



The Scottish Parliament
Pàrlamaid na h-Alba

Net Zero, Energy and Transport Committee

Gillian Martin MSP
Cabinet Secretary for Climate Action and Energy

2 December 2025

Dear Gillian,

The REACH (Amendment) Regulations 2025

At its meeting on 25 November, the Committee considered the Scottish Government's consent notification for the following UK statutory instrument—

REACH (Amendment) Regulations 2025

Further to our scrutiny of this notification, the Committee agreed by division¹ that it is content for the Scottish Government to give consent to UK Ministers making regulations in a devolved area in relation to this SI.

The Committee agreed that in writing to you I should draw your attention to concerns expressed about the proposal. In doing so, I make expressly clear that these were not concerns expressed by a majority of the Committee. A full discussion is in the Official Report, but in short whilst the principle of moving away from lead ammunition is accepted, there are views that—

- there is currently a lack of adequate alternative, and the changes would have a sudden effect, leading to a number of calibres and types of guns becoming effectively obsolete – and therefore that alternative approaches should have been considered;
- the likelihood in Scotland of eating game which contains lead shot, and the health risks posed, has not been set out clearly enough to justify proceeding in this way.

I pass these points on primarily for your awareness and for your reference in any further discussions with the UK Government but if you are minded to provide a response on them that would of course be welcomed.

Yours sincerely,

Edward Mountain MSP
Convener

Net Zero, Energy and Transport Committee

¹For: 4, Against: 0, Abstentions: 2