



To the European Commission (GROW.F.1)

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

Paris, April 16th, 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 latest draft Commission Regulation regarding the use of lead gunshot in sport shooting.

We thank you for having sensibly updated some very important points in line with our proposals, such as allowing the discharge of lead ammunition by active members of a sports shooting association at any authorized outdoor sports shooting range.

A. Please find below a sum up of all points we support in the draft regulation:

1. the five-year transition period for the implementation of RMMs in gunshot shooting ranges;
2. After 10 years, a review of that derogation is done in order to evaluate the progress made towards achieving a Union-wide switch to alternatives in sports shooting.
3. The derogation should be limited to gunshot sizes between 1.9 mm and 2.6 mm, which are the only calibres used in competitions.
4. the discharging of such gunshot takes place at an authorised outdoor sports shooting range;
5. the persons discharging such gunshot are active members of a sports shooting federation and discharge such gunshot at any authorised outdoor sports shooting range;
6. the authorised outdoor sports shooting ranges keep records of:
 - (i) the estimated weight of such gunshot discharged by active members of a sports shooting federation in that range;
 - (ii) the persons discharging gunshot at that range;
 - (iii) the weight of such gunshot recovered
7. The gunshot of sizes between 1.9mm and 2.6 mm can be placed on the market:
 - (a) by ammunition producers and distributors when supplying such gunshot to an authorised outdoor sports shooting range;



- (b) by an authorised outdoor sports shooting range when supplying such gunshot to active members of a sports shooting federation.

[Referring to this point 26 in annex, please bring a correction at point 38 in annex: “(ii) supplying such gunshot to active members of a sports shooting federation for use in that range”. The expression “for use in that range” must be deleted to comply with the point 26 of ANNEX.]

8. The following risk-management measures shall be present in outdoor sports shooting ranges where gunshot is discharged:
- (c) monitoring and, where necessary, treatment of the gunshot-impact areas that do not have surface covering, to ensure that they have a pH of between 6.5 and 8.5, in order to minimize lead migration into soil and water. Compliance with those pH values shall be verified at least once every six months;
 - (d) containment, monitoring and, where necessary, treatment of drainage water (including surface water run-off) from gunshot-impact areas to ensure compliance with the environmental quality standard for lead specified under Directive 2000/60/EC;
 - (e) a ban on any agricultural use within the site’s boundaries;
 - (f) records of compliance with the conditions in this paragraph

B. Besides, there remain three crucial points on which we would like to reiterate our counter-proposals with economically sustainable and technically adaptable decisions for our shooting ranges:

1. The time limitation of the 15-year derogation: it must be renewable, essential guarantee to justify the necessary investments for both industry and sports facilities.
 - On one hand, in agreement with FITASC/ISSF joint communiqué on September 1, 2023, if FITASC, ISSF, as well as ESC, 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.
 - On the other hand, after 15 years, if it is proven that the lead risk at authorized clay target shooting ranges is fully monitored, then the derogation may be renewed for another 15 years.
2. The item (a) of entry 63 in Appendix [X] (Conditions for the application of the derogation in paragraph 25), should be amended as follows: (a) at least one site-specific solution of lead-containment measures, chosen from the following list [...]

Indeed, lead-containment measures (walls, berms or banks, nets or shot curtains and surface covering) are site-specific and should be implemented only when conditions allow (depending on the discipline practiced, the ground topography, the administrative authorization).



For all 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, in any case, the pH monitoring and, where necessary, treatment of gunshot-impact areas.

3. With the chemical mobility of lead blocked thanks to the soil pH neutrality, outdoor sports shooting ranges do not have to recover spent lead shot at least once every three years, but only when the quantity of lead shot falls is sufficient to fund its recovery.

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.

To date, there are only two companies in Europe specializing in lead collection. Given the number of shooting ranges that will have to be dealt with, it will take time to set up a significant number of new companies responsible for lead recovery and thus, job creators. This fact reinforces the necessity to have a renewable derogation, guarantee that these new companies, which will have to hire staff, will be able to do so with complete financial security.

FITASC/ESC strongly hopes that the EC and/or REACH Committee will take into account our counter-proposals which are essential for the future of our sport.

You will see attached an updated file with our suggested amendments to your hardly applicable proposals for shooting ranges.

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