
By email

The Rt Hon Steve Reed OBE MP
Secretary of State for the Environment, Food
and Rural Affairs
DEFRA
Seacole Building
2 Marsham Street
London SW1P 4DF

Email: defra.helpline@defra.gsi.gov.uk;
thetreasurysolicitor@governmentlegal.gov.uk

EMAIL: [REDACTED]
[REDACTED]

TELEPHONE: 020 7650 1200

YOUR REF:

OUR REF: CDY/RGA/

DATED: 23 December 2024

Dear Secretary of State,

Re: HSE proposals to restrict use of lead ammunition in Great Britain

1. We write on behalf of Wild Justice following the publication of proposals to restrict the use of lead ammunition in Great Britain by the Health & Safety Executive ('HSE') on 13 December 2024 (see [here](#)).
2. The HSE (as the Agency for UK REACH) with support from the Environment Agency ('EA'), has assessed the risks to both human health and the environment from lead in ammunition. The Opinion on the Proposal for a Restriction describes the hazards associated with lead shot, the main exposure pathways relevant to the use of lead shot in live quarry shooting and outdoor target shooting, the risk characterisation to determine if lead shot poses a risk to the environment and/or human health that is not adequately controlled, the development of suggested risk management options to address those risks, and an assessment of the effectiveness and proportionality of those measures. It also contains a socioeconomic assessment that analyses the potential costs and benefits of the proposed restriction of lead ammunition.
3. The HSE concludes that:
 - for the environment there are risks that are not adequately controlled for lead shot (primary and secondary exposure), lead bullets (secondary exposure) and airgun ammunition (primary and secondary exposure); and
 - amongst consumers of high volumes of game meat that has been shot with lead ammunition (shot or bullets), there is a risk to the health of vulnerable people

(young children and women of child-bearing age) that is not adequately controlled.

4. The HSE is therefore proposing measures to restrict the use and placing on the market of some types of lead shot. The intended outcomes of the suggested restriction text are as follows:

Lead Shot

- The **use of lead shot for live quarry shooting** would be prohibited.
- The **use of lead shot for target shooting** would be prohibited. **However**, a derogation will allow a for a number of competitive athletes (as defined below) to continue shooting lead shot for the purposes of international competition and training.
- The **placing on the market of lead shot for target shooting** (in return for payment or free of charge) would be prohibited. **However**, a derogation will allow for supply to competitive athletes.

Lead Bullets

- The **use of large calibre lead bullets (≥ 6.17 mm) for live quarry shooting** would be prohibited.
- The **use of small calibre lead bullets (< 6.17 mm) for live quarry shooting** would **not** be prohibited.
- The **placing on the market of large calibre (≥ 6.17 mm) lead bullets for live quarry shooting** (in return for payment or free of charge) would be prohibited.
 - A label will be required for all large calibre (≥ 6.17 mm) lead bullets for target shooting indicating that they “must not be used for live quarry shooting”.
- The **placing on the market of small calibre (< 6.17 mm) lead bullets for live quarry shooting** (in return for payment or free of charge) would **not** be prohibited.
- The **use of lead bullets (all calibres) for outdoor target shooting** would be prohibited. **However**, a derogation would allow for this use to continue at sites that have controls in place to reduce the identified risks to the environment, and documentation indicating why these controls are appropriate. In practice, these controls, which include de-leading of ranges, are broadly expected to be in place at the majority of existing outdoor shooting ranges.
 - This means that **the majority of outdoor shooting ranges could continue to operate** and allow the use of lead bullets.
- The **placing on the market of lead bullets (all calibres) for outdoor target shooting** (in return for payment or free of charge) would not be prohibited.

Air weapons

- The **use of lead ammunition in air weapons** would **not** be prohibited.
- The **placing on the market of lead ammunition for air weapons** (in return for payment or free of charge) would **not** be prohibited.

5. Article 73 UK REACH provides:

“If the conditions laid down in Article 68 are fulfilled [i.e. “When there is an unacceptable risk to human health or the environment, arising from the manufacture, use or placing on the market of substances”], the Secretary of State must propose a draft amendment to Annex XVII [i.e. the schedule of

restricted substances], within three months of receipt of the [HSE]'s opinions [i.e. the HSE recommendations].”

6. If the Secretary of State concludes, based on HSE’s findings, that the criteria for restricting lead are met, then in accordance with Article 73 restrictions must be introduced before 13 March 2025.
7. Our client asks that you notify them of your conclusions within that three month window. We therefore look forward to your response before **13 March 2025**.

Yours faithfully,



Leigh Day