



The Muzzle Loaders' Association of Great Britain

The Governing Body for Muzzle Loading Shooting in the United Kingdom

Vice Presidents: D.J. Penn, P.W.G. Helps, A.J. Overton, D.E. Spittles

Established 1952

Home Office Approved Rifle and Muzzle Loading Pistol Club No.

CFP/10/1/7/4/1/2/1/2/3/512

Health & Safety Executive proposals on lead in ammunition

Dear MLAGB members,

The following are our recommendations to you regarding the Health and Safety (HSE) Opinion Report online survey. **It is imperative that as many members as possible with an interest in shooting muzzle loading and black powder breech loading shotguns respond to this survey and there is little time to do so as the closing date for submissions is 10th December 2023.**

Recommendations for response to HSE Opinion Report

1. Respond electronically by replying to the HSE Opinion Report 60-day response by 10/12/2023. A link to this is on-line survey is <https://consultations.hse.gov.uk/crd-reach/lead-in-ammunition/consultation/> and is shown on the email accompanying this document. Apart from the start of the online survey form requesting individual particulars, the only part that requires completion is the general comments section. Please note that the general comments section has an allowable space for 2500 characters. If this is insufficient, create a word document that can be attached to the box below on the form for file attachments. Do use this facility if you feel you don't have enough capacity in the form to say what you want to say. The link to the HSE Annex 15 Dossier Report on the Proposals To Restrict Lead In Ammunition is also shown on the email accompanying this document
2. All individuals, clubs and associations with an interest in shooting muzzle loading shotguns should respond to this 60 day consultation. It is considered that our search for derogation may be more fruitful if there are a good number of responses.
3. Write honestly how this proposed restriction in the use of lead shot is likely to affect you or your members if you are responding on behalf of a club or MLAGB branch. Please do not copy & paste, write your own words. Talk about the volume and frequency of shooting with regard to the small volume of lead shot released to the environment.
4. Talk about how muzzle loading shotgun clay pigeon shooting is likely to end after the transition period if no derogation is granted.
5. The concern for muzzle loading shotgunners is the continued use lead shot for both clay shooting and live quarry shooting after the respective transition periods. Respond to the HSE consultation in a way which reflects your interests, which may be clay shooting, live quarry shooting or both.
6. Talk about how important you muzzle loading shooting is to you and your social life.
7. Talk about being a custodian of our British gun making heritage.
8. Suggest that derogation (exemption) from any lead restrictions should be considered for muzzle loading and twist barrel breech loading shotguns.
9. For those with muzzle loading shotgun international competition interests, talk about derogation for training and competition to comply with MLAIC rules. i.e. that lead shot must be used. Talk about the two training facilities at Cambridge & Northampton.
10. If necessary, contact your MP about this matter **after** the output from the 60-day consultation has been published. This will be when this potential legislation is in the political arena.

Muzzle Loaders' Association of Great Britain, Shotgun Secretary: Martin Crix



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Detailed Discussion

The following information has been produced to assist our members with an interest in shooting muzzle loading shotguns in responding to the recent HSE Opinion Report on the proposal to restrict the sale and use of lead ammunition as an output from a MLAGB COM (Committee of Management) Zoom meeting held on 9/11/2023.

A European proposal to restrict the use of lead ammunition for hunting and outdoor target shooting was proposed by the EU chemicals agency ECHA in 2021 and is still in the process of being finalised. Prior to this the UK, being an EU member state before Brexit in January 2021, was part of these proposals. Following Brexit, the UK government was swift to form their own lead in ammunition restriction proposals via new chemical regulations termed UK REACH. The UK government appointed the Health & Safety Executive (HSE) to manage the proposed restrictions, consultation and evaluation.

In April 2022, the HSE published their report on the proposed restriction of lead ammunition. This document named HSE Annex 15 Restriction Report for Lead ran to some 226 pages. Part of the preparation for this report was a call for evidence from interested parties and a very wide spread of evidence was submitted by the gun trade association, shooting organisations (including the MLAGB), shooting clubs and individuals. Such was the volume of response that the HSE Final Opinion report had to be delayed from its 6-month intended publishing date.

The MLAGB, along with other historic shooting associations and clubs submitted evidence that stated that muzzle loading and twist barrel breech loading firearms bearing black powder proof marks should be exempted from any lead restriction by way of derogation as there was no suitable alternative projectile material to lead for the soft iron / steel barrels.

The long awaited HSE Opinion report was published on 11th October 2023 and has triggered a 60-day period response for socio-economic considerations with an end date of the 10th December 2023. In a nutshell, the report recommends that the use of lead ammunition for hunting with bullets and air gun slugs may be retained and that, subject to some spent lead management arrangements (de-leading of ranges), bullets and air gun slugs may continue to be used for target shooting on outdoor ranges. However, for shotguns and the use of lead shot in the HSE Opinion Report is very different. The HSE Opinion Report proposes that all hunting with lead shot will cease after a 3-year (from when the new law is enacted) transition period and that all target (including clay pigeons) shooting will be prohibited from the end of a 5 year transition period. The report recommends the removal of supply and use of lead shot after these transition periods with a very limited derogation from the lead restrictions for elite athletes to train and compete where the rules of their sport require the use of lead shot.

Despite the evidence given to the enquiry by the MLAGB and other historic shooting organisations, no derogation has been proposed by the HSE Opinion Report and it is assumed that we have been included in the statement that 22% of UK shotguns cannot shoot steel shot.

It is believed to a reasonable assumption that that there are approximately 150 - 200 active muzzle

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loading shotgun shooters in the UK and a similar number of shooters shooting twist barrel breech loading guns with black powder cartridges. Therefore, the number of shooters affected by these proposals is relatively small.

The main interest with shooting muzzle loading shotguns in the UK is with originals and it is a reasonable assumption to state that approximately 95% of muzzle loading shotguns in regular use in the UK are original. i.e. guns from the 1780's to the 1860's. The reason for this is that in the UK we are fortunate to have a relatively good supply of original muzzle loading shotguns in good shooting condition at reasonable cost. Therefore, for the purposes of this consultation no differentiation between original and reproduction shotguns is made.

The fact that human consumption of game which has been shot with lead shot is a high risk and primary source for ingestion of lead cannot be argued, however, careful preparation and removal of shot from the meat makes the risk tolerable. There seems to be scant evidence in the report or anywhere else that ingestion of lead shot by consumers actually does any real harm to health of consumers. Some muzzle loading shotgun shooters take part in live quarry shooting, particularly driven game shooting. The volume of shooting is very small due to the slow pace of loading, inherent in the shooting of muzzle loading guns. Shooting game with muzzle loading guns is a very effective way of getting more value (both monetarily and, more importantly, personal satisfaction wise) from a driven shooting day. The bags are very small (typically between 50 and 100 birds) and the principle of "less is more" is easily demonstrated on muzzle loading driven days. Bismuth shot is claimed by manufacturers to be the only alternative to lead shot that may be shot in twist barrel guns. However, bismuth shot is significantly harder than lead shot and is also brittle when crushed. There is no evidence that bismuth may be used in muzzle loading guns with soft iron / steel barrel construction without detriment to the barrel bores over protracted periods. Given that the volume of game shooting with muzzle loading guns is so low with the bag being shared amongst the participants it is suggested that derogation from any lead in ammunition restriction be considered for muzzle loading live quarry shooting given that the small volume of shot game generated is for home consumption and not for the commercial food chain. Corresponding loss to the environment of lead shot is so small that it is insignificant. The outlawing of the use of lead shot for muzzle loading live quarry shooting is considered a disproportionate response for a branch of live quarry shooting that seeks to improve the ethics of driven game shooting by significantly increasing the value of shooting whilst shooting considerably fewer birds.

Clay target shooting is by far the most popular and widespread use of muzzle loading shotguns. It is enjoyed by individuals, MLAGB branch members and other muzzle loading shotgun clubs throughout the UK on both a competitive and leisure basis. Clay pigeon shooting with muzzle loading shotguns stands to be most affected if the lead restriction proposals come into force after the transition period. Even if bismuth shot were to be found suitable for long term use in muzzle loading guns, the high cost of bismuth shot (13 times greater than lead at current prices from Clay & Game Reloaders) would simply be unaffordable. The MLAGB national clay pigeon competitions (7 in total) all take part on long established, commercial, clay shooting grounds and the MLAGB rules state that lead shot must be used. Club or MLAGB branch muzzle loading clay pigeon shoots typically take place either fortnightly or monthly where each shooter has between 20 and 40 shots. Therefore, the volume of shooting is small with a corresponding small loss of lead shot to the environment.

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MLAGB branches and other muzzle loading shooting clubs provide an important social hub for connection of their members, most of whom are in the older generation. The shared interest in historic arms and the camaraderie experienced when shooting them is very important to the individuals concerned. The HSE Opinion Report makes a statement that 100% of shooters who cannot shoot steel in their guns will either shoot bismuth shot or will buy a new gun that is capable of shooting steel shot is an incorrect assumption where muzzle loading enthusiasts are concerned. It is believed that many would give up shooting altogether if they were unable to shoot their original muzzle loading shotguns. If these proposed restrictions were imposed it would have a detrimental effect on these individuals and is unfair as no other suitable shot type is available for their old guns. It would also disproportionately affect our older shooters.

A few of our members compete in DTL (down the line) trap shooting internationally as part of the Great Britain Muzzle Loading Team. Selection for the GB Team requires regular attendance at training days throughout the year, typically once a fortnight, where conditions that are encountered in international competition are replicated. The competitions are over two rounds of 25 targets. The UK has two international standard training facilities, both of which are commercial clay shooting grounds. These competitions are held under MLAIC (Muzzle Loaders Associations International Confederation) rules which state that only lead shot may be used.

The British Association for Shooting and Conservation (BASC) is taking the stance that established and commercial clay shooting grounds should have derogation for continued use of lead shot given that the risks to the environment are disproportionate to the effect on clay pigeon shooters.

Yours Faithfully,

Martin Crix
Shotgun Secretary
20 November 2023



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