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16 December 2025

Dear Edward,

The REACH (Amendment) Regulations 2026

I am writing to you in relation to the points outlined by the NZET Committee in your letter of 02 December 2025 following the Committee's scrutiny of Scottish Minister's proposal to give consent to The REACH (Amendment) Regulations 2026 (in your correspondence titled the REACH (Amendment) Regulations 2025) proposed UK Statutory Instrument. As part of the UK REACH restriction process for lead in ammunition, as laid out in UK REACH Regulation, the Health and Safety Executive (the "Agency" under UK REACH) forms an Opinion which contains recommendations on the need for a restriction. The Opinion forming process was rigorous and involved evidence gathering, expert input and two public consultations over a number of years. This Opinion forms the basis of the decision to amend the UK REACH Regulation by UK and Devolved Government Ministers.

The Agency extensively researched whether there were adequate alternatives to lead ammunition for all uses, including those in Scotland, during the Agency's Opinion forming process. A restriction would not have been recommended if suitable alternatives were not available. For example, small calibre bullets (<6.17mm) are not included in the restriction due to the current lack of feasible alternatives. After publication of the Agency Opinion and during the decision-making process, Scottish Government officials spoke to Scottish stakeholders such as The British Association for Shooting and Conservation (BASC), the Scottish Association for Country Sports (SACS), Scottish Land and Estates (SLE), Scottish Gamekeepers Association (SGA), NatureScot, and RSPB among others to confirm that Scottish interests had been adequately considered.

Officials heard land management and shooting organisations' concerns around the proposed restriction, including the classification of large and small bullets and available alternatives. Discussions with NatureScot representatives outlined that Forestry and Land Scotland contractors have been required to use non-lead ammunition for land management for several years. In addition, NatureScot colleagues published a report highlighting the possible alternatives to lead ammunition which several produced appropriate levels of velocity and muzzle energy for the smallest calibre of bullet captured by the large bullet element of the

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restriction (.243). BASC also produced a report highlighting feasible alternatives, now that the legal grain weight for such ammunition has been lowered to 80 for deer stalking, to lead which had appropriate accuracy at 100m range.

On concerns that this restriction is coming into effect suddenly, users of lead ammunition and member associations have been aware of a possible restriction for several years; the Opinion to restrict lead in ammunition was published in December 2024 following its addition to the UK REACH work programme in 2021, and before this, the industry itself, including organisations like BASC, SACS, and SLE) proposed and was working towards a five-year voluntary transition away from lead shot (announced in 2020). As well as voluntary measures, alternative risk management measures were in place prior to this restriction, for example, the ban on use of lead shot over wetlands to protect wetland bird species. However, this ban is difficult to enforce, and there is strong evidence to suggest that this ban has not been successful. The UK REACH restriction aims to be effective, practical, monitorable and enforceable.

The likelihood of eating game which contains lead depends on a number of factors, such as ammunition used and the size of the shot animal amongst others. There is mounting evidence that wild-shot game sold by various UK retailers contains lead shot. The health risks of lead are well understood, and chronic exposure to lead through repeated consumption of contaminated meat can lead to a number of serious health issues. This amendment to the UK REACH Regulation therefore not only protects vulnerable animals in the wild from poisoning by lead shot, secondary poisoning through scavenging, but also people who may be adversely affected through ingestion of lead contaminated meat.

Yours sincerely,

GILLIAN MARTIN

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