

The Sportsman's Association of Great Britain & Northern Ireland



FIGHTING FOR FAIR AND EFFECTIVE FIREARMS LEGISLATION

Quarterly Newsletter 30/6/2020

The Sportsman's Association
PO BOX 2379
Salisbury
Wiltshire
SP4 4AN

www.sportsmansassociation.co.uk
Email: info@sportsmansassociation.co.uk
membership@sportsmansassociation.co.uk
mobile 07521 508076

AGM

The AGM is now postponed until restrictions on gatherings due to Covid 19 are lifted. If possible, we will try for 17th October, if the Trafalgar Meeting goes ahead.

Shooting as we Emerge from Lockdown

As chairman of BSSC Jonathan Djanogly MP wrote the following to Rt Hon Oliver Dowden MP, Secretary of State, Department for Digital, Culture, Media and Sport. *“It has been suggested that outdoor sports such as golf and angling might be amongst the first to benefit from an easing of the current ‘lockdown’ restrictions. I would suggest that shooting sports such as clay target shooting and target rifle shooting might be equally suitable.”*

The National Police Chiefs Council responded with *“As such our guidance to forces is clear; any facilities associated with outdoor sports and physical activities, including shooting ranges, can now reopen, if those responsible for them feel ready to do so and if they can do so safely, and in line with related public health guidance. Our advice extends to outdoor pest control and deer management, where, by definition, such tasks cannot be done from home, police should not hinder those fulfilling said functions, on the proviso that they are doing so in line with guidance and within the law.”*

BASC have produced a guide for deer stalking, pest control & game management, please see online.

The NRA re-opened Century, Stickledown, Butt Zero and NCSC clay ranges weekends only as of 23/5/2020. On 13/6/2020 a new range, Chobham Ridge, has been opened with multiple steel plates at varying distances. Short Siberia was re-opened on 19/6/2020. Please check the NRA website for the procedures they have put in place, all bookings must be made on-line.

The NRA and NSRA have produced guidance for outdoor clubs to re-open, so keep checking their websites for updates.

NRA <https://nra.org.uk/news/>

NSRA <https://www.nsra.co.uk/index.php/119-frontpage/2795-the-nsra-and-lord-roberts-centre>

BASC <https://basc.org.uk/coronavirus/firearms/>

CPSA <https://www.cpsa.co.uk/news/coronavirus-covid-19>

GTA <https://gtaltd.co.uk/news/shooting-grounds-and-ranges-opening-in-england/78>

MLAGB <https://www.mlagb.com/news/>

UKPSA <https://www.ukpsa.co.uk/news/covid-19-coronavirus-update/>

HBSA <https://sites.google.com/site/hbsauk/home/latest-news>

CA <https://www.countryside-alliance.org/covid-19-hub>

OFFENSIVE WEAPONS (COMPENSATION) REGULATIONS

The Government have laid in Parliament draft regulations for the compensation scheme for firearms prohibited under the Offensive Weapons Act. It is not yet known when this will be debated, or when the hand in will actually occur. In the mean-time BSSC members are taking a look at the draft regulations, surrender scheme and compensation list and will be in touch with the Home Office re any proposed changes.

The scheme is not expected to be initiated until the Government considers it safe for certificate holders to travel to police stations where necessary, although it is thought that police will in most cases make arrangements to collect firearms from certificate holder’s premises, or from RFDs.

General Licences - Please continue to monitor the websites

<https://www.gov.uk/government/collections/general-licences-for-wildlife-management>

<https://naturalresources.wales/permits-and-permissions/species-licensing/uk-protected-species-licensing/general-licences-for-birds-2020/?lang=en>

<https://www.gwct.org.uk/scotland/advice/scottish-general-licences/>

Defra GL can be contacted on 0330 159 1986 or GLenquiries@defra.gov.uk

Current General Licences (26, 28, 31, 34, 35 & 36) in England have been issued on a temporary basis which will expire on 31/7/2020. Defra will re-issue new licences from 1/8/2020.

Possible DATA Breaches at Natural England

A former SA member got in touch to say that he had been contacted by Natural England about a data breach, where his details from his application for a general licence for the control of wood pigeons have appeared on the Innocent Badger Website, <http://innocentbadger.com/news/>. He is named, and the address of the farm where he controls pigeons is given. He is totally misrepresented, as they use him in a story about the killing of parakeets and the use of traps. Neither of which he is involved in, but this does not suit the narrative of these un-named activists.

Innocent Badger openly boast:

“We have been threatened on numerous occasions by a number of different government departments to stop publishing the details of the people involved, we have completely ignored all those legal threats and will continue to ignore them.”

“We had threatening legal letters from Natural England last year after revealing confidential information, they can carry on threatening us, their threats are music to our ears. We know when they get upset we are on the right path. If they don't like it then they can stop licensing badger culls.”

The behavior of Innocent Badger is alarming and puts the security and safety of those they name, and misrepresent, in danger.

Further down the page Innocent Badger name and provide the addresses of at least three people saying all have firearms/shotgun licences, making them an open target for criminals, and other unpleasant activists.

Please let us know if any of you are similarly affected.

Medical Reports for Licence Renewals and Applications

If you are having difficulty obtaining a medical report from your GP for your firearms/shotgun/explosive licence renewal or application, you may want to contact MedCert, a highly eminent group of medical professionals who are very supportive of shooting, to do the report for you.

The idea of MedCert was formed after a day of good shooting, followed by good food and drink, in good company, as many a good idea is. After consultation with all the Firearms Licensing Authorities and many chats with well-known FEO's, MedCert launched their Website.

MedCert provide a service by doctors, GP's and above, with a wide medical knowledge base, who will immediately on your application to them, request your medical records from your GP (can take upto 4 weeks to arrive), and within seven days of receiving your notes, write a medical report taking into consideration the licensing criteria. This will then be sent to yourself or to your licensing authority, depending on the individual licensing authorities' procedures. If there are further issues with regard to the medical report MedCert will stay with you until your licence is renewed/issued. All this for £50

MedCert are fully GDPR compliant and no information is shared with anyone else. Each applicants' medical notes are given a reference number, only the doctor writing the report will know who you are. The report will be entirely evidence based, nothing personal about it. There will be no medical marker placed on your notes either, as they do not keep your records.

MedCert can be contacted via www.medcert.co.uk , or for those without internet, at MedCert, Zinc Building, Great Stoney, Chipping Ongar, Essex, CM5 OAD

Tel. 020 8063 4503 – Discount for SA Members of 10% using code SA1996

Meeting with Minister for Crime & Policing Re Medical

Reports

The BSSC met with Kit Malthouse MP, the minister for Crime and Policing with regard to medical involvement in firearms licencing. Also present were interested parties from parliament, police medical and shooting associations.

Jonathan Djanolgy MP, chair BSSC, said shooting organisations wanted to address five points;

1. A move to 10-year certificates.
2. A simple verification process.
3. A standard questionnaire form.
4. The continuous marker on medical records.
5. The medical fee charged, recommended at £50.

The police view was that the medical report was only a screening check, but that most forces were moving to the position that no medical screening, no certificate. That the applicant should request the medical information, preferably from their own GP, for several reasons. For the applicant and GP to build on the rapport between them, and to reduce the time and cost to the police making the process more efficient. This would then be comparable to other processes like passport and DVLA applications.

The BSSC has supported the Home Office view that the police should be responsible for contacting the GP, and that the GP would then be more likely to respond quickly. If it is to be the other way around the rules on what is required in an application for a certificate will have to be changed.

The British Medical Association want a single national system, not one fragmented by different police authorities. A national IT system for the medical marker is also being worked on, so that if an adverse diagnosis is made it can not be missed by the GP. In order for the flagging system to be effective the need for the certificate holder to remain registered with a GP was expressed. BSSC said the law required a certificate holder to be registered with a UK practice.

Geoffrey Clifton-Brown MP brought up the security of the medical marker to protect the certificate holder. Once the IT system is finished, and it is not known when that will be, the marker should only be visible to some parts of the system, and invisible to the rest.

When asked about whether certificates should last for 5 or 10 years, the police said it made little difference, although if for 10 years this may enable resources to be re-allocated to where it was needed most for public safety. When asked by Kit Malthouse the BSSC agreed to a trade off whereby the applicant would be required to obtain medical verification if it was for a 10-year certificate.

BASC then asked why not a certificate for life? The police said renewal offers a time to re-assess the applicant, but acceded that this was only valid at the time the checks are made.

The inconsistency of fees charged was brought up, which some of the medics present defended, strongly believing that as senior professionals £175 for 40-50 minutes work was acceptable. They did not understand how MedCert could do it for £50. The BMA said they were not in the business of defending excessive fees. Some police forces have negotiated set fees locally.

The BSSC pointed out that the 2016 guidance requires a record check of yes/no answers to whether an applicant has suffered from one of 8 listed conditions. GP's have different interpretations of what a medical report consists of and some police forces have introduced additional questions to the report, all impacting on fees. For medical reports to be applied uniformly then there should be one form agreed on by the Home Office for GP's to use. A form, based on the HGV medical requirement, was recommended by some of the medics' present.

BSSC said it must be impressed upon GP's that they are being asked for factual information only, not opinion, and that the decision to issue a licence remains only with the police, and that GP's are not liable

When asked to make any final comments the police accepted that there was no perfect system, and that if progress could be made on the principle of no medical screening, no certificate, and that the medical markers be put in place whilst accepting that some time will be needed to perfect this, then it is better to move ahead with what we can agree on.

Kit Malthouse ended the meeting saying the Home Office will work on what had been agreed on in terms of a longer certificate life, if the applicant will do more of the administration and work on costs will continue.

EU Regulation – Lead in Gunshot In or Around Wetlands

The EC are about to vote on their planned restrictions on lead shot over wetlands. FACE are urging member nations to reject the proposal due to serious legal and practical issues.

Banning possession/carrying of lead gunshot: The Commission proposes "anyone found in or around wetlands carrying lead gunshot while out shooting, or as part of going shooting, is **presumed** to be carrying that gunshot while out wetland shooting, or as part of going wetland shooting". This establishes a legal presumption that hunters must prove they have not been shooting over wetlands if carrying lead shot. The presumption of innocence is an extremely important EU law in all member

states, the burden of proof is on the prosecution to prove an offence. The Commission's proposal is illegal. Fundamental principles of EU law must not be interfered with for lazy administrative convenience of enforcement.

Definition of Wetlands and Inclusion of Buffer Zones: The Commission propose to use the Ramsar definition of Wetlands, this includes peatlands, wet or dry, and that a 1m² of temporary water, say after rain, constitutes a wetland. Combined with 100m buffer zones, this makes wetland boundaries perpetually movable. This does not fulfil the principle of legal certainty, making it unlawful and very impractical to administrate.

Transition Period: The EC propose a shorter period of 24 months, rather than the original proposal of 36 months. The transition period should be at least 36 months, and 60 months for countries that do not already have any restrictions in place.

Applicability of REACH to hunters: The original scope of REACH regulations was originally intended for industry. It is unclear whether the REACH regulations can legally apply to hunters as consumers.

I do not have any further information at this moment to give you on the EU's plans to further restrict the use of lead ammunition. I have been reading a lot on the subject of lead contamination/ exposure in relation to shooting, and was inspired by a draft paper written by SVENSKT, and distributed via the BSSC to write the following weighty piece. It has been many years since my A-level chemistry, so please correct me if I have any of the science wrong. I have done my best to make a complicated subject as easy to understand as possible, and used information from other texts both for and against the use of lead.

The Swedish Forum for Hunting (SVENSKT) questions the objectivity, technical insight into weapons and ammunition, and scientific foundation for much of the European Chemical Agency's Report. Viewing it as intended to support political policy decisions to achieve a "non-toxic" environment by the banning of all use of lead.

Over 6000 years ago humans learned to extract metallic lead for a variety of uses, and to produce lead compounds. Lead ore is commonly found in the Earth's crust, and is one of the world's most used metals. Even with the natural abundance of lead over half of all lead produced each year comes from recycled materials, giving it one of the highest recycling rates for materials commonly used today. Figures from 2008/2009, worldwide production of Lead exceeded eight million tonnes. Five million tonnes of this was from recycled materials. We shooters are regularly recycling our own lead.

In the ECHA report they explain their focus on lead as “lead-based ammunition is considered to be the most significant unregulated source of lead deliberately emitted into the environment in the EU”. SVENSKT assert that if manufacturing figures for ammunition are used it is very possible to calculate the amount of metallic lead used for hunting and shooting. Also, the dispersal of lead is restricted to known hunting/farming areas or ranges. This data can then be compared to other industries using lead. What is perhaps being ignored is the amount of lead ammunition deposited in European soil from war. Using US manufacturing statistics, the combined weight of lead from WWI and WWII can be estimated at one million tonnes, compared to what we deposit through hunting/target shooting.

Using SVENSKT Swedish data, 80% of lead ammunition manufactured is used for shooting activities, which are conducted in purpose-designed locations or limited geographic areas. Within these locations/areas the concentration of metallic lead in bullet traps or deposition areas for shot is high. However, these are localised deposits which can be cleaned, or in the event of lead compounds leeching into the soil, treated. Studies at Swedish Military shooting ranges have shown no notable leeching from bullet traps, into adjacent soil or groundwater.

Another study of contamination of shooting range soils from the use of lead bullets looked at both the weathering reactions and the abrasion of lead bullets as they pass through soil in contributing to lead soil contamination. To do this a known mass of bullets was fired into the sand of both a pistol and rifle range. It was found that a bullet lost 1.5% of its mass through abrasion. The soil was tested using synthetic precipitation leaching procedure for leaching of lead, with a result of $PB > 15$ microg/l, (15 microg/l being the maximum allowed). The weathering of lead was also tested in the laboratory, which found that all the lead converted to oxides and carbonates within one week. The authors concluded “Our study demonstrated that abrasion of lead bullets and their subsequent weathering can be a significant source of lead contamination in soils of a newly opened shooting range.”

But there are conflicting reports on the accuracy of these laboratory tests as there is another test for leaching, the toxicity characteristic leaching procedure. Both SPLP and TCLP take the same amount of time, but will give very different results on soil taken from the same range at the same time. In both tests the soil sample is put into solution, but in the TCLP the lead will revert back to solid lead with a protective layer on the surface preventing it from being further dissolved and therefore unable to leach any more. Which was the better leaching test to use, especially considering the results of the weathering test.

SVENSKT point out that the weathering of the lead forms an insoluble coating on the surface, which protects the underlying metal. When exposed to the outdoor atmosphere the surface of lead reacts to form lead oxide, which further reacts with carbon dioxide or if in an industrial area sulphur dioxide, these reactions create a

protective layer which has a low solubility. These weathered lead oxides and lead carbonates therefore pose minimal risk of leaching into the ground water table.

But many of these statements and studies seem to be too narrow, as most studies have focused simply on the amount of lead in the soil, with the occasional leaching test. The mobility and bio-availability of lead in soils varies considerably depending on the type of soil, how much and what type of vegetation is present, what sort of weather is experienced, water table etc... Ranges and soils in different geographic locations will give different results. SVENSKT make a valuable point when they suggest we should consider the location of ranges.

While writing this I only found one study, “Speciation and mobility of lead in shooting range soils”, done in Botswana, which covered both the mobility of lead, and the bio availability of the lead, and took into consideration the different forms of lead. Here is an extract “To better understand the risk posed by elevated levels of Pb in the environment, it is important to understand the different chemical species in which Pb exist in the shooting range soils (free metal, metal-organic complexes and salts). The different forms of heavy metals and their reactivity with the specific target constituents of the soils help ascertain for their solubility, mobility, bioavailability, fate and ecotoxicological importance in the environment.”

In pure water, pure lead is not soluble, but once you have the presence of dissolved oxygen and carbon dioxide in water the lead will corrode, the more acidic the water, the more lead that will be dissolved into it. In marine environments, it takes twice as long for the protective layer of carbonates to form, even so saline waters, including seawater, are generally less corrosive to lead, except in the presence of chlorine ions in flowing water.

I could find no information that the addition of tin and antimony to form hard lead has any quantifiable effect on lead solubility. However, the individual metals used in a bullet will leach by different percentage amounts under the same conditions.

Lead poisoning occurs when the body absorbs lead in large amounts by inhalation, ingestion or through the skin, over a period of months or years. Although acute lead poisoning is relatively rare, less than 2000 cases per year in the UK. We are exposed to lead sources in the air, water and foods we consume daily.

Lead is naturally present in the environment. However, it has become more widespread because of human (anthropogenic) activities. With the removal of organic lead compounds in fuel and the phasing out of lead in pipes and paints, the major sources of lead in the environment are from industrial emissions from mining, smelting, recycling or waste incineration, all of which are regulated and monitored to decrease contamination. So will the banning of lead ammunition be proportional to the toxic threat, especially if we can clean up after ourselves. Have all environmental factors been taken into consideration when blaming lead ammunition, and how likely is it to make a measurable difference to human or wildlife populations? The Norwegians clearly saw no benefit or they would not have repealed their ban on all lead shot, except for over wetlands.

With increased regulation on lead products, and in industries using lead, diet is now considered the main source of lead exposure in the EU. Cereals, vegetables, tap water, alcohol and smoking are important contributors to lead exposure to all humans across the EU. With ammunition derived lead from game the main source of exposure to those who eat game on a regular basis. Estimated at approximately 5 million people across the EU. The rate of absorption of ingested lead varies depending on age, nutrition and general health, and the physical and chemical form of the lead ingested.

Lead limit values in foods are published as directly bio-accessible lead ions. Except for meat from game, where finds of metallic lead are considered to be fully bio-accessible. SVENSKT view this as a failure by ECHA to differentiate between the risk from bio-accessible lead compounds which are soluble, and metallic lead in solid form. One study shows the bio-accessibility of lead in game meat varies between 1-2% of the total content depending on the size of the fragments.

Many different studies have been done to assess how much of the bullet remains, whether whole or fragmented, and where in the carcass these bullet remains are found. One method is to calculate the difference in weight of bullets recovered from a carcass, to an unfired bullet. This varied depending on the type of bullet used, but in one study the results were 0-15% for copper, 10-25% for bonded lead core, 18-26% for lead core.

The most common method to determine the quantity, size and location of bullets/fragments is x-ray. Standard x-rays have shown small fragments of lead to have radiated out from the wound channels by upto 24cm or more. SVENSKT dispute the accuracy of these x-rays, as unless the animal has been x-rayed in the exact position it was shot in, and depending on the angle the x-ray is taken at, in relation to the wound channel, they can be misleading. SVENSKT say computer processed combinations of many x-rays taken from different angles are necessary to get a better picture.

Or, to be as accurate as possible, to CT scan an un-butchered animal, with all it's organs in place, which has been hung and fixed in the position it was in when shot, then frozen for a couple of months once rigor mortis has set. They argue that CT imaging of the half-thawed animal will give a more accurate level of lead fragmentation and dispersion including lead dust. The delay of two months before testing tissue samples will also allow for a more accurate assessment of the dispersal of soluble lead tissue contamination. SVENSKT expect this to be present only in the tissue immediately around the lead fragments.

Lead shot can also fragment when fired into wild game, and again x-rays have been used to prove this, and yet again the dispersion of the fragments has varied from localised along the wound channel, to clustered around bone or throughout the carcass, bringing into question the techniques used when taking the x-rays.

When butchering wild animals for food it is very clear that every effort has to be made to remove as many fragments as possible, mostly by discarding a large enough area around the wound channel and constantly cleaning the knives to prevent transfer. SVENSKT state lead fragments that remain can only produce 1-2% of their weight in bio-accessible lead compounds in the stomach.

There are studies showing that people who eat game killed using lead ammunition have higher blood-lead levels than people who do not eat game, and some link the amount of lead in the blood directly to the amount of game eaten, thus proving the ingestion of lead ammunition as the cause.

Some studies have indicated that the blood-lead level from ingestion of ammunition derived lead was lower than that expected for lead from other dietary sources. Supporting SVENSKT view that only a proportion of the lead ammunition ingested is absorbed into the body, and the amount absorbed is less than that of lead in the general diet because the lead ingested largely remains as metallic lead and is excreted by the body.

If blood-lead levels are raised from ammunition derived lead in ingested game, how long are the levels raised for before the body excretes the lead, which would suggest short term effects, and how much of the lead absorbed is transferred to other body tissues or bones, suggesting long term effects?

Other studies have shown little or no effect of eating game on blood-lead levels.

This begs the question of how reliable these studies are, what their control groups are, does this vary from geographic area, from consumption of other lead contaminated foods and drinks, type of employment of participants, are they involved in leisure activities involving lead products. What exposure to lead contamination has the game ingested been exposed to, the list of variables goes on?

Sadly, it seems that you can find a study to prove your theories/beliefs whichever side of the argument you are on. This does not make for sensible policy decisions which will affect many people's lives and incomes.

In the report "Risks to human health from ammunition-derived lead in Europe" published in 2019 using data from FACE and BASC it was established that hunters and those responsible for land management, and their families, are the main consumers of game on a regular basis throughout Europe, with everyone else being occasional consumers, and that they constitute approximately 5 million of the EU population, about 1% in total. Therefore, if they *"are likely to be broadly representative of the EU this illustrates that the number of people at potential risk of health effects from lead in game is **nonnegligible** across the EU. Taking the consumption of at least one meal of game meat per week, averaged across the whole year, as the definition of a high-level game consumer."*

SVENSKT argue that the consumption of game meat and the use of lead ammunition should be a personal matter and not restricted. In the same way that alcohol and tobacco use are not restricted for private use, yet both are well known for their effects on human health.

I have not even touched on the alternatives to lead in ammunition, that will have to wait for another time. My personal conclusion is that we are going to be under increasing political pressure to prove that we have the welfare of all of the natural world at the center of everything we do in the shooting community. This may mean sometimes having to make changes to how we do things, hopefully because we have found a better way to do things, and at other times proving beyond reproach that we are already doing the best practice possible.

Any suggestions on how Sportsman's Association should be addressing these issues is very welcome. Or if you have other issues you think we should be tackling, do let us know.

Membership Cards

I will soon be getting a machine to make credit card style membership cards with photo ID on them. So get ready to send me your ugly mug shots, I'll let you know how before too long, if you are not familiar with phone cameras etc. find a youngster, and they will be able to do in seconds what will have taken some of us hours to manage.

Here is an example, although I need to work on my smile!



of Great Britain & Northern Ireland

Membership No. 000000

Name: Rachel Westlake

Expiry Date: dd/mm/yyyy

£10 Million Public Liability Insurance

Membership includes third party public liability insurance cover for an indemnity of £10 million any one incident, including Member to Member legal liability and indemnity to principle, not subject to excess.

For full cover please refer to paper cover note as issued on joining/renewal.

The Association must be notified immediately of any incident which may give rise to a claim.



PO BOX 2379, SALISBURY, SP4 4AN

07521 508076

www.sportsmansassociation.co.uk

membership@sportsmansassociation.co.uk

Keep on keeping well,
Rachel Westlake.