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To whom it may concern
European Chemicals Agency (ECHA)

Proposed EU ban on lead (Pb) ammunition and fishing weights

I write to express the support of the Namibian Chamber of Environment (NCE), and its 70 environmental NGO Members, for the proposed restriction of lead projectiles (bullets / ammunition) for hunting rifles and shotguns, where the ammunition will be used for hunting, harvesting, cropping and culling of wildlife; and for the proposed restriction of lead sinkers for fishing.

Wildlife in Namibia forms an important component of this country's land use and economy, on state, private and communal lands. The environmental NGO sector in Namibia supports hunting and the sustainable utilization of wildlife because our policy and legal framework links market incentives with conservation and rural development. Wildlife numbers in Namibia have increased over the past 40 years from 0.5 million to about 3 million today because wildlife is now a competitive form of land use. However, the environmental NGO sector does not support the use of lead ammunition because of its toxic impacts on people and scavengers, particularly vultures. Many communities eat game meat on a regular basis and are at risk of lead poisoning, particularly children.

There is a growing body of scientific evidence in Southern Africa on the levels and impacts of lead on vultures. There has been virtually no work on mammalian scavengers (hyaenas, lions and jackals) but we also expect to see elevated levels of lead in these species. For these reasons, Namibia is currently moving towards phasing out lead in both the hunting and fishing sectors. Our approach is to: (a) make hunters, farmers, game meat processing businesses and the general public aware of the risks associated with lead in meat, (b) provide information on the effectiveness and efficiency of lead-free ammunition, (c) introduce an environmental levy on lead ammunition for hunting rifles and shotguns, and (d) introduce regulations to restrict the use of lead ammunition. A parallel process is in place for lead fishing sinkers.

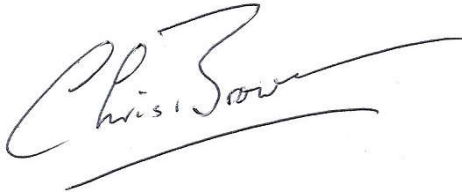
We would like to see the European Union introduce effective restriction on lead ammunition for wildlife hunting, harvesting and culling – for both rifles and shotguns - for the following reasons:

1. About 5,000 hunters from Europe visit Namibia each year. They hunt in the order of about 30,000 animals and fire about 75,000 rounds of ammunition. We would like to see these visiting hunters using lead-free ammunition so as (a) not to pollute Namibia's environment and people with lead, and (b) to help set an international example for our local hunters and farmers.

2. Some scavenging birds such as kites, buzzards, eagles and vultures migrate between Europe and Africa. It is important that lead in carcasses and offal from hunting is phased out and restricted in both the northern and southern hemispheres.

We would be happy to provide any additional information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Chris Brown". The signature is stylized with a large initial "C" and "B".

Dr Chris Brown
CEO: NCE

