

# BVA Consultation response to UK REACH – Restriction Proposals 004 - Lead shot in ammunition

## Who we are

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 19,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. As a health-centred profession and key stakeholder in the One Health agenda, the veterinary profession also takes a strong interest in policies designed to better protect the environment which both humans and animals share.

## Summary of our position

3. We support the report and its broad conclusions, including the proposal to ban the sale and use of lead ammunition. We have major concerns about the continued impacts of lead ammunition on the health of wildlife species, as well as on human and domestic animal health, and are grateful for the opportunity to engage with HSE on this matter.
4. We agree with the report's findings that the use of lead ammunition in both hunting and sports shooting pollutes the environment and presents a serious risk to wildlife, domestic animals and people. This risk is both unacceptable and avoidable, and we agree that further regulatory action is needed to control this.
5. We would like to see further attention given to animal welfare and the very harmful sub-lethal impacts on physiological systems and behaviour that lead causes. In particular, lead poisoning seriously compromises the welfare of large numbers of birds<sup>1</sup> in a variety of harmful ways<sup>2,3</sup>
6. We support a complete ban on the sales, use and possession of lead ammunition. As effective alternatives are already available in Great Britain, a complete ban on the sale and use of lead ammunition would be practical. A complete ban will also be enforceable and monitorable since there would be no legal use for the ammunition.
7. Given the unacceptable risks, we would support a quicker transition period away from the use of lead shots. A period of 18 months rather than 5 years would help to avoid more unnecessary harm and suffering.

---

<sup>1</sup> Eg Pain, D J, *et al.* "[Poisoning of birds and other wildlife from ammunition-derived lead in the UK.](#)" *Oxford Lead Symposium*, (2014) p58.

<sup>2</sup> Newth, J L, *et al.* "[Widespread exposure to lead affects the body condition of free-living whooper swans \*Cygnus cygnus\* wintering in Britain.](#)" *Environmental pollution* 209 (2016): 60-67.

<sup>3</sup> Sainsbury, A W, *et al.* "[The welfare of free-living wild animals in Europe: harm caused by human activities.](#)" *Animal Welfare* 4.3 (1995): 183-206.