

Online information session

Call for evidence on possible restriction of lead in gunshot, bullets and fishing sinkers

10 October 2019

11:00 – 12:30 Helsinki time



With you today

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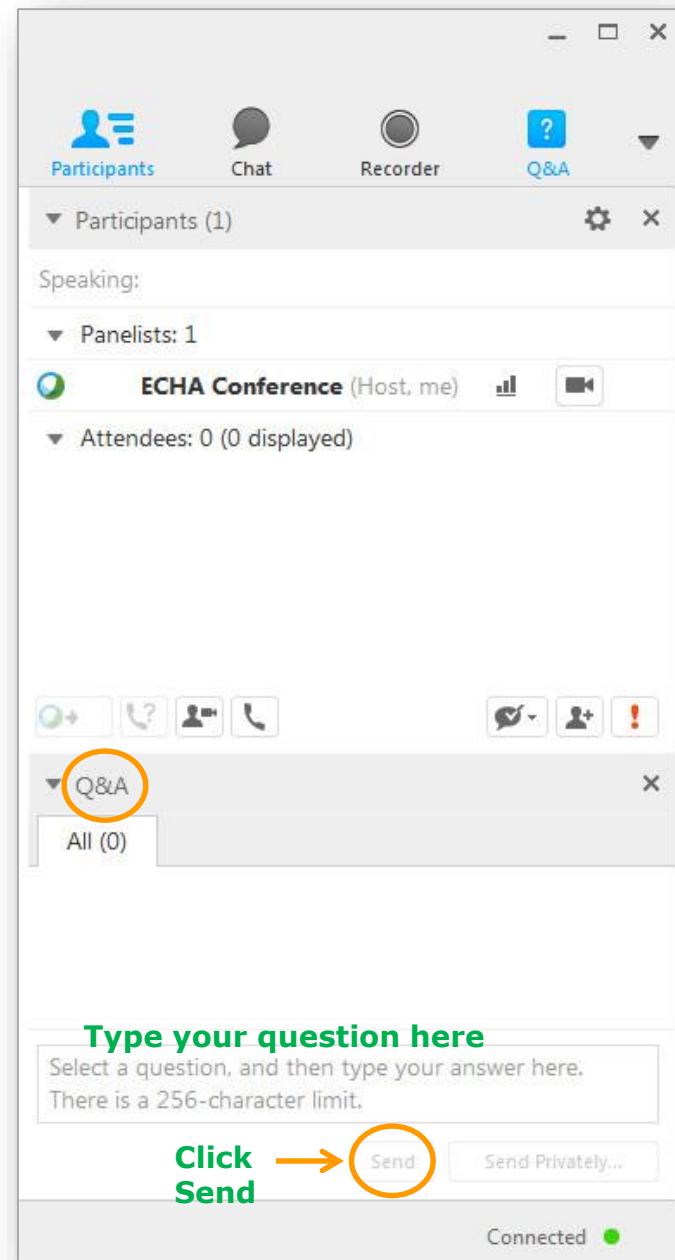
Iida Marie Lehtimäki

Scientific Officer



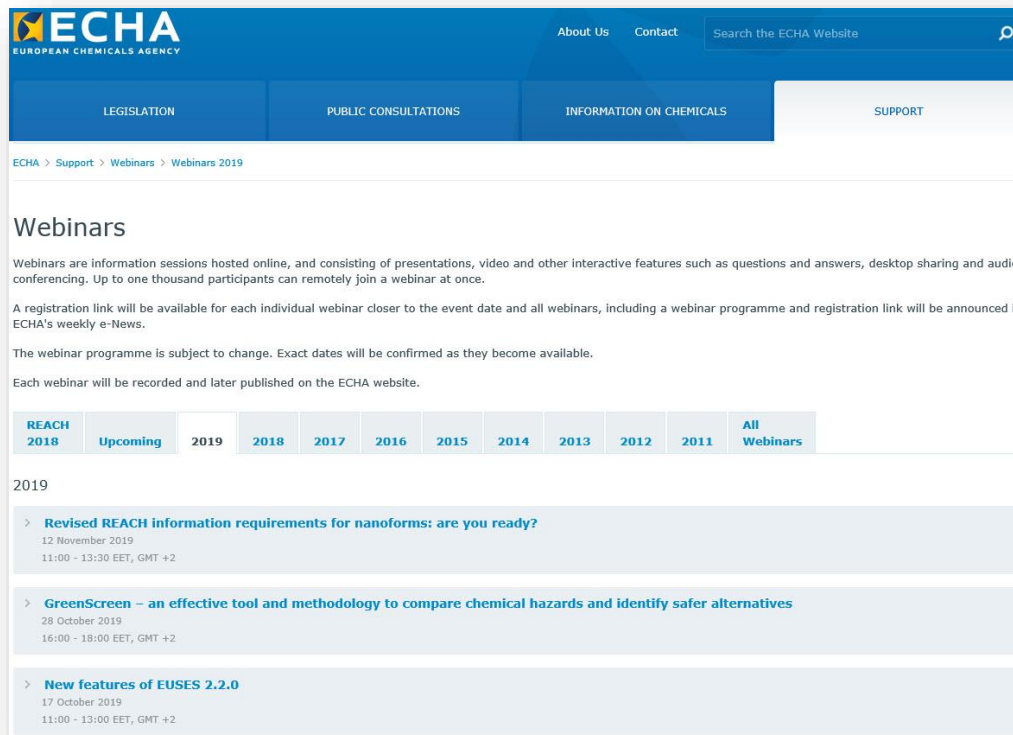
To ask a question

- Use the Q&A panel (256-character limit)
- We will answer as many as we can today
- Remaining questions answered afterwards
- Q&A document published ASAP
- Questions after the event:
echa.europa.eu/contact
- Press enquiries:
press@echa.europa.eu



Material published

- Recording and presentations
- Q&A document



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Webinars

Webinars are information sessions hosted online, and consisting of presentations, video and other interactive features such as questions and answers, desktop sharing and audio conferencing. Up to one thousand participants can remotely join a webinar at once.

A registration link will be available for each individual webinar closer to the event date and all webinars, including a webinar programme and registration link will be announced in ECHA's weekly e-News.

The webinar programme is subject to change. Exact dates will be confirmed as they become available.

Each webinar will be recorded and later published on the ECHA website.

REACH 2018	Upcoming	2019	2018	2017	2016	2015	2014	2013	2012	2011	All Webinars
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2019

- > **Revised REACH information requirements for nanoforms: are you ready?**
12 November 2019
11:00 - 13:30 EET, GMT +2
- > **GreenScreen – an effective tool and methodology to compare chemical hazards and identify safer alternatives**
28 October 2019
16:00 - 18:00 EET, GMT +2
- > **New features of EUSES 2.2.0**
17 October 2019
11:00 - 13:00 EET, GMT +2

echa.europa.eu/support/training-material/webinars

Today's objective

- To introduce the REACH restriction procedure
- To remind you about the previous restriction proposal: 'use of lead gunshot in wetlands'
- To outline the scope of our follow-up investigation into the 'use of lead in shooting and fishing', which may result in further restriction proposal(s)
- To help you decide if and what information you should submit in the call for evidence
- To clarify any elements of the information requested
- Not a debate about the need for a restriction


Introduction to REACH restriction









Restrictions under REACH

- A restriction is any condition on the manufacture, import or use of a substance (also in a mixture or article) – ‘safety net’
- Used:
 - to address a risk that is not adequately controlled
 - when action is needed at Union level
- We investigate need for a restriction by request from the European Commission (12 months)
- The investigation may conclude:
 - there is no need for a restriction (risks are controlled)
 - a restriction should have a different scope

Registry of Intentions (ROI)

Substance name 	EC / List no 	CAS no 
<p>laajenna / pienennä</p> <p>Lead and its compounds</p> <p>Lead  EC / List no: 231-100-4 CAS no: 7439-92-1</p> <hr/> <p>Lead compounds EC / List no: - CAS no: -</p>	-	-

Status 	Expected date of submission 	Submitter (s) 	Details on the scope of restriction 	Latest update 	
Intention	02/10/2020	ECHA	Placing on the market and use of lead in ammunition (gunshots and bullets) and fishing tackle. The assessment will cover the use of lead in gunshot in terrains other than wetlands, bullets used both in wetlands and in terrains other than wetlands as well as lead in fishing tackle.	03/10/2019	

Risk considerations

- Risk assessment is conducted according to Annex I of REACH, several approaches possible:
 - For substances with a safe exposure 'threshold'
 - Hazard Assessment
 - Exposure Assessment
 - Risk characterisation – $RCR > 1$ = uncontrolled risk
 - For substances with no safe exposure 'threshold'
 - semi-quantitative approach using a dose-response
 - PBT/vPvB substances, non-threshold carcinogens
 - If the above are impracticable, risks may be assessed on a case-by-case basis

Impact considerations

- 'Effectiveness' of a proposed restriction
 - key criteria for justifying a restriction
- Restriction must be
 - Targeted to the effects or exposures resulting in the risk
 - Capable of reducing these risks within a reasonable time period (proportionate to the risk)
- Socio-economic analysis
 - Net benefits (human health and environment)
 - Net costs (manufacturers, importers, consumers)

Restriction proposals and timeline

- Submitted for evaluation in Annex XV format
 - Problem identification
 - Impact Assessment
 - Uncertainties and assumptions
 - Conclusions
- Annex XV report made publicly available shortly after submission (~2 weeks)
- Opinion-making process (typically 12 months)
 - Conformity check prior to 9 month public consultation
 - RAC/SEAC evaluation of the proposal
- Opinions sent to Commission for decision

Recap of restriction proposal on use of lead gunshot in wetlands



Use of lead gunshot in wetlands

- Previous restriction investigation and proposal
- Request to ECHA from Commission
- Harmonisation of implementation of African Eurasian Waterbirds Agreement (AEWA):
 - EU is a Contracting Party
 - Implemented in different ways in EU Member States
 - Four Member States have not implemented any measures
- Intention added to ROI April 2016
- Annex XV submitted report April 2017

Documentation:

echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e180c0ac38

Use of lead gunshot in wetlands

- Investigation concluded that use of lead gunshot in wetlands posed a risk that was not adequately controlled
 - Lethal lead poisoning of one million water birds per year
 - Secondary lead poisoning of scavenging and predatory birds
- Proposal was evaluated by RAC and SEAC
- Public consultation on proposal for 6 months
- Opinions adopted June 2018
- RAC concluded that risks were not adequately controlled
- SEAC concluded that benefits of restriction would outweigh costs and the costs to hunters seem affordable
- Restriction not yet decided
- Wetlands are **not the focus** of the current investigation

**Scope of our investigation
into uses of lead in
shooting and fishing**



Why are we investigating further uses of lead?

- Alongside the preparation of the wetlands proposal, ECHA undertook a parallel study on the risks posed by other uses of lead
- This [study](#), published in 2018, concluded that there was sufficient evidence of risk to justify additional risk management of:
 - Use of lead gunshot in non-wetland areas
 - Use of lead in bullets
 - Use of lead in fishing tackle
- This conclusion is supported by:
 - Several Member States having taken measures to prohibit the use of lead in gunshot (outside of wetlands) and in fishing tackle
 - The use of lead containing bullets being prohibited in some regions
- Commission requested ECHA to develop an Annex XV restriction report on these uses in July 2019
 - Expected submission date 10 October 2020

Existing or planned regulation

Country/region	Brief details
EU	Use of shot in or over wetlands
NL	Use of lead shot in hunting and in sports shooting
DK	Use of lead shot in hunting
UK	<i>Use of lead fishing sinkers (size dependent)</i>
DE	`Different legislations in different Lander concerning use of lead bullets
IT	Use of lead bullets – parco dello stelvio
California	Ban on lead in hunting (shot and bullets)

Scope of our investigation

1. Gunshot for hunting birds and other animals (e.g. rabbits) in non-wetland areas
2. Gunshot for 'sports' target shooting, including training (e.g. clay pigeons)
3. Bullets/pellets for hunting any animal (e.g. deer)
4. Bullets/pellets for 'sports' target shooting (outdoor only)
5. Fishing tackle for recreational fishing (e.g. weights, jigs and lures)
6. Commercial fishing gear

We are not assessing

1. Indoor shooting
2. Use of lead compounds as primers or propellants
3. Military, police or other security service use of lead ammunition

Annual volume of lead use

Use	Estimated tonnages
Terrestrial shooting (hunting)	14 000 tones
Hunting with bullets	150 tonnes (2004 value, EU 15 + Hungary, Poland and Lithuania)
Sport shooting	10 000 – 20 000 tonnes
Fishing	2000 -6000 tonnes

Preliminary data: requires update

Elements of assessment

- Risk assessment
 - Releases (update information on actual consumption)
 - Human health assessment (via consumption of lead in food)
- Analysis of alternatives
 - Technical and economic feasibility of alternatives
- Socio-economic analysis
 - Costs: costs for affected industry / society
 - Benefits: valuation of environmental benefits

Q4

- Project scoping and planning
- 'Call for evidence' (8 weeks until 16 December 2019)
- Literature review

Q1

- Stakeholder workshop (February) – **Invitation only**
- Further information gathering

Q2

- Annex XV report writing

Q3

- Finalisation of Annex XV report for submission in October 2020 (if restriction proposed)

Call for evidence

- Open until 16 December 2019

Pyynnöt kommentoida ja esittää todisteita

Substance Details 

Name	Lead and its compounds
EC Number	231-100-4
CAS Number	7439-92-1
Start of consultation	03/10/2019
Deadline for providing input	16/12/2019
Subject of the call	The purpose of the call for evidence is to collect information to assess the impacts of a possible restriction on the placing on the market and use of lead in ammunition (gunshot and bullets) and fishing tackle.
Objective of the call	The purpose of the call for evidence is to collect information to assess the impacts of a possible restriction on the placing on the market and use of lead in ammunition (gunshot and bullets) and fishing tackle. Specific questions on topics that we would like to receive more information on can be found in the background note.
Target group	This call for evidence is intended for interested parties such as companies (manufacturers, distributors, importers etc.), trade associations, hunting, fishing and sports shooting organisations, scientific organisations and other stakeholders or Member State Authorities holding relevant information, including individuals.
How to submit your contribution	Give Comments
Related documents	
Background note	

Calls for comments and evidence allow interested parties to signal their interest and express their views and concerns in the preparatory phase of the restriction proposal. They also let interested parties comment on the different documents under preparation in ECHA in relation to restrictions, such as reports on substances in articles and guidelines on restriction entries.

echa.europa.eu/calls-for-comments-and-evidence

Who should participate in the call

- Manufacturers, suppliers, distributors, importers
- Trade associations
- Hunting, fishing or sports shooting associations
- Scientific organisations
- Conservation or other NGOs
- Member States
- Individuals

Information can be submitted confidentially

**Specific evidence
and information
requested**



Q1. Quantities of lead used and/or released to the environment and the resulting human health or environmental impacts.

- i. The volumes (tonnages) of lead in gunshot, bullets, pellets and fishing tackle placed on the EU market (total and per product) and the potential for release to the environment during its use;
- ii. Information on the frequency and extent of lead poisoning observed in terrestrial wildlife (including predatory and scavenging species);
- iii. Statistical information on the game meat consumption in humans, including specific groups such as infants, small children, women of childbearing age or high consumers (such as hunters and their families);
- iv. Information on the absorption of lead in humans after ingestion of lead fragments from gunshot and/or bullets in food;
- v. Information on the blood lead levels of game meat consumers and hunters;
- vi. Any other relevant human health/exposure data related to lead containing gunshot and bullet or fishing tackle?
- vii. Information on the practice of 'home casting' of fishing tackle with lead and/or the re-filling of cartridges;

Q2. Current best practice (including effectiveness) to minimise lead exposure to humans or the environment during use, for example:

- i. Best available techniques to remove lead from edible portions of meat prior to consumption;
- ii. Best available techniques to manage lead exposure *on indoor* and outdoor shooting grounds (including national or European standards or recommendations to capture lead and/or minimise environmental exposure to lead);
- iii. Use of inert materials to encapsulate lead in fishing tackle.

Q3. Information on other socio-economic impacts in response to a possible restriction

- i. The identity of existing or emerging alternatives and any information on the existing market share of comparable products on the market that do not contain lead;
 - ii. Technical and economic feasibility of potential alternatives, including information on product performance, price differences between lead containing products and alternatives, the number of affected products, expected costs and timelines for full-scale production of alternatives, etc.;
 - iii. Availability of alternatives in sufficient quantities on the market: current and future trends;
 - iv. Hazard and risk of the use of alternatives, including any impacts on animal welfare;
 - v. Other potential impacts stemming from the use of alternatives, e.g., discontinuation of certain products, changes in product performance, etc.
- **Are the issues in terms of shot cartridges the same as for wetlands**
 - **What non-lead rifle cartridges are already used, where would substitution be problematic or costly?**

Q4. Information on other socio-economic impacts in response to a possible restriction

- i. Costs and benefits to affected actors (including producers of alternatives), e.g.:
 - Manufacturers (e.g. ammunition, shotgun, rifle, air-rifle)
 - Professionals (e.g. pest control)
 - General public, including hunters
- ii. Provide data on key economic parameters, such as profit-loss, turnover, number of people employed, current share of products containing lead, etc.

Q&A



Q&A session

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Next steps

- Q&A document based on questions received:
as soon as possible
- Information session recording online
- End of call for evidence: 16 December
- February workshop
 - Participants invited based on call for evidence responses

Thank you!

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