

## General comments on Annex 15 restriction dossier on lead in ammunition

CHEM Trust is an environmental NGO that aims to protect humans and wildlife from harmful chemicals. <https://chemtrust.org>

We welcome the restriction in the UK on the use of lead in ammunition from environmental and health perspectives. The same reason for restricting the use of lead ammunition in hunting and sports shooting applies in the UK as it does in the EU: lead ammunition pollutes the environment and presents a serious and unacceptable, yet avoidable, risk to wildlife, domestic animals and people. These risks are not adequately controlled at the moment and further regulatory action is needed. The EU believes its restriction on lead in outdoor shooting, hunting and fishing 'could reduce lead emissions by approximately 630 000 tonnes over 20 years following its introduction. This is a reduction of 72 % compared to a situation without the proposed restriction'.<sup>1</sup> A strong argument for the potential efficacy of a similar restriction in the UK.

### **Human health:**

Our 2017 report '*No Brainer: The impact of chemicals on children's brain development: a cause for concern and a need for action*' set out policy recommendations to prevent children being exposed to chemicals that harm their brain development. Our report highlighted the following:

- The harm to children from exposure to lead: 'lead has been well known to cause intellectual disabilities for many years, with no known safe blood concentration. Even blood lead concentrations as low as 5 µg/dl, once thought to be a "safe level", may result in decreased intelligence in children, behavioural difficulties and learning problems. Lead exposure is believed to be responsible for the loss of more than 22 million IQ points in young children in the US. New evidence also shows associations between blood lead levels and ADHD, inattention and hyperactivity'.<sup>2</sup>
- The efficacy of introducing policy measures such as bans and restrictions and strong mitigation strategies to reduce chemical exposure. Removing lead from petrol: 'has demonstrated causality and the positive impact of chemical exposure reduction. In the US, children born after 2000 were estimated to have IQ scores 2.2-4.7 points higher than children born in the 1970s before the lead in petrol phase-out strategy was implemented'.<sup>3</sup>

We also note the human health impacts highlighted in the 2017 European Chemical Agency (ECHA) Annex XV restriction report. 'The impacts of lead on human health are manifold. Lead may affect almost every organ and system in the human body'.<sup>4</sup>

### **Environmental concerns:**

Whilst evidence of human health impacts are extensive, so is evidence that demonstrates serious adverse impacts on wildlife. Only a very small proportion of lead gunshot fired will hit its target. As the (ECHA) evidence finds 'the remainder of this 'spent' lead gunshot spreads into the environment where it can be ingested by birds that mistake it for food or for small stones that they eat to help them grind food in their gizzards. Ingestion of spent lead gunshot is well known in many species of

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<sup>1</sup> <https://echa.europa.eu/hot-topics/lead-in-shot-bullets-and-fishing-weights>

<sup>2</sup> <https://www.chemtrust.org/wp-content/uploads/chemtrust-nobrainer-mar17.pdf>, p. 11

<sup>3</sup> <https://www.chemtrust.org/wp-content/uploads/chemtrust-nobrainer-mar17.pdf>, p. 10

<sup>4</sup> <https://echa.europa.eu/documents/10162/33eb3963-00bc-090b-a741-d3dface6709>, p. 222

waterbirds, for example, ducks, geese and swans'.<sup>5</sup> The impact of this can be severe. 'Lead poisoning, through ingestion of spent lead gunshot (whether primary or secondary), is a well-established cause of morbidity and mortality in water birds'.<sup>6</sup> Secondary poisoning of scavenging and predatory animals inadvertently eating fragments of lead in the tissues of their food is also an issue highlighted by the ECHA. This happens in a variety of ways, including where predatory animals eat other animals wounded by lead ammunition or those shot for pest control.<sup>7</sup>

The wildlife damage caused by lead shot is considerable. In the EU, ECHA estimated at least 135 million birds are currently at risk of lead poisoning each year from ingesting lead gunshot and 14 million birds are at risk from eating animals shot with lead ammunition'.<sup>8</sup>

Evidence shows restrictions on lead in the past in Britain have had a positive effect on wildlife health. ECHA cites the ban on lead fishing weights in 1987 in its 2017 Annex XV restriction report having the following effects: 'lead-induced mortality declined substantially (Newth et al. 2012) and previously declining mute swan populations increased; this increase was quite dramatic on the most heavily affected river systems (Perrins et al. 2003)'.<sup>9</sup>

#### **Overall thoughts on risk management**

- We agree that the sale and use of lead ammunition (both shot and bullets) should be fully restricted in Great Britain.
- A complete ban on the sale and use of lead ammunition would be practical (as effective alternatives are mostly ready and available on the GB market) and enforceable (as there would be no legal use)
- A ban on possession (as well as sale and use) of lead ammunition is a practical and sensible approach and should also be considered to ensure good compliance with the restriction recommendations. As compliance with current regulations in England remains poor (Cromie et al. 2015).
- We support a quick transition away from lead ammunition – a period of **18 months** rather than 5 years which is too long and will cause more unnecessary harm and suffering.

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<sup>5</sup> <https://echa.europa.eu/hot-topics/lead-in-shot-bullets-and-fishing-weights>

<sup>6</sup> <https://echa.europa.eu/documents/10162/33eb3963-00bc-090b-a741-d3dface6709>, p. 127

<sup>7</sup> <https://echa.europa.eu/hot-topics/lead-in-shot-bullets-and-fishing-weights>

<sup>8</sup> <https://echa.europa.eu/hot-topics/lead-in-shot-bullets-and-fishing-weights>

<sup>9</sup> <https://echa.europa.eu/documents/10162/33eb3963-00bc-090b-a741-d3dface6709>, p. 128