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## **UK REACH Lead Ammunition Consultation**

The Chartered Institute of Environmental Health (CIEH) wishes to place on record its support for calls to ban the use of lead in ammunition on the basis that it is dangerous to both environmental and public health. The harm of lead ammunition to public health is of particular concern as ingestion of meat from animals killed by lead ammunition has adverse effects on human health, in particular young children.

Lead is a non-threshold toxicant, meaning there are no safe levels of exposure which are considered safe for human consumption. Lead pollution is also considered a “one-health” issue in that lead poisons humans, wildlife and contaminates our environment.

Over 20,000 tonnes of lead is scattered across Europe annually by lead ammunition, killing over 1 million wildfowl in Europe each year. In the United Kingdom alone, 100,000 wildfowl die annually in the United Kingdom. Not only does this impact human health through the consumption of wildfowl killed by lead shot, but so too in soil and surface water pollution in areas in which hunting with lead ammunition is common. Contaminating soil with lead has a negative impact on the environment because it can be assumed that a fraction of the lead deposited will be mobilized over the time leading to increased lead concentrations in water, soil, plants and consequently entering the food chain, negatively impacting both environmental and public health.

There exists overwhelming scientific evidence to support the banning of lead ammunition, with the negative effects of lead on public and environmental health being well known. There have been long-standing restrictions on the use of lead in several consumer products, for example in paint and in petrol, due to their toxic effects on human and environmental health. Banning the use of lead in ammunition serves merely as a continuation of this long-standing approach to this toxicant.

Furthermore, it is worth noting that the European Union Registration, Evaluation, Authorisation and Restriction of Chemicals (EU REACH) has introduced a ban on lead ammunition in the European Union from February 2023. Northern Ireland will remain subject to EU REACH owing to the operation of the Northern Ireland Protocol. Therefore,

failure to introduce similar regulations in this respect would result in regulatory divergence between Northern Ireland and Great Britain on this issue.

Therefore, the CIEH agrees that a ban on lead ammunition should be introduced and feel that the proposed 18-month timeframe is proportionate and achievable.

Kind regards,

Dr Phil James

Chief Executive, CIEH