

HSE Public Consultation on Lead in Ammunition

The following represents the NSRA's position relating to the current HSE Public Consultation on Lead in Ammunition.

Transition

- If any restriction is to be placed on the sale or use of lead ammunition, sufficient time is allowed for an orderly transition.
- In respect of shotgun cartridges, transition must take account of the need to allow time for the cartridge trade to import and install manufacturing machinery suitable for loading steel shot cartridges.
- The transition period must allow sufficient time for the development of robust supply lines for components. There are currently shortages of steel shot, which is not manufactured in China, and of double based powders and primers owing to the conflicts in Ukraine and now the Middle East.
- UK cartridge manufacturers are currently having to compete with EU manufacturers, who are facing a similar restriction on the sale of lead ammunition, for both components, machinery and tooling.
- A 5-year transition to non-lead shotgun cartridges is a minimum requirement.
- The availability of non-lead alternatives must be monitored, and the transition period adjusted to suit availability. In year 4 of a 5-year transition, 80% of the required ammunition supply must be available or an extension is required. If this is not the case the commercial viability of shooting grounds and game shooting will be compromised.

Humane Dispatch

- Soft expanding ammunition is required for humane dispatch. A derogation is required to allow operators to acquire/possess/use lead ammunition for this purpose. In the case of humane dispatch there is no risk from lead ammunition to wildlife or to the food chain.

Secondary Poisoning of Raptors

- Secondary poisoning of raptors from the use of lead bullets in deer management can be avoided by following best practice <https://bestpracticeguides.org.uk/> Depending on the process followed, green offal left in the field is either uncontaminated (contaminated parts being taken away with the carcass) or buried. This means any lead fragments are not bio available.

Use of Non-jacketed Lead Bullets in Rifles

- All non-jacketed lead bullets are, by their very nature, expanding and are used extensively in target shooting.
- The principal use of non-jacketed lead bullets in target shooting is that of .22rimfire, in which a standard solid round nosed lead bullet is universally used both for target shooting and for the shooting of pest species and small ground game. Since the bullet is soft lead, it may expand but a hollow nosed version designed to expand more readily may also be used for live quarry, for practice and target shooting.
- Solid lead projectiles are used in muzzle-loading shooting, breechloading historic arms and modern reproductions.
- Solid lead projectiles are used in shooting with classic arms using ammunition produced to fall within the limits of small ranges as operated by many clubs.
- Solid lead projectiles are used in gallery rifle shooting. Gallery rifle shooting uses relatively low powered pistol calibre rounds and is very popular in clubs.
- Cowboy action shooting uses very low-powered cartridges with soft lead projectiles.
- Soft lead bullets are used in Heritage Pistols held under S7(3) Firearms Act 1997. These are retained to enable the preservation of pistols of particular rarity, historic interest, technical interest or aesthetic merit. These often use obsolete calibres and owners produce soft lead bullets for their use.

Zeroing

- Zeroing rifles is essential following any alteration to the gun, sights or ammunition and may take place in any of the places indicated by the HSE. This usage is minimal in comparison with use on range days.

General Comments

- Lists of ranges or shooting clubs which may be approved for target shooting with lead bullets must not be publicised. This will compromise the safety and security of the ranges, the range operators or the users of such ranges. We would be content with the publication of lists of contractors designated as competent to remove lead from stop butts.
- The HSE's proposed derogation to permit the use of lead ammunition on outdoor target shooting ranges with rifles, would not permit target shooting by civilian shooters on military or police ranges. These ranges provide shooting for thousands of target shooters. An amendment is required to allow this.
- For small calibres below 6.5mm, non-lead ammunition often fails to achieve the energy levels required for shooting deer. This means any transition to non-lead needs more research before implementation is considered.