



NATIONAL HUNTING & SHOOTING ASSOCIATION

Accredited with SAPS (CFR) as
Hunting Association: FAR 1300050
Sport-shooting Association: FAR 1300088

1131 Justice Mahomed Street,
Brooklyn, Pretoria, 0181.
PO Box 190, Menlyn, Pretoria, 0063.
Tel: 087-945-3355
Fax: 0865 113 555
Email: admin@natshoot.co.za
Web: <https://natshoot.co.za>

NPC Registration no: 2015/278984/08

VAT No: 4110272293

PBO no. 930053143

Responsible and Accountable Firearms Ownership

16 November 2018

Mr T de Jongh
Assistant Manager – Biodiversity
DEDEAT

Dear Mr de Jongh,

EASTERN CAPE: DRAFT PROVINCIAL HUNTING PROCLAMATION 2019

1. In the Addendum to the draft hunting proclamation for the Eastern Cape for 2019, there is a section with title: Please note the following (following paragraph 33(1) of the Addendum).
2. In that paragraph the following is stated:

*“LEAD TOXICITY - Lead ammunitions are responsible for poisoning and their use by hunters has been banned. Even if it is no longer the subject of discussions, as a result of scientific evidence, the implementation of this decision taken in 1995 by the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) Parties is still outstanding. Only a third of the countries, of which South Africa is one, that are Party to AEWA have prohibited lead ammunition over the last 15 years.
Your cooperation in assisting with taking steps to ensure the transition to lead-free ammunition is sought”.*
3. As a SAPS accredited hunting association with close ties to the functioning of the DEA Wildlife Forum, the statement that lead-based ammunition (unqualified) has been banned for the use in hunting in South Africa, seemingly since 1995 already, comes as a surprise, as we are not aware of any such ban.
4. We are thus, not one hundred percent sure how we as hunters should interpret the inclusion of this paragraph into the Eastern Cape proposed hunting proclamation for 2019 and need your assistance in providing some clarity in our understanding of the paragraph's content and context, please.
5. For example; how does the 1995 decisions on the use of lead-based ammunition of the AEWA (predominantly focussed on the hunting of waterfowl in Europe), impact on the hunting of springbuck or kudu in the Eastern Cape (and in wider South Africa)? And further; how does it impact on waterfowling or the hunting of groundbirds in South Africa against the background of a severe lack of comparable data on gamebird population numbers in all provinces in this country, as well as on the number of gamebirds annually hunted? And lastly, what constitutes the body of scientific data on the cause of death of wildlife with reference to furred and feathered game animals in this country, other than by hunting?

Executive Council: Dr Herman Els; Mr Juan Kotzé; Mr Robert F Young (Jnr); Mr Robert F Young; Mr Hardus Els.



6. We would also like to draw your attention to the fact that only a third of the countries who are part of the AEWA have after 23 years signed their 1995 decision on the use of lead-based ammunition. That fact alone, we suggest, should convey some form of careful reconsideration of the hard stance on the use of lead-based ammunition put forward in your proposed 2019 proclamation.
7. We are also not sure who you address when you make the last request for cooperation, as quoted in paragraph 2 above. We assume you are “talking” to the hunting fraternity. In that context we state that we hear your request and do not stand irresponsible towards it.
8. However, in view of the lack of peer-reviewed scientific evidence of lead poisoning of huntable wildlife species through the use of lead-based firearm ammunition in this country, and noting that the lead in vehicle exhaust fumes and other forms of lead pollution of the air constitute a far greater health risk to man and animals alike, we have to conclude that available South African scientific evidence does not justify restrictions on the use of lead-based hunting and sport shooting firearm ammunition.
9. Moreover, if there was a ban on the use of lead-based ammunition as is quoted in paragraph 2 above, firearms dealers in this country would all be busy with illegal business in selling the high numbers of fully loaded factory ammunition for all the various calibres of hunting rifles and handguns and bores of shotguns, which hunters legally use. Neither would they be able to legally sell the high numbers of rifle and handgun bullets for reloading purposes, nor of shot for shotshell reloading (the SAPS list of firearms for which licences are issued in this country includes 1,463 different calibres, from air rifles to the outsize .50 Barret - all using lead-based bullets).
10. The absolute majority of the different brands of factory loaded ammunition sold by dealers, use lead-based bullets covered with one or other kind of copper or copper derivative. Lead is used extensively in shotgunning, and there are a large number of hunters making their own bullets from lead for use in handguns and in black powder firearms, or for making of shot for reloading of shotshells.
11. It is virtually impossible to buy shotgun ammunition with steel shot or bismuth in this country as dealers just do not import that kind of ammunition as they cannot sell it due to the exorbitant high costs they have to charge their clients when selling it. If shotgunners cannot use the available lead-based shotshells, which are the only shotshells available at dealers, wingshooting in the Eastern Cape, where the hunting of Orange River Francolin is a speciality, will be stopped. The same will happen with the hunting of small furred game animals, which are very frequently hunted with shotguns in that province. Thus, causing an implosion of a section of the wildlife sector in the Eastern Cape.
12. Apart from the economic implosion of the firearms industry due to the more than double the cost of copper-based bullets for use in hunting rifles and handguns, the banning of lead-based rifle and handgun ammunition will cause the whole wildlife industry in the Eastern Cape to suffer serious economic decline due to a much smaller pool of hunters being able to afford copper-bases factory ammunition and bullets for reloading made from copper or copper-derivatives (this obviously will also cause serious job losses, something the Eastern Cape in particular, cannot afford).
13. That said, your attention is also drawn to the fact that no science suggests that lead in shotgun ammunition is the major cause of death in waterfowl *per se*, even in USA and in Eurasia, where literally millions of wingshooters hunt feathered game annually. That lead can cause the death

of certain raptors and of some shovelling waterfowl, has been shown on individual birds, but this cannot be extrapolated to the wider sections of the wild populations of said birds (especially not in this country – we just don't have the scientific data).

14. In the USA their ban on lead-based ammunition has been recently rescinded and is effective only over their extensive wetlands. In Norway, a commonly acknowledged highly eco-friendly country, the ban on lead-based ammunition also only has reference to its use over their extensive wetlands.
15. We attach hereto, a position paper on the effects of the use of lead-based shot in wingshooting in this country. The document was compiled by Mr André van der Westhuizen, highly respected CEO of the SAPS accredited hunting association, SA Wingshooters, and submitted to the Hunters Forum on 20 April 2016. Mr van der Westhuizen concludes the document with the following comments:

“There is no evidence of large numbers of birds succumbing to ingested lead shot poisoning. In South Africa, the leading cause of mortality in gamebirds is the misuse of agricultural poisons with 14% of farms reporting gamebird-poisoning (Viljoen, 1998). This is followed by habitat destruction, mainly replacement of natural habitat by monoculture systems, destruction of wetlands and pollution.

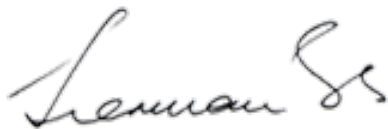
Lead pellets are not the only source of lead metal in the environment. Most of the gamebird hunters in South Africa pursue terrestrial gamebirds and most waterfowl are shot on grain fields or on flight lines en route to grain fields. A survey amongst SA Wingshooter members (in 2003) indicated that less than one percent of waterfowl are shot in or near wetlands where it can be a risk to our dabbling waterfowl species.

In South Africa, and in fact, in all studies done globally, the risk of lead poisoning by shotgun pellets, rifle and handgun ammunition is insignificantly small compared to other sources of lead and other threats to our wildlife to warrant any restrictions on the use of lead shot in any ammunition”.

16. The comprehensive NHTSA position on the use of lead-based hunting and sport shooting ammunition can be read in our Newsletter Vol. 12(28) dated 21 April 2016 on our website - <https://natshoot.co.za/nhsa-info/nhsa-newsletters/vol-12-28>
17. As hunters and responsible conservationists, we are much more concerned about the “environmental poisoning” by pesticides and pollution by Endocrine Disruptive Chemicals (EDCs) and radioactive heavy metals, which constitute an environmental crisis of much wider proportions (and danger) (an aspect which is very badly managed in this country as a whole). We also with extreme concern, note the continuous malicious poisoning of wildlife through the irresponsible use of pesticides, which has become widespread. The increasing pollution of our drinking water systems by, again, EDCs and the dramatic pollution of our waterways (i.e. recently the Vaal river system) and our wetlands by heavy metals including uranium, arsenic, cyanide, cadmium and radio-active polonium, is, we submit, a far more serious environmental hazard for man and animal alike, than the use of lead-based hunting ammunition.
18. We are therefore, of the considered opinion that the all of a sudden concern re the use of lead in hunting and sport shooting firearm ammunition, constitute an unnecessary distraction in addressing the above-mentioned far more serious environmental and health risks, of which the responsible management is seriously lacking in the whole of our country.

19. The Eastern Cape has become one of the prime hunting destinations in South Africa. The negative consequences of the suggested hard stance on the banning of lead-based ammunition in the proposed 2019 Eastern Cape hunting proclamation, suggests a much wider negative impact on the Eastern Cape's wildlife sector, than that suggested by the not so extensive scientific data on the purported impact of the use of lead-based ammunition in the hunting of furred and feathered game in that province.
20. Therefore, in line with your request "...*Your cooperation in assisting with taking steps to ensure the transition to lead-free ammunition is sought...*", we ask that you please afford the South African hunting fraternity the opportunity to enter into discussions with you on this matter. Please discuss this matter with the legal firearms owners before entering the current paragraph on the banning of lead-based ammunition in the Eastern Cape into your proposed 2019 hunting proclamation, as it then becomes what we believe to be ill founded law.

Yours in conservation through accountable sustainable use.



Dr Herman Els

Executive Chair: National Hunting & Shooting Association

Tel: 087-945-3355 (Option 4)

<https://natshoot.co.za>