[redacted]

From: [redacted]
Sent: 28 October 2014 14:36
To: [redacted] (Defra)
Subject: Re: Paper on lead ammo

Categories: Lead FOI - Sent to Me

Dear [redacted]

Many thanks for copying this to me. It will come as no surprise that I had already seen it, but I had not been aware of the circulation to [redacted] for the Ornis group etc. That's helpful as the EU currents are running quite briskly in parallel to the LAG ones.

As you will know I am currently preparing for a restricted LAG meeting at FSA on Thursday which [redacted] is attending. My objective there is to see whether and to what extent a consensus/common position might be achievable. Whatever emerges it remains my intention to complete [redacted] report, which is now well advanced without further delay. I reckon that I have seen everything that needs to be seen, and listened to everything that needs to be heard - that on top of 40+ years of steering various groups around the lead minefields.

If I had to give you the heads up, it would be along the lines that the LAG process will point with complete certainty to the toxic nature of lead ammunition, qualified with equal certainty that precise effects and their extent can only be predicted with uncertainty. The conclusion to be drawn on all the evidence that I have so far seen is that lead ammunition is harmful for both wildlife and human health - it is not just a matter for wildfowl - and moreover that the alternatives are safe, effective and available at comparable cost. The dispersal of some thousands of tons of an accumulative, seriously toxic material every year is quite simply an insupportable thing to be doing for purposes of recreation and sport - especially if there are now alternatives that can well be used.

I have seen nothing that persuades me otherwise - although I am still in listening mode. I have not always been of this view and know that the shooting and landowning stakeholders say there isn't really a problem and it's all a conspiracy etc - but that really isn't the case at all. They seem to forget that I was [redacted] - so there aren't that many rabbits left to pull out of the hat.

Hence, although one can quibble with words, the position taken by "the scientists" in their conclusion is a sensible and well founded one: namely to foresee "a phase out and eventual elimination of lead-based ammunition and its replacement with non-toxic alternatives". I'm afraid that halfway houses as so far mooted by the shooting stakeholders do not stand up to scrutiny, and although there will predictably be arguments for more research there are reasons why it would not change the fundamental position.

So by all means keep your cards close pending the outcome of the LAG process, but [redacted] line makes sense - of "welcoming it" pending further consideration at a future date i.e. working with the grain of the evidence. (I do however recognise a current UK political dimension).

Forgive me for being frank - but hope stimulating!

Best wishes as ever and thank you again,

[redacted]

On 28 Oct 2014, at 12:28, [redacted] (Defra) [redacted] wrote:

Dear [redacted]

I hope this finds you well?

I just wanted to make you aware of the attached report and covering letter which was sent to the EU ORNIS Committee a couple of days prior to its annual meeting. I attended, and the report was discussed very briefly under AOB – the Commission welcomed the paper and suggested it warranted further consideration at a further meeting (though not sure when). They are aware of the UK's ongoing work to review the position here, and that we wouldn't wish to prejudge the results of that process by supporting or criticising the report.

I shall leave you to do with this what you wish, but thought you should be aware.

Best wishes

[redacted]

<<Information point for consideration under AOB for Expert Group on Birds and Habitats Directives >>

[redacted]

[redacted] | **Defra** | [redacted]

Department for Environment, Food and Rural Affairs (Defra)

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From: [redacted]
Subject: **Information point for consideration under AOB for Expert Group on Birds and Habitats Directives**
Date: 14 October 2014 16:20:04 BST
To: [redacted]

[redacted]

FOR ATTENTION OF MEMBERS OF THE EXPERT GROUP ON BIRDS AND HABITATS DIRECTIVES

Dear Colleagues,

We have receiving the message below with attached European statement from a group of 30 scientific experts on lead poisoning of birds, which they have asked me to table for the information of the Member States attending the meeting of the expert group. I note that they have also forwarded it to the Member States but I am sending it directly to you just in case you have not already received it (the original e-mail has been copied to many MS representatives). Please excuse any double posting in relation to this information. We had not foreseen any item on the agenda to discuss this topic but I propose time permitting its inclusion as a point under Any other Business on Thursday. Please note that this topic is also to be discussed at the forthcoming conference of the Parties of the Convention on Migratory Species. In this context I understand that there have already been some discussions with Member States within the framework of the WPIEI, which we should have regard to.

[redacted]
European Commission
[redacted]

Von: [redacted]
An: [redacted]
Kopie: [redacted]

[redacted]

[redacted]

Betreff: Consensus Statement on Lead by Scientists

Dear Mr [redacted]

We write to you in your capacity as Chairman of the Expert Group on the Birds and Habitats Directive meeting, scheduled for 15-16 October 2014.

Ten years ago, the 25th anniversary conference of the EU Birds Directive at Bergen op Zoom committed itself to phase out the use of lead gunshot in wetlands by 2009 at the latest {Action 5-8 Aim to phase out the use of lead shot in wetlands as soon as possible and ultimately by 2009 (Member States, European Commission).} However, despite this target, lead gunshot is still being widely deposited in many European wetlands, and, in addition, lead from ammunition of all kinds is continuing to enter the food chain of humans and terrestrial wildlife, including predators and scavenging birds. Even in countries where the use of lead ammunition in wetlands has been banned, published compliance monitoring has shown that lead ammunition is still frequently used illegally, long after bans were introduced in those countries.

In the ten years since the Bergen op Zoom conference, the evidence concerning the effects of lead ammunition on human and wildlife health has become considerably more detailed and compelling. Recent research has increasingly highlighted impacts of lead on birds other than waterbirds, including predatory and scavenging raptors, along with the potential hazards to human health from residues of lead in game animals killed using lead ammunition. Fragmentation of both lead shot and bullets occurs to a greater extent than was previously thought, thereby widening the opportunities for particles of ammunition-derived lead to be ingested and for lead to be absorbed by wild birds and humans. Rigorous scientific quantification of the effects of ammunition-derived lead on bird populations in Europe has not been attempted. Nevertheless, indicative evidence has emerged for population-level effects on waterfowl and white-tailed eagles in Europe, and convincing studies of population-level effects have been published on species such as California condors elsewhere.

In those European countries where a ban on the use of lead gunshot in all habitats has been introduced, non-toxic alternatives are used widely and the sport of shooting game animals remains viable and undiminished. Hence, there is growing evidence to indicate that the introduction of a phase-out of the use of lead ammunition in all habitats would be beneficial and that it would not impose undue disadvantages on sport shooting interests.

The eleventh Conference of the Parties of the Convention on Migratory Species will be considering lead poisoning of birds from ammunition sources in the context of the draft Resolution and guidance related to addressing poisoning in migratory birds (1). Therefore, we assume that the Expert Group on the Birds and Habitats Directive will be considering this matter when preparing for the CMS CoP at its meeting on 15-16 October 2014.

To assist the Member States in considering this important issue, a group of thirty experts with significant involvement in the scientific study of the effects of spent lead ammunition on wildlife and human health in Europe has

prepared a document entitled "Wildlife and Human Health Risks from Lead-Based Ammunition in Europe: A Consensus Statement by Scientists". This document takes into account the worrying additional recent research findings mentioned above.

We respectfully request that the attached statement be tabled for the information of the Member States attending that meeting. The statement concludes that there is overwhelming scientific evidence for significant toxic effects of lead on both wildlife and human health. We suggest that, in light of this evidence, and given the availability of non-toxic alternative ammunition, action should be taken in Europe to eliminate the release of lead to the environment through the discharge of lead-based ammunition, in order to protect human and environmental health.

We hope that this document, which will also be published and supplied to the eleventh Conference of the Parties of the Convention on Migratory Species, will be of assistance to the Expert Group on the Birds and Habitats Directive.

Yours sincerely,

[redacted]

(1) http://www.cms.int/sites/default/files/document/COP11_Doc_23_1_2_Bird_Poisoning_Review_%26_Guidelines_E_0.pdf

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[redacted]