.

Such action would bolster the Government's wider environmental agenda. In this CBD and COP year, the UK Government has rightly argued that meaningful action must be taken to halt the global decline of nature and to recover vulnerable species. Waterbirds are counted amongst the vulnerable, with 55% of the world's waterbird species in decline. This international species vulnerability is also reflected in UK waterbird populations. If the large-scale poisoning of waterbirds in the UK were allowed to continue, with no realistic end in sight due to the likely failure of voluntary transition, the UK Government would be in danger of falling well short of global leadership on this important aspect of nature recovery.

This shortfall is likely to become more apparent, as our neighbours in the European Union - with whom we share many migratory bird populations of species - have recently adopted a compulsory ban on lead shot possession and use in and around all wetlands. These restrictions extend well beyond those existing in the UK countries and include greater potential for enforcement. The EU is also in the process of developing a proposal for restricting the use of all lead ammunition both in wetlands and non-wetlands to protect human health from consuming lead in game meat as well as terrestrial wildlife. To be an international champion for nature's recovery, the UK must not become the place in Europe where migratory and other bird species are most likely to suffer unnecessary disease and death.

Regulation to end the use of lead shot across the UK would prevent this disparity and ensure that the UK remains at the forefront of bird protection.

Regulation could be speedily implemented by a Statutory Instrument or by an amendment to the Environment Bill. Alternatively, regulations could be included with other measures in a Wildlife and Animal Welfare Bill, brought forward in the Queen's Speech to set new post-Brexit standards for animal protection and to implement the Government's animal welfare commitments.

Such legislative action is likely to command broad support. Environmental and shooting sectors are united on the principle of ending lead shot usage, it is only the delivery mechanism that is in question. The recent study (Green et al. 2021) presents a compelling case for a change in that delivery mechanism.

Thank you for your consideration of this new evidence, demonstrating the likely failure of voluntary transition and the need for a regulatory approach to end lead shot usage for the benefit of the health of all.

Yours sincerely,



Dr Richard Benwell
CEO, Wildlife & Countryside Link