

**Scottish Target Shooting**

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HSE Consultation: Restriction Proposals 004 - Lead Shot in Ammunition

A submission on behalf of Scottish Target Shooting

Submitted on: 6th November 2022

Response to HSE Consultation

Introduction

1.1 Scottish Target Shooting (STS) is the governing body for the sport of target shooting in Scotland, bringing together the following key disciplines in Scotland to support development of the sport at grassroots level and performance on the international stage, as well as to discuss other matters which affect all shooting disciplines, specifically the following:

- | | | |
|-------------------|-------------------|-------------------|
| ✓ Air Guns | ✓ Gallery Rifle | ✓ Pistol |
| ✓ Full-bore Rifle | ✓ Olympic Shotgun | ✓ Smallbore Rifle |

1.2 At the date of this submission, STS has over 850 members and 60 member clubs with a combined membership of over 2,500 target shooters.

1.3 Our members would therefore be impacted in a variety of different ways by any restriction on the use of lead in ammunition. In the case of target shooting, which neither produces game meat nor discharges lead beyond the ranges over which it operates, we do not agree that the proposed restrictions advanced by HSE are proportionate to the human health or environmental risks.

1.4 It is disappointing that HSE's Restriction Report maintains that "Sports shooting with lead shot uses a lower tonnage than hunting." This statement ignores the information which our colleagues at the BSSC submitted in the first round of evidence gathering and is incorrect. Their submission, citing sales and production figures for shotgun ammunition over the five-year period 2015-2019 compiled by the Gun Trade Association, stated that the split between clay target shooting and game shooting (i.e. sports shooting and hunting) was 70% clay and 30% game. It is clear from manufacturing and sales data that the number of shotgun cartridges used in registered competition, in practice for competition in informal clay shooting and in practice for hunting is far greater than the number used in game and other live quarry shooting. The Restriction Report thus appears to reflect both a lack of understanding of shooting sports and an unwillingness to accept the veracity of information provided in good faith by the industry. It also indicates that restriction proposals advanced on the basis of dubious figures cited in the Restriction Report are themselves open to question.

Rimfire Rifles

2.1 Rimfire rifles are small calibre rifles in which ignition of the propellant is effected by means of a priming compound which is contained within the rim of the cartridge case. They are overwhelmingly chambered in .22 (5.6mm) or .17 (4.4mm). They are used for target shooting, for pest control and for hunting small game such as rabbits. There are estimated 106,000 lawfully held rimfire rifles in the UK. The majority of .22 rimfire rounds fired (approx. 3.8m annually) are for target shooting,

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much of which takes place at indoor ranges. Target shooting requires ammunition with a high and consistent degree of accuracy.

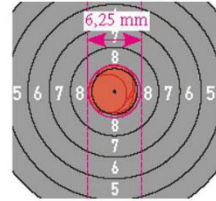
air rifle 10m
Olympic shooter
free standing position
20 shots



shooters group

1,65mm >

air rifle 10m
clamped rifle
(in a vice)
20 shots

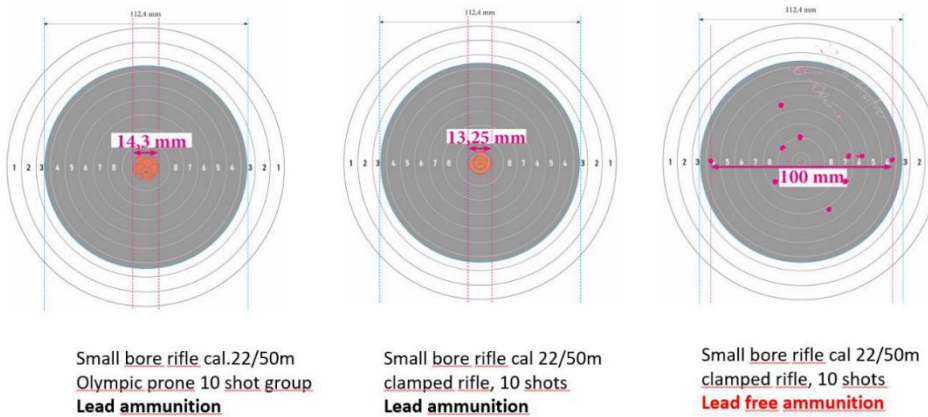


gun accuracy

(Illustrations provided by the German firearms and ammunition manufacturers association JSM)

2.2 For around 15 years, manufacturers of sporting firearms and ammunition have been working both individually and together on the substitution of lead by any other suitable materials. Research and development departments have invested considerable resources to find products that could also satisfy the lead-free demand from precision sport shooting disciplines. While there are some poly-copper alternatives to conventional .22 lead ammunition, there are no lead-free projectiles available that meet the criteria required by small-bore target shooting. It is important to note that elite target shooters achieve almost the same level of precision as the gun itself, and in certain disciplines they shoot freehand only slightly worse than the self-accuracy of the gun in clamped condition with selected (lead bulletted) ammunition, as shown below.

2.3 Research and development has thus far been unable to develop substitutes for lead bullets in the disciplines of small-bore rifle and air rifle/pistol which even come close to the high precision of lead projectiles. The following illustration compares the accuracy of .22 rimfire lead and non-lead ammunition, as used in Olympic disciplines.



Small bore rifle cal.22/50m
Olympic prone 10 shot group
Lead ammunition

Small bore rifle cal 22/50m
clamped rifle, 10 shots
Lead ammunition

Small bore rifle cal 22/50m
clamped rifle, 10 shots
Lead free ammunition

(Illustrations provided by the German firearms and ammunition manufacturers association JSM)

When currently available non-lead ammunition is used, a rimfire rifle, even when clamped, shoots a random group which is significantly worse than can be achieved by an elite shooter using lead ammunition. Thus genuine competition is no longer possible, as the winner of a competition is no longer the best shot, but merely the luckiest.

2.4 We do not believe that a restriction on the use of rimfire ammunition for target shooting is proportionate or necessary.



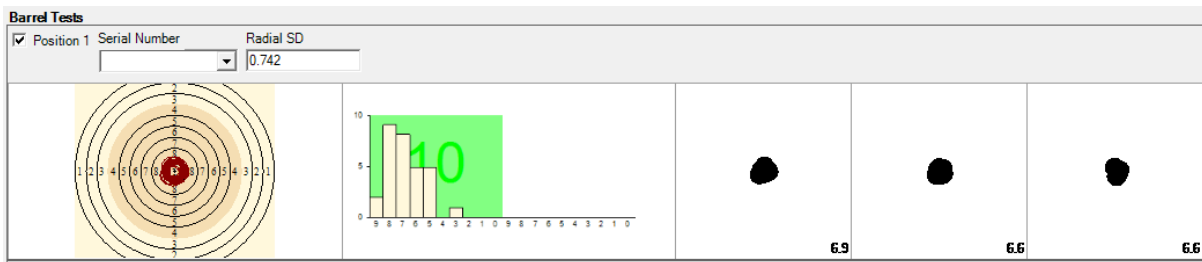
Airguns

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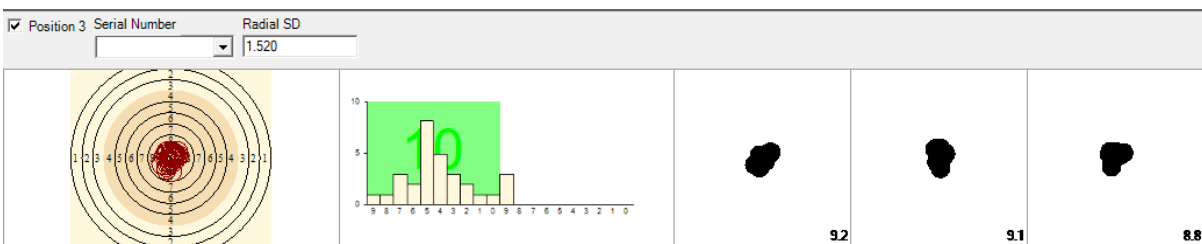
3.1 There are some 9m air rifles in the UK, firing approximately 30m pellets per annum. In Scotland, air guns are licenced by Police Scotland. Airguns are used for formal and informal competition (around 80% of shots are fired on indoor ranges), on outdoor field target competitions at which metal knock-down targets are shot at, for hunting small pests and for informal 'plinking'. Pellets are available in different calibres, each with a variety of configurations (e.g. flat-nose, round-nose, pointed, hollow-point). Each calibre may also be available in different weights. Lead is used as pellet material due to its combination of properties (density, plasticity, low melting temperature) meaning that it grips the rifling and deforms into the barrel dimensions and has enough weight for continued momentum. Common pellet calibres are .177, .22 and .25, the .177 calibre pellet being by far the most popular, especially for target shooting.

3.2 Competitive shooting with the .177 air rifle or pistol at 10 metres requires extreme precision. Non-lead pellets are commercially available in low quantities and are generally made of tin-zinc alloy, or alternatively of pure tin or zinc, but at present only lead pellets are capable of achieving the necessary degree of precision. In accuracy tests comparing lead and tin pellets, three groups of 10 pellets were shot per batch using the same rifle and the same target in a consecutive test. Accuracy was calculated by measuring the distance between the target centre and the shot hole centre. The spread is given as a radial standard deviation RSD, (the smaller the better). The RSD for the lead pellet is half of that for the tin pellet and the overall group size is smaller.

Lead pellet group 6.7mm, RSD 0.742mm



Tin pellet group 9mm, RSD 1.520mm



(Illustrations provided by the German firearms and ammunition manufacturers association JSM)

3.3 **Given the negligible risk to the environment and human health, the fact that the overwhelming proportion of airgun pellets is fired indoors in controlled ranges, we do not believe that a restriction on the use of airgun ammunition for target shooting is proportionate or necessary.**

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Clay Target Shooting

4.1 Clay target shooting (also known as clay pigeon shooting) is the sport of shooting with a shotgun at a frangible flying disc, made from a mixture of pitch and chalk and designed to withstand being launched from a clay trap at high speeds, but which also breaks easily when hit by just a very few pellets. Many shooters enjoy informal clay target shooting, or shoot at clay targets in practice for hunting, but there are also several tiers of formal competitive shooting in specific disciplines such as trap and skeet, at club, county, national and international level. Great Britain has a long record of success at elite competition, most recently with Matthew Coward-Holley winning bronze in the Men's Trapshooting event at the Tokyo Olympics in 2021.

4.2 Clay target shooting grounds are in general privately run and some have been operating over decades and have had many millions of cartridges fired over them. Shooting grounds accommodate both 'sporting' layouts at which clay targets are thrown, often in or around woodland to simulate the flight of game birds; and skeet or trap layouts on more open ground. Clay target shooting is undertaken with lead shot, in compliance with international competition regulations. There are legal requirements concerning property boundaries and fall of shot: depositing shot on a neighbouring property could constitute a constructive trespass. Furthermore, there are strict safety rules regarding shot fallout areas, so the fall of spent shot is controlled and spent shot is contained and sequestered within the shooting ground.

4.3 Shooting is undertaken with all popular shotgun calibres, though the great majority of shooters use 12 gauge shotguns. In comparison to shotgun hunters, clay shooters use lighter loads of smaller pellets, typically 24 grams of 7½ shot/2.3mm. This is because less downrange energy is required to break a clay target than to kill a bird. Furthermore, smaller pellets do not travel so far as the larger ones used for hunting, ensuring better control of fallout areas. Pattern densities are maintained by virtue of the fact that the smaller shot sizes used in clay target shooting have a greater number of pellets per unit weight. The Clay Pigeon Shooting Association (CPSA) is the national governing body for clay target shooting in England and has proposed to reduce the maximum load for use at clay grounds and at its registered competitions from 28 grams to 24 grams, and the maximum shot size to 7½ shot/2.3mm. Approximately 12 million CPSA registered clay targets are shot per year, amounting to 336 tonnes of lead used. This is in addition to an estimated 161m rounds fired at informal, non-registered clay targets, making in total some 4,750 tonnes of lead per annum.

4.4 A limited number of grounds have reclaimed lead in the past and a small additional number plan to do so in the future or are putting in place measures to capture and reclaim lead. Most of those reclaiming and recycling lead are trap grounds as opposed to sporting grounds, on which lead recovery tends to be difficult or impossible. For example, at the National Clay Shooting Centre at Bisley, Surrey, the fallout zone is screened to remove lead shot every 3-5 years. The process involves scraping up the top 5cm or so of soil and spinning out the lead shot. At the last screening, the ground recovered 340 tonnes of lead shot and received over £30,000 from the contractor.

4.5 It is noted that HSE concludes in its Restriction Report that there is no risk of contamination of surface waters from lead shot, though HSE suggests that there remains a risk of primary exposure to birds from lead used in clay target shooting. However, birds are present only in small numbers at shooting grounds where thousands of shots may be fired daily, and it is proposed that any remaining risk to birds can be alleviated through management plans, approved by a local authority, which:

- Identify risks to bird life through a bird survey
- Minimise bird numbers coming onto a clay ground through
- Appropriate location and siting of stands
- Distraction techniques
- Management of vegetation

4.6 It is noted that HSE proposes a licencing system for grounds to enable elite shooters to use lead ammunition there. However, we do not believe such a system to be viable. There is only a small number of elite athletes on the STS and British Shooting pathway across all shooting disciplines, and it is not considered financially viable for shooting grounds to undertake

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the regulation which will inevitably be required for licensing in order to provide facilities for such a small number. Furthermore, as with all other sports, success at elite level requires a very broad-based pyramid of opportunities and competitions and given that international competition requires use of lead shot, competitors at all levels need to compete with the same ammunition. Additional, if adopted, it will not be possible for athletes to reach elite level if such barriers are put in place.

4.7 It is the view of STS that lead ammunition fired on formally registered and approved clay target grounds does not represent a significant risk to bird life, the environment or human health, and that any restriction of it is disproportionate.

Fullbore Target Rifle Shooting

5.1 Competitive target shooting with fullbore (centrefire) rifles emerged in the 19th century from military target practice in order to improve skill at arms amongst civilian shooters for the better defence of the Realm. Fullbore target shooting has become a popular and very diverse sport, with a wide range of different classifications based upon the type of equipment used and the ranges at which shooting is carried out. These include 'target rifle' using 7.62mm/.308 rifles with iron sights; civilian service rifle; 'F class' with rifles up to 8mm and telescopic sights, 'Match rifle' shooting out to 1,200 yards with target rifle equipment but with the addition of telescopic sights; Gallery rifle and pistol using lever action rifles and long barrelled pistols shooting over short distances such as 25m; Classic and Historic shooting using original or reproduction firearms along with pistols held under S7(3) of the Firearms Act 1968; Muzzle loading rifles and pistols; Sporting rifle shooting at moving or static targets. There are also specific disciplines for schools, cadets and disabled people. A further classification involves the use of larger calibre rifles for long range shooting: .50 generally up to 1,000 yards and other large calibres out to 2,000 yards and beyond. The UK national governing body of fullbore target rifle shooting is the National Rifle Association (NRA), based at Bisley Camp, Surrey, and the national governing body for muzzle loading is the Muzzle Loaders Association of Great Britain. The governing body for large calibre long-range rifle shooting is the Fifty Calibre Shooters Association (UK).

5.2 Shooting is undertaken on indoor and outdoor rifle ranges, which require detailed arrangements to ensure both the safety of participants and the general public. Outdoor ranges require specified firing points and elevated bullet catchers to capture and contain the bullets. There are also a number of indoor ranges offering fullbore rifle and pistol shooting, and these are believed to account for some 46% of shots fired. Target shooting takes place both over civilian ranges such as those operated by the NRA at Bisley Camp, and over military ranges controlled and operated by the Ministry of Defence or associated organisations. Civilian shooting on military ranges is run by rifle clubs affiliated to the NRA. While in most cases it is necessary for a shooter to hold a Firearm Certificate (FAC) to possess rifles and ammunition, clubs that are approved by the Home Office may offer the opportunity for suitable non-certificate holders to possess and use a rifle on their ranges, and this offers a valuable path into the sport for those interested in taking it up.

5.3 It is estimated that target shooting for sport and competition using centrefire rifles up to 5.6mm accounts per annum for 2.67m rounds, estimated at 9.49 tonnes of lead (of which 5.13 tonnes outdoors). It is estimated that target shooting for sport and competition using centrefire rifles of 5.6mm and over accounts for 9.53m rounds, estimated at 65.45 tonnes (of which 34.04 tonnes outdoors). All centrefire ammunition used for target shooting for sport and competition is of the non-expanding type, mainly full metal jacket or hollow point open tipped match bullets.

5.4 Lead bullets fired at rifle ranges in practice or competition become embedded in the bullet catcher. This may be composed of a variety of granular materials but is usually of sand or granulated rubber. Ranges are designed and operated to ensure that all bullets, even those that miss the target, end up in the bullet catcher. Stop butts are regularly inspected to assess the build-up of bullets, and as bullets embedded immediately behind the targets can form a mass or clump which may present a ricochet hazard, it is necessary to periodically remove lead from the stop butt in order to maintain the safety and efficiency of the range.

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5.5 It should be noted that many civilian rifle ranges are situated on land formerly used by the military, and that in these cases safety areas may contain large quantities of military ordnance dating back many decades.

5.6 There is considerable crossover in range use between civilian and military, police and emergency services shooters. Many civilian rifle clubs shoot over Ministry of Defence ranges, where the bulk of ammunition used is inevitably military lead bulletted ammunition. Civilian target shooters are prohibited from using non-lead ammunition on military ranges. Likewise military personnel and cadet forces compete extensively at civilian ranges. Thus military, cadet, police and other emergency services personnel conduct firearms training and compete at civilian ranges.

5.7 At the Bisley ranges operated by the NRA, the bullets used are predominantly copper jacketed lead. Approximately 5 million bullets are fired over the rifle ranges per year. Bullet catchers are designed to capture all bullets fired by use of sand or rubber composite stop butts. The stop butts are regularly graded and are generally free of vegetation. Stop butts are routinely screened to recover bullets, typically once or twice per year. The Bisley ranges recover between 25-30 tonnes of screened bullets each year. The screened bullets are sold for recycling, and the receipts offset part of the contractor costs. Similar screening operations are carried out on other outdoor ranges operated by clubs affiliated to the NRA.

5.8 In its Restriction Report, HSE acknowledges that there is no risk of leaching of lead through stop butts into groundwater. This is borne out by scientific investigation (*T Astrup, J K Boddum, T H Christensen; Lead Distribution and Mobility in a Soil Embankment Used as a Bullet Stop at a Shooting Range, Journal of Soil Contamination, 8(6):653–665 (1999)*). In this study, the detailed mapping of the distribution of lead bullets, soil lead, and easily leachable lead in a more than 30-year-old earthen stop butt, just behind the target of a sport shooting line, showed that the stop butt was heavily polluted with lead, but that migration of lead out of the stop butt had not taken place. The stop butt investigated is considered to constitute a worst-case, because lead bullets had accumulated over very long time (supposedly 30 years) and the low soil pH values of around 5 in the stop butt supposedly would increase lead mobility. The investigation shows that the lead in the stop butt does not constitute a significant risk to the surrounding environment, but that a major part of the soil in the embankment is so polluted with lead that it should be handled as a waste, if removed from the facility or if the facility is abandoned, in accordance with existing environmental regulations.

5.9 It is noted that in its Restriction Report, HSE comments adversely on agricultural activity over rifle ranges. While agriculture is not a major economic component of range use, vegetation between firing points and stop butts needs to be managed and ranges may therefore be grazed by livestock, especially sheep. Where ranges are owned by private estates and used from time to time by rifle clubs, grazing of the range area may be integral to the wider agricultural use of the estate. In addition, the safety areas behind the stop butts may be very extensive and vegetation there will often be managed by extensive grazing by farmed livestock or, in the case of Bisley, feral deer. It is noted above that virtually no bullets are embedded in the ground between the firing points and stop butt, or travel over the stop butt to fall in the safety area, and it is therefore maintained that any prohibition on agricultural activity within a rifle range or over the safety area behind it is disproportionate.

5.10 Given that target rifle shooting does not produce game for human consumption, given the fact that bullets fired almost entirely end up in stop butts from which they are recovered and recycled as a matter of course, given that ammunition designed for and used by target shooters is distinctive from that used for hunting, given the inextricable linkage between civilian, police and military usage of rifle ranges, and given that no discernible leaching of lead salts from stop butts occurs, it is argued that a restriction on the use of lead ammunition for target shooting is disproportionate.

5.11 We therefore propose that Firearm Certificate holders whose rifles are conditioned for target shooting should continue to be permitted to purchase, possess and use lead-based ammunition.

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Muzzle loading

6.1 Muzzle loading firearms are loaded from the muzzle with black powder (or equivalent) and lead shot (in the case of shotguns) or lead bullets or balls (in the case of rifles, pistols and muskets). Muzzle loading firearms are used in sport or competition and these are licensed in the same way as breech loading firearms. It should be noted that muzzle loading pistols were not prohibited under the 1997 Firearms (Amendment) Act and can be held on a conventional Firearm Certificate. Muzzle loading firearms include both original antique arms and modern reproductions.

6.2 There are well established competitions for muzzle loading rifles, smoothbore muskets, muzzle loading pistols and shotguns, and even miniature smoothbore cannons. These take place at many conventional shooting ranges, such as the National Shooting Centre at Bisley, Surrey and the Muzzle Loaders' Association of Great Britain range at Wedgnock, Warwickshire. Elite competitors are able to progress to international competition, where the UK is well represented. Chris Hobbs won gold in the flintlock event at the muzzle loading world championship in Pforzheim (Germany) in 2022. International rules for muzzle loading competitions stipulate the use of lead shot. The governing body for competitive muzzle loading is the Muzzle Loaders Association of Great Britain.

6.3 Muzzle loading and black powder breech loading shotguns are used for live quarry shooting on both driven game shoots and traditional walked up shoots over pointing dogs. The use of muzzle loading arms is necessarily slow, limiting the number of shots that can be fired within a given time. Consequently, the volume of shot used in the field and outside of a formal range environment is extremely small. The modest bag is generally shared amongst the participants with no game entering the commercial food chain.

6.4 Muzzle loading firearms are designed, manufactured, and proofed for use with black powder propellant and lead projectiles. Rifles and pistols require the use of a projectile that is sufficiently soft to compress into the rifling, and many older firearms have twist or Damascus barrels made from a mixture of steel and soft iron which would be damaged by a harder material. The proof houses in Italy and Hungary, both C.I.P. accredited, have reported that there are no safe alternatives to lead projectiles for muzzle loading arms.

6.5 *Where muzzle loading firearms are used on rifle or pistol ranges or on formal clay shooting grounds, their use of lead bullets or shot is of no greater risk to the environment or human health than the lead ammunition used on those ranges and grounds by breech loading firearms, and it is the view of BSSC that any restriction on the use of lead on ranges or shooting grounds by muzzle loading guns would be unnecessary. Given the minimal volume of use of lead ammunition by field use of muzzle loading arms, it is the view of BSSC that any restriction would be disproportionate to the risk.*

Transitional period

7.1 In its Restriction Report, HSE has proposed a transition period of 18 months for lead gunshot, a transition period of 18 months for lead bullets of large calibre (5.6mm and over) and a transition period of five years for lead bullets of lead bullets of small calibre (less than 5.6mm). While we are in principle supportive of change from lead to non-lead ammunition, we are concerned that the gun and ammunition industry will be unable in such a short time to ensure adequate supplies of non-lead rifle ammunition in large calibres so as to ensure that the hunting and culling of deer and other medium and large game can continue without disruption. We are also concerned that a five-year period is insufficient to allow the firearms and ammunition industry to apply the necessary research and development and then introduce production, manufacture and distribution of suitable non-lead rifle ammunition in small calibres, as well as ensuring the modification or replacement of firearms so as to ensure that small calibre rifles can remain fit for purpose.

7.2 Most technology used for lead gunshot manufacturing cannot be adapted to alternative metals. The manufacturing process for steel gunshot cartridges is distinctly different from lead gunshot and the machinery needed is entirely different from lead cartridge manufacturing machinery. Neither machinery nor knowhow of lead manufacturing process can be transferred to manufacturing of substitute materials for lead gunshot. Although the major cartridge manufacturers may have

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production lines for non-lead cartridges, production facilities in the UK and in the EU (which will potentially be impacted by similar legislation), would be in a critical situation. Therefore, a sufficiently long transitional period must be provided for cartridge manufacturers to ensure an orderly and non-disruptive adaptation to any new framework.

7.3 The conflict in Ukraine has had a sudden and dramatic effect upon the ability of the ammunition industry to supply civilian markets. It is self-evident that in a period of armed conflict within Europe, priority will be given to the supply of ammunition for national defence. European manufacturers have warned that conversion of production lines for rifle ammunition from lead bullets to non-lead bullets could affect their ability to supply NATO forces.

7.4 It should also be noted that steel shot is principally manufactured in China, there being no production of steel shot in Europe and only limited production in the United States. Manufacture of steel shot requires a number of heavy industrial processes (i.e. steel manufacture, drawing of wire, cutting, annealing, heading and polishing) which require very high temperatures (1,500°C as opposed to 327°C for lead), noting that Chinese heavy industry remains reliant on fossil fuels and particularly coal. Finished shot must then be transported by sea freight from the far east. We are uneasy about a supply chain which relies upon China and reliance on a product which has a carbon footprint that is many times greater than the lead shot which, for presumed environmental benefit, we are trying to replace.

7.5 A further concern which the ammunition industry is currently trying to address is that of developing suitable wads which are necessary to contain a steel shot load and thereby to prevent damage to shotgun barrels during firing, steel shot being much harder and more abrasive than lead. Steel shot cartridges have hitherto been loaded with plastic cup wads which, while very effective, are now recognised to present additional and unacceptable risk to the environment. A number of biodegradable alternatives have already been successfully developed, but further development work is still ongoing in this area. Thus the ammunition industry has to address the technological and manufacturing challenges not just of a transition to non-lead projectiles but of non-lead projectiles *and* non-plastic wads at the same time.

7.6 A transitional period of 18 months, as suggested by HSE would surely entail shortages of both non-lead shot and cartridges, as supply would not catch up with demand. Furthermore, the imbalance of supply and demand would dramatically affect the prices of non-lead ammunition. This estimate is supported by the Joint Statement by the Directors of the UK's leading shotgun cartridge manufacturers (Eley Hawk, Gamebore, Hull Cartridge and Lyalvale Express) in 2020 when referring to the voluntary transition announced by the live quarry shooting associations: "we are committed to investing into the alternatives. Our collective goal is to develop high performance ammunition for all shotguns and gauges using sustainable materials... [but]... doing this within a five year window without significant support is IMPOSSIBLE".

7.7 STS is of the view that HSE overstates the risk to the environment and to human health from the continued use of lead ammunition and underestimates the practical implications of change. We therefore feel that the transition periods it has proposed both for shotgun and rifle ammunition are disproportionately short, and do not allow the gun and ammunition trade time to develop, manufacture, supply and distribute sufficient stocks of suitable cartridges.

Buy-back Scheme

8.1 STS considers it possible that a buy-back scheme could incentivise the transition from lead to non-lead ammunition. Any such scheme would, however, have to fairly compensate shooters for any loss which they incur as a result of restrictions, and on a market value basis.

8.2 Alternatively, we would see value in a scheme which enables shooters to exchange lead ammunition which they are no longer able to use for comparable non-lead ammunition.

8.3 Any Government-funded scheme should also give consideration to clubs and retailers holding stocks of lead ammunition which would no longer be saleable, and to manufacturers with machinery and equipment which could no longer be used for the production of lead ammunition and which was not suitable for conversion to the production of non-lead loads.



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Further Information

About Scottish Target Shooting (STS)

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- ✓ Air Guns
- ✓ Full-bore Rifle
- ✓ Gallery Rifle
- ✓ Olympic Shotgun
- ✓ Pistol
- ✓ Smallbore Rifle

Scottish Target Shooting is recognised by **sportscotland** (the National Agency for sport in Scotland), the Commonwealth Games Council for Scotland and Commonwealth Shooting Federation as the governing body for shooting in Scotland. At the date of this submission, Scottish Target Shooting has over 850 members and 60 member clubs with a combined membership of over 2,500 target shooters.

By uniting under the umbrella of Scottish Target Shooting, these disciplines are better placed to utilise and attract commercial investment to grow the sport. A single body is also better placed to deliver clear and consistent pathways for athletes, coaches and officials, regardless of discipline, improving talent transfer and resource sharing between disciplines.

As a single body the sport is also better placed to respond to consultations such as these by representing all disciplines with a single voice, working closely with other bodies such as **sportscotland**, the Scottish Government and Police Scotland.

Specifically, on a performance level, the governing body works with **sportscotland**'s Institute for Sport to prepare Scottish athletes to compete on behalf of Scotland at the Commonwealth Games and works with British Shooting to prepare Scottish athletes for Team GB to compete at the Olympics and Paralympics.

Other STS partners include other Scottish Governing Bodies such as Pentathlon Scotland, Scottish local authorities and UK national shooting bodies such as British Shooting, the National Rifle Association and National Small-bore Rifle Association.

For additional information regarding Scottish Target Shooting, visit the website at: www.scottishtargetshooting.co.uk.

Contact Details for Scottish Target Shooting

Should any information be unclear or the committee wish for further information regarding any of the points raised in this response then Scottish Target Shooting can be contacted using the following details:

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