



EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
Consumer, Environmental and Health Technologies

Directorate-General for Environment
Circular Economy and Green Growth

Directors

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NOTE FOR THE ATTENTION OF MR BJORN G. HANSEN, EXECUTIVE DIRECTOR, ECHA

Subject: Request to the European Chemicals Agency to prepare a restriction proposal on the placing on the market and use of lead in ammunition (gunshot and bullets) and of lead in fishing tackle conforming to the requirements of Annex XV to REACH

In September 2018, ECHA published the results of an investigation report on lead in shot used in terrestrial environments, in other ammunition types and in fishing tackle¹. The report builds on the results of the Annex XV dossier for the restriction on lead shot in wetlands² and follows the Commission's request³ to collect information for the assessment of the risk and socio-economic impact of a possible restriction for other uses of lead ammunition, including hunting in other terrains than wetlands and target shooting, as well as for the use of lead weights for fishing. The report concludes that there is sufficient evidence of risk from those uses of lead to justify additional regulatory measures.

Taking due account of the evidence presented and the conclusions of the ECHA investigation report, the Commission would like to ask ECHA to develop an Annex XV dossier in accordance with Article 69(1) of REACH in view of a possible restriction on the placing on the market and use of lead in ammunition, i.e. gunshot used in terrains other than wetlands and bullets used both in wetlands and in terrains other than wetlands, as well as of lead in fishing tackle, to address the concerns posed by these articles.

In the Annex XV dossier, ECHA should also assess aspects of animal welfare such as avoided suffering of animals in the context of hunting and aspects related to potential

¹ https://echa.europa.eu/documents/10162/13641/lead_ammunition_investigation_report_en.pdf

² <https://echa.europa.eu/documents/10162/6ef877d5-94b7-a8f8-1c49-8c07c894fff7>

³ https://echa.europa.eu/documents/10162/13641/echa_annex_xv_restriction_proposals_en.pdf/ed07424a-328d-88e0-b7c6-412251426582

accidents to hunters and sport shooters of lead ammunition and its alternatives. Particular attention should be paid to the differences between types of ammunition (e.g. bullets, pellets, shot, etc.). In line with our initial request for an investigation report (dated 3 December 2015), military use of ammunition should be excluded.

ECHA should aim to collect relevant information as early as possible in the Annex XV development process, to identify viable restriction options targeted at addressing the identified risks for each of the articles concerned (i.e. gunshot, other ammunition and fishing tackle), to establish a clear scope of the suggested restriction options and to provide a thorough assessment of the option(s) that appear more viable, so that the RAC and SEAC have all relevant information and analysis at hand in order to be able to define the most appropriate restriction option when elaborating their opinions, so as to inform and support the Commission's risk management decision. These requirements are in line with the Commission's 'Better Regulation' policy.

ECHA should enter the relevant restriction intention in the Registry of Intention (RoI) within one month from receipt of this note and start working on the dossier as soon as possible.

We would appreciate receiving a confirmatory letter from ECHA that our request has been accepted.

(e-signed)

Carlo Pettinelli
DG Internal Market, Industry,
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(e-signed)

Kestutis Sadauskas
DG Environment