

# Scottish Quality Wild Venison



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# Agenda

- **SQWV Journey and Structure**
- **An ‘end to end’ scheme**
- **Lead v Nonlead ammunition**
  - *Context*
  - *HSE legislation*
  - *Industry concerns*
  - *Stalkers Forum feedback*
- **Why SQWV?**
- **Q&A**



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# SQWV's journey...so far!

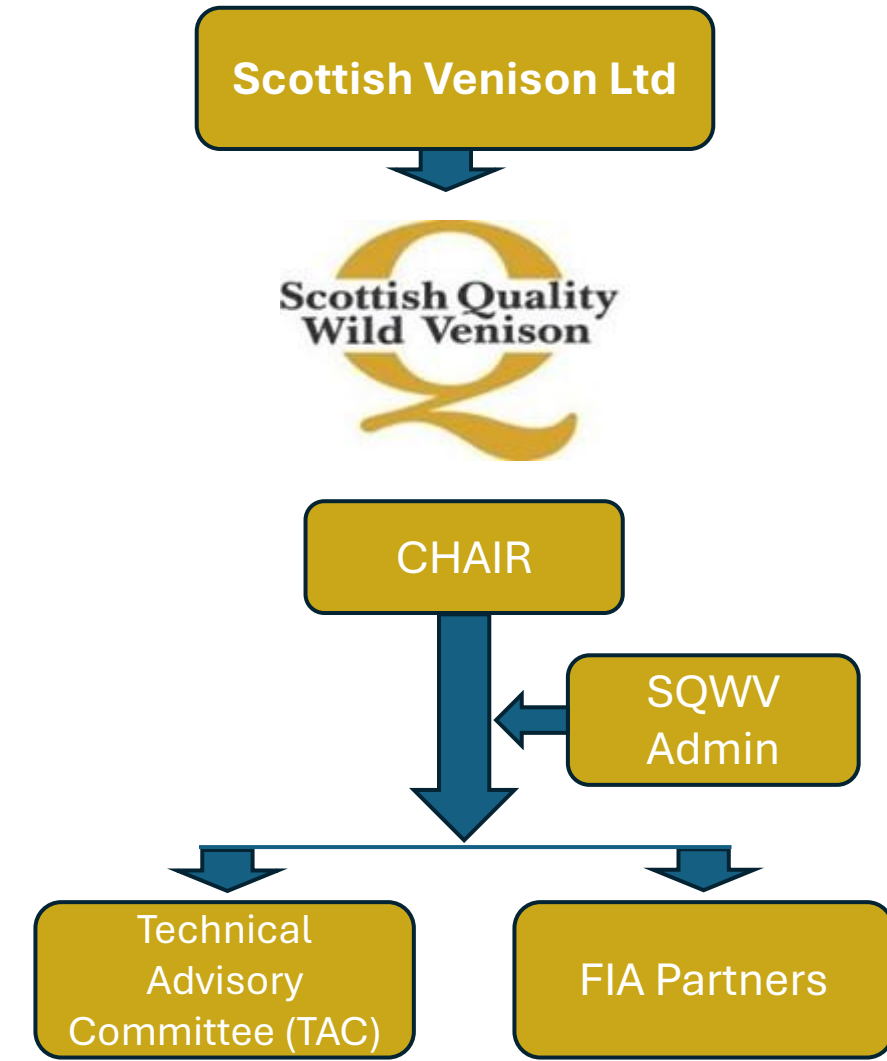
- **Established** c.20 years ago
- **2015** – FSS ultimatum
- **2023** industry review – food perspective
  - Review, Refresh, Relaunch
- **Jan 2024** – *introductions of Non-lead requirement*
- **Dec 2024** – transfer of scheme management to FIA
- **Jan 2025** ‘Producer scheme’ relaunch
- **Mar 2025** ‘Processor scheme’ design
- **May 2025** – **target relaunch** ‘end-end’ scheme to buyers



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# New Structure

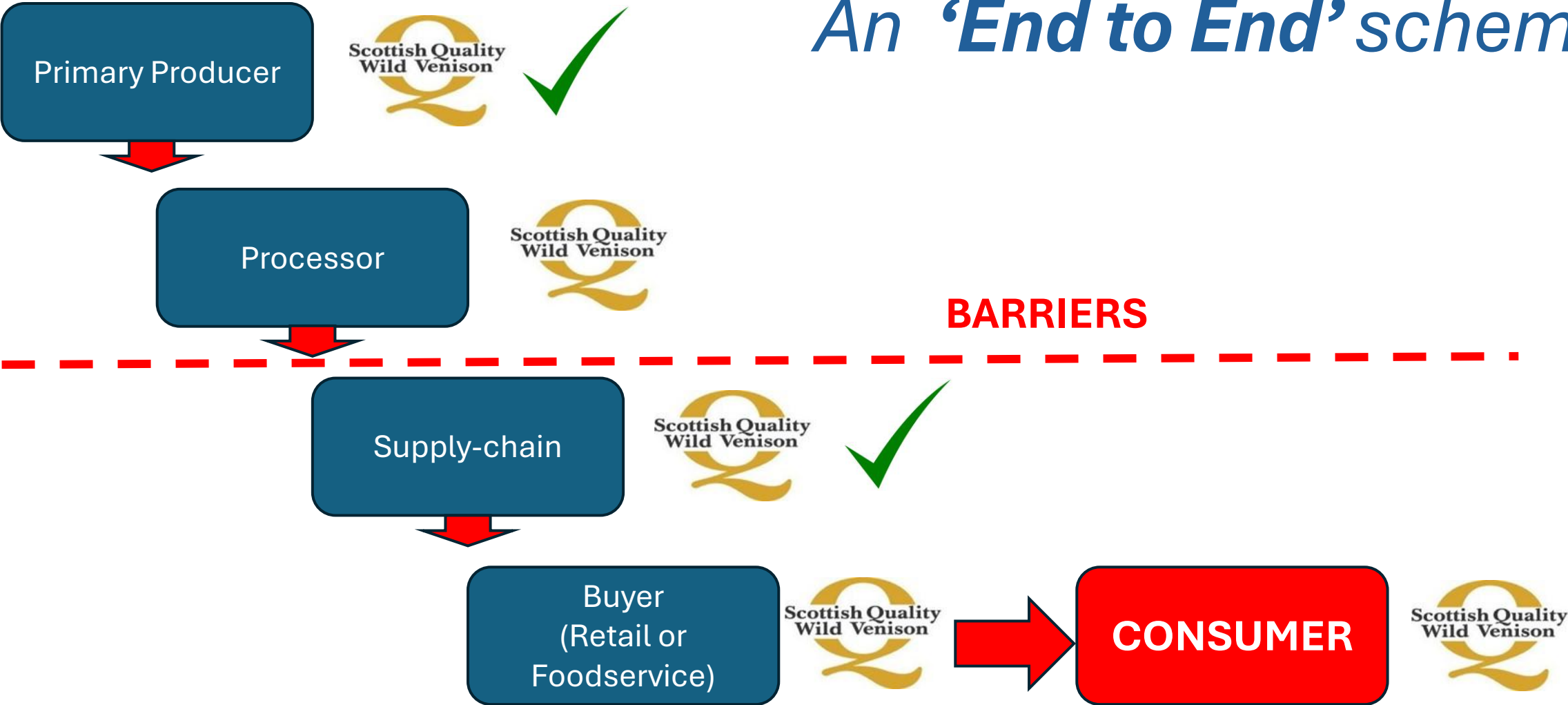
**YOUR FEES:**  
Certification costs  
SQWV running costs



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# An 'End to End' scheme



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# Scottish Wholesale Association



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# Lead Ammunition

-V-



# Nonlead Ammunition



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# Context

- SQWV priorities
- Food safety & consistency
- Protect against ‘Black market’ & ‘Grey market’
- **Food producer –versus- Land manager**
- Customer and consumer confidence
- Proactive approach
- No safe level of lead & EU Legislation



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# Non-lead – versus- Lead



## Agency Opinion on the Annex 15 Dossier on the Proposal for a Restriction

Lead in Ammunition



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# Non-lead – versus- Lead

The Agency for UK REACH concludes that:

- for **the environment** there are risks that are not adequately controlled for lead shot (primary and secondary exposure), lead bullets (secondary exposure) and airgun ammunition (primary and secondary exposure)
- amongst **consumers of high volumes of game meat** that has been shot with lead ammunition (shot or bullets), there is a risk to the health of vulnerable people (young children and women of child-bearing age) that is not adequately controlled.



**EXTRACT**

As a result of the above considerations, combined with a low overall cost of implementation, **the Agency is now proposing a restriction for large calibre bullets for live quarry shooting.**

# Non-lead – versus- Lead



**EXTRACT**

With non-lead alternatives to the .243 calibre now being viable for live quarry shooting it became practical to include these in the proposed restriction. As such, the cut-off point to distinguish between small calibre and large calibre bullets was lowered to 6.17 mm. .243 calibre bullets are now considered large calibre (for the purpose of this restriction proposal) and are thus included in provisions for large calibre bullets. Relevant costs have been amended accordingly in the SEA e.g., regarding the re-barrelling of guns in calibres between 6.17 mm and 6.5 mm now being attributed to a restriction on large calibre bullets.

In the original Annex 15 report, a transition period of 18 months was proposed for a restriction on this use. However, **the Agency is now proposing a 3 year transition period for the use of large calibre lead bullets for live quarry shooting** to accommodate the changes to the cut-off. This also allows for alignment with the recommendation from LAG that 3 years may be required (after the introduction of relevant legislation) for appropriate alternatives to become available for lead bullets for the humane dispatch of animals.

LEADTIME



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# *Non-lead – versus- Lead*

## **EXTRACT**

In summary, alternative ammunition or dispatch methods are available for most applications. It has been suggested by LAG that 3 years may be required to ensure sufficient alternatives and guidance are available.

- A 3-year transition period for large calibre bullets is already proposed
- A 5-year transition period for lead shot is already proposed

The Agency therefore considers that no explicit derogation is required.

# Non-lead – versus- Lead



**EXTRACT**

Ban on supply

## Lead bullets (Use 2: live quarry shooting)

Use 2a – Large calibre lead bullets ( $\geq 6.17$  mm)

- **A restriction is proposed on the placing on the market and use of large calibre lead bullets for live quarry shooting**

Use 2b – Small calibre lead bullets ( $< 6.17$  mm)

- **No restriction** is proposed at this time on the placing on the market or use of **small calibre** lead bullets for live quarry shooting

Large and small calibre bullets

A risk (for both the environment and human health) that is not adequately controlled has been identified for live quarry shooting with lead bullets. There are no realistic ways to prevent lead from entering the environment from this continued use or to control the risk to humans from ingestion of ammunition-derived lead when lead bullets are used for live quarry shooting. The most effective risk management option, therefore, would be a prohibition on the placing on the market and use of all lead bullets for live quarry shooting.

The Agency considers such a restriction to be proportionate in the case of large calibre bullets. However, concerns remain regarding the technical feasibility of non-lead alternatives for small calibre bullets and the associated socioeconomic impacts of this. Consequently, the Agency does not currently propose restriction on small calibre bullets for live quarry shooting.

Poor controls



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# Non-lead – versus- Lead



**EXTRACT**

## *Information in the supply chain*

The proposed labelling for large calibre bullets used for target shooting notwithstanding, consideration could be given to the provision of information in the supply chain to:

- inform users about the negative consequences of using lead ammunition for both the environment and human health,
- promote the availability of alternatives and/or
- highlight any existing regulations or other interventions (e.g., as outlined in this section)

This could be achieved through the provision of information at the point of sale or by the inclusion of labelling on the packaging of other ammunition (i.e., in addition to the proposed labelling of large calibre bullets that can remain on the market for target shooting). The Agency has not included this in the package of measures under the proposed restrictions as there are likely to be more effective ways to communicate this information (e.g., via direct engagement with suppliers and shooting organisations).

How can we achieve this?



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# Non-lead – versus- Lead

**EXTRACT**

## *Meat preparation measures*

Poor  
controls

Meat hygiene measures and stewardship programmes to minimise the amount of metal in meat for human consumption are already in place (Section 1.5.2.1 of the Background Document). However, meat can still contain small fragments and particles of metal that cannot be easily detected and that can be far from the shot site. Further development of labelling of food products that may contain lead, e.g., detailing the risks associated with lead consumption, could be considered. At best these measures might reduce the risk of human exposure, but they would not eliminate it. In isolation, they also would not reduce release to the environment and would not address the environmental risk. They would be ineffective for meat that is not marketed; i.e., the proportion of meat that is consumed by hunters and their families/friends or that is distributed to workers at shoots.



# Non-lead – versus- Lead



**EXTRACT**

## *Key effects of lead relevant to this assessment*

The key human-health effects that were considered in the Background Document were



Risk to health

- **in the developing foetus and young children** (seven years of age and younger): developmental neurotoxicity
- **in adults:** cardiovascular effects (elevation of systolic blood pressure) kidney toxicity.

Authoritative reviews of these effects have concluded that none of them has a threshold below which they do not occur.



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# Non-lead – versus- Lead



**EXTRACT**

Exposure of humans to **ammunition-derived lead in game meat** was assessed in the Background Document. The highest consumers of game meat are hunters and their families. Employees of shoots are also likely to be high consumers.



## *Lead in game meat*

Lead ammunition that hits an animal often fragments into small particles upon impact. The degree to which this occurs, and the consequent lead contamination of the meat, depends upon the type of ammunition and its velocity.



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# Non-lead – versus- Lead



## *Lead bullets*

Likewise, the use of lead bullets can result in meat contamination. The concentration of lead and extent of particle distribution detected in meat from animals shot with lead bullets depends upon the type of bullet used. Lead bullets that are designed to expand upon impact are more likely to result in larger numbers of (microscopic) particles/fragments that are dispersed further from the wound channel, and hence are more difficult to detect and remove. Reported maximum distances of fragments

from wound channels have ranged from 5 cm for the more stable types of lead-containing bullets (those that deform without fragmenting) to 45 cm for those that are designed to rapidly expand and fragment. There also tend to be more, smaller fragments when the projectiles hit bone. Therefore, smaller bullet fragments and lead particles have been detected in meat that is intended for human consumption, i.e., relatively far from the wound channel. Average lead concentrations above the EUML have been reported in UK wild deer shot with lead ammunition, presumably bullets.

**EXTRACT**

Microscopic  
and leaching



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# Non-lead – versus- Lead

**EXTRACT**

## *4.3 Justification for action*

Market failures currently exist whereby the use of lead ammunition results in negative externalities, as well as likely constituting an information failure. These are instances when markets arrive at undesirable outcomes and can necessitate government intervention to rectify the situation. In this case, the societal costs associated with widespread pollution from spent lead ammunition are not currently internalised within the market. Additionally, those who use lead ammunition may not be fully aware of the associated environmental and human health risks.

A blue arrow pointing to the right, with the word 'Education' written in white text inside it.








Education

***There is no safe  
level of lead***



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# Concerns noted:

-  • Cost of ammunition
-  • Health & Safety – e.g. ricochet
-  • Animal welfare
-  • Night shooting & forest/urban shooting
-  • Rifle replacement
-  • Guest risk
-  • Lead –v- Copper –v- Tin etc.....what are the options?



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# *Initial key take aways*

- **A general acknowledgement that Non-Lead is coming**
- **Training and advice for Stalkers on**
  - Selection of ammunition for you, and species
  - Shot placement advice
- **SQWV needs to clearly demonstrate value to the industry**
  - Pence per kilo
  - Ring fence good operators/insurance policy
  - Open up new markets
- **Future engagement – sharing of best practice and experience**
  - Range days?
  - Stalkers group?



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## *Quote of the day.....*

*“To say non-lead doesn’t work, is like saying that all lead works.....”*

*anonymous*



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# *Why should I become an SQWV member?*

- Ensure your standards are up to date and compliant
- Certify your standards
- Protect against **Black** and **Grey market** activities & differentiate
- Reassure buyers – commercial to consumers
- Open new markets – Retail and wholesale
- Start to build value in the supply-chain



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# Q&A



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