

Countryside Alliance



The Voice of the Countryside

Countryside Alliance responses to the socio-economic consultation by the Health and Safety Executive on their draft Agency Opinion covering proposed restrictions on the use of lead in ammunition. The consultation closes 10 December 2023.

Q1 The Agency is considering a 5-year transition period before the entry into force of the proposed restriction on **target shooting** with **shotguns**. Due to the voluntary agreement to transition away from lead ammunition for use in **live quarry shooting** by 2025, the Agency is considering a shorter (e.g., 3-year) transition period for this use.

Please provide information you have regarding the viability, difficulties and benefits of a shorter transition period for the use of lead ammunition in live quarry shooting with shotguns.

As detailed in the 2022 reports commissioned by the Gun Trade Association, conducted by Cranfield School of Management (CSM) and Blake International (BI), a transition period away from lead shot of less than 5 years would cause much socio-economic harm and a potential cliff-edge scenario for shooting businesses. Businesses would likely fold, there would likely be lack of consumer supply and the diminishing of complimentary sectors like travel and hospitality, all leading to sector unemployment and reduction in tax contribution. The CSM report suggests a transition period of 4.5 - 6 years, whereas BI concludes that at its most optimistic, a minimum 6-year transition period will be needed for an operational transition from lead to non-lead shot. The BI report states "even inside a 6-year implementation window, there would likely be market supply disruption." The reports considered many factors when calculating these timescales, one being the increased difficulty in the provision of cartridge materials due to global conflicts and supply chain disruptions. The procurement of appropriate tooling also represents an unavoidable, expensive, and time-costly obstacle. The lead-in time for each new machine tool can top 3 years, which may increase as European cartridge manufacturers also compete for tooling from the three tooling suppliers, located in Italy and the Czech Republic, as a result of similar ongoing EU legislation on the restriction of lead ammunition. Another obstacle for cartridge manufacturers is securing the funding to enable non-lead production capacity, whilst maintaining economic viability. These difficulties show why a transition period of less than 5 years would impact significantly on shooting businesses.

For the above reasons, and to avoid a cliff-edge scenario for shooting businesses, a review of non-lead cartridge supply should be conducted during the 3rd year of the transition period to determine whether the 5-year transition needs to be extended. Taking the current level of non-lead cartridge total availability, detailed in the BI report as 14%, as a baseline, it is suggested that by the end of the 3rd year of transition, 60% of total availability would need to have been achieved. If it has not, then an extension would be required. This review should be conducted by an independent body.

Q2 Do you possess information regarding the need for a derogation on the use of lead ammunition for humane dispatch (i.e. in instances where animals/livestock require humane dispatch, which may occur for example: on-farm; in transit; in markets, lairages or collection centres; or as a result of accidents on the public highway, at racecourses, shows or exhibitions)?

It is important that a derogation is in place for the acquisition, possession and use of lead ammunition for humane despatch on safety grounds. Humane despatch is often performed in areas with hard surfaces, such as concrete farmyards and asphalt roads. In these scenarios the high risk of ricochet from the use of hard, lead-alternative bullets such as copper or brass presents an unacceptable danger of serious injury / death to humans, whether the shooter or bystanders. By using lead bullets, which are significantly softer than non-lead alternatives, the risk of ricochet is minimised.

It should also be noted that the meat from humanely despatched animals is carefully disposed of and does not enter the food chain. Therefore, there is no risk of lead entering the food chain when it is used in humane despatch.

Q3 Do you have information regarding the monetary benefits associated with reducing the risk of secondary poisoning of raptors from the use of lead bullets e.g., from WTP-based evaluations or similar?

The Countryside Alliance has not seen any conclusive evidence of the lead-poisoning of raptors from bullet debris in the UK. It should be noted that there is little opportunity for raptors to consume meat / viscera which may have been contaminated with lead from bullet debris. Deer stalking best practice calls for shot placement in the vital organs of the chest cavity. Shots at the abdominal cavity are not best practice, and therefore, the abdominal viscera are unlikely to contain any bullet debris. The only access for raptors to meat / viscera from shot deer is through the finding of the gralloched abdominal viscera, which is unlikely, as best practice states that the gralloch should either be removed from the field and disposed of, buried or well hidden, and as previously stated, if any viscera were to be found, it would unlikely contain any bullet debris.

Q4 The Agency is seeking information on the types of bullets marketed and used for both live quarry shooting and target shooting. For example, whilst non-expanding ammunition must **not** be used to shoot deer, there is no such requirement for many other quarry.

Please describe any instances in which you use non-expanding ammunition for live quarry shooting in the box below, including an indication of relevant calibre and quarry.

Standard soft-nosed .22 rimfire is used for small ground game, vermin and target shooting. Ammunition is marketed as being suitable for all purposes.

Please describe any instances in which you use expanding ammunition for any shooting other than live quarry in the box below, including an indication of relevant calibre and location.

Historic firearms target shooting, for which many calibres used across numerous locations in the UK. Although not necessarily designed to expand, any non-jacketed lead ammunition is expanding by definition, due to the softness of lead causing deformation on impact.

Q5 Rifles and zeroing

How often do you zero your rifle for live quarry shooting?

Add comment (300 character limit)

Rifle zeroing should take place with every new batch of ammunition, or with any alteration to the rifle setup. The process of rifle zeroing uses a fraction of the amount of ammunition compared to practice shooting at targets.

In what locations do you zero your rifle for live quarry shooting? Please choose all that apply.

- At an indoor shooting range
- At an outdoor shooting range
- On my own property
- At the location of a live quarry shoot
- Other private land with the permission of the landowner
- Other (specify below)

All of the above are usual.

Q6 General comments

It is possible to provide both general comments on the draft opinion and answers to the specific questions.

Please provide your general comments in the box below

It should be noted that the most prevalent calibre of rifle held in the UK is .243 according to Home Office statistics. On the market there is no viable non-lead .243 ammunition for shots taken at 250m+, which are prevalent when deer stalking in open-hill areas. When non-lead ammunition has been tested by deer managers, the consensus has been that non-lead .243 ammunition “runs out of energy and doesn’t kill like lead”. There has been ballistics testing by BASC which shows that none of the commercially available, 80 grain, non-lead, .243 ammunition tested met the requisite minimum muzzle energy to legally shoot deer in England and Wales or Scotland, 1,700 ft lbs and 1,750 ft lbs respectively.

If HSE were to change its opinion and propose a restriction on the use of lead rifle ammunition for live quarry, then a significant proportion of deer stalkers will no longer be able to manage deer populations without first having to spend considerable sums on changing their rifle to a more powerful calibre. It would also devalue the tens of thousands of .243 rifles currently registered. The socio-economic impact would be significant and would be felt not only by those that would have to buy new rifles, but also those with an interest in the land where deer management using .243 may cease. The resulting damage to trees would cause environmental and financial loss, which would be felt by the general public and by land owners / managers.

We suggest that 1 March be the best end date for transition period away from lead shot. This will avoid the complication of having a cut-off point in the middle of either the game shooting season, which runs from 12 August to 1 February, or the competitive clay pigeon shooting season, which starts in mid-late March and runs until the end of October. Many shooters purchase all the cartridges they will require for the whole season before that season begins. A transition end point outside of the two seasons will help to minimise wastage and disruption, and maximise understanding by making communications more clear and obvious.