

[REDACTED] (Defra)

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**From:** [REDACTED] (Defra)  
**Sent:** 04 June 2014 12:04  
**To:** [REDACTED] (Defra)  
**Subject:** FW: Draft Submission seeking agreement for publication of WWT report of compliance with the lead shot Regulations 1999.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

A bundle is coming your way- text below shows most of the correspondence.

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**From:** [REDACTED] (ERG-WAC)  
**Sent:** 08 October 2010 12:43  
**To:** [REDACTED] (ERG-BIO); Marlow, Francis (ERG-BIO)  
**Cc:** [REDACTED] (ERG-BIO); [REDACTED] (ERG-BIO); [REDACTED] (ERG-BIO)  
**Subject:** RE: Draft Submission seeking agreement for publication of WWT report of compliance with the lead shot Regulations 1999.

My comments on the submission-

Good summary of the project- but please state full titles of WWT and BASC- perhaps a short note of who they are and what they do?

Please add a line in the project outline, that the possible methods were reviewed and developed ( in an earlier ADAS study), and we used the best available methods to try, as much as possible, to assemble a robust evidence base, and appreciate the difficulties in actually testing compliance. The project involved dealing with some sensitivities, and also working around assumptions that we had to make, and we recognise that there were limitations and attention should be drawn to the caveats in the report. That is why I was so careful to make sure that assumptions were clearly stated.

The QA

There may be a question- what are the regulations! The minister might need to know the answers to the questionnaire!

There may be a question as to the project creating demand for shot birds- the answer should refer to the method development ( the earlier ADAS study) , where we investigated possible ways of testing compliance, and came up with the top 3 suggestions. The difficulties in testing compliance should be made clear, and we adopted the best ways available.

There may be a question about the peer review- The answer should include something about the way the Steering Group worked to guide the project through every stage, and review the report. It should also include the organisations represented on the Steering Group, so that it is clear that this was not done behind closed doors and that we worked in partnership and with good will to address this issue.

For the question about why lead is used, I believe that it is because lead is more predictable in flight and penetrates well ( i.e. they can hit things effectively with it) and gun barrels are designed based on lead- other ammunition apparently is thought to damage them. As I don't shoot and may not have used the right words, perhaps BASC could give a couple of points.

There is nothing to indicate that we seem to be the first country to have come up with a way of testing compliance- again illustrating the difficulty. The ADAS review of methods demonstrated this clearly.

Are there likely to be any repercussions, say from the EU, now that we have a report that states non compliance?

I do not know if game dealers will feel slightly annoyed, as they will be exposed ( as a group, not individually) as selling lead shot birds, and supporting those that do not comply with the regulations. This again will need to be fielded in that there were no suitable alternatives for getting discrete access to shot birds.

I hope these suggestion are helpful.

Cheers

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**From:** [REDACTED] (ERG-BIO)  
**Sent:** 08 October 2010 11:10  
**To:** Marlow, Francis (ERG-BIO); [REDACTED] (ERG-WAC)  
**Cc:** [REDACTED] (ERG-BIO); [REDACTED] (ERG-BIO); [REDACTED] (ERG-BIO)  
**Subject:** FW: Draft Submission seeking agreemnt for publication of WWT report of compliance with the lead shot Regulations 1999.

Francis,

On 1) There has been no external peer review but [REDACTED] of course commented on the report and it was revised in light of her comments. A member of Defra's statistics team also commented. The strength of the report is that both WWT and BASC have 'signed up' to its findings.

On 2) I'm by way of this email asking [REDACTED] about Bob clearing reports before publication?

We can hold off but will start to get questions about any delays soon (from WWT and RSPB) and the Lead Ammunition Group are keen to see the report also. I can deal with these but just to let you know people are keen to see this report published and will cry 'fowl' (sorry!) if we delay too long!

Thanks,

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**From:** Marlow, Francis (ERG-BIO)  
**Sent:** 08 October 2010 11:02  
**To:** [REDACTED] (ERG-BIO)  
**Subject:** RE: Draft Submission seeking agreemnt for publication of WWT report of compliance with the lead shot Regulations 1999.

Thanks [REDACTED], I'd like to do a bit more work on the sub itself so can you hang on for now. In the meantime, can I just check

- 1) Has this research been peer reviewed?
- 2) There used to be (I think) a requirement to clear publication of any defra funded research with bob Watson before it is published. I don't know if that requirement still exists but no doubt the science team can confirm either way, it may have fallen by the wayside of course..

Francis

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**From:** [REDACTED] (ERG-BIO)  
**Sent:** 08 October 2010 10:39  
**To:** Marlow, Francis (ERG-BIO); [REDACTED] (SEG-PRO)  
**Subject:** FW: Draft Submission seeking agreemnt for publication of WWT report of compliance with the lead shot Regulations 1999.

Francis, [REDACTED]

Have you had a chance to look at this? Let me know if you're are happy for it to go and grateful if [REDACTED] is happy with the publication date also?

Thanks,

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**From:** [REDACTED] (ERG-BIO)  
**Sent:** 21 September 2010 15:37  
**To:** Marlow, Francis (ERG-BIO); [REDACTED] (ERG-BIO); [REDACTED] (ERG-BIO); [REDACTED] (ERG-BIO); [REDACTED] (ERG-BIO); [REDACTED] (SEG-PRO); [REDACTED] (SEG-PRO); [REDACTED] (SEG-PRO); [REDACTED] (ERG-BIO); [REDACTED] (ERG-WAC)  
**Subject:** Draft Submission seeking agreemnt for publication of WWT report of compliance with the lead shot Regulations 1999.

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All,

Please see a draft submission seeking ministerial agreement to the publication of the recently completed WWT compliance study for the Environmental Protection (restriction on use of lead shot) (England) Regulations 1999.

We are aiming to publish the final report on 29<sup>th</sup> October and I would appreciate your comments by Tuesday 28<sup>th</sup> September both on the submission and on the attached draft Q&A intended to be used by press office. Grateful also for clearance from [REDACTED] for this publication date. We are also working with WWT and BASC to publish this report on a no surprises basis.

Many Thanks,

[REDACTED]

<< File: Submission lead complinca report (3).doc >> << File: Qand A for publication of Lead Shot Com,pliance Report.doc >>

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