



07/09/2020, Brussels

### FACE Position on the use of lead ammunition

**Recognising the fact** that in most European countries, regulations banning the use of lead shot for hunting in wetlands have been introduced in line with national conditions, or are close to being introduced;

**Acknowledging that** the evidence and the debate about lead ammunition is wider than waterbirds and wetlands, and that concerns encompass broader issues (e.g. safety, lethality, cost), which require close attention;

**Recalling that** FACE and its Members at the FACE General Assembly of 26 March 2010 in Brussels agreed to undertake to continue to call for the use of lead shot in wetlands to be eliminated as much as possible, particularly where there is a demonstrated risk and to make available information on suitable alternatives to lead shot;

**Acknowledging that** the phasing-out of lead shot over wetlands is in line with the principle of wise use, contributing to the conservation of wetlands;

**Considering that** nowadays suitable alternatives for lead ammunition are increasingly made available by the ammunition manufacturers in line with the demand from hunters and other consumers and that FACE members should be informed by the ammunition manufacturers about safe and effective ammunition accessible to the average European hunter's budget;

**Stressing that** further work on non-lead ammunition is required to address the impacts on the environment, wildlife populations, lethality, user safety and safety to others, and all the implications and cost of the proposed transition;

**Recognising that** a total transition to non-lead shot, initiated over 20 years ago, has fully entered into force in two European countries with a more recent transition in a region of another country since 2004, but also recognising that the situation may pose technical and legal difficulties (e.g. due to CIP regulations) from one country to another;

**Taking into account** that the CIP regulations create a range of issues regarding the availability of satisfactory non-lead shot cartridges in a number of European countries;

**FACE and its Members at its General Assembly of 7 September 2020 agreed to call for the use of lead shot in wetlands to be phased out as much as possible taking into account the following concerns:**

- Measures should be related to and proportionate to the risk of lead poisoning of birds;
- The diversity and quantity of wetlands within European countries differs and that national regulations should be both practical and understandable for hunters and enforcement officers in line with national conditions;
- Any definition of wetlands must be identifiable in the field with minimum sizes set at national level, which excludes areas without water, such as dry peatlands or dry areas dominated by peat soils;
- Buffer zones create a wide range of legal problems and are not practical for hunters and enforcement officers;



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- Current national laws do not ban the possession of lead shot when restricting the use of lead shot for hunting over wetlands and any restrictions on possession of lead shot are highly problematic and difficult to enforce.

### **FACE and its Members at the FACE General Assembly 7 September 2020 further agree to:**

- Promote the exchange of information on this topic between FACE Members;
- Call upon the FACE Ammunition Working Group to provide sound advice to the FACE Board and FACE Members on issues relating to the use of lead and all projectiles in ammunition;
- Urge FACE Members to minimise the risks from the use of lead ammunition by following the guidance on [www.leadammunitionguidance.com](http://www.leadammunitionguidance.com);
- Call upon decision-makers and policy-makers within each Member State to monitor and report on the implementation of the regulations in force.
- Request that the CIP regulations are reviewed to promote the availability of satisfactory steel shot cartridges;
- Call on FACE Members to undertake research into the impacts of all ammunition on wildlife populations, firearms, safety and lethality (which is important for animal welfare) as well as the costs of adapting/modifying firearms for hunters associated with a transition to non-lead ammunition;
- Demand a proportionate approach in the context of 'Better Regulation' to defined problems from the EU and from government authorities of the FACE membership.