

OPEN LETTER

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Dear Mark,

Dropping the lead – a pressing issue of our time

You may be aware of a UK angling practice known as ‘dropping the lead’ – widespread in carp fishing circles, where anglers deliberately dump lead weights. If online [forums](#) and [social media](#) are representative, there is growing unease with this practice across the angling community; with concerns on fishery health, water quality and wider environmental grounds.

This letter is not about apportioning blame, rather the need to recognise a collective responsibility to proactively act, involving everyone who cares about angling’s future, whatever their affiliation.

Background:

Making tackle as safe as possible should be commended on fish welfare grounds. Some UK fisheries approach this by insisting that the lead is ‘ejected’ if a fish gets snagged, or the rig is lost. A [review](#) conducted by the author highlights that for many years, dropping the lead has been publicly promoted, to varying degrees, by most UK carp tackle manufacturers. However, this appears to go beyond fish welfare purposes. In many cases it is recommended that rig release systems – working on line tension – are set to discard the lead either when a fish is hooked, or on every take. The often-stated reason is that it prevents a fish from using the weight to help expel the hook. In some cases, the purpose (e.g. prevents the lead weight from banging around the rod tip when long-rigs are used) patently has nothing to do with fish/fishery welfare. An increasing number of [anglers](#) view the practice as unnecessary and claim to never use it; instead seeing it as commercially, rather than fish/fishery welfare, motivated and reflecting ‘catching at all costs’.

When the England and Wales freshwater [fishing rules](#) were drafted, civil servants no doubt realised that anglers would lose the odd lead weight. However, the civil servants could not have foreseen the emergence of the widespread and indiscriminate practice of lead weight dumping.

Size of the issue:

The [Agreement on the Conservation of African-Eurasian Migratory Water-birds](#) acknowledged that due to a lack of accurate data “*it is currently not possible to determine with certainty the amounts of lead that enter the environment when anglers lose or discard lead fishing weights*”.

Assuming most new weights are bought to replace lost ones, then as a rough proxy, the amount of newly purchased leads could be taken to equal the total amount lost / discarded. However, underpinning data on annual UK lead weight sales do not appear to be (readily) publicly available.

A 2004 [European Commission](#) report provided a cautious estimate on the total annual consumption of lead ‘sinker’, covering all lures and fishing equipment (excluding commercial fishing) for the (then) EU25. The UK total figure for lead sinkers was tentatively estimated between 500 to 1,000 tonnes per year, or between 225 to 450 tonnes per year for inland waters (with split shot removed). These figures must be heavily caveated and therefore treated as indicative only. For example, the study possibly overestimated the number of UK anglers and didn’t distinguish between lead sinker types. The report also excluded the intervening period (2004-2017) during which lead dropping has become a widespread UK angling phenomenon. Nevertheless, the figures suggest that the order of magnitude maybe significant.

The extent of total lead loading per fishery will be dependent on a wide range of factors (e.g. angling pressure, fish species present and fishery rules etc.) [Gillhams](#) 12-acre fishery, Krabi, Thailand estimates that at least three tons of lead weights have been 'lost' in their lake. *But, does this have any relevance to the UK position?* If online forums (e.g. [carp.com](#)) are anything to go by, then the answer appears to be 'yes'. Published examples indicate that [4kg](#) and over 6kg¹ of lead weights were dropped, respectively during two separate fishing sessions. Given the number of fisheries, the popularity of carp fishing and how widespread this practice has seemingly become (also spreading to Barbel fishing), the extent of annual UK lead dumping over the last 15-20 years could be significant. Box 1 provides a conservative example. It is also understood that a major UK fishery has given permission over this coming winter for divers to investigate and film the lake-bed, where lead dropped is suspected to run into 'many tonnes'.

Box 1 – conservative example: an angler dropping a lead weight (average 3.5oz) on each 'take' would add 1kg of lead to the lake bed per ten takes. It is assumed there are c.300,000 UK carp anglers and one in nine of them drops the lead on every take, or when a fish is hooked. Each angler fishes for six months each year and drops five 3.5oz (average weight) leads per month. This equates to c.100 tonnes of lead per year, or 1 million weights. Yet, each angler would be discarding in a season considerably less lead than the two examples quoted above, although these might represent more 'exceptional' cases.

Legislation and regulation on discharging / discarding:

Anglers, fisheries and tackle manufacturers could potentially be breaking the law. Yet, in a mainly unregulated industry these issues are either not widely understood, or conveniently ignored.

1. It is an offence under the [Environmental Permitting](#) Regulations 2010 to cause, or knowingly permit, a water discharge, unless complying with an environmental permit or exemption. Water discharge activities are listed in [S.21](#) including poisonous, noxious or polluting matter or solid waste (see below legal definition) into inland freshwater. 'Knowingly permitting' includes cases where a person or company (e.g. potentially a fishery) is aware of a polluting incident, but refuses to take steps to prevent pollution.
2. Article 1 of the [Waste Directive](#) (as amended) defines 'waste' as "*any substance or object in the categories set out in Annex I which the holder discards or intends or is required to discard.*" Dropping lead weights – whether coated or not – could potentially have implications for: i) anglers; ii) fisheries operating rules that stipulate this technique; and/or iii) tackle manufacturers publicly promoting this practice. The amount of lead deposited in some fisheries could potentially lead to their classification as illegal (hazardous) waste sites, where any potential prosecution could result in expensive clean-up costs.
3. Anglers could potentially also be prosecuted for a littering offence under the 1990 [Environmental Protection Act](#). Whether lead weight dumping would be interpreted as 'litter' or 'fly-tipping' is a moot point, but one that no angler would wish to see tested in the courts.

Lead substitution – European direction of travel:

According to the [World Health Organisation](#) (WHO) there is no known safe level of lead exposure. Lead is a heavy metal and toxic even at very low levels of exposure. WHO has identified lead as one of 10 chemicals of major public health concern needing action by EU Member States. When lead fishing weights are discarded, the lead is spread in the wider environment, making retrieval complicated. Certain freshwater fisheries are also sources for drinking water abstraction.

The [European Commission](#) is currently evaluating further proposed lead restrictions (e.g. PVC stabilisers) via the REACH ([EC 1907/2006](#)) Directive. It has also asked the European Chemicals Agency to consider lead fishing weights, to assess the associated risk and socio-economic impact, with a view to possible wider restrictions. [Directive 2011/65/EU](#) already restricts hazardous substances in electrical and electronic equipment, requiring lead to be substituted by safer

¹ Crafty Carper, Issue 74, October 2003 - pages 138-139. NB: the total amount of lead weight dumped may have been considerably higher however, the comment "several hundred" takes from bream could not be substantiated.

alternatives. Importantly, the REACH legislation requires substitution when lead is present in products at concentrations orders of magnitude less than those found in lead fishing weights.

[Denmark](#) has introduced a ban on the import or sale of products containing lead, including fishing weights. Irrespective of Brexit, any further EU restrictions on angling products containing lead would by default prohibit their UK export to Member States. Coating or painting lead weights would also appear to be a short-term 'fix' at best, as these can fail (i.e. split and flake) exposing the lead.

The [European Fishing Tackle Trade Association](#) has called on the fishing trade and the angling community "to voluntarily stop manufacturing, importing, retailing and using angling weights (sinkers) made of lead above the size of 0.06 grams and replace them with suitable lead-free alternatives by 2020 at the latest." Its position is aligned with the apparent European legislative trend towards further lead restrictions and supported by various national and international angling bodies. In its response, the [Angling Trust](#) commented that "the present laws in England are more than sufficient to safeguard the environment and see no evidence to the contrary". This appears at odds with the [Trust's](#) own public statement on fighting "pollution, over-abstraction and litter", particularly when the widespread UK practice of discarding lead weights is considered.

What is needed?

The widespread practice of lead dropping could potentially be [problematic](#) on several fronts, including: fish welfare, fishery health and water quality. There is also a risk that this practice could be challenged through the courts. Irrespective of the success or otherwise, should any such legal challenges become common knowledge in the mainstream press, and/or went viral on social-media, they could cause irrevocable damage to the public perception of angling. This would play straight into the hands of those wishing to see the pursuit of angling banned.

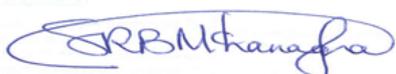
Dropping the lead is being promoted as the 'right way to fish', mainly by commercial interests. This makes it extremely difficult for beginners to adopt good angling practice on fish welfare and environmental protection grounds. Instead, UK tackle manufacturers should be promoting environmental, economic and social sustainability across their products, angling techniques and marketing. This could only help strengthen angling's conservation credentials for future generations and support the basis on which the sector's economic prosperity, and all associated (often rural) jobs rely.

Promisingly, non-toxic commercial solutions are available from UK manufacturers. [Dinsmores](#) manufacture a range of lead-free weights and [Pallatrax](#) produces a natural stone version for which they received the [2015 Green Apple Award](#).

Moving forward, the UK angling community and its representative bodies must be seen to take a principled position here, as well as proactively develop suitable solutions. There is a window to proactively shape the future, rather than risk enforced and reactive change from others down the line. As with plastics in our oceans, the dumping of lead fishing weights has become a pressing issue of our time. It is one on which the entire angling community needs to both acknowledge and take ownership, however challenging, and start working collectively to solve for future generations.

Regards

Yours sincerely



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