



To the European Commission (GROW.F.1)

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

Paris, September 1st, 2023,

Subject: Common statement of the International Shooting Sport Federation (ISSF) and the Fédération Internationale de Tir aux Armes Sportives de Chasse (FITASC) regarding ECHA's proposal to restrict ban the use of lead in clay target sport shooting

Dear Sir, dear Madam,

ISSF and FITASC, as two major international shooting sport federations, regulate shooting sport around the world and therefore must manage and reconcile the rules of the sport considering the differences in social and environmental conditions in different parts of the world. The history and consistency of the disciplines of our sport are based on technical standards that apply worldwide. These include the type of firearms and ammunition to ensure the best and equal conditions in international but also national competitions.

Adhering to the health and environmental objectives pursued by the European Commission, ISSF/FITASC must ensure that the clay target sport shooting disciplines are sustainable in the long term.

Based on current knowledge, only lead gunshot meets the ballistic and economic requirements necessary for the practice of all clay target sport shooting disciplines. Gunshots made of other materials, due to their different ballistic and/or economic properties, are today unsuitable to clay target sport shooting, including a lack of the necessary precision for our sport, ensured safety of the athletes, financial challenges for the range owners etc...

Therefore, we have grave concerns regarding the currently proposed restrictions on the use of lead gunshot for clay target shooting sport prepared by ECHA and now submitted to the European Commission.

Major international shooting sport championships such as Olympic Games, World Championships, World Cups etc. take place in large shooting sport centres that could meet some of the requirements of the ECHA derogations. However, there are only a few such centres in Europe and an essential prerequisite for the continued success of our sport is a complex network of different sized shooting ranges with different disciplines, which are used by sports shooters at different levels. There are great differences in the size and use of the clay target shooting ranges and for many regional and local facilities of our member federations, the requirements proposed by ECHA are neither practicable nor necessary given the risks they pose. In several European countries, most clay target shooting ranges are small to medium-sized and are run by local shooting, hunting or reserve clubs on a voluntary basis.

In its proposal, ECHA inappropriately over simplifies and makes assumptions regarding the risks for environment and human health and minimized the socio-economic impact of the sporting ranges. ECHA proposes a restriction that will entail major difficulties, huge costs and impracticality for many EU Member States. Moreover, we believe that ECHA's risk assessment does not adequately assess the variability of both the environment and geography of clay target shooting ranges and the many different types of shooting ranges in the European Union. The actual risks posed by most shooting ranges to the environment are minimal and many have already taken the safety measures required by their country. There are multiple ways to ensure our sport minimises its impact on the environment. The best approach is for facilities to use techniques to simply assess the site-specific risk of lead, contain and manage this risk using Best Available Techniques (BAT's) suitable for the environment of that shooting range.

We believe SEAC has greatly underestimated the socio-economic value of clay target shooting range sport: a ban of lead will result in many bankruptcies as the implementation of conditions for the proposed restrictions cannot be fulfilled.

Therefore, we are convinced that a balance must be achieved between the benefits of a sporting activity with uniform rules worldwide and the minimal risks posed by its shooting ranges. It is possible to make science-based decisions to ensure the environmental sustainability of each clay target shooting range with specific and local requirements, rather than imposing general requirements that apply to shooting ranges EU-wide.

No need for restriction as there already is a sustainable solution.

There are existing and tested approaches for the risk assessment and sustainable management of clay target shooting ranges that enable the practising and competing and does not threaten human being health and/or environment.

Exemption for target shooting ranges is needed. Shooting ranges should be subject to achieving practical outcomes based on sound risk management principles using an array of Risk Management Measures (RMM's) suited to the environment and social-economic risks of the range.

As stated in our "counterproposal" for clay target sport shooting (see hereafter), Best Available Technology solutions for each shooting range should be installed either at the European level under a European Charter drawn up with the collaboration of the European Commission, or at the national level with the collaboration of the national competent authorities.

This will manage the risk of lead and maintain the social and economic advantages of shooting ranges.

Study on replacing lead gunshot by gunshot made of alternative materials is under current technical development.

Today, this change is not possible due to several reasons (ballistic, safety, range installations, costs etc.). Studies are in progress. 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.

Hoping for a favourable consideration of our concerns regarding the current restriction proposal, we are ready to discuss alternative solutions.



Luciano ROSSI
ISSF 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"> • Regular (at least once a year) lead gunshot recovery with >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); • 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; • Ban of any agricultural use within site boundary; • Records of compliance with these conditions shall be maintained by permitted locations and shall be made available to enforcement authorities on request. 	<p style="color: red;">Lead and its compounds</p> <p style="color: red;">1. Shall not be placed on the market in a concentration equal or greater than 1 % w/w: [...] c. in gunshot</p> <p style="color: red;">2. Shall not be used, in a concentration equal or greater than 1 % w/w: [...] d. in gunshot for sports shooting [...]</p> <hr style="border: 1px solid red;"/> <p style="color: red;">4. By way of derogation:</p> <p style="color: red;">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 style="border: 1px solid red;"/> <p style="color: red;">b. From EIF + [10] years paragraph 2d shall not apply if:</p> <p style="color: red;">- 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 sport shooting; AND</p> <p style="color: red;">- the following measures are in place:</p> <ul style="list-style-type: none"> • Lead gunshot recovery at site-specific frequency and site-specific Risk Management Measures (RMMs) based on Best Available Techniques for outdoor shooting ranges to prevent lead chemical migration; • 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; • Ban of any agricultural use within site boundary; • Records of compliance with these conditions shall be maintained by notified locations and shall be made available to enforcement authorities on request.