European Federation for Hunting and Conservation



## Proposal to restrict lead in all ammunition requested by European Commission

**Brussels, 28 August 2019** – The European Commission (EC) has <u>requested</u> the European Chemicals Agency (ECHA) to prepare a restriction proposal addressing the risk to wildlife and humans (via the consumption of game meat) from lead in all ammunition (shot and bullets) including target shooting. Lead in fishing weights is also included in the request. The EC's letter to ECHA, which became public on 21 August 2019, also asks ECHA to assess issues linked to animal welfare, potential accidents to hunters using lead ammunition and its alternatives.

FACE understands that ECHA will publish the dossier on its 'Registry of Intentions' in the coming months. From there, ECHA is required to prepare a restriction proposal within 12 months. If ECHA's proposal recommends that further action is necessary, the agency will begin preparing a restriction on all lead in ammunition with its Committee for Risk Assessment (<u>RAC</u>) and its Committee for Socio-Economic Analysis (<u>SEAC</u>) committees. At that stage, there will be consultations with relevant stakeholders including FACE, which also sits on ECHA's decision-making committees.

Although FACE <u>supports</u> phasing out the use of lead shot over wetlands, it does not support general bans on lead in ammunition. From FACE's perspective, any further measures beyond lead shot over wetlands must be proportional with the demonstrated risks to wildlife populations and human health via game consumption (taking into account risk management measures).

This request from the EC to ECHA comes at an interesting time when the EU, through <u>REACH</u>, is currently working on developing an EU-wide restriction on phasing out the use of lead shot over wetlands, which emerged from an EC <u>request</u> to ECHA in 2015. The restriction on phasing out lead shot over wetlands has sparked <u>frustration</u> within the hunting community.

When the EC requested ECHA to prepare a restriction on lead shot over wetlands, the same <u>letter</u> (03/12/2015) also asked ECHA to look into the wider impacts of lead ammunition. On 12 September 2018, based on ECHA's assessment of the wider impacts of lead ammunition, ECHA issued the following <u>Press Release</u> recommending that *"that measures are needed to regulate the use of lead ammunition in terrestrial environments in addition to those proposed for wetlands"*. The Press Release is based on this <u>report</u>: 'Review of the available information on lead in shot used in terrestrial environments, in ammunition and in fishing tackle'.

This ECHA report opened the door for the EC to request ECHA to develop a restriction (Annex XV dossier) on lead ammunition (shot and bullets) over all habitats. This was a matter of timing because once "*a risk to human health or the environment that is not adequately controlled*" has been identified

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(as set out in Article 69 of the EU REACH <u>Regulation</u>), the EC *"shall"* request ECHA to prepare an (Annex XV) restriction report.

If ECHA recommends that a wider restriction on lead in ammunition is necessary, this approach is likely to be extremely complex in terms of establishing actual risks to wildlife populations and human health particularly regarding the available risk management measures.

##END##

**NOTE TO EDITORS**: FACE is the European Federation for Hunting and Conservation. Established in 1977, FACE represents the interests of Europe's 7 million hunters as an international non-profit-making nongovernmental organisation. FACE is made up of national hunters' associations from 36 European countries including the EU-28. FACE is supported by 7 associate members and is based in Brussels. FACE upholds the principle of sustainable use and has been a member of the International Union for the Conservation of Nature (IUCN) since 1987. Visit <u>www.face.eu</u>

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