Webinar: Consultation on the restriction proposal of lead in outdoor shooting and fishing

Questions and answers

ECHA organised a webinar on 15 April 2021 on the Consultation on the restriction proposal of lead in outdoor shooting and fishing.

The purpose of this document is to clarify aspects of the proposed restriction on lead in outdoor shooting and fishing. It is presented in the form of 'questions and answers'. It does not address generic restriction issues, or other aspects of REACH, which are addressed on the ECHA website[1].

The document is intended to support respondents to the consultation on the proposal, which is open from 24 March 2021 until 24 September 2021.

This document is complementary to the ECHA webinar that was organised on 15 April 2021.

This document is based on the questions received from stakeholders before and during the webinar. Editorial changes have been made to improve clarity and similar questions have been combined.

If you need further clarification, or if a specific question has not been answered, please contact the ECHA helpdesk[2].

Readers are reminded that the text of the REACH and CLP Regulation is the only authentic legal reference and that the information in this Q&A document does not constitute legal advice.

The European Chemicals Agency does not accept any liability with regard to the use that may be made of the information contained in this document.

[1] https://echa.europa.eu/support/qas-support/browse/-/qa/70Qx/view/scope/REACH/Restrictions
[2] https://echa.europa.eu/contact/other

Use of the information in this document remains the sole responsibility of the reader.

For the most up-to-date advice on restrictions, contact us or refer to our support material.

1. REACH restriction process-related questions

Question	Answer
What is the preferred way of submitting scientific material for the consultation (mail, e-mail, via the ECHA website or something else)?	Interested parties must only submit information to the consultation via the secure webform on the ECHA website, which also contains specific questions on the topics for which more information is requested: https://echa.europa.eu/restrictions-under-consideration/-/substance-rev/27801/term Only information submitted via the secure webform will be considered. Your responses can be entered directly into the webform or as an attachment. However, please do not submit the same comments via both means. The information provided should be supported by evidence. The consultation is open until 24 September 2021. Please familiarise yourself with the proposed restriction and the supporting documents before sending your comments.
Why are the timelines to provide information to the consultation so short and will the information submitted even be considered?	The restriction process is defined in Title VIII of the REACH Regulation which also sets out the process timelines. It is foreseen in the process that ECHA's Scientific Committees, RAC and SEAC, evaluate the restriction proposal taking into account the information submitted in the consultation. Interested parties can submit information if they consider it relevant. Information provided during the consultation may have an influence on the conditions of the restriction including transitional periods for certain uses, particularly where arguments are well supported with evidence. Please refer to the Consultation Guidance on the ECHA website for further details on what type of information should be provided in the consultation: https://echa.europa.eu/documents/10162/13641/restriction_consultation_guidance_en.pdf
With respect to the consultation, would relevant information submitted after the first deadline (5 May 2021) though still within 6 months be considered by RAC and SEAC in forming the final opinion?	Yes. As set out in the background note to the consultation, information on the scope of the proposal, hazard of the substance(s) and the costs of the proposal is likely to be most useful if it is submitted by 5 May 2021. However, information submitted after this date will still be considered by the Committees as they develop their opinions. It is possible to submit more than one consultation response during the six-month period so please take this into account when deciding when to submit information, e.g. if some information is available now but other information only later. The 5 May deadline can also

	be used to explain what further information will be submitted later in the consultation. This can help the Committees to plan their work.

2. Scope of the restriction

Question	Answer
How is the scope of the restriction defined?	The scope of the restriction was set by the Commission's request to ECHA to develop a dossier on the use of lead in hunting, sports shooting, and fishing tackle. This request specifically excluded military uses. The request to ECHA can be found here: https://echa.europa.eu/documents/10162/13641/rest_lead_ammunition_COM_request_en.pdf
Is there a reason why the lead weights for SCUBA divers are not included in the current draft? I think that in the past there was already a draft of restriction initiated by Denmark about lead for hunting, fishing, and diving.	Lead weights for SCUBA divers are diving equipment, and therefore not in the scope of the restriction proposal. On 16 July 2019, the European Commission requested ECHA to prepare a restriction proposal on 'the placing on the market and use of lead in fishing tackle, to address the concerns posed by these articles, that were identified in a report published by ECHA in 2018'. (Scuba) diving equipment are not within the scope of the request, and therefore not part of the restriction proposal.
Based on your logic - there is alternative in water pipes - If you are consistent - you should now ban all lead pipes carrying water.	The scope of this restriction proposal covers lead shot and lead ammunition for civilian use outdoors for hunting, sports shooting, and fishing and therefore does not relate to the use of lead in water pipes. ECHA notes that the lead concentration in drinking water in the EU is regulated my means of the Drinking Water Directive 98/83/EC. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01998L0083-20151027
Why military use is not involved? Military ammo use is much larger. If we all want to save the environment, which is a great aim, why to make exceptions? It is still not clear for me.	The scope of the assessment was defined by the European Commission and excludes military uses of lead ammunition.
How will the goal of the legislation be affected by the fact that national armies and other national security forces will not be affected? Wont that diminish the ability to prevent poisoning from lead, if the most significant	It is likely that the effectiveness of the restriction will be lower if military uses are excluded. Nevertheless, please tell us how much lead ammunition would continue to be used by military personnel. The scope

Question	Answer
users of lead-based ammunition remain to use it on wide scale?	of the assessment was set by the European Commission. Monitoring the effectiveness of a restriction is part of the evaluation and, as such, information on "monitorability" is included in the restriction report. Also, RAC and SEAC will have to evaluate the monitorability of the proposed restriction when giving their opinions. Furthermore, the European Commission can review a restriction at any point in the future and take action if it is not functioning as intended.
It is important to note that national armies and forces and voluntary training will be impacted by availability of suitable ammunition on commercial markets.	ECHA is aware of the potential "spill-overs" onto ammunition manufacturing. If you have more information, please provide it during the consultation.
If it is dangerous for humans - are military and other persons not humans?	The scope of the assessment was defined by the European Commission in their request to ECHA and it involves civilian use of lead in shot and ammunition in hunting and outdoor sports shooting only. Therefore, this excludes uses of lead ammunition by the military, police, customs, etc.
What would be the effectiveness of the proposed restriction considering that military and police will not be affected? Lead used by sport shooters or hunters is only a fraction. Is there any study or data that you can present?	Military uses of lead ammunition are outside of the scope of the proposed restriction. ECHA has assessed the risks posed by the uses within the scope of its investigation and has concluded that these risks are not adequately controlled. ECHA has quantified the production volumes of lead in those sectors that are in the scope. From the information that ECHA received in the call for evidence we understand that a large fraction of lead in ammunition is used by civilians. If you have evidence to the contrary, you can provide it during the consultation.
I do not understand question number 14 in the consultation regarding voluntary military training - how a member state organizes its national defence and military organization is out of scope of the current file? Substances used in the interest of defence and covered by national exemptions are excluded from REACH. If voluntary military training is considered to fall within "defence" and there is a national exception, then the activity is not covered by REACH.	ECHA has been made aware of situations where civilians buy lead ammunition to be used during voluntary military training. ECHA considers that in case the training would be performed on a shooting range that is (also) used by the general (civilian) population, it would be within the scope of this restriction. We would like to know more about this use from the consultation in order to provide the best possible information for the Commission and the EU Member States in their final decision making.

Question	Answer
For example, restrictions on placing on market for lead ammo or availability of products in market because of civilian restrictions affect voluntary military training.	

What about civilian guns owned for self-defence? Did you consider the effects of the proposed restrictions on those?	The Annex XV report includes a list of uses the Dossier Submitter considers to be out of scope such as:
	
	Indoor shooting, police, law enforcement, military applications, protection of critical infrastructure, commercial shipping or high-value convoys, soft-target and public space protection, security purposes, technical testing and/or proofing, testing and development of materials and products for ballistic protection, forensic analysis, historical and other technical research or investigation.
	
	ECHA considered the use of lead ammunition for self-defence in relation to the scope and identified it as a topic that we would like to receive more information on in the consultation, specifically in relation to the nature of risks that could occur via the pathways and receptors identified in the Annex XV report such as
	
	• Primary ingestion (primary poisoning)
	• Secondary ingestion (secondary poisoning)
	• Exposure to lead fume/dust from shooting and when home-casting (projectiles and fishing tackle)
	• Via environment:
	  • consumption of game meat (esp. hunting families)
	  • intake of water and soil contaminated by lead (from shooting ranges, during service life and end of life)
	
	Furthermore, ECHA would like to receive more information on the technical and economic feasibility of alternative ammunition materials. How would the risks via the pathways and receptors identified in the Annex XV report differ between training (for self-defence) and any use of lead ammunition in the 'act of self-defence'?

Does the restriction intend to cover also the "use" by professional operators?	The Annex XV report includes a list of uses the Dossier Submitter considers to be out of scope such as:

Question	Answer
	Indoor shooting, police, law enforcement, military applications, protection of critical infrastructure, commercial shipping or high-value convoys, soft-target and public space protection, security purposes, technical testing and/or proofing, testing and development of materials and products for ballistic protection, forensic analysis, historical and other technical research or investigation. Some of these uses could be considered to be 'professional'. Nevertheless, other professional uses, such as by professional hunters or professional sports shooters are intended to be within the scope of the proposed restriction. The proposed restriction of lead gunshot is intended to cover both the placing on the market and use of lead gunshot. This would allow manufacturers to export lead shot outside of the EU. The proposed restriction on lead in projectiles other than gunshot is intended to only cover the use, rather than placing on the market. This is in order to allow continued placing on the market of lead projectiles other than gunshot for sports shooting.

3. General issues

Question	Answer
Following Brexit, is the UK market concerned by this legislation?	The UK is no longer a member of the European Union and the EU REACH Regulation, under which this restriction proposal is developed, no longer applies in the UK. Therefore, the restriction will not apply to the UK. Exporters from the UK to the EU would be affected by the proposed restriction though. ECHA has taken account of the Brexit in both the risk and the impact assessment of the Annex XV report. This means that impacts are determined based on data from the EU-27 only and any impacts on British shooters or hunters are not accounted for.
Will the restriction also be automatically implemented in Norway, Iceland, and Liechtenstein?	Yes. Any restriction under REACH will be implemented in Norway, Iceland, and Liechtenstein. REACH is a harmonising Regulation that is directly applicable in all EEA Member States.
How can we be sure that sales of lead gunshot from non-EU countries will not develop?	A general ban of lead gunshot would apply to imports to the EU/EEA. In practice this will be a matter of enforcement of the restriction at the borders of the EU/EEA. If a ban would be agreed, then it would become

	illegal to sell lead containing gunshot in the EU. In case it would be agreed to have a derogation for sport shooters under strict conditions such as use at permitted sites with lead recovery > 90 %, permitted athletes, and permitted retailers to sell lead gunshot, enforcement authorities would have to ensure compliance.https://echa.europa.eu/documents/10162/da9bf395-e6c3-b48e-396f-afc8dcef0b21
How can you weigh the cost against benefits for society, when only shooters and fishers will bear the costs?	The costs of the restriction will not only affect fishers and shooters but also the producers of lead containing sinkers, bullets and shot. All of these needs to be weighed against the potential benefits incl. those accruing to hunters and their families (e.g. via consumption of non-contaminated meat) and to the environment (e.g. through reduced mortality of wildlife). The information that ECHA has received indicates that price differences between lead containing products and alternatives is in most cases insignificant compared to the budget that hunters and fishers spend on exercising these leisure activities.
Hunting and fishing are not leisure activities. Hunting and fishing, at least in some member states, are management activities in the service of the public. They are an instrument of the government to manage the game and fish. How will this be taken into account in the analysis	ECHA acknowledges that hunting and fishing are an important service to society. In several Member States the concern over the toxicity of lead for human and the environment already led to bans on the use of lead gunshot over wetlands and on lead bullets for hunting, including for population management purposes. If you would like to provide additional information on the benefits of hunting or fishing that would be lost to society in the event of a restriction on the use of lead in ammunition and fishing sinkers (i.e. if alternatives could not be used) please do so in the consultation.

4. Environmental impact / aspects

Question	Answer
Why is lead contamination of soil at shooting range concerning?	The concentration of lead in shooting ranges soils has been reported to reach values comparable to those found in lead mining areas, posing risks to human health and the environment via soil, surface water (run-off water) and potentially ground water. Sports shooting ranges may also be located on land used for agricultural purposes during and/or a fter service life posing a risk for contaminated food. In addition, runoff water may also contaminate land, surface water and groundwater outside the perimeter of the shooting range both during service and end of life.

	At EU level no harmonised concentration limit value for lead for soil quality has been established for the protection of human health and the environment, apart from one exception: the Sewage Sludge Directive in its annexes defines limits for lead in agricultural soils on which sewage sludge is applied.
Do you need information on water and drinking water? Which type of information?	In the previous work on wetlands and in the current restriction report, ECHA report studies that linked elevated levels of lead in water to the presence of shooting ranges nearby, suggesting that the use of lead in ammunition on shooting ranges affects water quality, potentially even drinking water quality. We would be interested in any further studies that might confirm these data and link this to the use of lead. Equally, we would be interested in studies that show that risks would not occur due to risk management measures that are taken at shooting ranges.
What happens when you use steel pellets in your shotgun in an area where there are a lot of lead pellets prior? Will the steel pellets in contact with lead pellets donate electrons to the lead causing the protective oxide layer on the lead to dissolve? If so then the ban on lead shotgun shells have caused more lead to be released into the nature, despite your best intentions to reduce the exposure of lead.	ECHA has investigated the fate and behaviour of lead in soils in the presence of steel (iron) gunshot based on speciation modelling, field evidence and information on 'ferrous chemical amendment'. There is no evidence that an increased mobilisation of lead would occur following the use of steel shot at a shooting range and, in general, ferrous amendments would be expected to reduce the mobilisation of lead. Should you have information to the contrary please provide this in the consultation so that it can be evaluated by RAC and the Dossier Submitter.
Did ECHA take part in the examination of historical battlefields? These are excellent representations of what a lead projectile (not shot) can cause in the natural environment. I took part in such projects. We realized that even 400 years old bullets do not dissolve in the ground.	The fate and behaviour of lead in the environment is described in the Annex XV report. In addition to dissolution as lead ions, the hazard and risk of lead from ammunition in the environment is also associated with its inadvertent ingestion as fragments. If you would like to share further information on the availability of lead fragments in the environment, please submit in the consultation.
In the field we do not find bird dying of lead poisoning. Why?	This aspect was already discussed during the development and evaluation of the restriction on the use of lead gunshot in wetlands. Lead poisoned birds will hide and can become easy prey. Carcasses get scavenged in a few hours/days depending on its size. Therefore, it is not common to find lead poisoned birds. Monitoring programmes that investigate the cause of death of birds frequently identify lead poisoning as a likely cause of death. These studies are described in the Annex XV report.
What if there is no impact on populations of birds? How will ECHA approach risk in this respect? Look at individual mortality?	This aspect of risk assessment was discussed extensively, by both the Dossier Submitter and RAC, during the development and evaluation of the restriction on the use of lead gunshot in wetlands. REACH does not

	require population-level impacts to be demonstrated to conclude that risks are uncontrolled. In the restriction on the use of lead gunshot in wetlands individual-levels effects (mortality of ~1 million waterbirds per year in the EU) was considered to be of sufficient magnitude to conclude that risks were not controlled, irrespective of the available population-level data.
How was the estimate of 135 million birds "at risk" of primary poisoning from lead gunshot and other lead ammunition calculated? Was is a list of species or taxonomical groups compiled and their total population estimates added together? There is not sufficient detail in Annex XV to understand the methodology. Greater explanation would be helpful.	The risk assessment for primary poisoning of birds used both direct and indirect evidence of lead shot ingestion. The direct evidence is based on the observation of ammunition derived lead ingestion in a particular species. The indirect evidence is based on the feeding ecology of species and its similarity to a species that is known to have ingested ammunition derived lead. For additional info on the methodology and literature see also Annex XV report, section 1.5.3.3. Primary and secondary poisoning of wildlife (birds) and 1.5.3.4. Likelihood of primary ingestion of gunshot and fishing tackle by Birds. Species at risk of lead poisoning in the EU are summarised in section 1.5.4.2. of the Annex XV report. For the species at risk, the EU population size was taken (Annex XV report, section 1.8.5. Impacts on birds). All details of the methodology are in the Annex XV report and its annexes published on the ECHA website. If you have further information, please provide this in the consultation. The number of birds at risk was estimated precisely, but it is clear that this level of precision is not meaningful. It is also clear that not all of the birds identified to be at risk will indeed be poisoned. We hope to refine these estimates based on information received in the consultation. Please submit a comment in the consultation if you still consider that the methodology is not clear after reading all these sections. RAC and SEAC will also evaluate the Dossier Submitter's methodology as well as any comments from the consultation on this point.
As regards 135 429 204 birds at risk, how (and why) ECHA has deducted such an exact figure out of Member States´ estimates under Article 12 of Birds Directive? Most birds are at risk from something. Why has ECHA focussed on the number of birds "at risk"?	The Annex XV report (and its Annexes) include a review of the available scientific literature on the risks to birds from the ingestion of lead. The estimates of the numbers of birds 'at risk' is part of the risk characterisation where the extent of the risk is described. It is also useful for the impact assessment (socio-economic analysis) of the proposal, as

	it allows the benefits of the proposal (the avoided risks) to be quantified. Please see the following sections of the Annex XV report, which should provide the information you may be interested in: ✓ section 1.5.3.3. Primary and secondary poisoning of wildlife (birds), discussing the methodology applied ✓ section 1.5.3.4. Likelihood of primary ingestion of gunshot and fishing tackle by birds ✓ Section 1.5.3.5. Likelihood of secondary ingestion of shot, bullets and fishing tackle by birds: overview ✓ section 1.5.4.2. Species at risk of lead poisoning in the EU ✓ section 1.8.5. Impacts on birds The number of birds at risk was estimated precisely, but it is clear that this level of precision is not meaningful. It is also clear that not all of the birds identified to be at risk will indeed be poisoned. We hope to refine these estimates based on information received in the consultation. About population effects please see the specific question *"What if there is no impact on populations of birds? How will ECHA approach risk in this respect? look at individual mortality?".* In section 1.8.5. both the breeding population and wintering population occurring in the EU have been specified.

5. Human health impact / aspects

Question	Answer
Are you expecting **hunters to be unaware of the potential risks and** incapable of taking care and deciding for themselves?	The REACH restriction process aims to protect our health and the environment from the risks posed by lead in ammunition and is not an attempt to ban hunting. After assessing all the uses of lead within the scope of the Commission's request, ECHA concluded that there are risks to wildlife, livestock, the environment and human health that are not adequately controlled and which need to be addressed at EU level. The risks of the restriction will not only affect hunters, sports shooters or fishers but also other actors in the society and the environment. All of these needs to be weighed against the potential benefits incl. those

	accruing to hunters (e.g. via consumption of non-contaminated meat).
Lead is an element and occurs naturally in soil. Lead accumulates from the soil into vegetables and grains. Are the lead residues in game meat from ammunition or accumulated from vegetables and grains eaten by game over a long period of time?	Several studies show a relationship between the concentration of lead in meat in relation to the distance to the wound channel with very high lead concentrations in and around the wound channel and low lead concentrations in meat samples taken far away from the wound channel. Several investigations even confirmed the source of lead in game meat from ammunition (e.g. Wilson et al., 2020; Bull Environ Contam Toxicol 105: 366-371).
Is there really a concern from game meat consumption? Lead is toxic to humans - but how and in what quantities does it transfer from lead gunshot to humans? You claim IQ loss from eating game meat? May we ask for a source? There are studies contradicting it done on families with members hunting.	Yes. Lead is toxic to the developing nervous system of young children reducing the IQ, for which no safe level has been identified. The absorption of metallic lead is far higher in small children (ca. 50%) compared to adults (ca. 10%) due to the high calcium requirement of small children and lead mimicking calcium. Consequently, several food safety agencies have published advice regarding the consumption of game meat. For example, ANSES advised consumers to limit themselves to occasional consumption of large wild game (approximately three times a year); and that women of childbearing age and children avoid all consumption of large wild game. https://www.anses.fr/fr/content/consommation-de-gibier-sauvage-agir-pour-r%C3%A9duire-les-expositions-aux-contaminants-chimiques The Dossier Submitter received information on lead in game meat from the European Food Safety Agency (EFSA) as well as consumption patterns of EU citizens. Based on this raw data we modelled the impacts on high-frequency game meat consuming families. The methodology and supporting references are detailed in the proposal.
As regards Table 1-50, how ECHA explains that the lead concentration figure in game meat hunted by rifle bullets (2.516 ug/g) is almost 7 times higher than in game meat hunted by gunshots (0.366 ug/g)?	The difference in lead concentration is observed in a database of lead concentration in meat samples (n=12,908) provided by the European Food Safety Agency (EFSA). The difference between concentrations in meats hunted with rifle bullets versus gunshot is likely to be the result of different fragmentations that the two types of projectiles have when hitting the prey. You find a summary of the state of science on this topic in the Annex XV report: https://echa.europa.eu/documents/10162/da9bf395-e6c3-b48e-396f-afc8dcef0b21
Why is ECHA's risk assessment (Tables 1-48 and 1-50) based on game meat intakes (calculated per year: infants 4.24 kg/toddlers 14.64 kg/adults 80.89 kg). Does ECHA consider that those annual game meat	The risk assessment is based on the assumption that hunter families eat significantly more game meat than a regular consumer and can hence be characterised by the 95th percentile of observed consumption behaviour in the EU. The information on intake is based on a survey of game meat

intakes are representative as regards hunters and their families in the EU27?	consumption by the European Food Safety Agency (EFSA) and compiles information on regular consumers from all EU Member States.
ECHA´s figures are more than four times higher than those used by BfR, AESAN and ANSES in the respective dietary exposure studies? How do you explain this?	The data on game meat consumption used by ECHA are based on data from EU wide food surveys collected by EFSA. For characterising the game meat consumption of hunter families, ECHA has used the 95th percentile of the distribution assuming that hunters and their families have a substantially higher game meat consumption than the regular consumer. The data from Spanish AESAN (2012) refers to a national survey resulting in intake values for hunters only slightly lower than the data used by ECHA, whereas the values indicated by BfR and ANSES are based on assumptions, not measured data.
Is the information from the European Food Safety Agency public?	The raw data from EFSA is currently not public, but in principle the data should be available from https://www.efsa.europa.eu/en/food-consumption/comprehensive-database

6. Alternatives - general

Question	Answer
Is there a current lead substitution that is acceptable to ECHA and the EU as a substitute for lead in firearms in order to avoid the economic and social damage associated with banning the use of lead in the EU?	ECHA has evaluated the availability, technical performance, costs, environmental footprint, social impact, and environmental and human toxicity of available alternative materials for each specific use such as shot and bullets for hunting or sports shooting and fishing tackle. For hunting purposes, steel gunshot and copper bullets were identified as suitable alternatives. For sports shooting, steel gunshot was identified as a suitable alternative; however, bullets with sufficient precision do not currently appear to be on the market for sport shooting. For fishing sinkers and lures suitable alternatives are on the market. The identified alternatives are already used in sports shooting (shotgun), hunting and in fishing. All the identified alternatives have a hazard / risk profile that is of less concern than lead. For the use in firearms the dossier concludes that there are suitable alternatives that are available (and are already used by hunters).
Are you aware the steel, bismuth or tungsten are not suitable alternatives for lead? These materials are much harder than lead, which will lead to more ricocheting and more injuries. Probably much more health damage than lead supposedly causes.	ECHA has analysed the experience in Denmark and the Netherlands with alternatives to lead gunshot, which has shown that no major injuries occurred. We have also reviewed all of the scientific assessments of the risk of ricochet from the use of alternatives. This is documented in the

	Annex XV report and was already evaluated as part of the proposed restriction on the use of lead in wetlands. If you have additional scientific studies on the ricochet of alternatives to lead ammunition, please submit them in the consultation.
A report that we compiled, proved that no alternative shot shell, is currently available for the type of hunting and game that occurs most commonly in the Mediterranean. Evidently no possible alternative ammunition available for such game. Is this been looked into, especially for humane concerns?	ECHA would welcome this type of information to be submitted in the consultation.
Full metal jacket bullets often contain copper, which is also critical for the environment. How does ECHA consider this?	ECHA has done an assessment of the toxic profile of alternatives. ECHA's assessment showed that copper bullets used for hunting pose no relevant concerns for human health or the environment (including both wildlife or water).
What about this work on alternatives? Nickel – Dust and aerosols while shooting carcinogenic (UMK-AG 1998). Tungsten – Toxic to soil microbes and plants (Strigul et al. 2004). Bismuth – Human toxicant (Jayasinghe et al. 2004). Steel – Chromium load to environment (Levonmäki and Kairesalo (2001).	ECHA has done an in-depth analysis of the toxic profile of the alternatives. If there are further studies that we could take into account, then we would like to receive details of them in the consultation.
ECHA concludes the alternatives are safe?	ECHA's assessment showed that the most prevalent alternatives (steel for shot and copper for bullets) show no known human health or environmental concerns.
Can the use of coated lead gunshot or lead fishing tackle reduce toxicity to birds?	The coatings (if used for shot or fishing tackle) will be abraded by the gizzard action, and after that the lead core will be dissolved in the highly acidic environment of the avian stomach, as already extensively tested in the 1960's and 1970's in the US. Note that some coatings of fluoropolymers, such as Teflon, have been assessed as non-toxic for wildlife and are approved by the US Fish and Wildlife Service but only on non-toxic cores (such as steel) made of material approved by the US Fish and Wildlife Service.
Could the alternatives to lead ever be restricted under REACH in the future?	A Member State, or ECHA, at the request of the European Commission, can start the restriction procedure when they are concerned that a substance poses an unacceptable risk to human health or the environment. ECHA can also propose a restriction on articles containing substances that are on the Authorisation List (Annex XIV). Therefore, if the alternatives to lead are found to pose an unacceptable risk to human or the environment, they may be subject to a restriction in the future.

	However, ECHA's assessment of alternatives concluded that the use of the most prevalent alternatives (steel for gunshot and copper for bullets) are not associated with risks to human health or the environment.
It was stated 'For sports shooting, steel gunshot was identified as suitable alternative;' How is this possible? Ricochet of steel pellets could be a potential source of severe injuries to athletes and officials whereas ballistic reports regarding use of steel pellets are disappointing.	ECHA has analysed various ballistic studies indicating that the ricochet power of steel gunshot is not so much larger than that of other gunshot (incl. lead). Please provide, in the consultation, any information indicating risks to athletes and officials from ricochet of steel gunshot.
Existing guns are not prepared to use steel ammo, so all guns will be useless.	You can read on most shotgun producers' webpages in the liability sections that their guns can use regular steel shot. Shotguns produced after 1970 can use regular steel shot. In older shotguns you may have to use tungsten or bismuth shot instead.
That might be the truth on newer guns but not the older ones what about standard firearms - e.g. used for IPSC shooting competitions? There is no usable alternative yet and won't be any soon.	Please note that for bullets used for sports shooting, no ban is proposed but ECHA rather proposes a set of conditions (such as bullet traps) to control emission of lead.
There needs to be an assessment of the unnecessary carbon footprint of all this. This is huge. Standard Steel has very limited use, and the higher grades of steel cartridge mean they cannot be used in most guns -	ECHA evaluated the availability, technical performance, costs, environmental footprint, social impact, and environmental and human health toxicity of available alternative materials for each specific use such as shot and bullets for hunting or sports shooting and fishing tackle. The environmental footprints of alternatives were in general better compared to lead (see section C.4 in the Annex to the restriction report).
Have safety concerns been taken into consideration for certain habitats mainly of the Maltese islands, which are constituted mainly of rocks, that will not absorb the kinetic energy from lead-free shot which retains more energy and therefor rebounds and become a dangerous hazard?	If you have more information on this then ECHA would like to receive this in the consultation. This would allow ECHA to compare this information with other studies on shooting safety that are already in the report.
Current rifles are designed to use lead ammo, alternative ammo will be much more expensive and current rifles are not designed to use steel or copper ammo! Is this proposal a back-door to disarm Europeans, hunters, sport shooters and anyone who LEGALLY own a gun.	In ECHA's assessment on the compatibility of rifles with non-lead rifle ammunition ECHA took into account advices from manufacturers, hunting associations and other studies. Please see for example this advice from the German hunting association: https://www.jagdverband.de/umstieg-auf-alternative-munition (in German) if your comment refers to a specific type of gun then please submit that information in the consultation.
If I want to field test e.g. non lead .22 rim fire, are there any criteria on the type of report that would be accepted by the committees? My experience thus far is that it is not good enough, but how to document	Indeed field test on this calibre type are welcome. In your field test please make sure that you describe well what ammunition you use, which brand and the target you're shooting at. The Annex XV report refers to

this correctly?	some studies that can also be used as an example for these kind of tests, see for example Annex to the report; Table D.1-22: overview of tests of lead and non-lead bullets (on page 356)
Some non-lead rifle bullets have more than 1% lead. How would ECHA approach this?	Indeed this is an issue that ECHA recognises in the Annex XV report. There are e.g. brass bullets that are used and that contain lead up to 3 to 4% weight by weight. ECHA has identified that the transition to brass with a lower percentage of lead (or even copper) could pose technical challenges. If you have more information on this then please submit this in the consultation.

7. Hunting

Question	Answer
Would be a viable option to bury remnants of hunting containing lead, to protect raptors and scavengers from lead poisoning?	Some species of scavengers dig up the viscera, consume it and would continue to be exposed to lead.
In cases like Cyprus, having a few wetlands and raining days throughout the year, in combination with minimum hunting days per period, is there a possibility to apply this regulation with exceptions? Meaning, to be able the country to evaluate and apply the regulation accordingly. Thank you!	As REACH is a harmonising regulation any measure under REACH applies without exemption to the whole of the EU. If you consider that a use should be derogated from the restriction you must provide additional information in the consultation: https://echa.europa.eu/documents/10162/13641/restriction_consultation_guidance_en.pdf/7c4705d5-ad01-43ed-a611-06f1426a595c ECHA would like to note that the current dossier demonstrates a risk to birds also outside of wetlands. In a previous dossier ECHA presented a proposal on the use of lead shots in wetland. This proposal has been adopted by the EU and the member states in January this year. To clarify, the discussion on wetlands was closed with the European parliament voting in favour. it was published in the official journal in January this year.
How will a lead-ban influence black powder hunter?	In principle the current wording of the proposed restriction entry also covers the use of lead ammunition in black powder hunting. ECHA makes note of the technical difficulties to substitute lead in the types of gun used in black powder shooting, but we could not establish well the volume of lead for this use. ECHA therefore seeks more information on

	the volume in the consultation. It would also be important to understand if the meat of the game would be used for human consumption.
I would like to have some more information about lead used for hunting split up a bit. How much lead is used for gunshots and how much for rifle bullets for hunting? In addition, how much of that is used for "real hunting" and how much is used for practising on a shooting range?	The Annex XV report contains an overview of the volume of lead used in each of the identified sectors. You can look at e.g. the executive summary which contains a table summarising the estimated volume of lead that is used per sector. Please look at e.g. Table 2: https://echa.europa.eu/documents/10162/da9bf395-e6c3-b48e-396f-afc8dcef0b21. ECHA consider that when hunters practice this takes place at shooting ranges. So, the practising of hunters has been assigned under shooting ranges.
In many EU countries, hunting of waterbirds with lead shot has been banned for more than 20 years. Where do they get lead shot? Doesn't the lead dissolve and disappear from coastal water, or do they eat lead shot fired in the 1960s?	Birds are poisoned by lead shot after eating it. This can happen if they mistake it for food or the small stones ('grit') that they must keep in their gizzard to grind down food. Lead shot can remain accessible in the environment for many years after its original use but is most readily available shortly after its initial use. Prior to the REACH restriction on the use of lead in gunshot in wetlands only very few EU Member States had a complete ban on its use. The current proposal relates to the use of lead gunshot outside of wetlands as well other types of lead ammunition.
The distinction between small and big calibres does not exhaustively explain how certain products should be classified. For instance, 22 LR (rimfire) is described in many parts of the dossier as a 'small calibre', although its diameter is above 5.6 mm. In which group should 22 LR be included?	ECHA has provided additional clarification on this in the updated dossier published on 24 March 2021. To ECHA's best knowledge the .22 LR would fall under 'small calibre'. The 5.6 mm requirement should be understood as 5.6 mm centrefire, as described in the report.
The killing effect with lead free ammo wasn't a theme today. Have you taken this into consideration?	This has indeed been considered in the dossier. There is a section on suitability of non-lead ammunition in terms of hunting which considers as well this aspect. The various studies that were analysed show no difference in lethality between lead and non-lead ammunition. If you have more information that you think ECHA should consider as well, then please submit this in the consultation.
Will the regulation ban lead use in hunting cartridges in all areas or only on wetlands? And how a wetland is defined?	In a previous Annex XV report ECHA proposed a restriction on the use of lead gunshot in wetlands. This proposal has been adopted by the EU and the member states in January this year: https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e180c0ac38

	In this proposal, wetlands are defined as per the RAMSAR definition: "…wetlands are areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres." The current restriction proposal focuses on the use of lead gunshot in all terrains, including for both hunting and sports shooting.

8. Sports shooting

Question	Answer
What evidence do you have on lead in sports shooters as health hazard?	Lead is a hazardous substance. Several studies examining indoor shooters demonstrate that blood lead levels increase with the use of fire weapons (with lead-containing primer) compared to use of air weapons, with increasing calibre of the weapon, increasing shooting frequency, and reduced ventilation. For outdoor shooters the available evidence is too limited to draw a conclusion. If you have more information on lead exposure of outdoor shooters, then ECHA would like to receive this in the consultation. To minimise hand-to-mouth intake of lead dust from hunting or sports shooting, good hygiene measures need to be applied to reduce the health risk.
By admitting that there are only a few alternatives (hunting) and alternatives are insufficient for any precision-based shooting disciplines (sport shooting) in the ECHA report, why ECHA is proposing such a major restriction for small calibres?	Concerning sports shooting with small calibre bullets: If the use takes place at ranges that meet the requirements for regular lead recovery with > 90% effectiveness achieved by the means of bullet containment, i.e. bullet traps , then the conditions of the proposed restriction allow this use to continue. Concerning hunting: we know from experience in California that small calibres bullets became available soon after the introduction of the ban. If you have more information on this type of bullets, then ECHA would like to receive this in the consultation.
How does ECHA define bullet traps on rifle ranges? What could constitute a "bullet trap"?	Bullet trap systems are self-contained assemblies which, as technical equipment or installations in shooting ranges, safely dissipate the bullet energy of impacting bullets. They must be designed and constructed in such a way that: - the absorption or rejection or conduction of impacting projectiles, of whatever type, takes place reliably and safely

	- enable the projectile material to be disposed of and separated from the catch material as far as possible - safe firing (no dangerous rebound of projectiles and fragments) is ensured for the shooters when shooting at close range - the removal of bullet trapping material is as simple and safe as possible. The design and materials used in bullet trap systems must be adapted to the intended use of the respective type of ammunition and weapon and to the shooting technique. In terms of safety, the bullet trap systems must be coordinated as a self-contained unit with the other structures of the internal safety of a firing range, and in the case of open firing ranges, also with external safety. The bullet trap systems are classified according to their shooting sport or other intended purpose and the respective energy (E0) of the projectiles.
Can ECHA consider approving the use of permanent dirt mounds as bullet traps for outdoor shooting? The dirt mounds are tilled, and the lead recycled every year, in many EU countries as per status quo. Dirt mounds is currently the only feasible solution for many dynamic shooting disciplines such as IPCS and Steel Challenge. The current proposal will be a de factor ban of these disciplines in all but the largest and wealthiest organisations in Europe, with large cultural loss as a result.	ECHA analysed the available data and concluded that suitable measures are available to prevent soil contamination such as bullet traps and if needed for safety reasons, additional berm(s) covered with foil and an appropriate coverage material. Please provide evidence within the consultation if such measures would not be suitable for dynamic shooting disciplines.
Bullet traps for dynamic shooting (e.g. IPSC and SRA) must be at least 12 mm Hardox 500 or equivalent. One trap easily becomes 100 kg. Even the weight and cleaning of trapped lead make it awkward and dangerous to humans. Wouldn't it be safer and easier for everyone to use a proper sand wall?	Please provide such specific information to ECHA via the consultation.
Considering that muzzle loading guns do not have any alternative to the use of lead (as in our complete report), for safety reasons, technical reasons, sporting rules reasons. Considering that because for they dimension (8-19 mm), the balls are unlikely to be swallowed by birds of any size. Considering that, because for the limited quantity of shots there is not any impact on the environment (during the re-enactments they cannot use the bullets .. of course !!), Considering that in few months there is no chances to found any other product which can replace lead, guaranteeing the same technical and safety characteristics, how do you plan to guarantee manufacturing companies and distributors from a certain closure ??	Indeed, the Annex XV report recognises the technical difficulties of replacing lead in historical guns. If the use takes place at ranges that meet the requirements for regular lead bullet recovery with > 90% effectiveness achieved by the means of bullet containment, i.e. bullet traps, then that use can continue. Please provide evidence within the consultation if bullet traps would not be feasible for muzzle loaders. For any use that takes places with muzzle loaders and other historical weapons outside of shooting ranges, we would like to understand better these situations. Please submit relevant evidence on these subjects in the consultation.
If I want to go indoor shooting, where can I buy my lead ammo if the sale is banned?	For outdoor sports shooting with bullets, ECHA has proposed that the use can be continued under strict environmental conditions when using bullet

Does an indoor shooter then need a license from a Member State, although indoor shooting is excluded from the restriction? How a retailer knows whether bullets are used for indoor or outdoor (covered by recovery obligation) shooting?	traps. Therefore, no impact on the possibility to buy lead bullets for indoor sports shooting is expected. For sports shooting with bullets no licence would be needed, neither for indoor nor for outdoor shooting. Also, no permit would be requited for retailers to sell lead bullets for sports shooting.
The current draft bans on the sale and use of lead gunshot. But on the other way, indoor uses of lead ammunition are excluded from this restriction. How can this restriction be easy applicable, as the seller will not know if the purchaser will use the lead gunshots indoor or outdoor. This can happen as you did not research sport shooting well. First there are indoor skeet ranges. Second shotguns are used for tactical shooting sports as well, like IPSC.	To ECHA's knowledge gunshot (whether lead or alternative) is only used outdoors. This is a conclusion based on the information that was submitted in the call for evidence. Should you have information on lead shot being used indoors or for tactical shooting then we would like to receive that through the consultation.
In restrictions report page 222 "The practice to keep lead bullets in the mouth for shooting was reported for 17% of shooters investigated in South Africa with an average PbB increase of 82 µg/L (Mathee et al., 2017)". How this is related to EU countries? Is that common in EU also?	ECHA has collected and reported published studies to evaluate potential risks for shooters. However, due to lack of reliable information, no main risk has been identified for outdoor sports shooters. The main risk identified for outdoor sports shooting is the contamination to soil, surface and potentially ground water.
Outdoor shooting ranges are constructed in a way, that a bullet cannot leave the premises, so the argument about polluting the environment is very vague, is there any evidence or scientific research showing that outdoor shooting ranges influence the environment outside of their areas?	ECHA identified a risk to soil, surface (run-off) water and possibly ground water from soil berms containing lead bullets. Contamination from such soil berms can have an influence outside the area from contaminated run-off water and even contaminate groundwater as confirmed by case studies in the literature. Additional information in available in the Annex XV report, in relation to both service life and end of life of a range. Please also see answer to question: *"Why is lead contamination of soil at shooting range concerning?"* under the Environmental impact / aspects section.
In sport shooting (where the target is usually paper), most of the FMJ and CMJ bullets don't even fracture on target impact and stay whole in the shooting range backstop, so the lead is not interacting directly with the soil, because it stays in the jacket made of different metal. As far I know there are already domestic laws which regulate recycling and disposal of bullets from outdoor shooting ranges.	In order to guarantee safety of operation, spent bullets need to be recovered periodically: the backstop berm consisting for example of soil or sand must be mined and the lead separated out. Mechanical disturbance of the berm triggers lead fragmentation. Berms are typically associated to high lead levels in the ground around the trap. Recycling is not addressing the risk of soil contamination at shooting ranges, specifically when there is no bullet trap.
REACH does not cover what has been used in the past, so I find question number 8 in the consultation about remediation of shooting ranges out of	While this is not strictly in the realm of REACH, the information is still relevant to receive a picture of potentially avoided remediation cost in the

scope from the current regulation?	future.
There are already regulations on lead recycling from shooting ranges, so why is it proposed to include outdoor shooting ranges in the restrictions? Domestic laws for individual countries already regulate placement and environmental impact of shooting ranges is marginal.	The Commission asked ECHA to investigate a possible restriction including lead ammunition in outdoor shooting ranges. ECHA identified a risk to soil, surface and possibly groundwater in case bullets are deposited in soil berms, which are still frequently used in the EU. The proposed restriction therefore requires strict environmental measures such as the use of appropriate bullet containment, i.e. bullet traps to minimise the environmental risk. Please also see answer to question: *"Why is lead contamination of soil at shooting range concerning?"* under the Environmental impact / aspects section.
Can you explain in more details Q 14 concerning the "voluntary military training and the call for information on that use?	Through discussion with stakeholders we have been made aware of certain situations under which civilians purchase bullets to perform military training. We would like to know more on this use to consider this situation further.
We must all be aware that the proposed legislation, if passed, will affect sport shooting in a massive way, undoubtedly it will cause some disciplines to be no longer possible. There are many sport shooting types that can only be performed outdoor, like long range, dynamic shooting, trap, skeet, etc.	For outdoor sports shooting with gunshot, ECHA's preferred option is a ban on marketing and use because suitable alternatives are available. Considering that the use of lead gunshot is required e.g. when participating at Olympic games, ECHA has identified possible optional derogations that would allow the continuation of the use of lead gunshot under strict environmental condition by regular recovery of lead shot with effectiveness of > 90%. For outdoor sports shooting with bullets, for which ECHA did not identify suitable alternatives with sufficient precision, ECHA has proposed a derogation to allow the continuation of the use under strict environmental condition by regular recovery of lead bullets with effectiveness of > 90% by means of bullet traps. Please provide detailed information in the consultation in case that you can demonstrate that the proposed derogation would not allow the disciplines to be continued.
What are the trends of datasets for blood lead levels in children or adult populations in Cyprus or in the region? If not available, do you think this is a must action to be undertaken so that the related lead biomarker be followed up in association with lead sources, including sports shooting?	Some information on blood lead level of the general population in the EU is summarized in the 'Lead' document published under the HBM4EU initiative: https://www.hbm4eu.eu/wp-content/uploads/2019/03/HBM4EU_D4.9_Scoping_Documents_HBM4EU_priority_substances_v1.0-Lead.pdf There is no legal requirement to measure blood lead level in recreational sports shooters. In the absence of suitable information on blood lead levels of hunters or outdoor shooters it would be helpful to receive such information (including information on blood lead levels in a comparable

	control group) to quantify the risk. Should you have such information please provide it in the consultation.

9. Fishing

Question	Answer
Are lead in fishing nets, ropes and lines included in the restriction proposal?	The restriction proposal excludes from the scope fishing nets, ropes and lines made of lead (where lead is embedded), because no risk for birds, nor human health have been identified for these types of fishing tackle. Lead is indeed threaded or enclosed and lead does not wear out, and lead from this fishing tackle is not typically ingested by birds. It is important to note that the lead sinkers that would be added on fishing nets, e.g. barrel-shaped sinkers added on purse seine nets, would fall under the definition of fishing sinkers and would therefore be subject to a ban with a transition period as described in paragraph 4 of the proposed entry.
Are coated lead sinkers also covered by the restriction proposal?	Yes –sinkers and lures (as defined in the proposal) which are made of lead and covered with any coating would be restricted according to the current proposal. This is specified in section 2.3.2.3 (justification of the proposed wording): "Coated lead sinkers, lures (…) would also be captured by this definition if the content of lead is > 1 % w/w.".
As a fishing brand, it is a very important topic and we understand the stakes. However, in order to replace it, the current solutions we have are Zinc alloy or other heavy metals alloys to get comparative density. Can you ensure that lead toxicity is way worse than for other heavy metals?	The Annex XV restriction proposal identifies the current available alternatives to lead (in term of technical function, and expected properties), and the majority of the available alternatives are not toxic. You can find in the report section 2.8.1.3 and in the Appendix D.4.2, a detailed analysis of the alternatives that have been analysed. As a fishing brand, you need to consider carefully and with caution which alternative to lead to select. Some identified alternatives, e.g. zinc, are indeed toxic for wildlife when ingested. Note that, according to the market survey we conducted, zinc and zinc alloys seems to be a minor use as an alternative compared to other metals (cf. section D.4.2.3 in the appendix). Nevertheless, if you have other information on the availability on the EU market of alternatives, we would be happy to receive them.
Does ECHA have any viable alternative to lead that will allow comparative continuation of the sport in all forms, bearing in mind that there are no equivalents regards comparative weight, (and more importantly density) affecting fishing methods, and retail cost.	The Annex XV restriction proposal identify the current available alternatives to lead and compare them to lead in term of technical function (including weight and density), expected properties, retailing prices among other things. You can find more details in the appendix to

	the report in section D.4.2. This section includes also information on recent studies and tests performed by fishers on current alternative to lead. Based on the information at hand, it is currently concluded that alternatives are already available, technically and economically feasible. In case, you would have other, or different information available on how the alternatives may affect the different types of fishing, we would be pleased to receive this information via the consultation.
Taking aside the cost, there are no close comparisons for heavier weights where density at depth is an issue. There is no acknowledgement of this fact in the proposals which is more impacting on viability of alternatives than weight. Where is the data for any practical alternatives above 50g?	The Dossier Submitter acknowledges that for weights above 50 g, depending on the alternative material (and its density), the alternative sinkers or lures might indeed have a larger dimension. In case, you would have complementary information, and concrete example (alternative, type and weight of sinker, application, fishing depth, issues etc) where and how the alternatives may affect the different types of fishing, we would be pleased to receive this information via the consultation.
Hard baits lures are based on a plastic body which contain one or more encapsulated counterweight(s). Is it not plausible that these encapsulated lures form a much lower health hazard and environmental threat in case of direct emitting lead to the environment?	One of the main risk of lead in fishing tackle is the ingestion by birds, and as the ingestion of such lures do exist and can harm the birds (including causing death), a restriction is therefore also proposed for hard-bait. Nevertheless, according to the information collected during the preparation of the dossier, lead has already been phased out from most of these hard plastics baits with encapsulated counterweight. In case you would have different information, please submit it via the consultation.
Commenting on being a threat for birds. Is there supporting evidence that claims that these birds specifically died due coming in contact with lead from encapsulated lures? Is it not plausible that other factors like entanglement or hooks could cause these deaths?	According to the information collected during the preparation of the dossier, lead has already been phased out from most of these hard plastics baits with encapsulated counterweight. In case you would have different information, please submit it via the consultation.
Has ECHA considered how to collect banned lead fishing sinkers and lures? I was specifically meaning the lead tackle in anglers' homes, which would not be allowed to be used anymore when restrictions take effect.	The collection of existing lead fishing sinkers and lures is outside the boundaries of a REACH restriction. Nevertheless, some actions could be taken at Fishing association level, for example to collect these sinkers and lures from fishers, and support consumer transition to alternatives. Such exchange programmes have been implemented locally in the past in EU and in the US. Some national regulations also foresee the collection of (un-used) articles by retailers.
Is fishing tackle used by professionals included? But gear used by commercial fishers like trawls and nets seem not to be affected if you read the annex page 502ff: "Ban on placing on the market and using lead fishing nets, ropes and lines."	If by professional, you mean professional fishers, then the restriction proposal intends to cover all sinkers and lures containing lead. The restriction wording does not make any difference regarding how and by whom the lead fishing sinkers and lures are used. Nevertheless, fishing nets, ropes and lines made of lead where lead is embedded, threaded or enclosed in the line are not proposed for restriction.

	It is important to note that the lead sinkers that would be added on fishing nets, e.g. barrel-shaped sinkers added on purse seine nets, would fall under the definition of fishing sinkers and would therefore be subject to a ban with a transition period as described in paragraph 4 of the proposed entry. If you have any complementary information regarding the use of lead in nets, ropes and lines, we would be happy to receive this information via the consultation.
Is it possible that ECHA proposes a risk management measure for use of fishing leads concerning breaking strength of used lines for this lead.	Please provide information in the consultation on your proposal, so it could be assessed by the scientific committees.
Not all produced fishing lures contain lead. How is it fairly possible for a consumer or a law inspector to determine if (older) lures do contain lead, without testing these on an destructive way which will permeably end the further use?	Indeed, not all fishing lures contain lead, but most of the current ones do (except hard baits with counterweights). If the proposed restriction is adopted, it will become a law, and as any law, it will be enforced. The enforcement of the proposal at retailers could be done in multiple and complementary manners, for example paper inspections or lab testing (with non-destructive methods). Some portable testing methods are also developed for lead. You can find additional information on the existing testing methods in the Annex XV report.
The vast majority of anglers, fisheries and retail trade in the UK are actually totally unaware of this consultation. How would you suggest we can inform such parties i.e. is there a Press Release that can be used?	It is indeed important to ensure that stakeholders potentially affected by the proposed restriction are aware of the ongoing consultation and to provide relevant input into the process. A good starting point is the "hot topics" page on the ECHA website: https://echa.europa.eu/hot-topics/lead-in-shot-bullets-and-fishing-weights Furthermore, a press item was published on the ECHA website to announce the start of the consultation: https://echa.europa.eu/-/have-your-say-on-proposed-restriction-of-lead-in-outdoor-shooting-hunting-and-fishing
We, Modified Materials BV, have been developing lead free iron-based weights since 2008, see www.loodrvijvissen.nl Currently we are developing a do-it-yourself system. Co-operation with anglers and governmental institutions is needed to make the technology available on large scale. Cost of weights is driving DIY casting of lead. Lead free alternatives are more expensive. In NL 20 to 50 000 persons cast their own lead. Offering a non-toxic alternative would increase availability of affordable nontoxic materials.	Thanks for the information on the system you are developing. You can provide this information on home-casting via the consultation webform, so it can be taken into account by the committees. Please remember to justify properly any statement. For example, claiming that '20 to 50 000 persons cast their own lead' would need to be supported by evidence in order to be taken into account by the Committees.

This idea would change DIY casting from a problem to part of the solution.	
Will there become an EU marking available on all lures (not only packages) so anglers and inspectors can easily determine, or future made lures are lead free?	Thanks for your suggestion. This is currently not foreseen in the current restriction proposal. Feel free to share your suggestions, and additional details (such as expected impact, cost and expected benefits of such a measure), via the consultation webform so it can be taken into account by the Committees.
Within the restrictions in angling there will be a several year phase out period. The angling industry was aware in 2015 by EFTTA that they should phase lead out by 2020. Alternatives are already available, and this time would result in a further 6 million bird deaths - surely that can't be right?	It is correct that EFTTA communicated on the will from industry to phase-out lead, nevertheless this voluntary action was not realised. It is also correct that multiple alternatives are available on the EU market, but not currently in sufficient quantity to serve the entire EU market. In addition, it is assumed that the transition to suitable alternatives could be feasible if a sufficiently long transition period is given to the European industry to adapt their manufacturing equipment and to gear up in terms of capacity of production. In case you would have different or additional information regarding the EU market of the alternatives, or the readiness of the EU industry, please provide this information via the consultation.
Wouldn’t it make more sense to ban the further production and import of lead containing hard bait lures to overcome a difficult and uncontrollable situation for consumers and law inspectors?	Thanks for your reflection on the scope of the restriction proposal. The scope of the Annex XV report has been investigated based on the request from the Commission. This request did not cover the manufacture/production of ‘fishing tackle and ammunition’ (at industrial sites). These ‘industrial’ uses have therefore not been considered as candidates for restriction and are not assessed in this Annex XV report.
You mention the immediate banning of the lead release systems in angling, responsible for the loss of 1000's of tons of lead within the environment. Can you please clarify what 'immediate' means in this statement and therefore when would it come into effect?	By immediate ban, it means that if the proposed restriction is adopted, then there will be no transition period granted once the law will be published in the official journal for this type of system which allows an intentional drop of the lead sinker. In the Annex XV restriction proposal, we did not provide any estimations regarding the quantity of lead released in the environment using 'immediate release systems', so in case you have information on the quantity of lead released using these types of systems, please submit it via the consultation webform. Thanks.
There are concerns over policing, forcing home casting "underground", public internet sales. Existing restrictions in member states already not being enforced by official organisations due to resources. Are current proposals enforceable or practical enough to achieve any aim sufficiently?	In the Annex XV restriction proposal, the Dossier Submitter concludes that the proposed restriction is practical and enforceable (cf. section 2.8.4.2), and recognises as well the crucial role of the enforcement to achieve the risk reduction expected. The ECHA FORUM (representing enforcement authorities from all over Europe) will also provide its advice regarding the enforceability of the restriction and it will be taken into account by the scientific Committees.