ECHA proposal under REACH Regulations

Restriction proposal on the use of lead gunshot in or over wetlands

Dear Madam or Sir,

We the undersigned European and other concerned scientists with expertise in the toxic effects of lead ammunition on human, wildlife or domestic animal health are writing to you as a follow up to the European Scientists’ Open Letter of October 2018. In this, the European Commission’s initiative, undertaken by the European Chemicals Agency (ECHA), to produce their restriction proposal on the use of lead gunshot in or over wetlands was applauded, and the opinion that the use of lead gunshot for shooting in or over wetlands requires restriction, as proposed by ECHA and adopted by its scientific committees, was strongly supported.

Collectively, we:

1. Acknowledge, but are concerned, that a positive decision on the proposal to restrict lead gunshot use in and over wetlands has been subject to repeated delays over the last 2 years, for a variety of reasons that do not necessarily relate to the evidence base.
2. Are concerned that misinformation about the issue and about the suitability of alternatives to lead gunshot continues to circulate.

We therefore continue, in the strongest terms, to:

3. Urge the Member States at the REACH Committee and the European Council as well as MEPs at the European Parliament to support this important restriction proposal which harmonises restrictions across all wetlands in Europe.

Subsequent to the original Open Letter a considerable body of additional evidence has accumulated that supports and reinforces the urgent need for further measures to restrict the use of all lead ammunition for shooting. Examples include papers in the dedicated special issue of the peer-reviewed journal *Ambio* ‘Lead in Hunting Ammunition: Persistent Problems and Solutions’. These highlight the human and wildlife impacts of continued use of lead ammunition, their economic cost to society, and the wide range of suitable alternatives available. Concerns regarding the exposure of children and other vulnerable groups to lead from ammunition in game meat have resulted in moves by some shooting and retail organisations, and governmental agencies, away from the use of lead ammunition in Europe and elsewhere. For example, California State in the USA banned the use of all lead ammunition *from 1st July 2019*. The need for primary prevention measures to reduce low-level childhood exposure to lead from all sources was recently highlighted by *Unicef and Pure Earth*.

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1. REACH is a European Union regulation concerning the Registration, Evaluation, Authorisation & restriction of Chemicals. ECHA is the European Chemicals Agency.
We therefore:

4. Applaud the European Commission’s request to ECHA 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 in REACH.

5. Urge the European Commission and Member States at the REACH Committee, European Council and Parliament to support such further restrictions on the use of lead ammunition across the EU.

This open letter is being produced as a freely available document. As scientists and health professionals working in various relevant disciplines our motivation is to promote appropriate use of the large body of evidence available in support of health-protective initiatives for people, wildlife and the environment.

We, the undersigned scientists, are a group of 75 professionals from 18 countries, 13 of which are in Europe

Yours faithfully,

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Open Letter from European and Other Concerned Scientists

August 2020

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Open Letter from European and Other Concerned Scientists

August 2020

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Open Letter from European and Other Concerned Scientists

August 2020

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