

SUPPORT A NON-TOXIC FUTURE

Support the restriction on lead gunshot in EU wetlands

There are no safe levels of exposures to lead.
It is time to choose health not poison.



The European Parliament now has the opportunity to bring us one step closer to removing toxic lead exposures from the lives of people, wildlife and the wider environment by supporting the proposed REACH restriction on use of lead gunshot in wetlands. Some hunting and ammunition interests may not want change but this proposal has been rigorously scrutinised by the European Chemicals Agency's (ECHA) Risk Assessment Committee (RAC) and Committee for Socio-economic Analysis (SEAC), and is supported by:

1. EU Member States at the REACH Committee – an overwhelming 90%
2. EP ENVI Committee with two objections defeated and ECHA and the Commission addressing every point raised therein
3. The European Scientists - medics, veterinarians and scientists who urge MEP support
4. Progressive hunters, including the European Hunting Experts
5. International Lead Association hoping the 'the European Parliament endorses the proposal'.

We urge you to choose health over poison and ensure no further delay or objection to this essential restriction proposal. More information can be found on the [Lead Ammunition Hub](#) with an experts' message to MEPs [here](#).

This restriction is good news for:

- The **health of people** consuming game shot in and around wetlands, including hunters, their families (particularly pregnant women and children), as well as other wild-game consumers.
- **Soils** which are contaminated by the 1000s of accumulating tonnes of lead shot deposited in wetlands annually.
- **Biodiversity**, in particular waterbirds (such as swans), **1 million** of which die every year from lead poisoning after consuming lead shot mistaking it for food or grit, and predatory and scavenging birds (such as eagles), which are poisoned by either consuming poisoned birds or eating the pellets of lead shot embedded in their prey.

The science is extensive:

The body of evidence of risks from the toxic effects of lead ammunition on humans, and wild and domestic animals is overwhelming and growing, and was thoroughly reviewed and presented by ECHA and [adopted by the RAC](#). Medics, veterinarians and scientists are in agreement - lead ammunition needs to be replaced by non-toxic alternatives. A recent [open letter from 75 European and other scientists](#) provides background and "urges MEPs at the European Parliament to support this important restriction proposal which harmonises restrictions across all wetlands".

The solution works:

Non-toxic ammunition is now [widely available, effective and comparably priced](#) and guidance on their use is provided on The European Federation for Hunting and Conservation (FACE) [website](#). Denmark and Netherlands banned the use of *all* lead shot in the 1990s fully proving that change is entirely possible. Despite profitable product lines of non-toxic ammunition, parts of the ammunition industry still resist change. Although they know change is coming, they need guaranteed markets to drive innovation, production and markets even further, and that takes regulation. All this is thoroughly explored in the adopted ECHA SEAC [final opinion](#).

The regulation is needed now:

Under the African Eurasian Migratory Waterbird Agreement (AEWA) there is an international legal obligation for the EU and its Member States to ban lead shot in wetlands, in place since 1999. The EU is yet to comply. At the Member State level, to date regulation has been patchy, absent and/or poorly enforced, resulting in lead shot often persisting as the ammunition of choice. This REACH restriction proposal ensures those Member States which have yet to attempt to address any risks do so, it harmonises policies across Member States and for some countries with a high proportion of wetlands, goes further, for which an extended transition time is explicitly provided.

As documented during the extensive preparation and scrutiny of both ECHA and its Committees (RAC and SEAC), **the proposed restriction is fully compatible with the REACH regulation and fully respects the principle of proportionality.** Indeed, of all the legislative measures available within the EU, this approach was the only one considered fit for purpose based (amongst other issues) on the poor track record of Member States trying to regulate this issue on their own.

It is undeniable that all lead ammunition needs to be replaced by non-toxic alternatives to protect the health of wildlife in all habitats, soils, and consumers of game meat, and to protect markets of game meat (some supermarkets and retail outlets have already started to reject lead-contaminated meat products and demand use of non-toxics in their supply chains). The current restriction proposal is a necessary first step in the right direction and provides provisions for regulation to go further, i.e. ban lead shot everywhere, which would bring additional enforcement benefits.

Delays and obstructions must not delay progress:

We are witnessing the dying days of lead ammunition. However, similar to the removal of lead from petrol, there has been denial of the problem then denial of the solution, and now prevarication over the policy and process to delay and obstruct this restriction. Circulating misinformation, myths and false concerns about efficacy of non-toxic ammunition have been dispelled. Despite claims to the contrary, ECHA and RAC recommended a risk-reducing buffer zone around wetlands. Some in the hunting lobby argue that the restriction should not have been undertaken under REACH, despite it being the EU regulation to protect people and the environment from chemical hazards, and with unfounded concerns about over-zealous enforcement – particularly by puddles. These final concerns must not be used to prevent health protection and to allow poisoning to continue. **The facts are simple - the risks are great and non-toxic alternative ammunition exists** (and are [promoted by many hunters](#)): **this proposal is entirely proportionate, will enable proper enforcement and includes generous time for transition** (on top of the already extended timetables).

Making the EU fit for the future:

Beyond supporting the European Green Deal, supporting the restriction proposal on use of lead shot in wetlands helps bring about a wide range of benefits to sustainable hunting, the health of people, wildlife and soils, food safety, innovation and markets.

As the European Hunting Experts say in their [open letter](#): ***“It is in every hunter’s best interest to switch to non-lead ammunition... We therefore urge you not to succumb to suggestions that it is not possible to change. It is”***.

We urge you to support the restriction proposal and take a step closer to a “Zero Pollution”, non-toxic future.

