

PROHIBITION ON THE USE OF LEAD SHOT OVER WETLANDS: A Consultation Paper on Proposed Regulations

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Comments by

Northern Ireland Environment Link

Northern Ireland Environment Link is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 52 Full Members represent over 85,000 individuals, 262 subsidiary groups, have an annual turnover of £100 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments we would be delighted to do so.

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Northern Ireland Environment Link (NIEL) welcomes the consultation on the proposed legislation to prohibit the use of lead shot over wetlands. As the only part of the UK not to have restricted the use of lead shot NIEL believes these legislative proposals are overdue and we hope for their speedy progression onto the statute book. Without the introduction of this legislation the UK will not meet its commitments under the African Eurasian Waterbird Agreement and more recent European Union commitments. The consultation exercise will help refine the proposals and should ensure that stakeholders have an opportunity to share their concerns, expertise and experience.

The poisoning of waterbirds from lead gunshot pellets is avoidable: effective, safe and reasonably-priced non-toxic alternatives to lead (steel, bismuth and tungsten) are now widely available for hunters to use. We would urge all stakeholders to support these proposals.

Specific Proposals

There are advantages and disadvantages in adopting the different models already operating in Scotland and England/Wales:

- The model adopted in England and Wales restricts the use of lead shot below high water mark (HWM), over Sites of Special Scientific Interest for waterbirds and for shooting certain species of waterbirds. This model allows the easy identification of restricted areas while the species specific restrictions mean that lead shot is unlikely to be used over most other, non-notified, wetlands. However, Northern Ireland has yet to declare a number of Areas of Special Scientific Interest (ASSI) which are important to waterbirds and lead contamination of non-notified wetlands could continue as there would be no definitive restriction on lead shot use over these areas in this model.
- The Scottish model prohibits the use of lead shot over all wetlands. While this sounds attractive, experience from Scotland would suggest that it is difficult to define the boundary of every wetland area, be it on a map or on the ground, making compliance and enforcement particularly difficult.

NIEL does not see merit in the third option proposed by the Department: i.e. is to restrict the use of lead shot on or over the foreshore and specified ASSIs known to be important for waterbirds, but not for the purpose of shooting certain species of waterbirds.

Based on the experience of practitioners in England and Wales, and Scotland **NIEL believes that Northern Ireland should adopt the England and Wales model**. This is primarily because we believe that this model provides clarity to shooters and enforcement bodies. However, it is important that:

- The regulations list all restricted ASSIs and species.
- The ASSI network is completed as a priority.
- An enforcement policy and compliance monitoring programme is initiated from the outset.
- Advisory material (including maps of ASSIs covered by the regulations) and best practice guidance is made available to hunters.

While the prohibition of lead shot over wetlands is an important step, NIEL believes that the Department should also consider prohibiting the sale and use of lead shot in Northern Ireland. With the bank of existing and further emerging evidence highlighting the toxicity of lead and the availability of viable alternatives to lead shot we believe now is the time to progress this legislation.