



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

M. Giuseppe Casella, *Head of REACH Unit*  
Mrs Patrizia Tosetti, *Policy Officer at REACH Unit*

Paris, March 7<sup>th</sup>, 2025,

*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 Commission Regulation's proposal to restrict the use of lead gunshot in sport shooting*

Dear Sir, dear Madam,

FITASC and ESC have carefully read the draft Commission Regulation regarding the use of lead gunshot in sport shooting: we generally support the terms of the derogation allowing lead gunshot use in sport shooting and is grateful to the EC good sense for having dismissed some of the unimplementable and unscientific ECHA's measures.

You will see attached a file with our comments point by point, explaining our supportive position or our suggested solutions to your non-applicable proposals for shooting ranges.

Below we wish to highlight and explain the spirit of our proposal:

**1/ Derogation deadline (point 37)**

We support the derogation limited to gunshot sizes between 1.9 mm and 2.6 mm, while expressing the strongest reservations about the time limitation of the 15-year derogation, which must be renewable, essential guarantee to justify the necessary investments for both industry and sports facilities.

Indeed, if ISSF/FITASC commit to continuing research to find material/ technology alternative to lead, with equivalent or very close ballistic and economic properties and without negative effects for health and environment, the result of this research being uncertain to date, the transition to alternative ammunition to lead shot cannot be today confirmed within 15 years.

**2/ On lead risk management at shooting range grounds (point 37)**

We fully support the following measures, to be implemented at each shooting range wishing to be authorized to use lead shot:

- pH monitoring and, where necessary, treatment of gunshot-impact areas;
- the obligation to contain, monitor and, where necessary, treat drainage water (including surface water run-off) from gunshot impact areas (*with lead pellet traps that would prevent any physical mobility of the lead pellets off the shooting range grounds*);
- the prohibition of any agricultural use within a shooting range's boundary;
- limiting the use of lead gunshot to members of a sports shooting federation;



- and limiting the number of operators that can place the derogated gunshot calibres on the market.

However:

- We partially support the item “*at least two specific lead-containment measures (walls, berms or banks, nets or shot curtains, and surface covering)*”, which cannot be generalized to all shooting ranges: we reaffirm that lead-containment measures must be site-specific, adapted according to the discipline practiced and to the nature of the land of shooting installations;
- We do not support that “*Outdoor sports shooting ranges should also recover spent lead shot at least once every three years*”.

Our explanations and proposals:

- For Olympic Trap, Fosse and Helices shooting installations, that have the effective possibility and administrative authorization of installing a wall/berm/bank equipped with plastic covering, we support:
  - (i) Recovery of the part of the lead shot at their base, at any time;
  - (ii) For the rest of the lead not trapped on plastic covering: the pH monitoring and, where necessary, treatment of gunshot-impact areas.
- For any other grounds where walls/berms/banks/nets/surface coverings are difficult or impossible to achieve (such as shooting installations in Sporting / Olympic Skeet disciplines or installations on sloping, wooded, rocky land or with high or low vegetation), we support:
  - (i) the pH monitoring and, where necessary, treatment of gunshot-impact areas.

Under these conditions, the chemical mobility of lead is blocked thanks to the soil pH neutrality, which could be checked each year by the delegates of the federations. With these guarantees, it is useless to impose a lead recovery frequency every three years on all shooting ranges.

Especially since each club has its own characteristics: large clubs shoot a lot of clay targets and therefore a lot of cartridges; small clubs shoot few clay targets and therefore few cartridges, which represents insufficient quantities of lead to finance a collection every three years.

Thus, we support that lead recovery must take place when the quantity of lead shot falls is sufficient to fund its recovery.

*Note: we maintain that the shooting ranges that cannot or do not wish to comply with these rules will have to use only lead-free cartridges.*

### **3/ Overwhelming and inapplicable administrative tasks**

We do not support the EC proposal requiring methods of controlling what each shooter shoots, that the shooter must shoot all the cartridges purchased on the same shooting range and that he cannot carry any.



While one can understand the EC's objective of preventing any use of lead cartridges other than sport shooting (in particular while hunting), this administrative process is not applicable in shooting ranges because it would require hiring dedicated staff solely for these control tasks, which is financially impossible for shooting ranges. And, in any case, these staff would have no coercive or police power to be able to search shooters or their vehicles when leaving the club.

#### **4/ Lead shotshell selling process**

We support that only authorized sport shooting ranges will be able to market lead shot cartridges of sizes between 1.9 mm and 2.6 mm and only to active members of a sport shooting federation.

This distribution channel will allow shooting clubs to generate an additional margin to finance lead management.

However, this exclusivity presents the following risks:

- That the shooting range limits the choice of cartridge brands, or even makes agreements with the biggest manufacturers to give it exclusivity (thus, eliminating other manufacturers);
- That the shooting range imposes the sale price outside of any free competition.

We support that a shooter member of the national shooting federation can buy his/her cartridges in any authorized club, transport them and store them in reasonable quantities at home:

- Indeed, the transport of these gunshot must be authorized outside the shooting ranges in order to allow the shooter to use the cartridges of his choice either on another authorized shooting range or during a national or international competition, which will also guarantee free competition on the prices charged.
- Many good and high-level shooters and for all disciplines are under sponsor contract with brands and are forced to use their sponsor's cartridges in approved shooting ranges or during national and international competitions.

#### **5/ Packaging marking**

We support the following packaging marking:

*“WARNING: this product contains lead which is very toxic to the environment and may damage fertility or the unborn child.*

***These cartridges may only be used on approved sport shooting ranges.***

***Any other use could result in sanctions up to and including suspension or withdrawal of the sport shooting license.”***



This means that a sports shooter whose license has been revoked will no longer be able to practice sports shooting. This text is extremely repressive and sport shooters who are perfectly responsible men and women, authorized to own a weapon, will not take the risk of being penalized so seriously for using a few lead cartridges while hunting.

Finally, we invite 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.

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



Proposed restriction of lead ammunition for clay target sport shooting  
 Common Counter Proposal of the International Shooting Sport Federation (ISSF) and  
 the Fédération Internationale de Tir aux Armes Sportives de Chasse (FITASC)

ECHA'S PROPOSAL	ISSF / FITASC Counterproposal
CLAY TARGET SHOOTING RANGES - Conditions of the restriction -	
GUNSHOT	
<p>Lead and its compounds</p> <p>1. Shall not be placed on the market in a concentration equal or greater than 1 % w/w: [...] c. in gunshot</p> <p>2. Shall not be used, in a concentration equal or greater than 1 % w/w: [...] d. in gunshot for sports shooting [...]</p> <hr/> <p>4. By way of derogation:</p> <p>a. [OPTIONAL DEROGATION (part 1 of 4): Paragraph 1c shall not apply if:</p> <p>- the retailer places lead gunshot on the market only for users licensed by Member States.</p> <hr/> <p>b. [OPTIONAL DEROGATION (part 2 of 4): Paragraph 2d shall not apply if:</p> <p>- the user has a licence, granted by the Member State, to use lead gunshot for sports shooting; AND from EiF + [5] years the use takes place at a location that has a permit granted by the Member State for the use of lead gunshot for sports shooting; AND</p> <p>- the following measures are in place:</p> <ul style="list-style-type: none"> <li>Regular (at least once a year) lead gunshot recovery with &gt;90 % effectiveness (calculated based on mass balance of lead used vs lead recovered in the previous year) to be achieved by appropriate means (such as walls and/or nets and/or surface coverage);</li> </ul>	<p>Lead and its compounds</p> <p>1. Shall not be placed on the market in a concentration equal or greater than 1 % w/w: [...] c. in gunshot</p> <p>2. Shall not be used, in a concentration equal or greater than 1 % w/w: [...] d. in gunshot for sports shooting [...]</p> <hr/> <p>4. By way of derogation:</p> <p>a. Paragraph 1c shall not apply for gunshot cartridges with wads with a container AND shot sizes between 1.9 and 2.6 mm used for sport shooting.</p> <hr/> <p>b. From EiF + [10] years paragraph 2d shall not apply if:</p> <p>- The use takes place at a location that has a permit granted by the Member State for the use of lead gunshot cartridges with wads with a container AND lead gunshot sizes between 1.9 and 2.6 mm for sports shooting; AND</p> <p>- the following measures are in place:</p> <ul style="list-style-type: none"> <li>Lead gunshot recovery at site-specific frequency and site-specific Remedial Management Measures (RMMs) based on Best Available Techniques for outdoor</li> </ul>



<ul style="list-style-type: none"><li>• Containment, monitoring and, where necessary, treatment of drainage water from projectile impact areas (including surface water run-off) to ensure compliance with the environmental quality standard (EQS) for lead specified under the Water Framework Directive;</li><li>• Ban of any agricultural use within site boundary;</li><li>• Records of compliance with these conditions shall be maintained by permitted locations and shall be made available to enforcement authorities on request.</li></ul>	<p>shooting ranges to prevent lead chemical migration;</p> <ul style="list-style-type: none"><li>• Containment, monitoring and, where necessary, treatment of drainage water from projectile impact areas (including surface water run-off) to ensure compliance with the environmental quality standard (EQS) for lead specified under the Water Framework Directive;</li><li>• Ban of any agricultural use within site boundary;</li><li>• Records of compliance with these conditions shall be maintained by notified locations and shall be made available to enforcement authorities on request.</li></ul>
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