

An Open Letter from Global Scientists on the Restriction on the placing on the market and use of lead in outdoor shooting and fishing proposed by ECHA under REACH Regulations¹

October 2023

Dear Madam or Sir,

We, the undersigned European and other concerned global scientists, have expertise in quantifying the risks from the toxic effects of lead ammunition to human, wildlife or domestic animal health, and the effectiveness of measures to mitigate them. We are writing to you to express our concern about the continuing risks posed by lead ammunition use, and to highlight recent evidence. Moreover, we:

- 1) *Welcome* [Commission Regulation \(EU\) 2021/57](#) restricting the use of lead in gunshot in or around wetlands;
- 2) *Applaud* the European Commission's initiative and the [substantial body of work](#), including extensive stakeholder consultations, undertaken by the European Chemicals Agency (ECHA) to produce their [Opinion on an Annex XV dossier proposing Restrictions on Lead in Outdoor Shooting and Fishing](#);
- 3) *Agree with* the [Opinion](#) that the use of lead in outdoor shooting and fishing requires restriction and that EU-wide action is justified, as proposed by ECHA and adopted by its scientific committees;
- 4) *Urge* the European Commission, Member States, REACH Committee, European Parliament and European Council and to support this important restriction proposal in the form of the preferred option proposed by ECHA (i.e., without optional derogations);
- 5) *Encourage* the European Commission to respond to [RAC²'s recommendations/strong recommendations](#), especially that:
 - a) A further analysis of the feasibility for organisations such as the International Olympics Committee, FITASC (Fédération Internationale de Tir aux Armes Sportives de Chasse) and ISSF (International Sports Shooting Federation) to change their requirements regarding the use of lead gunshot in international competitions be conducted.
 - b) A regulatory maximum level be set for lead in game meat, similar to the maximum levels of lead for meat other than game meat already defined by Commission Regulation (EC) 1881/2006³.
- 6) *Encourage* the European Commission to respond [to SEAC⁴'s recommendations](#), especially that:

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

² [ECHA's Committee for Risk Assessment \(RAC\)](#).

³ According to Commission Regulation (EC) 1881/2006, the maximum levels of lead for meat (muscle) and for the offal of cows, sheep, pigs and poultry are 0.10 and 0.50 mg/kg wet weight respectively.

⁴ [ECHA's Committee for Socio-Economic Analysis \(SEAC\)](#).

- a) The text of the restriction entry includes the ban of ‘carrying’ of lead ammunition in the field, in line with the restriction on lead gunshot in wetlands.
 - b) Education, particular if supported by influential groups (peers, associations or clubs) can be an effective tool to convince users to switch to lead-free alternatives, as complementary awareness-raising measure accompanying a ban.
- 7) *Urge* the International Olympics Committee (IOC), FITASC and ISSF to require the use of *non-lead* ammunition for Olympic shooting disciplines to ensure reduced exposures of lead to athletes and the environment and to meet the [IOC’s strategic intent](#) of ensuring that the Olympic Games are at the forefront of sustainability.

Our concerns result from the risks posed to human, animal and environmental health by lead from ammunition as documented by an overwhelming body of scientific evidence and highlighted in several Scientific Consensus Statements ([A Consensus Statement of Scientists 2013](#); [Scientific Consensus Statement 2014](#)) and Special Issues of Journals (e.g., [Kanstrup et al. 2019](#)) in addition to the [ECHA Background Document](#). Since the date of intention of the restriction proposal (03-Oct-2019) considerable additional research on risks from lead ammunition use for outdoor shooting and associated mitigation measures has been published. While some will have been incorporated in the restriction dossier, much will supplement it. This recent evidence is reviewed in summary in the appended document. It highlights that, in Europe:

- risks exist for a yet wider range of wild avian and mammalian species;
- risks extend not only to livestock but also to companion animals;
- negative effects are seen at ever lower levels of exposure;
- populations of some protected species are likely to be substantially suppressed by secondary ingestion of lead from ammunition.

Additionally, the range of suitable non-lead ammunition has increased including shot and both large and small calibre bullets, and most constraints on the use of non-lead ammunition have been, or could readily be, overcome. This is highlighted by the Danish government’s decision, supported by The Danish Hunters’ Association, [to ban lead bullets for hunting by April 2024](#), as a supplement to their 1996 ban on all use of lead shotgun ammunition. Only the replacement of all lead ammunition with non-toxic alternatives will adequately control the risks.

We, the undersigned scientists, are a group of 81 professionals from 14 European Countries (11 EU countries) and seven countries beyond Europe across six continents. We work in various relevant disciplines, and include scientists and other professionals with expertise in this issue who are hunters, veterinarians, conservationists, human health specialists and social scientists. We urge relevant bodies from across the European Union to support this restriction proposal on the use and placing on the market of lead in outdoor shooting and fishing to protect the health of people, wildlife and the environment. This is also an important step towards meeting the European Commission’s zero pollution ambition under the European Green Deal, and will contribute to the pollution reduction commitment under Target 7 of the Kunming-Montreal Global Biodiversity Framework, with positive ramifications for people and wildlife globally.

Our Open Letter can be found [here](#) and its appendix can be found [here](#).

Yours faithfully,

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