



**To the European Commission (GROW.F.1)**

M. Giuseppe Casella, *Head of REACH Unit*  
Mrs Patrizia Tosetti, *Policy Officer at REACH Unit*  
Paris, March 21<sup>st</sup>, 2025,

Ref: 25038

Subject: *Draft Commission Regulation's amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards lead in ammunition and fishing tackle:*

*Common statement of the European Shooting Confederation (ESC) and the Fédération Internationale de Tir aux Armes Sportives de Chasse (FITASC) regarding timeframes in Commission Regulation's proposal to restrict the use of lead gunshot in sport shooting*

Dear Sir, dear Madam,

Following our letter ref. 25033 last March 7, 2025, we are pleased to send you here attached two further documents, as far as lead gunshot in sport shooting is concerned:

- The FITASC/ESC joint communiqué of March 20, 2025, insisting on that fact that we need reasonable and renewable timeframes to finance and implement development solutions for our sports facilities;
- A technical note by our expert Jean-Louis Seveque, focusing on run off and pH management at clay target shooting ranges authorized to use lead shot.

What we propose regarding timeframes:

The European Commission regulation comes into force only 5 years after its approval process, so that the clay target shooting ranges in EEA have the necessary time to:

- be ready for pH monitoring and soil treatment if necessary (3 years);
- be ready for containment, monitoring and, where necessary, treatment of drainage water (5 years).

After these 5 years, the derogation requirements apply: any clay target shooting ranges that have done the necessary to meet these requirements can be reviewed to get the authorization to use lead shot.

After 10 years, a review of that derogation is done in order to evaluate (i) the efficiency of the lead risk management measures implemented and (ii) the progress made towards achieving a Union-wide switch to alternatives in sports shooting.

After 15 years, if the lead risk at authorized clay target shooting ranges is fully monitored, then the derogation may be renewed for another 15 years.

At last, let us renew our invitation to a representative of the European Commission of your choice to urgently visit shooting ranges of different sizes, so that you can see in situ why our proposals are the only ones that can be effective in the goal set by the EC. We are at your disposal to organize these visits, hoping that you will retain this proposal.

Again, we remind you that we share the same objective: to secure the environment while reorganizing the clubs so that our sport has a long-term future.

Best regards.

Alexander RATNER  
ESC President

Jean-François PALINKAS  
FITASC President