

FACE PRESS RELEASE

European Federation for Hunting and Conservation



Phasing out lead gunshot over wetlands: Why the EC proposal is unworkable

The European Commission (EC) recently published its fourth [proposal](#) on the lead shot over wetlands restriction, which will be “[discussed](#) and voted” by EU Member States on 3 September 2020 in the EU REACH Committee.

The EC’s revised proposal remains highly ambiguous, disproportionate and discriminatory. It has not addressed in any way the major problems introduced in the first, second and third draft proposals. Importantly, it is liable to unintentionally cause a number of serious legal problems not only for European hunters but also for enforcement agencies.

FACE wishes to clarify the following points:

- FACE supports phasing out the use of lead shot for hunting over wetlands, and could have supported the proposal had the EC respected the [Better Regulation guidelines](#), in particular achieving the goal of legal certainty.
- Thus far, 23 Member States have phased out the use of lead shot for hunting over wetlands in line with the African-Eurasian Migratory Waterbird Agreement (AEWA). Member States have designed their regulations in a way that is proportionate to the risk as well as being practical and understandable for hunters and enforcement officers in line with national conditions.
- FACE does not support the current EC proposal because of the excessive scope of the proposed restriction (i.e. ‘wetland’), the introduction of fixed buffer zones around wetlands (which were not recommended by [ECHA](#)), a short transition period (even shorter than what ECHA recommended), a vague ban on possession of lead shot, which automatically criminalises hunters, and a very broad definition of wetlands posing nearly unresolvable situations for hunters and enforcement officers.

For a summary of some of the main problems, watch this short [video](#).

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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 37 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 www.face.eu

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