



# **Dossier tal-FKNK Dwar: IL-FUTUR IMMEDJAT TA' L- UŻU TAĊ-ĊOMB FIL-MUNIZZJON**

**A FKNK Dossier Regarding:  
THE IMMEDIATE FUTURE USE OF LEAD IN AMMUNITION**

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## Dossier tal-FKNK Dwar I-Futur Immedjat ta' I-Użu tač-Comb fil-Munizzjon – Dičembri 2022

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### X'għara s'issa:

L-UE, permezz tal-ECHA (European Chemicals Agency) f'Helsinki u s-sistema tar-Regolament (EC 1907/2006) REACH (Registration, Evaluation, Authorisation and restriction of Chemicals) għanda għan aħħari li telimina għal kollox l-użu ta' proġettilli tač-čomb għall-kačča u l-isparar sportiv fil-beraħ, kif ukoll čomb użat fis-"sinkers" u "lures" tas-sajd fis-snin li ġejjin. Għalkemm inizjalment il-mira kienet li fil-pajjiži membri tal-UE ma jibqax jintuża čomb fil-munizzjoni fi žmien ħames snin, issa l-UE qegħda taspira li dan isseħ f'inqas žmien.

Permezz ta' bosta stqarrijiet u avviži f'dawn l-aħħar snin, il-Federazzjoni Kaččaturi Nassaba Konservazzjonisti (FKNK) spjegat din is-sitwazzjoni għall-benefičju tal-membri kaččaturi tagħha, kif ukoll wasslet l-istess informazzjoni lin-negożjanti končernati. Dan sar billi l-FKNK tat dettalji tax-xogħol li qegħda twettaq flimkien mall-FACE, il-Federazzjoni bbażata f'Brussel li tħaddan fiha 37 għada tal-kaččaturi u nassaba minn daqstant pajjiži fl-Ewropa, fosthom il-FKNK, sabiex jinstabu alternattivi adegwati għač-čomb.

Filfatt, uffičjali mill-Kunsill tal-FKNK dejjem jippartecipaw fil-laqgħat tal-"Working Groups" relattivi tal-FACE, dak tal-"Firearms" u l-ieħor tal-"Ammunition". Dawn il-laqgħat normalment jinżammu ġo l-uffičini tal-FACE ġewwa Brussels, u wara kull laqgħa l-membri tal-FKNK jiġu aġġornati bir-riżultat tal-laqgħa permezz ta' stqarrija għall-istampa u/jew avviž. L-Uffičjali responsabbli tal-FKNK ukoll kellhom laqgħat mar-rappreżentanti lokali tal-ECHA, Il-MCCAA (Malta Competition and Consumer Affairs Authority) u ħadu sehem fl-laqgħat relattivi oħra li kienu organizzati mill-"World Forum on Shooting Activities – WFSA". Fl-2019 il-FKNK ippublikat rapport imsejjaħ "Malta Lead Situation Report – 2019" (Micallef, 2019 mill-Link: <http://bit.ly/3j2LSrU>), fejn ġew indirizzati l-effetti tal-eliminazzjoni tal-proġettilli tač-čomb mill-munizzjon u l-użu ta' alternattivi fuq is-saħħa, kemm tal-bniedem kif ukoll tal-kačča, l-ekonomija u s-socjeta'. Dan ir-Rapport huwa aġġornat skont kwalunkwe żviluppi ġodda. F'Dičembri tal-istess sena 2019, il-FKNK ippublikat ir-riżultati ta' eżerčizzju li kienet wettqet permezz ta' X-Rays fuq diversi speči ta' kačča u l-effett tač-čomb fuq din il-kačča, li tinqabad fil-gzejjer Maltin "Lead Shot X-Rays Report" (Micallef and Farrugia, 2019 mill-Link: <http://bit.ly/3uWaxro>).

Ir-riżultati ta' dan l-eżerċizzju u b'kunsiderazzjoni li f'Malta l-laħam tal-kaċċa ma jiġix ikkunsmat kuljum u/jew fuq bażi regolari, iżda kultant, fl-istaġun, u f'okkażjoni waħda jew tnejn fis-sena, normalment f'ikliet tal-kaċċaturi, intossikazzjoni taċ-ċomb minħabba l-konsum mill-bniedem mhix biss hija remota iżda improbabbli ħafna sa impossibbli.

### **L-ewwel pass tal-UE:**

L-ewwel pass lejn dan l-għan tal-UE, sar permezz tar-regolament li jipprojbixxi spara taċ-ċomb fuq artijiet mistagħdra (wetlands) u li se jidhrol fis-seħħ mill-15 ta' Frar 2023. Għalkemm diġa ġie nnutat li dan ir-regolament ma tantx jista japplika għal Malta minħabba n-nuqqas ta' artijiet mistagħdra fejn issir il-kaċċa, xorta waħda l-FKNK, flimkien mall-FACE, se tkompli taħdem fuq definizzjoni addattat għall-pajjiżna ta' "wetland", dan speċjalment peress li d-definizzjoni ta' "wetland" li qegħda tintuża mill-UE, dik tal-Konvenzjoni RAMSAR, tista tiġi nterpretata b'mod skorett, għax per eżempju l-ftit għadajjar li jistaw jinholqu f'xi lokalitajiet fil-gżejjer Maltin, wara xi halba xita qawwijja, jistaw jitqiesu bħala "wetlands"! meta dawn, kif jaf kulħadd, u bit-tembijiet tal-gżejjer Maltin, malajr jinxfu għal kollox f'temp ta' jumejna, jekk mhux fi ftit siegħat. Apparti dawn il-ftit għadajjar temporanji kif spjegajna, l-unika żewġ għadajjar li jaqaw taħt id-definazzjoni ta' "wetlands", tant li huma elenkati fil-Konvenzjoni RAMSAR, huma dik tal-Għadira, il-Mellieħa u l-oħra tas-Simar, ix-Xemxija, li huma t-tnejn Santwarji u għaldaqstant fejn il-kaċċa mhix permessa.

Il-projbizzjoni tal-użu ta' munizzjon biċ-ċomb fl-għadajjar u l-madwar qegħda tiġi fis-seħħ minħabba l-kaċċa li jsir għal borok u wiżż u ċ-ċomb mit-tiri li jistgħu jispicċaw fl-għadira, li jistgħu jibilgħaw dawk it-tajr (speċjalment dawk magħrufa bħala "dabbling ducks") waqt li jkunu f'dawn l-għadajjar. Għalhekk iżjed u iżjed magħndiex tapplika għal Malta din il-projbizzjoni taċ-ċomb waqt il-kaċċa fl-għadajjar, apparti li kif diġa ġie spjegat minħabba n-nuqqas assolut ta' għadajjar fejn tista jsir il-kaċċa, iżda ukoll peress li ftit li xejn borok u wiżż jidhlu l-art u fil-fatt il-biċċa l-kbira tal-ħsad ta' dawn l-għasafar jsir minn opri tal-baħar fuq il-baħar u 3 Km mix-xatt, liema staġun miftuħ huwa minn Ottubru sa Diċembru.

L-istatistika tal-qbid fqir ta' borok u wiżż fil-gżejjer Maltin u l-ibħra territorjali joħroġ ċar mit-Tabella 1 fl-aħħar ta' dan ir-rapport.

## **Xi Jridu Jikkunsidraw I-Awtoritajiet Maltin Qabel Ma Jimplimentaw il-Projbizzjoni ta' I-Użu ta' Projettili taç-Ċomb fil-Munizzjon:**

1. Id-definizzjoni ta' "Wetland" (F'dan il-każ, l-argumenti tal-FKNK u I-FACE huma msejsa fuq id-dikjarazzjoni tal-UE stess li tgħid li l-awtoritajiet nazzjonali jinsabu fl-añjar pożizzjoni biex iqisu l-ispeċifitàjiet tat-territorji differenti u biex joñorġu gwida lill-awtoritajiet ta' infurzar tagħhom jew lill-partijiet interessati dwar kif id-definizzjoni ta' artijiet mistagħdra, kif stabbilita fl-abbozz ta' Regolament, għandha tiġi interpretata b'mod korrett, f'konformità mal-għanijiet tal-miżura u l-prinċipju tal-proporzjonalità);
2. L-ineffiċenza u krudelta ta' alternattivi għač-čomb fuq il-kačča ta' Malta;
3. L-ineżistenza ta' kalibru tal-projettili alternattivi għall-kačča ta' Malta;
4. In-nuqqas, kważi ineżistenza ta' projettili alternattivi għal "air-guns" fis-suq Malti;
5. In-nuqqas ta' projettili u skratačč alternattivi fis-suq lokali;
6. Il-prezz għoli ħafna ta' projettili alternattivi li hemm fis-suq barra minn Malta (ara Tabella 2 fl-aññar ta' dan ir-rapport);
7. Il-perikli għall-bniedem u l-klieb tal-kačča bl-użu tal-alternattiva l-aktar użata, dik tal-azzar, minħabba "ricochets" fuq l-art tal-ġebel iebes fil-gzejjer Maltin;
8. Il-perikli fl-użu ta' projettili alternattivi f'armi tan-nar li ma jkunux "proofed" għat-tali projettili (apparti li f'Malta m'hawnx l'hekk imsejña "proof houses" – aktar spejjes biex tintbagħat l-arma barra minn Malta), speċjalment f'armi ta' čertu eta', liema armi x'aktarx ikollhom jispiččaw tajbin biss għall-vetrina (spejjes oħra biex tinx tara arma ġdida adegwata). Il-projettili alternattivi għač-čomb ukoll jistgħu jikkażaw ħsara irreparabli, u anki ta' periklu, f'čertu "chokes" tal-armi;
9. Il-konsum insinifikanti ta' kačča f'Malta u għaldaqstant kull allegazzjoni li č-čomb mit-tiri jista jkollu xi effett tossiku jew ikun ta' ħsara fuq il-popolazzjoni inġenerali, anke jekk limitata għall-kaččaturi, qatt ma ġiet ippruvata li hija ta' xi sinifikat;
10. X'għandu u x'jista jsir mill-amont sostanzjali ta' čomb li hawn fl-idejna, kemm għand l-individwi kif ukoll għand il-kommerčanti;
11. L-isparar sportiv massif li jsir fuq id-diversi ranges tal-isparar li jinsabu mxerda madwar il-gzejjer Maltin.

## **Il-Proposta tal-UE u l-Požizzjoni tar-Renju Unit, tal-FACE u s-Sigurta' u d-Difiża fl-UE:**

Il-Proposta tal-UE biex jiġi abolit għal kollox l-użu taċ-ċomb mill-munizzjoni tinsab f'dan il-Link: <https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e1840159e6> .

Il-Požizzjoni rispettiva fir-Renju Unit mill-Links:

- “Webpage on sustainable ammunition”: <https://basc.org.uk/ammunition/>
- “Steel shot: What you need to know”: <https://basc.org.uk/download/63109/> .

Tal-FACE mill-Link:

- <https://www.leadammunitionguidance.com/> (tinsab fil-proċess li tiġi aġġornata).

Kif din il-Proposta tista teffetwa s-Sigurta' u d-Difiża fl-UE ġew diskussi f'żewġ artikli online mill-:

- EURACTIV (websajt tal-aħbarijiet pan-Ewropea speċjalizzat fil-politiki tal-UE) hawn: <https://www.euractiv.com/section/defence-and-security/opinion/eus-security-and-defence-a-moratorium-on-the-eus-proposal-on-lead-ammunition-is-required/> .
- u THE PARLIAMENT MAGAZINE (rivista ta' kull xahar dwar il-politiki, il-politika u l-kultura tal-UE) hawn: <https://www.theparliamentmagazine.eu/news/article/reach-restriction-on-the-use-of-lead-ammunition> .

## **A FKNK Dossier Regarding the Immediate Future Use of Lead in Ammunition – December 2022**

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### **The Situation so far:**

The EU, through the ECHA (European Chemicals Agency) in Helsinki and the system of the Regulation (EC 1907/2006) REACH (Registration, Evaluation, Authorization and restriction of Chemicals) has an ultimate goal of completely eliminating the use of lead projectiles from ammunition used for hunting and outdoor sports shooting, as well as lead used in fishing sinkers and lures in the coming years. Although initially the goal was that in the EU member countries lead will no longer be used in ammunition in five years' time, now the EU is aspiring for this to happen in less time.

Through many statements and announcements in recent years, the Federation for Hunting and Conservation - Malta (FKNK) explained this situation for the benefit of its hunter members, as well as conveying the same information to the commercial traders concerned. This was done by the FKNK in giving details of the work that is being carried out together with FACE, the Federation based in Brussels which includes 37 hunters and trappers' organisations from many countries in Europe, including the FKNK, in order to find adequate alternatives to lead.

In fact, officials from the FKNK Council always participate in the meetings of the relative Working Groups of FACE, that of "Firearms" and the other of "Ammunition". These meetings are usually held in the FACE offices in Brussels, and after each meeting the members of the FKNK are updated with the outcome of the meeting through a press release and/or announcement. The responsible Officers of the FKNK also had meetings with the local representatives of ECHA, The MCCA (Malta Competition and Consumer Affairs Authority) and took part in other relative meetings that were organized by the World Forum on Shooting Activities - WFSA. In 2019 the FKNK published a report called "Malta Lead Situation Report - 2019" (Micallef, 2019 from the Link: <http://bit.ly/3j2LSrU>), where the effects of the elimination of lead projectiles from ammunition and the use of alternatives on hunting, economy and society were addressed. This Report is updated periodically with any new developments. In December of the same year 2019, the FKNK published the results of an exercise it had carried out using X-Rays on various species of game and the effect of lead on this game, which is harvested in the Maltese islands, "Lead Shot X-Rays Report" (Micallef and Farrugia, 2019 from the Link: <http://bit.ly/3uWaXro>).

The results of this exercise and considering that in Malta game meat is not consumed every day and/or on a regular basis, but sometimes, in season, and on one or two occasions in the year, usually in hunters' meals, lead poisoning due to human consumption is not only remote but highly improbable to impossible.

### **The EU's first step:**

The first step towards this goal of the EU, was made through the regulation that prohibits lead shot on wetlands and that will come into force from 15 February 2023. Although it has already been noted that this regulation cannot really apply to Malta due to the lack of wetlands where hunting takes place, anyway the FKNK, together with FACE, will continue to work on a suitable definition for our country of "wetland", this especially, since the definition of "wetland" that is being used by the EU, that of the RAMSAR Convention, can be interpreted incorrectly, because for example the few ponds that can be created in some locations on the islands Malta, after some heavy rain, could be considered "wetlands"!, when these, as everyone knows, and with the hot temperature of the Maltese islands, quickly dry up completely within two days, if not in a few hours. Apart from these few temporary ponds as we have explained, the only two ponds that fall under the definition of "wetlands", so much so that they are listed in the RAMSAR Convention, are that of Għadira, in Mellieħa and the other of Simar, in Xemxija, which are both Sanctuaries and therefore where hunting is not allowed.

The ban on the use of lead ammunition in and around wetlands is being enforced due to the hunting of wild ducks and geese and the lead from the shots that can end up in the pond, which could be swallowed by those birds in the course of their feeding (especially those known as "dabbling ducks"), while they are in these wetlands. Therefore, it is even more obvious that this prohibition of lead during hunting at wetlands does not apply to Malta, apart from, as already explained due to the absolute lack of wetlands where hunting is permitted, but also because very few wild ducks and geese ever venture inland. In fact, most harvesting of these birds is done by from boats at sea and 3 Km from the shore, which open hunting season runs from October until December.

The statistics of the insignificant harvest of wild ducks and geese in the Maltese islands and its territorial waters are evident from Table 1 at the end of this report.

## **What the Maltese Authorities Have to Consider Before Implementing the Prohibition of the Use of Lead Projectiles in Ammunition:**

1. The definition of "Wetland" (In this particular regard, the arguments of the FKNK and FACE are based on the EU's own statement which says that the national authorities are in the best position to take into account the specificities of the different territories and to issue guidance to the authorities of their enforcement or to the interested parties on how the definition of wetlands, as established in the draft Regulation, should be interpreted correctly, in accordance with the objectives of the measure and the principle of proportionality);
2. The inefficiency and cruelty of alternatives to lead on Malta's game species;
3. The non-existence of alternative shotgun projectile calibres for hunting Malta's game species;
4. The lack, almost non-existence of alternative projectiles for "air-guns" on the Maltese market;
5. The lack of alternative shotgun projectiles and cartridges in the local market;
6. The very high price of alternative projectiles that are on the market abroad (see Table 2 at the end of this report);
7. The dangers for humans and hunting dogs using the most used alternative that of steel, due to "ricochets" on the hard stone ground in the Maltese islands;
8. The dangers in the use of alternative projectiles in shotguns that are not "proofed" for such projectiles (apart from the fact that in Malta there are no proof houses - more costs to send the shotgun abroad), especially in shotguns of a certain age, which weapons are more likely to end "hanged-up" in some showcase (another cost to buy a new adequately proofed shotgun). Alternative projectiles for lead can also cause irreparable damage, and can even be dangerous, in certain chokes of weapons;
9. The insignificant consumption of game in Malta and therefore any allegation that the lead from the shots may have a toxic effect or be harmful on the population in general, even if limited to hunters, has never been proven to be of any significance;
10. What should and what can be done with the substantial amount of lead that is in hand, both at individuals and at traders;
11. The massive sports shooting that takes place on the various shooting ranges that are scattered all over the Maltese islands.



## **The EU Proposal and the Positions of the UK and FACE and Security and Defence in the EU:**

The EU Proposal to completely abolish the use of lead from ammunition can be found at this Link:

<https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e1840159e6> .

UK's Position from the following Links:

- “Webpage on sustainable ammunition”: <https://basc.org.uk/ammunition/>
- “Steel shot: What you need to know”: <https://basc.org.uk/download/63109/> .

FACE's Guide from the following Link:

- <https://www.leadammunitionguidance.com/> (in the process of being updated).


The possible effects of the EU's Proposal on Security and Defense in the EU have been discussed in two online articles by:

- EURACTIV (pan-European news website specialized in EU policies) here:

<https://www.euractiv.com/section/defence-and-security/opinion/eus-security-and-defence-a-moratorium-on-the-eus-proposal-on-lead-ammunition-is-required/> .

- and by THE PARLIAMENT MAGAZINE (a monthly magazine about EU policies, politics and culture) here: <https://www.theparliamentmagazine.eu/news/article/reach-restriction-on-the-use-of-lead-ammunition> .

Tabella/Table 1

 <b>WILDFOWL HARVEST ON THE MALTESE ISLANDS AND TERRITORIAL SEA - IL-ĦSAD TAL-BOROK U WIŻŻ FIL-GĴEJĴER MALTIN U L-BAĦAR TERRITORJALI</b>																	
YEAR - SENA →			2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	TOTALS TOTALI	AVERAGE BIRD OVER 12 YEARS - MERGANSER 6 YEARS	
Scientific Name <i>Isem Xjentifiku</i>	English Name <i>Isem Inqilż</i>	Maltese Name <i>Isem Malti</i>	HUNTING OPEN SEASON FROM LAND IS SEPTEMBER TO JANUARY/SEA OCTOBER TO DECEMBER L-ISTAGUN MIFTUH TAL-KAĊĊA MILL-ART HUWA SETTEMBRU SA JANNAR/BAĦAR OTTUBRU SA DIĊEMBRU														
<i>Anas acuta</i>	Pintail	<i>Silfun</i>	45	21	2	8	8	3	3	0	0	1	0	3	94	8	
<i>Anas clypeata</i>	Shoveler	<i>Palettuna</i>	4	49	6	11	10	8	1	2	3	0	0	6	100	8	
<i>Anas crecca</i>	Teal	<i>Sarsella</i>	81	46	37	54	101	30	28	2	16	4	0	106	505	42	
<i>Anas penelope</i>	Wigeon	<i>Silfun Ewropew</i>	42	0	20	14	13	12	8	0	3	2	3	5	122	10	
<i>Anas platyrhynchos</i>	Mallard	<i>Kuluvert</i>	15	52	3	5	24	4	15	1	2	0	4	4	129	11	
<i>Anas querquedula</i>	Garganey	<i>Sarsella Ħamra</i>	6	4	1	10	8	2	0	3	0	5	0	10	49	4	
<i>Anas strepera</i>	Gadwall	<i>Kuluvert Griż</i>	1	0	0	20	0	0	6	0	1	0	0	3	31	3	
<i>Anser anser</i>	Greylag Goose	<i>Wiżża Griża</i>	2	5	0	1	0	0	1	0	7	0	0	3	19	2	
<i>Anser fabalis</i>	Bean Goose	<i>Wiżża tal-Ful</i>	9	2	3	4	27	6	0	0	0	0	0	3	54	5	
<i>Aythya ferina</i>	Pochard	<i>Brajmla</i>	2	1	0	3	0	0	3	1	4	8	1	18	41	3	
<i>Aythya fuligula</i>	Tufted Duck	<i>Brajmla tat-Toppu</i>	4	1	1	1	4	3	0	0	1	1	2	4	22	2	
<i>Mergus Serrator</i>	Red-Breasted Merganser	<i>Serra</i>	24	8	41	59	5	5	-*	-*	-*	-*	-*	-*	142	24	
<b>TOTALS - TOTALI →</b>			<b>235</b>	<b>189</b>	<b>114</b>	<b>190</b>	<b>200</b>	<b>73</b>	<b>65</b>	<b>9</b>	<b>37</b>	<b>21</b>	<b>10</b>	<b>165</b>	<b>1308</b>	<b>121</b>	
<b>AVERAGES PER SPECIES - MEDJI KULL SPEĊI</b>																<b>109</b>	<b>10</b>
The above data is extracted from the Wild Birds Regulation Unit (WBRU) Website Reports and Statistics at: <a href="https://mgoz.gov.mt/en/Pages/WBRU/Reports-and-Statistics.aspx">https://mgoz.gov.mt/en/Pages/WBRU/Reports-and-Statistics.aspx</a> [accessed on 26.11.2022]. Id-dejta ta' hawn fuq hija estratta mir-Rapporti u l-Istatistika tal-Websajt tal-Wild Birds Regulation Unit (WBRU) fuq: <a href="https://mgoz.gov.mt/en/Pages/WBRU/Reports-and-Statistics.aspx">https://mgoz.gov.mt/en/Pages/WBRU/Reports-and-Statistics.aspx</a> (aċċessata 26.11.2022).																	

11/26.11.2022

Tabella/Tabel 2

<b>SHOT PRICE COMPARISON PER 25 CARTRIDGES -                      TQABBIL TAL-PREZZIJET TAL-PROJETTILI UŻATI FL-ISKRATAĊĊ                      KULL KAXXA TA' 25 SKARTOĊĊ</b>			
TYPE - TIP	FROM - MINN €	TO - SA €	*AVERAGE - MEDJA €
Lead - Ċomb	6.50	18.25	10.45
Steel - Azzar	7.50	25.25	11.90
Copper - Ram	21.50	41.25	37.28
Bismuth - Bismut	42.25	60.00	57.81
Tungsten - Tungstenu	79.25	90.00	85.00
*Average prices of shot types in retail sale identified in the Internet search in 29 European countries (Kanstrup & Thomas, 2019) - Prezzijiet medji ta' tipi ta' projettili għall-bejgħ bl-imnut identifikati fit-ftitxija fuq l-Internet f'29 pajjiż Ewropew (Kanstrup & Thomas, 2019)			



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## References:

ECHA (European Chemicals Agency) (n.d.) available at: <https://echa.europa.eu/> [accessed on 15th December 2022].

EURACTIV (n.d.) available at: <https://www.euractiv.com/> [accessed on 16th December 2022].

FACE The European Federation for Hunting and Conservation in the EU (n.d.) available at: [www.face.eu](http://www.face.eu) [accessed on 15th December 2022].

Federation for Hunting & Conservation – Malta (FKNK) (n.d.) available at: [www.huntinginmalta.org.mt](http://www.huntinginmalta.org.mt) [accessed on 15th December 2022].

Kanstrup N. and Thomas V. (2019) *Availability and prices of non-lead gunshot cartridges in the European retail market*. *AMBIO A Journal of the Human Environment* 48 (6).

MCCAA - Malta Competition and Consumer Affairs Authority (n.d.) available at: <https://www.mccaa.org.mt/> [accessed on 15th December 2022].

Micallef L. (2019) Malta Lead Situation Report – 2019. FKNK: Malta.

Micallef L. and Farrugia L. (2019) Lead Shot X-Rays Report. FKNK: Malta.

RAMSAR Convention on Wetlands (1971) available at: <http://www.ramsar.org/> [accessed on 15th December 2022].

THE PARLIAMENT MAGAZINE (n.d.) available at: <https://www.theparliamentmagazine.eu> [accessed on 16th December 2022].

Wild Birds Regulation Unit (WBRU) (n.d.) available at: <http://www.wbru.com/> [accessed on 15th December 2022].

World Forum on Shooting Activities (WFSA) (n.d.) available at: <https://www.wfsa.net> [accessed on 15th December 2022].