

Annex A

Request

- 1) *Could you please provide me with all correspondence (between FSA and external organisations, companies and/or individuals) since Jan 1st 2017 up to the 10th December 2018 regarding the FSA advice on eating lead shot game: <https://www.food.gov.uk/safety-hygiene/lead-shot-game>*
- 2) *The above link to the FSA advice states that the advice was updated on the 19th December 2017. Could you tell me what changes were made to the advice and the evidence base for those changes.*
- 3) *Could you please send me the full text of the advice on eating lead shot game before it was changed on the 19th December 2017*
- 4) *Have any meetings been held between the Chairman of the Board, Heather Hancock and representatives of any of the following organisations: The British Association for Shooting and Conservation (BASC); The Game and Wildlife Conservation Trust (GWCT); The Moorland Association and The Countryside Alliance.*
- 5) *Regarding question 4, if any meetings have been held could you please provide me with the dates, which organisations attended, agenda and minutes from those meetings.*
- 6) *Have any meetings been held between any FSA staff and representatives of the British Game Alliance*

Response

- 1) The FSA routinely refers enquirers to the FSA advice on eating lead shot game when responding to enquiries from members of the public or other stakeholders about lead shot. However, from the wording of your request we have interpreted that such routine correspondence is outside its remit, which is focussed on correspondence regarding the advice itself. In the period of interest there has been no correspondence regarding the advice.
- 2) The FSA web page containing the advice on lead shot game was updated on the 19th December 2017. This update was undertaken in advance of the migration of content onto a new FSA website which launched in January 2018. Whilst a number of stylistic changes were made to fit with the new website style guide the substance of the advice did not change.
- 3) The full text of the previous version of the advice can be found on the archived webpages at the following link but for ease this text has been included in Annex B of this response. The text of the current advice is included on Annex C for comparison.
<https://webarchive.nationalarchives.gov.uk/20180411152728/https://www.food.gov.uk/science/advice-to-frequent-eaters-of-game-shot-with-lead>

- 4) No meetings have been held
- 5) Not applicable see response to question 4
- 6) No meetings have been held between FSA staff and representatives of the British Game Alliance relating to lead shot.

Additional informal information concerning the FSA advice on lead shot game

The protection of public health from risks which may arise in connection with the consumption of food is paramount to the FSA and legislation exists to ensure that food sold in the UK is safe to eat.

There is no agreed safe level for lead intake and therefore exposure to lead should be reduced as low as reasonably achievable. This is especially important for vulnerable groups such as toddlers and children, pregnant women and women trying for a baby, as exposure to lead can harm the developing brain and nervous system.

Maximum levels for lead are established in legislation for a number of foods in order to limit consumer's dietary exposure to lead, however no level is set for game meat.

At European level it has been considered that due to the very variable nature of lead levels in game shot with lead, consumer advice would be a more effective risk management measure.

In 2012 the FSA published advice for consumers who frequently eat lead shot game, particularly small game, to eat less of this type of meat. This advice is also publicised on the NHS Choices website¹.

In April 2010 the Lead Ammunition Group² (LAG) was set up by the Department for Environment Food and Rural Affairs (Defra) and FSA to serve as an independent body and bring together relevant stakeholders and experts to advise the UK Government and its agencies on human health and environmental impacts of the use of lead ammunition and provided its final report to Government in 2015. At that time the FSA requested that the independent Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT) review the LAG report and advise the FSA. The COT advised that FSA advice did not need updating.³

The 2015 LAG report therefore did not change the FSA advice for frequent consumers, particularly pregnant women and children, to reduce consumption of lead shot game. The FSA actively participates at the European level in the review of food safety legislation and the setting of maximum limits for a range of chemical contaminants,

¹ <http://www.nhs.uk/conditions/pregnancy-and-baby/pages/foods-to-avoid-pregnant.aspx#Game>

² <http://www.leadammunitiongroup.org.uk/>

³ <https://cot.food.gov.uk/sites/default/files/reservedminutes-08sept2015.pdf>

including lead and continues to ensure that policies, decisions and advice are based on the best available scientific evidence and analysis, including independent expert advice. The FSA will continue to provide advice to consumers and take action, where appropriate, to reduce exposure to chemical contaminants, such as lead, in food

The LAG have published an executive summary of an updated report on the LAG website⁴. A draft version of the executive summary was circulated to members of the LAG including the FSA in May 2018 but the FSA was not involved in further correspondence regarding this updated report.

⁴ <http://www.leadammunitiongroup.org.uk/>

Annex B

Previous advice available from archived FSA website at following link

<https://webarchive.nationalarchives.gov.uk/20180411152728/https://www.food.gov.uk/science/advice-to-frequent-eaters-of-game-shot-with-lead>

Advice to frequent eaters of game shot with lead

The FSA's advice since 2012 is that frequent consumers of lead-shot game should eat less of this type of meat. Eating lead-shot game on a frequent basis can expose consumers to potentially harmful levels of lead.

To minimise the risk of lead intake, people who frequently eat lead-shot game, particularly small game, should cut down their consumption. This is especially important for vulnerable groups such as toddlers and children, pregnant women and women trying for a baby, as exposure to lead can harm the developing brain and nervous system.

Not all game is shot with lead. Generally, the large game sold in supermarkets is farmed and will have no or very low lead levels. The FSA's advice is not applicable to consumers of such meat. People unsure about whether their game has been shot using lead ammunition should ask their supplier for information.

This advice is based on a study of consumers of wild game, conducted by the FSA in Scotland and published in 2012, and also pre-existing data on lead levels in these types of food in the UK.

There is no agreed safe level for lead intake. Independent scientific expert groups across the European Union advise that exposure to lead should be reduced as far as possible.

Annex C

Text from current FSA website

<https://www.food.gov.uk/safety-hygiene/lead-shot-game>

Lead-shot game

Eating lead-shot game on a frequent basis can expose consumers to potentially harmful levels of lead. Those who eat lead-shot game should minimise the amount they eat, especially for small game animals.

Lead-shot game refers to:

- Pheasant
- Partridge
- Black grouse
- Red grouse
- Ptarmigan
- Brown hare
- Deer
- Duck
- Goose
- Wood pigeon
- Woodcock
- Snipe
- Rabbit
- Golden plover

shot for food using pellets or balls made of lead.

Eating lead-shot game meat on a frequent basis can expose you to potentially harmful levels of lead.

To minimise your risk of lead intake, if you frequently eat lead-shot game meat, particularly small game, you should cut down your consumption.

Exposure to lead can harm the developing brain and nervous system. So cutting down the amount of lead-shot game eaten is especially important for:

- toddlers
- children
- pregnant women
- women trying for a baby

Not all game is shot with lead. Generally, the large game sold in supermarkets is farmed and will have no or very low lead levels. You don't need to worry about eating this kind of game meat. If you're not sure whether game has been shot using lead ammunition or not, ask your supplier for information.

The science behind our advice

Our advice is based on a study of consumers of wild game, conducted by the FSA in Scotland and published in 2012. We've also used existing data on lead levels in these types of food in the UK.

There is no agreed safe level for lead intake. Independent scientific expert groups across the European Union advise that exposure to lead should be reduced as far as possible.