

Response ID ANON-RF93-2NMY-A

Submitted to UK REACH – Restriction Proposals 004 - Lead shot in ammunition
Submitted on 2022-11-06 10:47:14

About you

First name

Please enter your first name:

James

Family name

Please enter your family name:

Aris

Email address

Please enter your email address:

james-aris@countryside-alliance.org

Country of residence

please enter your country of residence:

United Kingdom

Are you submitting information as an individual or on behalf of an organisation/institution?

Organisation/institution

Where did you learn about this consultation? (please select all that apply):

HSE website

If you selected other, please provide more information below:

Type of organisation/institution

Please choose from the dropdown list:

Company

Name of organisation

Please add the organisation/institution name:

Countryside Alliance

Yes

Country where the organisation or institution is legally established

Please add the country:

United Kingdom

I am content to be contacted by HSE on the basis of the information I provide. I also consent to HSE providing my personal information to the Environment Agency. The Environment Agency may use this information to contact me if it requires further information about my response

Yes

The Appropriate Authorities (i.e., DEFRA and the Welsh and Scottish Governments) may use this information to contact me if they require further information about my response

Yes

General comments

Please provide any general comments

Add comment (restricted to 1000 characters):

The Countryside Alliance is a political campaigning force representing over 100,000 members and supporters in England, Ireland, Scotland and Wales. We are members of the British Shooting Sports Council and have used parts of their submission in this paper.

In February 2020, the Countryside Alliance and eight other rural organisations issued a joint statement on future shotgun ammunition for live quarry shooting, stating that in consideration of wildlife, the environment and to ensure a market for the healthiest game products, at home and abroad, we wished to see an end to both lead and single-use plastics in ammunition used by those taking all live quarry with shotguns within five years. The shooting community must maintain its place at the forefront of wildlife conservation and protection, and sustainability in our practices is of the utmost importance.

Shooters spend in excess of £2.5 billion each year on goods and services, and shooting is worth £2 billion to the UK economy. It is a major lifeline for those employed by shoots, both full and part time, as well as for rural businesses, especially hospitality, throughout the winter, and increasingly in the summer months with the rise of simulated days. If insufficient time is given to transition away from lead in ammunition this would cause adverse effects to the UK shooting industry, as detailed in our 'additional comments' submission.

The Countryside Alliance is of the view that given the clear issues the proposed 18-month transition period will have on the UK shooting industry as set out in the Annex 15 restriction dossier, both in reference to shotgun and rifle ammunition, all calibres and shot, excluding air rifle pellets, should be subject to a transition period of no less than 5 years. We look forward to contributing to the socio-economic impact consultation due to be launched in February 2023.

Quantities

Bullets

Small calibre - hunting :

Data provided by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area, shows that the Restriction Report has hugely underestimated the number of both shot and bullets, large and small calibre, for both hunting and sporting purposes, used in the UK per annum. Given the average figure is way above that quoted by HSE, we are gravely concerned that the underestimation may lead to a false sense of ease relating to the amount of time it would take to transition. The proposed 18-month transition period is insufficient when taking into account the vast number of shot and bullets used each year. More details are submitted in our 'Additional Comments' paper.

Small calibre - sports shooting :

Data provided by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area, shows that the Restriction Report has hugely underestimated the number of both shot and bullets, large and small calibre, for both hunting and sporting purposes, used in the UK per annum. Given the average figure is way above that quoted by HSE, we are gravely concerned that the underestimation may lead to a false sense of ease relating to the amount of time it would take to transition. The proposed 18-month transition period is insufficient when taking into account the vast number of shot and bullets used each year. More details are submitted in our 'Additional Comments' paper.

Small calibre - total (where split is unknown):

Data provided by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area, shows that the Restriction Report has hugely underestimated the number of both shot and bullets, large and small calibre, for both hunting and sporting purposes, used in the UK per annum. Given the average figure is way above that quoted by HSE, we are gravely concerned that the underestimation may lead to a false sense of ease relating to the amount of time it would take to transition. The proposed 18-month transition period is insufficient when taking into account the vast number of shot and bullets used each year. More details are submitted in our 'Additional Comments' paper.

Large calibre - hunting:

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Lead-free alternatives

Shot cartridges - hunting:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Shot cartridges - sports shooting:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Shot cartridges - total (where split is unknown):

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Small calibre - hunting :

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Large calibre - total (where split is unknown):

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Air gun projectiles - hunting:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Air gun projectiles - sports shooting:

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Air gun projectiles - total (where split is unknown):

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Muzzle loading projectiles - hunting:

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Muzzle loading projectiles - sports shooting:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Muzzle loading projectiles - total (where split is unknown):

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Air guns and air rifles

Add comment (restricted to 1000 characters):

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Air gun and air rifle projectiles

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Muzzle loaders

Not Answered

If yes, please provide more details:

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Muzzle loader projectiles

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No

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Projectiles made from alternatives

a. Small calibre bullets (defined as less than 5.6 mm)

Add comment (restricted to 1000 characters):

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

b. Large calibre bullets (defined as equal to or larger than 5.6 mm)

Add comment (restricted to 1000 characters):

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

c. Air gun and rifle pellets

Add comment (restricted to 1000 characters):

The Countryside Alliance supports the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

We are opposed to the current proposal to ban lead in airgun pellets as we believe that lead can viably continue to be used in airguns both for live quarry and target shooting. There are currently no viable alternatives on the market, as the accuracy and lethality of existing alternatives have been shown to be less efficient than lead (We defer to the British Shooting Sports Councils research as submitted on this issue) potentially causing extended periods of suffering. Pellets rarely fragment so lead loss in quarry is negligible. Pellet catchers are generally used in target shooting so 100% of the lead can be recovered and recycled. We believe the risks can be controlled through existing measures.

d. Shot cartridges

Add comment (restricted to 1000 characters):

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Information from the manufacturers of the alternative ammunition and ranges that currently restrict the use of lead alternatives are particularly welcomed.

Add comment (restricted to 1000 characters):

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

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Risk management measures - lead shot cartridges

Buy-back scheme

Add comment (restricted to 1000 characters):

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Potential optional derogation for licenced sites, licenced athletes and licenced suppliers

a. Recovery of 90% of the lead shot over the land every year:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

b. No part of the site where shooting takes place has any agricultural activity :

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

c. Containment, monitoring and, where necessary, treatment of surface (run-off) water to ensure compliance with the environmental quality standard (EQS) for lead specific under the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015 and the Scotland River Basin District (Standards) Amendment Directions 2015.:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

d. All of the above three risk management measures :

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Add comment (restricted to 1000 characters):

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

a. Estimate the capital costs of any infrastructure required to meet these conditions, outlining how you have arrived at this number. Please also supply details of the intended measures likely to be implemented, how many shooting positions and how long the sites would need to install and test them:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

b. Estimate the amount of lead used on their site on an annual basis:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

c. Estimate the annual cost of shot recovery, outlining how you arrived at this number:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

d. Estimate costs for monitoring of water runoff from the site, outlining how you arrived at this number:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Add comment (restricted to 1000 characters):

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The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

For these athletes, please provide an estimate of how many cartridges they shoot on average on an annual basis:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

We welcome your comments on how a licence scheme for athletes could be operated and how effective it could be:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Estimate how many suppliers would be likely to apply to supply these athletes:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Estimate the costs for these suppliers to set up monitoring systems to ensure they only sell to permitted athletes, outlining how you arrived at this number:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

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Risk management measures - bullets

Buy-back scheme

Add comment (restricted to 1000 characters):

We defer to the British Shooting Sports Councils submission on this issue, as per the below.

We consider it possible that a buy-back scheme for lead ammunition could incentivise the transition from lead to non-lead shot and ammunition. Any such scheme would, however, have to fairly compensate shooters for any loss which they incur as a result of restrictions, and on a market value basis.

Alternatively, we would see value in a scheme which enables shooters to exchange lead shot and ammunition which they are no longer able to use for comparable non-lead ammunition.

Any Government-funded scheme should also give consideration to retailers holding stocks of lead ammunition which would no longer be saleable, and to manufacturers with machinery and equipment which could no longer be used for the production of lead ammunition, and which was not suitable for conversion to the production of non-lead loads.

Potential derogation for licenced sites

a. Recovery of 90% of the lead released over the land every year:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

b. No part of the site where shooting takes place has any agricultural activity :

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

c. Both of the above risk management measures:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

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The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

a. Estimate the capital costs of any infrastructure required to meet these conditions, outlining how you arrived at this number. Please also supply details of the intended measures likely to be implemented, how many shooting positions and how long the sites would need to install and test them:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

b. Estimate the amount of lead used on their site on an annual basis:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

c. Estimate the annual cost of bullet recovery, outlining how you arrived at this number:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

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Impact assessment

Number of individuals engaged in shooting

Add comment (restricted to 1000 characters):

See below

Add comment (restricted to 1000 characters):

See below

Add comment (restricted to 1000 characters):

1,000,000 people involved in UK shooting.

3.9 million work days on conservation pa - the equivalent of 16,000 full time jobs.

DATA: The Value of Shooting – Public & Corporate Economic Consultants 2014.

Current uptake of lead alternatives

Add comment (restricted to 1000 characters):

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Costs for adaptation of existing firearms

Please provide a brief overview of the data you have provided, for example, the source of the information:

The Countryside Alliance has nothing further to add to the evidence submitted by our partners on the British Shooting Sports Council, which we believe is the most complete evidence available in this area.

Choose your file:

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Affordability for hunters

Add comment (restricted to 1000 characters):

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Environmental impacts

Add comment (restricted to 1000 characters):

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Additional comments

Add comment (restricted to 1000 characters):

The impacts of too short a transition period, as proposed, would lead to a decrease in shooting in the UK. As well as the negative economic impact people who shoot also put in 3.9 million work days on conservation every year – the equivalent of 16,000 full-time conservation jobs. Any decrease in activity level will be detrimental to conservation efforts in the UK. The majority of the £2.4b that shooters spend in the UK on shooting every year contributes to the rural economy and many communities rely on that income during winter months outside the main tourist season. The social and mental health benefits that hunting shooting brings to the estimated 1,000,000 people that are involved in the UK are also a major concern should a disproportionately short period be imposed.

Regarding large calibre rifle ammunition, the Restriction Report has not considered the pressing government cull targets for deer with the increase in tree planting across the UK. The Department for Environment, Food and Rural Affairs (Defra) recently consulted on key proposals to ensure the sustainable management of the English deer population, and a reduction in the impacts of deer on the natural environment. Severe damage will be inflicted on new crops if deer managers and hunters are unable to purchase sufficient ammunition. The increase in pest species such as foxes and rabbits will have severe detrimental effects on conservation of ground-nesting birds and others in the UK.

Non-confidential attachment

Please confirm:

No

Upload file:

No file uploaded

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Additional comments

Thank you for your contribution. Please leave any further comments below

Add comment (restricted to 1000 characters):

Non-confidential attachment

Please confirm:

Yes

Upload file:

Countryside Alliance - HSE - Additional Comments.pdf was uploaded

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No file uploaded