**General comments and answers to specific information requests**

**Specific information requests:**

1. **Hunting**

**Transition period of the ban on use of lead gunshot in hunting**: With regard to the supply of steel gunshot, SEAC considers it feasible to meet market demand of hunters earlier than proposed by the Dossier Submitter, e.g. after 18 months from entry into force, in particular if the restriction of the use of lead gunshot in wetlands will lead to an increase in current production capacities. To further assess the impacts of a shorter transition period for the ban on use of lead gunshot in hunting, SEAC requires information on (i) the current production capacities of steel gunshot in the EU and (ii) the timeframe required for a transition to steel gunshot production.

1. **Labelling of individual bullets and gunshot cartridges**: To facilitate the enforcement of a ban on use in hunting, it is important to identify lead ammunition in the field in a practical and cost-effective way. In the consultation on the Annex XV report, it was raised that labelling of individual bullets or gunshot cartridges involving text warnings would not be technically feasible. Instead, harmonised markings or colour coding denoting lead containing bullets or cartridges have been proposed as a means to effectively support enforcement activities in the field. SEAC requires information on technical feasibility and costs of possible labelling measures to assess their practicality and proportionality.
2. **Impacts of the proposed ban on use of lead ammunition on the use of historic guns in hunting**: Comments received in the consultation on the Annex XV report pointed to the cultural values of the use of historic guns, such as muzzle loaders, in hunting. To conclude on the reliability of these comments, SEAC requires further information on the cultural values of the use of historic arms in hunting, such as scientific publications assessing the cultural values of hunting with historic guns.
3. **Impacts of the proposed restriction on the use of air gun/rifle pellets**: SEAC requires further evidence on the suitability (technical feasibility, economic feasibility, availability) of alternatives to assess potential impacts of the proposed restriction on the use of air gun/rifle pellets.
4. **Sports shooting**

**Suitability of steel gunshot as an alternative to lead gunshot in clay target shooting**: In the consultation on the Annex XV report, contradictory information on the suitability of steel gunshot for clay target shooting was received. SEAC requires further information, in the form of the results of tests, field reports, practical experience, or similar, on whether there are clay target shooting disciplines for which the use of steel gunshot is currently not suitable and why. SEAC would be especially interested in any limitations of steel gunshot to consistently hit targets at longer distances.

1. **Switching between using steel and lead gunshot for sports shooting**: The optional conditional derogation of the proposed restriction, allowing the use of lead gunshot for licenced individuals at permitted sites, may necessitate regular back-and-forth switching between the use of steel and lead gunshot for such individuals (e.g. steel gunshot is used at the local club if this is not a permitted site, lead gunshot is used when training at a permitted site for a competition). SEAC would be interested to receive relevant information, including practical experience, that allows it to better understand how much time (hours, days, weeks) is needed when switching from steel to lead gunshot, or vice versa, to reach the same level of proficiency.
2. **Lead gunshot recovery with more than 90% effectiveness**: The optional conditional derogation of the proposed restriction, allowing the use of lead gunshot for licenced individuals at permitted sites, would necessitate the introduction of a method to keep track of the amount of lead used per year and to keep records to confirm that more than 90% of used lead is recovered. SEAC would be interested to receive relevant information concerning suitable methods to keep track of the amount of lead used and the lead recovery rate, as well as about estimates of the costs involved.
3. **Fishing**

**Availability and performance of alternatives for split shot sinkers with a weight below 0.06g**: In the consultation on the Annex XV report, some commenters claimed that the performance of alternatives to lead split shot sinkers was not sufficient but did not provide supporting justification. To further evaluate this claim SEAC requires further information on the availability and technical performance of alternatives and justification for why this performance would result in disproportionate socioeconomic impacts.

1. **Labelling of sinkers with a weight above 50g**: The labelling of large sinkers, e.g. by a durable coating, imprinting or mark on the sinker to denote industrial manufacture, could result in similar benefits as a ban of these sinkers as it could effectively prevent home-casting of sinkers. To assess this option in more detail, SEAC would need additional information on the technical feasibility and costs of labelling possibilities of large sinkers with a weight above 50g.

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| Ref. | Date/Type/Org. | Comments |
| 991 | Date/Time:  2022/06/29 12:10  Type:  BehalfOfAnOrganisation  Org. type:  International organisation  Org. name:  BDMP  Org. country:  Germany | General Comments:  Dear Madam and Sir, thank you for offering the opportunity to be heard on an existential question. As an internationally successful sports shooting association with partners around the world and many world championship titles in handgun and rifle/shotgun shooting, we hereby bring to your notice that the lack of alternatives means that our sport would be dead if lead is banned. Unfortunately, there are no viable alternatives, especially in handgun shooting, and any alternative would enormously degrade precision. The result would be that all non-European competitors were still able to use lead and international competition would no longer be feasible for us. The restriction proposed for Annex XV stated that quite clearly. But most important of all is to be aware of the facts: Shooting ranges in Germany are sustainable because we already recycle our lead. We protect the environment as well as our-selves from any danger that is correlated with lead. We recycle our lead - it stays in the cycle of reusable materials. We hope you understand the consequences of the approach for our sport, and come to the conclusions that lead, shot in a safe environment like shooting ranges in Germany, are not just unavoidable but more sustainable than lead free alternatives, that must be disposed as toxic waste while lead can be fully recovered. |
| Specific information 5:  IN top level shooting there is no alternative to lead as the ballistics of alternatives give the precision that lead does. If the european Union will decide to ban lead in sport shooting, the rest of the world still will shoot with lead bullets wich will lead to a unsumountable disadvantage for our teams. We will not be able to compete in international level. Our top level sport will be dead |
| Specific information 6:  On our shooting ranges we do not allow individuals to shoot lead free alternatives. But law enforcement trains with lead free alternatives what requires a separation from lead and lead free bullets when recovering the lead from the bullet trap. As the process of separation is pricey the users of lead free ammunition have to pay an extra charge to co-finance the additional effort. When the bullets are seperated the recovering process of lead starts, and as you will know, the recovery of lead is one of the most effectice processes known in recycling. The lead industry will give further information if information is needed. The separation of lead and lead-free bullets increase the price of the cleaning and recycling process with about 50% of the overall costs. The lead free alternatives must be disposed as toxic waste what abuses the environment much more that lead that is fully recovered. |
| SEAC Rapporteurs response: |

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| 992 | Date/Time:  2022/07/06 18:16  Type:  Individual  Country:  Netherlands | General Comments:  Protect private and museum cartridge collections against lead bans. |
| Specific information 1:  Consider an exemption for research and cartridge collectors in order to protect collections against lead bans. |
| Specific information 2:  Consider an exemption for existing cartridges held for research and collecting purposes. |
| Specific information 3:  Cartridges are being held in private and museum collections and should not be affected by restrictions on use or possession of lead. |
| Specific information 4:  Cartidges held in collections should not be affected. |
| SEAC Rapporteurs response: |

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| 993 | Date/Time:  2022/07/20 19:10  Type:  Individual  Country:  Hungary | General Comments:  I have several concerns about this restriction. Subject No1. Hunting. Proposed ban on use of lead gunshot in hunting and sport purposes with regard to the supply of steel gunshot. Concern. Most of the hunting and sport guns today are unable to use steel gunshot. It will be huge impact on the EU citizens to replace the barrels and/or the guns. And huge impact on manufacturers to replace lead, probably combining steel with a substance that is more hazardous than lead. Like bismuth. Generating huge amount of waste of metal material (mainly the barrels) that also contain hazardous substances and today there is no real process to recycle the number of barrels that must be replaced. Anyway, who will take the cost of the replacement? Who will take the cost of the recycling of old barrels? On the other hand, steel gunshot has much more critical risk of bouncing back or change direction than lead shots. Who will take the responsibility for the risk increased? ECHA is going to take the liability or someone else? And finally….does it make sense to spend time and resources to ban lead shot for hunting? Is there any objective evidence demonstrating that human health has been impacted badly due to eating wild game shot down by lead bullet? Or any evidence about environmental degradation of forests due to lead shots….? I do not think so. Subject No2. Impacts of the proposed ban on use of lead ammunition on the use of historic guns in hunting and sports Concern. Historical guns for hunting and sport purpose are more and more popular in the EU. Several manufacturers are delivering products and generating revenue (and tax) for the particular EU member states. There is no any alternative material to use in these historical guns, just lead. Physically the historical barrel is not capable to use steel bullets for example. Restricting the lead for the historical guns equal to erasing this market as well as the manufacturers from the EU. Citizens owning historical guns also losing the sense keeping the highly valued items. IS there any plan for ECHA to take the liability and compensate the owners of historical guns? |
| SEAC Rapporteurs response: |

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| 994 | Date/Time:  2022/07/21 00:02  Type:  Individual  Country:  Sweden | General Comments:  The upcoming ban on lead is in plain words stupid and is actually an assualt on hunters and sport shooters. The Swedish ban on use of lead shotgun pellets in Estlands is good as solid lead is dissolvable in acid and thereby eventualiteter ends up in top predators when ingested by birds. All other uses of solid lead are however completely safe. Solid lead is stable unless subjected to acid and a ban would kill caliber .22 LR and thereby a lot of sports. There is no cost effective alternative. Also moose hunters with the most common caliber for that use in Sweden 6,5x55 would no longer be allowed to use their rifles for that as the only alternative material, copper, is to light. |
| Specific information 1:  A ban on lead in ammunition would kill caliber .22 and thereby among other sports some included by ISSF. Also solid lead is stable and doesn’t pose a threat unless subected to acids. When it rains acid we will have larger problems than slightly elevated levels of lead. |
| Specific information 2:  Ammunition is already expensive and further burdens on the factories would make it harder for them to compete outside the EU. Also import from outside the EU would cease further raising the prices |
| Specific information 3:  The only alternative to lead in shotguns not suitable for lead shot is Bismuth. A rare and expensive material. Tremendus values would disappear as historic shotguns would become worthless over night. |
| SEAC Rapporteurs response: |

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| 995 | Date/Time:  2022/07/21 00:03  Type:  Individual  Country:  Sweden | General Comments:  Reasonable bans on use of lead in ammunition for hunting is welcome and an improvement. The bans we have in Sweden are effective, and reasonable, only banning the use of lead near wetlands, where birds can accidentally eat leadshot, or lead is exposed to flowing water. No other bans are necessary. We have 100 000s of tons of leaded phone cables in the ground. No problem. We hunt and sport shoot wwith lead everywhere except wetlands. no problems. If you dig out musket balls around fortifications, hundreds of years old, from battles also hundreds of years ago, there is no leakage an no problem. Remember that lead exists naturally in our nature, without problems. |
| Specific information 6:  Swedish authorities made extensive research. Hunting with steel in forrest terrain, wrecks the trees and timber for the wood industry. Steel wrecks their equipment, while lead doesn't. It simply won't work. |
| SEAC Rapporteurs response: |

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| 996 | Date/Time:  2022/07/21 00:03  Type:  Individual  Country:  Sweden  Privacy statement:  I am myself a avid sport shooter and hunter. I am a member of the Swedish National Rifle team and travel all over the world competeing. This would be devastating to sport shooting in general and would make very little differnce in the enviroment… we are allready well aware how to recycle and keep shooting ranges clean and safe. | General Comments:  I am myself a avid sport shooter and hunter. I am a member of the Swedish National Rifle team and travel all over the world competeing. This would be devastating to sport shooting in general and would make very little differnce in the enviroment… we are allready well aware how to recycle and keep shooting ranges clean and safe. |
| Specific information 1:  This ban will be devastating to wildlife control and hunting throughout Europe… and will do way more enviromental damage than the mininal ammount of lead being put ”back in to nature” by hunting. |
| Specific information 2:  This wil be a close to impossible task and will be a constly process that will make little to none difference except more expensive production and sales (due to extra admin) |
| Specific information 3:  The effects of this is so marginal it is useless to ban it… it will slowly ”fade away” by itself. |
| Specific information 4:  This will be devastation to sport shooting… sports that allready have invsetd a lot och time and money in to enviromelntal safe systems and recycling of the lead. |
| Specific information 5:  This will be devastating to sport shooting on a loca and olympic level. |
| Specific information 6:  Pointless |
| Specific information 7:  90% is possible with modern indoor rnges and ”should” not be a problem on outdoor ranges with approved birms. Today the lead (from indoor and outdoor ranges) are recycled by the local gun clubs and returned as ”sorted scrap metal/lead” |
| SEAC Rapporteurs response: |

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| 997 | Date/Time:  2022/07/21 00:25  Type:  Individual  Country:  Sweden  Privacy statement:  No business or affilation. Working in government as an armorer. | General Comments:  Working as an armorer for the Swedish national police. |
| Specific information 3:  It is not just old, blackpowder, shotguns or rifles. Older shotguns are not proofed for steel shot. These will have to be replaced at great cost for the owner/hunter. |
| Specific information 4:  Every alternative to lead pellets for airrifles will vastly increase cost. One of the huge benefits of using air rifles is low cost. In Sweden it will deeply affect sport shooting for youngsters. Most probably all activities wilö cease as a direct result of a lead ban. |
| Specific information 5:  Steel shot performs well, but very differently from Lead as it is less dense and malleable, new shotguns can probably be manufactured that handles steel shot better. But again it will require the owners of the shotguns to invest huge amounts of money for low gain. Except for wet lands lead will not seep out into the nature. |
| Specific information 6:  The only way of succeding of having similar pattering and performance when using lead or steel shot will be to have 2 different shotguns that are configured/constructed differently to perform at the same level. |
| Specific information 7:  Again, lead will not be released into the nature from lead shot. Any lead shot of projectile will oxide and thus will not release lead into the nature. We have shooting ranges in Swedwn that has been operated at the same location for ~ 100 years. No heightened lead levels have been measured. |
| SEAC Rapporteurs response: |

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| 998 | Date/Time:  2022/07/21 01:33  Type:  Individual  Country:  Sweden | General Comments:  This is so taken out the blue. Led in solid form is not a problem. Too many tests have proved this. Led in fuel is another story. Then it is airborne. In Sweden it is already prohibited to use led for hunting in water and near water. Led that get shot into sand walls stay there. No led leaks from those, already proven. A ban on led will only lead to kill our sport. A hunter trains maybe 2 times per year (20 rounds max) so not a big impact for then. and sport shooters shoot at least 50 rounds per training, 50 shots per competition. For me i shoot 5000 rounds per year and all of them ends up in our sand wall where we can extract the lead every 10 years to recycle it. No birds will eat our bullets… IPSC can use 150-300 shots in 1 competition. And for training 1000s of rounds if competing. When it comes to the safety no other material can replace led. Due to we shoot at steel targets. Led is soft and does not bounce back. And the cost that is already high will be even more expensive to train and compete. Will EU sponsor us with that extra cost? Will EU buy our guns that cannot use other bullets than led? Due to the mechanisms are made for certain amount of gun powder. And cannot withstand a higher amount of gunpowder to fire the heavier projectiles as wismuth and copper. How does copper and wismuth interact with the barrels? Wear the barrels down ? Probably! An extra cost again. Who will cover that? Without lead the sport shooting will die! No biathlon in olympics, no air rifle /hand gun competipions No .22 competitions.  So make something out for the shipping industry instead and demand air purifiers (catalysts) for the oil tankers and so on. They are poluters not the sport shooting. Do something about bad cars in Russia, India and china instead. Do something about the plastic dumping in india, pakistan and other countries Bigger impact that hunters and sport shooters!! |
| Specific information 7:  You need to visit a shooting course of national shooting and IPSC! If you dont you can never know what questions to ask. Then you can see how small the fragments are.. sport shooting is not just clay pigeon shooting it is so much more! but led in solid form is not harmful. And no one eats something in the shooting walls. And nothing leaks out in the water from these walls. It is solid form.. Ask a metallurg or a chemist. You need a strong acid to dissolve led! No crops are farmed where there are shooting ranges. It is a big difference in clay pigeon shooting when aiming in the air. But for rigle and hand gun all ammunition get stuck in a wall of sand. Nothing in the wild. You need to make a differentiation here. Shooting in the air (clay pigeon) or in a shooting wall of sand (controlled) You need more knowledge in this field how it realky works. You cannot understand this just by reading. You need to maka visit to a shooting range. To actually understand what you are asking. |
| SEAC Rapporteurs response: |

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| 999 | Date/Time:  2022/07/21 01:36  Type:  Individual  Country:  Sweden | General Comments:  We need to have our nature fist but we need to question and make sure the changes will make effekt and the science does agree |
| Specific information 1:  According to science the led from bullits will not get into the water since it is stable as it is, with Steel this will effekt the rifles and the time to kill of the enimals but also a large problem for the forrestry industry. If you look at the swedish Laws were we are not alowed to use led ammunition close to wet areas, that has been working good. |
| Specific information 4:  Same here as with all ammunition we use for hinting, träning or competition most shoths are fired at traing sites were we take care of all led, this is ideas that do not make sence and training is so importera that air Guns are used a lot for this |
| Specific information 5:  Same here, this will not make the world or nature any benifits, at places used for training or competition we take care of all led, lets fokus on areas were we make different |
| Specific information 8:  But why, is the any science that say that the led from small fishing in ny way harm nature ? |
| SEAC Rapporteurs response: |

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| 1000 | Date/Time:  2022/07/21 05:11  Type:  Individual  Country:  Sweden | General Comments:  I deeply oppose the ban. Lead does not "shed" in nature, this is a fallacy and one that had been proven over and over. Still some ppl see insist on claiming it to be politically correct, to what avail i have no idea.  However. As an academic i believe in evidence. Evidence show that this proposed ban is based on false information and should thus be shown the door. |
| Specific information 1:  Again. The proposition is based on false information. |
| Specific information 2:  Well, there´s no real need to qualify or attest to anything really as.. per above, the whole proposition is based of "facts" that are simply not true. |
| Specific information 3:  Again, see above. That said however the development of "alternative" slug materials is no doubt in motion. From copper to god knows what else. Truth of it is that it is downright hard to replace lead as a main component in gun bullets, and i presume the ones touting this ban are aware that hunters use their ammunition on live animals. Thus criteria No1 is, and should remain, focus of a clean dispatch. |
| Specific information 4:  This gets even more silly than the above. The absolute vast majority of air guns are used for target practice. Within gun clubs to maintain a high standard when it comes to shooting knowledge and abilitys. Yes. There ARE lead free alternatives on the market already for air guns but truth be told the PCP world especially is moving vs heavier and heavier shot to, again, serve for an as humane and clean dispatch as possible - when air guns are used for hunting (which they are global) |
| Specific information 5:  In my discipline a death blow as i compete with old black powder fired firearms. None of them can be shot with steel (or other) alternatives. Such a ban would be the death of the sport in a wink of an eye. What´s more, on a given range what does it matter if lead is used? To what avail? Again. From an evidence point of view, as in an academic such, it is STILL not proven in any way or form that this proposition stands on solid ground. Present that FIRST and we can talk later. Hell, we´ve got shots fired in the mid 1700 still in the walls for instance down at Varbergs fästning. They have in other words been in there for 300yrs. What has happend is an oxidation. That´s it. Nothing has "drained" from them in any way or form. Experiments have been conducted filling entire streams with lead shot and the water STILL doesn´t show raised levels unsuited for mankind to use said water. This is FACTS. Evidence! |
| Specific information 6:  See above. What is your point of this? What is your agenda? What problem is it you´re trying to solve? Again. This is a fallacy. At the cost of millions upon millions to no effect. Insanity. |
| Specific information 7:  When we´re talking hunting on live critter this is already a fact. Rarely do we see bullets break up, and net spent weight is often checked. This often remains way above 90% |
| Specific information 8:  Again. See above. In most countries old phone wires are still in the ground, with a lead sheat surrounding them. Along those lines, have you seen nature die or revert or anything the likes? We´re talking millions of km worth of wiring here... Again. This is a fallacy. |
| SEAC Rapporteurs response: |

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| 1001 | Date/Time:  2022/07/21 07:17  Type:  Individual  Country:  Sweden | General Comments:  If lead is banned för sport shooting, the sport will die out. There is nothing today that can function as lead in a bullet for sport shooting. If you want to ban it, find something that can replace it while keeping the accuracy and softness of the bullet before banning lead. Lead in sport shooting is always taken care off in Sweden. Nothing ends up in the nature. |
| Specific information 6:  You can't use steel bullets in a rifle. The chamber rifling is ruined in a few shots and the barrel must be changed. Two barrels will never shoot the same so this is not possible. |
| Specific information 7:  This is totally fine. We do this at our club. We recover more than 90%, and give it to a recycling station in Sweden. |
| SEAC Rapporteurs response: |

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| 1002 | Date/Time:  2022/07/21 10:31  Type:  Individual  Country:  Sweden | General Comments:  The EU lead ban needs to be dropped. This is not related to reality. There are millions of tons of lead from bullets already in nature (WWII) and that has not been reported as an environmental issue in any scientific studie. |
| Specific information 1:  I highly disagree with this claim. This needs to be further investigated. |
| Specific information 2:  There is no need to further label ammunition. This have not been a problem in the past. |
| Specific information 3:  This will have big impact on historic guns. |
| Specific information 4:  Lead is not a problem for the environment in a solid state. |
| Specific information 5:  Lead is not a problem for the environment in a solid state. |
| Specific information 6:  This will not work. Lead is not a problem for the environment in a solid state. |
| Specific information 7:  This is not in anyway related to reality. Lead is not a problem for the environment in a solid state. |
| SEAC Rapporteurs response: |

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| 1003 | Date/Time:  2022/07/21 10:38  Type:  Individual  Country:  Sweden  Attachment: | General Comments:  Sport shooting was defined as clayshooting mostly , but there are other sports that are going to be impacted without recovery by a full ban . |
| Specific information 5:  Gunshot is not only used in clays hooting . That is just one sport . The sport i am practicing is called IPSC - Practical Shooting and one of its disciplines is shotgun in which steel shot is not possible to be used due to the fact that that regulation of the sport involves metal targets that fall on impact . Imposing a ban on lead shot will without doubt cripple the sport if not take it to extinction when it comes to shotgun . |
| Specific information 6:  The sport i am practicing is called IPSC - Practical Shooting and one of its disciplines is shotgun . Given the impossibility to use steel shot in this discipline (see answer to the question above) achieving the same proficiency is not possible |
| SEAC Rapporteurs response: |

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| 1004 | Date/Time:  2022/07/21 10:52  Type:  Individual  Country:  Sweden | General Comments:  Dear SEAC members,  I would like to point out, if I may, that this proposal goes directly against the subsidiary principle of the EU, in all environments with a pH over about 3.5 it is a technical non-issue (there are archeological examples of this with musket balls over 210 years old. The short explaination is that lead oxide forms a water tight barrier), for several of the shooting and hunting activities there exists no technically and economically viable alternative and it is my considered opinion that this is an attempt to yet again leverage 'environmental concerns' to make things more difficult if not impossible for hunters and sport shooters in EU. I beseech you to not go forward with this proposal. |
| Specific information 1:  Speaking for Sweden there is already a ban on using lead gunshot in wetlands, and steel is not a equivalent replacement for several reasons including but not limited to the logging industry, ricochet risks and so on. |
| Specific information 3:  The concern is valid for technical and cultural reasons. Hunting with muzzle loaders is illegal in Sweden, but the problem is the same for shotguns up to much more recent times. This requires further study and varies between manufacturers, but it affects guns manufactured well into the 20. century. |
| Specific information 4:  Lead free airgun pellets do exist, but the short story is that a large number of air guns in existence (specially the lower cost / consumer grade ones will not work well at all with lead free pellets. From an engineering standpoint we would need further studies to find out if air rifles specifically made for non lead pellets would run into problems with the laws on maximum allowable energy present in several countries if used with lead pellets. |
| Specific information 5:  I do not know but I suspect that this proposal is handmade to create a multitude of problems for the sport shooters in the union, and I do not know, but I suspect that the persons that drafted this ban fully well knows it. |
| Specific information 7:  This would require a complete redesign of most if not all outdoor firing ranges, and I can not even begin to estimate the economical scope of this. It would force a majority of outdoor firing ranges to close. |
| SEAC Rapporteurs response: |

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| 1005 | Date/Time:  2022/07/21 11:33  Type:  Individual  Country:  Sweden | General Comments:  Especially for smaller caliber bullets (e.g. 22lr) there are today not any working lead-free alternatives. These are, however, not very frequently used for hunting and mostly for practice and sport-shooting and therefore mostly used at the range. Therefore there is not any large problem with the lead from these calibers spreading into the nature since all the lead will be collected in bullets traps or sand traps or equivalent. The same can also be said for many other slow calibers ( less than 400m/s) as e.g. pistol calibers which are difficult to produce with lead free alternatives at a low cost and a acceptable precision, but are almost only used on the range and all bullets are collected in bullet traps or sand traps. |
| Specific information 2:  It is not reasonable to require a marking of ammunition in the manner described. Among other things this means that all older ammunition (both lead-free and lead) will not be usable. And also, the fact that many hunters load and shoot their own ammunition and reuse the cases would make a marking impossible. Not being able to load your own ammunition would significantly increase the cost for hunters and sport-shooters and also have a greater environmental impact as cartridges would not be reused. |
| Specific information 4:  there are no acceptable alternatives to lead ammunition for air rifles at present, and air rifles are important mainly as youth sports and for indoor training. In addition, in principle, all air rifle shooting is carried out with bullet-collecting targets and it is not used for hunting, so a possible environmental problem with air rifle ammunition is non-existent. |
| Specific information 6:  when changing between different types of ammunition, a new insertion of the weapon is always required, which means that you prefer to use the same ammunition. Also if you switch between lead and other (full metal jacket or lead free) tou might need an extra careful cleaning of the barrel which is very time consuming, to keep the accuracy of the weapon. |
| Specific information 7:  it would be very difficult to verify this in practice as much of the practice/shooting at shooting ranges is done on an individual basis and one would then be expected to be completely rely on individual reporting to know how much lead that is used at the range. However, since the absolute majority of the shooting is done at the range, rather than in the forrest, it is no doubt the when the lead is recovered from the the range (sand-traps, etc) much more than 90% of the lead WILL be recovered. |
| SEAC Rapporteurs response: |

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| 1006 | Date/Time:  2022/07/21 11:36  Type:  Individual  Country:  Sweden | General Comments:  I hunt with lead because right now its the best alternative in the market it has more power when it hit and makes so i can use all my rifles for hunting and not have to stop using my smaller rifle because the bullet weight of lead free makes soit falls below the bar for a swedish class one rifle or stop hunting with my old side by side shotgun because it cant handle the pressure of hunting steel. The lead hunters put out in a year is nothing compared to what the military puts out in a day ban their use of lead ammo first. Lead ammo is also very expensive and from my experience and from many others dont expand as good |
| Specific information 1:  There are no good substitutes for lead on the market. If a ban on lead is enforce I and alot of other hunters will be forced to get new guns because our current ones will not have enough power with lighter copper bullets or shotguns tha are not build for the extra pressure needed to shoot steel will run a risk of exploding |
| Specific information 2:  I think this is a could be a good idea of marking and separate lead and lead free ammo boxes |
| Specific information 4:  I have tried to find lead free options to my rifled air gun and the selection is vary limited some of the brands I found used plastic instead so i dont feel like thats better and thet were twice as expensive for halv the pellets |
| Specific information 5:  I do belive clay shooting should be lead free our local shooting club has that rule and i dont see any problem with it |
| Specific information 7:  Of the hunts i have been a part of we have found 9/10 lead bullets only one we didn’t find was a “execution” shot on a wounded animal that was shot from a very close range with a big rifle so it exited |
| SEAC Rapporteurs response: |

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| 1007 | Date/Time:  2022/07/21 11:45  Type:  Individual  Country:  Sweden | General Comments:  I only feel qualified to speak about my own experience and knowledge about the gun ranges I have visited, but from where I am sitting these requirements are not realistic from an economic perspective. |
| Specific information 6:  After reading through the proposal I have concerns regarding the requirements for outdoor ranges to be approved sites: The requirements for a site to be approved would require renovations whose costs would probably be too high for the shooting community to bear on its own and I am not even sure if the construction of a roof over the bullet trap would be safe for the shooter considering that metal would probably have to be used for at least the beams. I fear that the requirements in the proposal would make it next to impossible to finance the retrofitting of an existing outdoor range to a point where they would fulfill the requirements in the proposal. Furthermore, "regular" lead ammunition is already reaching prohibitively high prices even for people with high salaries. Requiring steel ammunition to be used at non approved ranges would make practical shooting a sport only for those extremely few that have either: access to a nearby indoor range that is dimensioned and constructed for dynamic shooting , OR, can afford to use exclusively lead free ammunition. I, personally, would not be able to afford the ammunition required for me to maintain my current level of proficiency let alone compete at a national or European level despite having switched jobs and pursuing a career just so I can afford more ammunition and pursue my dream. |
| SEAC Rapporteurs response: |

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| 1008 | Date/Time:  2022/07/21 13:12  Type:  Individual  Country:  Sweden | General Comments:  Time has clearly shown that metalllic lead does not pose a hazard outside of wetlands |
| Specific information 1:  Use is steel shoot would efffectivly make forestry impossible |
| Specific information 2:  Labling indicidual bullets are not possible in any practival way |
| Specific information 3:  Ban on lead would render historical guns unusable |
| SEAC Rapporteurs response: |

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| 1009 | Date/Time:  2022/07/21 13:40  Type:  Individual  Country:  Sweden | General Comments:  A ban on lead shot will cripple the hunting in forrested areas, (i.e the major part of Sweden) because of the detrimental effect of steel shot in trees when harvesting and producing lumber. It will be impossible to keep up the animal conservation and bio-diversity without the hunting with shot in forrests.  A ban will also negatively effect training in markmanship with shotguns, that currently is well functioning by so called "hunting-tracks" at almost all shooting ranges focused on hunting, and that depends on lead projectiles to be safe with current design. A redisign to be safe with steel pellets would be impossible due to the extremely high cost, impossible for but the 1% largest shooting ranges. |
| SEAC Rapporteurs response: |

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| 1010 | Date/Time:  2022/07/21 13:56  Type:  Individual  Country:  Sweden | General Comments:  The overall proposal of the lead ban is essentially both in writing and practicality an indirect ban on hunting and sporting rifles. 1. Since these rifles and other sporting equipment is already heavily restricted under current law, non other than law abiding citizens have the possibility to legally use or own such equipment currently. 2. The environmental aspects are of course of great importance, however, the studies that have been made for the basis of the proposals of lead ban are flawed and lack factual evidence. If it were to hold true, wouldn't the entire continent of Europe be in dire need of utter and complete sanitation.  Therefore, this proposal of lead ban is complete nonsense in historical, factual, chemical and metallurgical aspects. Please read your history books and for the people of EU, have a degree in science before proposing monumental change based on flawed research. |
| Specific information 1:  There is a current marked, however it will not be able to expand to the extent that this proposal will demand it to. |
| Specific information 2:  Physically labeling each bullet by markings or color coding would impact both price, production time and further more the environment as well. The technical aspects of marked projectiles would most likely introduce confusion and lesser accuracy upon firing with end-user. Both would impact negatively in its practices. |
| Specific information 4:  As a long time airgun sports shooter, the lead pellets used are what both makes the sport safer but also the functionality of the gun itself.. many other materials have already been tried and tested, however non have proved to be a better alternative. |
| Specific information 7:  To "recycle" said lead from shooting ranges, A) would be to dig up and sort lead from dirt/stone/sand either by hand or by machine, or B) rebuild all ranges with projectile "traps". Both of which would imply massive amounts of time, money and legislation. None of which each individual hunting nor sporting club or individual could manage to do. It would also need the state to aid in the funding of such work, which most likely none would prioritize. |
| Specific information 8:  Simple answer if you have common sense knowledge about metals.. Oxidation of metals occur, lead has a protective layer of oxidation such that it is encapsulated and deterioration is negligible compared to steel. Steel, when oxidized, is called rust. Using steel replacements would introduce either stainless steel and/or increase of consumption of fishing equipment. Both negative for socioeconomic aspects. Furthermore the practicality of softer lead means that when adding or removing sinkers the line doesn't need to be cut, as it can be pressed on/off the line via a wedge. Cutting lines more often would mean increased likelihood of loose line in the sea and lakes but also increase consumption of plastic fishing lines. |
| Specific information 9:  See answer for Q8 above. |
| SEAC Rapporteurs response: |

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| 1011 | Date/Time:  2022/07/21 14:51  Type:  Individual  Country:  Sweden | General Comments:  Taking my personal opinions as a IPSC shooter aside I find it difficult to understand the dismissal of many points of view during the consultation guidance as non scientific or not backed up by imperical data and yet in conclusion referring to the experience of " a champion clay target shooter " as a defacto proof of it being a organizational issue when it comes to steel shot accuracy.  In regards to the entire document I find that although it is well written once again there are a lot of "opinions" and "estimates". It seems questionable to on one side demand considerable scientific data but moments later for example "estimate" that there are no more than 12000 sports shooters who compete internationally or "It is important to note that basically all small calibres used in hunting and sports shooting are rimfire cartridges, e.g. the commonly used .22 LR" without any reference to actual numbers. 22lr is only one of many calibers used on all ranges in the nordic countries and is slowly being overtaken by IPSC and other fast growing shooting sports where 22lr is "basically never used"  When making decisions and placing restrictions information should by definition be based on research and not assumptions both for and against a proposal.  Besides that one point that seems to have been totally overlooked in this situation is where the cost of renovation already existing shooting venues to a new EU standard in regards to lead will lead to the eventual demise of most shooting venues. The reason for this is that in almost all cases at least in the nordic countries ranges are run and financed by non profit organisations which in todays market economy in no way have the financial means to physically restructure an entire geographical area. A practical example of this is one of our local clubs here in Sweden just reconstructed a shooting bern resulting in a cost of 25000 Euros to comply with local laws. Reconstructing the entire club and surrounding soil would mean the death of a club that has been active since the early 1900s. |
| SEAC Rapporteurs response: |

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| 1012 | Date/Time:  2022/07/21 15:04  Type:  BehalfOfAnOrganisation  Org. type:  Other contributor  Org. name:  Bayerischer Sportschützenbund e. V.  Org. country:  Germany | General Comments:  Der Bayerische Sportschützenbund e. V. (BSSB) spricht sich für eine Beibehaltung der bewährten, bleihaltigen Sportmunition aus. Bei einer etwaigen Nutzungsbeschränkung bleihaltiger Sportmunition fordert der BSSB sportfreundliche Ausnahmeregelungen, wie diese etwa von der Europäischen Chemikalienagentur (ECHA) im Beschränkungsbericht Anhang XV „Lead and its compounds“ (EC Number 231-100-4, CAS Number 7439-92-1, submitted by ECHA) vorgeschlagen wurden (z.B. Ausnahmen für Raumschießanlagen, Ausnahmen für Schießstände mit einer Bleirückgewinnung von mindestens 90 Prozent). Mit Blick auf die Wurfscheibenschießanlagen sind verhältnismäßige, flexible Vorgaben zielführend, bei denen von der benannten Mindestanforderung der 90-prozentigen Bleirückgewinnung entsprechend der baulichen Begebenheiten vor Ort erleichternd abgewichen werden kann.  Die Begründung für diese Position ist vielfältig. Sie umfasst insbesondere sozio-ökonomische Themen aber auch Erwägungen zum Umweltschutz.  Umweltschutz: Die rund 460.000 Sportschützinnen und Sportschützen der ca. 4.500 Mitgliedsvereine des Bayerischen Sportschützenbundes e. V. verwenden bei ihrer Sportausübung bleihaltige Sportmunition. Die in Deutschland vorgeschriebenen Rückhaltevorrichtungen bewirken dabei eine nahezu vollständige Rückgewinnung und Rückführung des verschossenen Bleis in den Wertstoffkreislauf: Ein schädlicher Umwelteintrag durch die Verwendung bleihaltiger Munition beim Sportschießen liegt aufgrund der Tatsache, dass auf entsprechende Geschossfänge geschossen wird, also nicht vor. Rechtsgrundlage hierfür sind in Deutschland die entsprechenden Vorgaben der Richtlinie für die Errichtung, die Abnahme und das Betreiben von Schießständen (Schießstandrichtlinie). Der Umweltschutz ist als möglicher Beweggrund für eine etwaige Nutzungsbeschränkung bleihaltiger Sportmunition aus bayerischer und deutscher Sicht also gerade nicht gegeben.  Dies trifft – bei entsprechenden Rückhaltevorrichtungen (u.a. Schrotfangwall) – ausdrücklich auch auf den Wurfscheibenbereich zu. Wo angezeigt, kann eine Optimierung der entsprechenden Rückhaltevorrichtungen eine weitere Erhöhung des Rückhaltegrades bei den Wurfscheiben-Schießanlagen bewirken. Dahingegen kann die Verwendung von Schrotmunition aus Bleisubstituten (z.B. Stahlschrot) bei den Wurfscheiben-Schießanlagen zu einem gegenteiligen, unbeabsichtigten Effekt führen, da etwa Stahlschrot durch chemische Wechselwirkungen eine erhöhte Mobilisierung des ansonsten kontrolliert liegengelassenen Bleis erzeugt.  Sozioökonomische Auswirkungen – der Spitzensport: Internationale Sportwettbewerbe setzen internationale Vergleichbarkeit voraus, mithin die Möglichkeit, unter vergleichbaren Bedingungen und mit vergleichbarem Sportmaterial zu trainieren und am Wettbewerb teilzunehmen. Ein international nicht abgestimmter, einseitig von der EU vorgenommener Umstieg auf Bleiersatzstoffe in der Sportmunition bedeutet das Aus für die Vergleichbarkeit bei internationalen Wettkämpfen wie etwa den Olympischen Sommerspielen oder den Weltmeisterschaften. Denn internationale Lösungen zum Thema „Bleifreie Munition“ liegen zum gegenwärtigen Zeitpunkt, aber auch auf absehbare Zeit nicht vor. Dies geht u.a. auf die ballistische Tatsache zurück, dass Sportmunition aus Bleisubstituten eine erheblich geringere Schusspräzision aufweist als bleihaltige Sportmunition: Das gerade auf Präzision zielende Sportschießen wird durch die ausgesprochen unpräzise Materialstreuung von Sportmunition aus Bleisubstituten unmöglich. Unser Schießsport wäre – ohne tatsächlichen Mehrgewinn für den Umwelt- und Gesundheitsschutz – ad absurdum geführt. Solange hier keine international abgestimmten Lösungen in Sicht sind, bedeutet eine einseitig von der EU vorgenommene, weitgehende Nutzungsbeschränkung bleihaltiger Sportmunition das Ende einer Teilnahme „auf Augenhöhe“ unserer Sportschützinnen und Sportschützen aus Bayern und Deutschland an internationalen Wettkämpfen. Internationale Erfolge unserer Sportlerinnen und Sportler werden so in unnötiger Weise erschwert oder gar verunmöglicht. Der Verlust wäre groß: Alle bislang bei Olympischen Spielen, Weltmeisterschaften und Weltcups durch Athletinnen und Athleten aus Bayern und Deutschland erreichten Medaillen waren nur durch den Einsatz bleihaltiger Sportmunition möglich. Einzelne, nicht-olympische Disziplinen wären durch eine weitgehende Nutzungsbeschränkung bzw. durch ein Verbot bleihaltiger Sportmunition in ihrem Bestand sogar in Gänze gefährdet: Die traditionsreiche Sportdisziplin Vorderlader etwa wäre mit ihren Europa- und Weltmeisterschaften komplett verunmöglicht. Diese Disziplin ist technisch auf die Verwendung von Bleikugeln angewiesen.  Sozioökonomische Auswirkungen – der Breitensport: Bleihaltige Sportmunition kommt nicht allein im Spitzensport zum Einsatz. In Form insbesondere der Druckluftdisziplinen findet sie bei jedem Preis- und Vereinsschießen, bei jedem Schießabend im örtlichen Schützenheim oder im Vereinsgasthaus Verwendung. Geeignete Alternativstoffe für die allseits verwendete, bleihaltige Sportmunition sind nicht in Sicht. Aktuell getestete, bleifreie Sportmunitionen sind zudem zum gegenwärtigen Zeitpunkt für die übergroße Mehrheit der bayerischen Sportschützinnen und Sport-schützen finanziell nicht darstellbar. Ein Kostenbeispiel aus dem Druckluftbereich kann dies verdeutlichen: Eine Dose mit 200 Diabolos aus Zinn kostet etwa ab acht Euro, eine Dose mit 500 Diabolos aus Blei etwa ab fünf Euro. Folglich ist Zinn bei gleicher Menge um das Vierfache teurer. Auch sind die gebräuchlichen Sportwaffen technisch weitestgehend nicht für bleifreie Sportmunition ausgelegt genauso wie die üblicherweise verwendeten Scheibenanlagen. Hier würden ausgesprochen kostspielige Umrüstungen unumgänglich. In Konsequenz leidet insbesondere der gesamte Amateursportbereich im Sportschießen: Die Jugend- und Nachwuchsförderung wird deutlich erschwert, ebenso der Vereinssport als Breitensport. Es ist zu erwarten, dass bei einem zwangsweisen Umstieg auf bleifreie Sportmunition ohne diesbezügliche Ausnahmeregelungen allein in Bayern Zehntausende von Sportschützinnen und Sportschützen aus finanzieller Sicht gezwungen sind, ihren Trainings- und Wettkampfbetrieb einzustellen. Auch die Umrüstung der Schießanlagen ist finanziell von zahlreichen Schützenvereinen nicht zu schultern. Ein im Gemeinwesen Bayerns tief verankertes Stück bürgerschaftliches Vereinsleben und ein für den sozialen Zusammenhalt wichtiger Teil des bayerischen Amateursports brechen so weg. Mit dem Breitensportbereich unseres Schießwesens ist generell auch das über Jahrhunderte währende Schützenwesen und damit ein immaterielles Kulturerbe der UNESCO in Gefahr.  Zusammenfassung: Eine weitgehende Nutzungsbeschränkung bleihaltiger Sportmunition hätte mit Blick auf die zu erwartenden, sozioökonomischen Folgen gravierende, negative Auswirkungen auf das Sportschießen Bayerns. Ohne hinreichende, sportfreundliche Ausnahmeregelungen zur Nutzungsbeschränkung sind ein faktisches Ende des Sportschießens und damit auch des traditionsreichen Schützenwesens unserer Heimat zu befürchten – und dies ohne Vorteile für den Umweltschutz und die Nachhaltigkeit.  Folgende Nachweise können diese Auskünfte untermauern: - Bayerisches Staatsministerium für Landesentwicklung und Umweltfragen, Der umweltverträgliche Betrieb von Wurfscheibenschießanlagen: Arbeitshilfe für Behörden, Betreiber und Ingenieurbüros - Bayerisches Landesamt für Umwelt, Der umweltverträgliche Bau und Betrieb von Wurfscheibenschießanlagen: Merkblatt zur Untersuchung, Bewertung und Überwachung von Wurfscheibenschießanlagen im Hinblick auf den Boden- und Gewässerschutz, 2013 - Bayerischer Sportschützenbundes e. V., Stellungnahme zur Berichterstattung des Bayerischen Rundfunks zum Thema Bleibelastung durch Schießsport, 2016 - SUVA, Factsheet Bleibelastung in Raumschießanlagen, 2013 - Vergleichstest zur Präzision von bleihaltigen und bleifreien Geschossen im Auftrag des Verbands der Hersteller von Jagd-, Sportwaffen und Munition (JSM) bestätigt durch das Beschussamt Ulm, 2021 |
| Specific information 4:  Technische Machbarkeit: Bleihaltige Sportmunition zeichnet sich durch hohe Schusspräzision aus und ist für das nationale wie internationale Sportschießen aufgrund der fehlenden Präzision der Bleisubstitute alternativlos. Munition aus Bleisubstituten ist insbesondere im Bereich der Jagdmunition bekannt. Für den Bereich der Sportmunition werden alternativ Zinnlegierungen erprobt, bei denen allerdings wieder ein wesentlicher Anteil an Blei enthalten ist und die mit Blick auf die Präzision keinen gleichwertigen Ersatz darstellen. Wirtschaftliche Machbarkeit: Ein Kostenbeispiel aus dem Druckluftbereich kann die, bei Anwendung von Bleisubstituten in der Sportmunition zu erwartende Teuerung verdeutlichen: Eine Dose mit 200 Diabolos aus Zinn kostet etwa ab acht Euro, eine Dose mit 500 Diabolos aus Blei etwa ab fünf Euro. Folglich ist Zinn bei gleicher Menge um das Vierfache teurer. Zudem sind die gebräuchlichen Sportwaffen technisch weitestgehend nicht für bleifreie Sportmunition ausgelegt genauso wie die üblicherweise verwendeten Scheibenanlagen. Hier werden ausgesprochen kostspielige Umrüstungen unumgänglich. |
| Specific information 5:  Flinten mit Stahlschrotbeschuss verwenden regelmäßig stärkere Ladungen, um den im sportlichen Bereich geforderten Zielentfernungen nachkommen zu können (bei Trap von 35 bis ca. 50 Meter). Nichtsdestoweniger sind die Trefferergebnisse bei der Verwendung von Stahlschroten im Vergleich zum Bleischrot deutlich schlechter. Dies liegt an der im Vergleich zu Bleischroten deutlich erhöhten Abnahme kinetischer Energie während des Fluges von Stahlschroten. Generell muss festgehalten werden, dass viele Flinten älterer Bauart technisch für Stahlschrot überhaupt nicht geeignet sind (fehlender Stahlschrotbeschuss, zu erkennen an fehlendem Lilien-Stempel): Mit diesen darf kein Stahlschrot verschossen werden. Unserer Erfahrung nach schießt die Mehrheit der Flinten-Schützen auf unseren Schießständen bayernweit insbesondere beim jagdpraktischen Übungsschießen mit Flinten ohne Stahlschrotbeschuss. Eine zwangsweise Umstellung auf Stahlschrot innerhalb der EU wäre also in Bayern mit hohen sozioökonomischen Kosten für die Flintenschützen verbunden. |
| Specific information 6:  International werden die Wurfscheibenschießanlagen mit Bleischrot betrieben. Um bei internationalen Wettkämpfen konkurrenzfähig zu bleiben, muss deshalb auch weiterhin die Möglichkeit bestehen, mit bleihaltiger Schrotmunition zu trainieren. Da die ballistischen Eigenschaften von Blei- und Stahlschroten stark variieren, sind etwa auch die Vorhaltemaße beim dynamischen Schießen (z.B. Trap, Skeet, Doppeltrap) entsprechend unterschiedlich. Dies erfordert für den Schützen eine regelmäßige, kaum zu leistende Umstellung im Trainingsbetrieb. Dies schränkt die international zu erbringenden Schießleistungen stark ein und verschlechtert die von Bayern und Deutschland zu erwartenden Leistungen im internationalen Wettkampfbereich deutlich. |
| Specific information 7:  Auf Grundlage der im Schießbetrieb benutzten Wurfscheibenanzahl (technisch dokumentiert) ist bereits ein rechnerischer Schlüssel zur Feststellung der verschossenen Patronen üblich und auch behördlicherseits für verschiedene Schießstand-Zulassungsverfahren in Anwendung. Da alle Schützen gemäß der sportlichen Vorgaben bis zu 24 Gramm pro Schrotpatrone Blei verschießen, kann der Bleieintrag entsprechend ermittelt und dokumentiert werden. Die Ermittlung des rückgewonnenen Bleis kann etwa durch einfaches Wiegen des z.B. durch Kehrmaschinen am geteerten Wallfuß aufgenommenen Bleischrots erfolgen. |
| SEAC Rapporteurs response: |

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| 1013 | Date/Time:  2022/07/21 16:17  Type:  Individual  Country:  Sweden | General Comments:  I haven't yet seen any scientific proof that the type of lead used for shooting or in fishing sinkers will negatively affect health with the exemption of shallow water birds that eats small rocks to help them digest their food by grinding it down. The type of lead in these applications is very stable after oxidation and will be encapsulated in living tissue.  Applying these suggested restrictions will increase damage to forestry and wood mills. Will make current ammunition and sinkers obsolete and increase the cost for those using them. Replacements are more expensive due to higher material costs and increase the risk of harming others in the case of shooting accidents due to ricochets.  Adding these to some already strict use of existing policies and laws will only serve to criminalize citizens of EU for crimes that have no real victims. This bureaucratic burden will only make people more anti-EU. Distancing politics and common people even further away from each other and this is a time where unity should be the ultimate goal. Not by making decisions not supported by the common people. |
| SEAC Rapporteurs response: |

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| 1014 | Date/Time:  2022/07/21 17:55  Type:  Individual  Country:  Sweden | General Comments:  Lead for guns are vital for hunting and shooting and can not bee taken away whitout making alot of problems and very big risk of wounding animals that whit lead shot would die quick having shot hundreds of birds whit steel and lead i know that steel should not bee used nor any ather suplement on the market |
| Specific information 1:  Steel shot are not killing good enuff to bee used they are to hard. Steel shot are very bad for the forest industry the saw mill dont cut trees whit Steel i |
| Specific information 2:  Labels are good banns are not |
| Specific information 3:  Not only many historical guns but also air guns and many other thing can only use lead |
| Specific information 4:  There are no alternativs that works for airgun hunting. |
| Specific information 5:  The risk of ricochets will increas alot Steel shot decreas distans |
| Specific information 6:  There are already to many typs of licences just more papperwork for no gain |
| Specific information 7:  Lead in solid form are not a problem |
| SEAC Rapporteurs response: |

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| 1015 | Date/Time:  2022/07/21 18:58  Type:  Individual  Country:  Sweden | General Comments:  This should not be regulated by EU at all. The suggestion is a major threat against sports shooting and hunting, which would be almost impossible to continue doing if this suggestion is implemented. Please stop destroying Our hobbies and national interests. |
| Specific information 1:  Why ban something that is not a problem? It is not today, so please leave us alone. |
| Specific information 2:  As a life-long sports shooter, I know that there is no way to produce ammunition that conforms with your suggestion and still can be safe to use at a cost affordable to normal people. |
| Specific information 3:  Stop trying to solve a problem that does not exist. By banning hunting and shooting with our historic weapons, you will only upset people and make them more anti-EU |
| Specific information 4:  As an active competition shooter with air guns, I have studied this and never seen any indications of possibility for a lead substitute with the extreme tolerances necessary for this sport. |
| Specific information 6:  This is risky for us shooters. Where and when would we be allowed to even carry or transport lead gunshot? The switch is unsafe, because steel shoot is very risky against steel targets. |
| Specific information 7:  This requirement would totally kill many shooting sports such as dynamic shooting. It is impossible to build recoerable rangea for such sports. For other shooting sports, it would mean closure of all small, non-profit shooting ranges which we have in Sweden. These are run by unpaid volunteers and does not have financial muscle to completely rebuild our ranges. This would be a disaster for national defence and safe gun handling. |
| SEAC Rapporteurs response: |

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| 1016 | Date/Time:  2022/07/22 02:37  Type:  Individual  Country:  Sweden | General Comments:  Financial cost for target shooters and shooting clubs seems widely underestimated in this report.  In some shooting disciplines there is no other alternative to lead pellets because of safety reasons.  In my testing lead projectiles greatly outperform current alternatives.  This ban would be devastating to sport and target shooting in times when everything should be done to support it.  The risks of lead poisoning has been known to the shooting community for a long time and individuals can by themself take precautions to avoid it.  Lead in a shooting berm does not release lead to animals. |
| Specific information 3:  Historical Guns are also used when celebrating historical events, not only hunting. For example last summer members of my shooting club shot a salute in the city in honor of fallen defenders, marking the 300 year aniversery for the battle of selånger 1721. (When russian war ships plundered Sundsvall, Sweden) |
| Specific information 6:  The kind of shotgun shooting I do, this is not even possible. Lead pellets are 100% required. Shooting steel pellets on steel targets is dangerous. |
| Specific information 7:  For a sport shooting club run by its members working voluntairy, this would be nearly impossible, too much man-hours and administration would be required. |
| SEAC Rapporteurs response: |

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| 1017 | Date/Time:  2022/07/22 11:11  Type:  Individual  Country:  Sweden | General Comments:  The lead ban i a total disaster, and it is a threat to our cultural inheretence of hunting, sport shooting and our nations defence capability. Studies show that solid lead in the ground is stable and not a problem. We already have restrictions on using lead shotshell in shallow waters and that is more than sufficient. |
| Specific information 3:  Your definition of "historic guns" are way to narrow. It will affect a series of cartridge guns guns in different calibers that need the density och a lead bullet to meet our high set standards for projectile energy. |
| SEAC Rapporteurs response: |

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| 1018 | Date/Time:  2022/07/22 11:35  Type:  Individual  Country:  Sweden | General Comments:  This law is useless the amount of lead is so low that it will not make any difference for the earth or wildlife. |
| Specific information 1:  yo dangerous to use any thing else. will make animals suffer more and longer. |
| Specific information 3:  we can't use old guns. can't compete steel it to hard and to dangerous for ricochet |
| Specific information 5:  we already have carpets that make us collet the lead. |
| Specific information 6:  it's going to be very very expensive have ta change some weapons like shotguns. |
| SEAC Rapporteurs response: |

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| 1019 | Date/Time:  2022/07/22 14:41  Type:  Individual  Country:  Sweden | General Comments:  Lead restriction will as there’s no alternative today will be the end of a whole sport. Where today a lot of young and old can compete on the same terms and bring each other together. Cowboy action shooting ( and other sport shooting branches) will not be able to compete internationally on the same terms and will therefore no longer be able to gain from the good European athletes who has gained lots of championship winnings in these sports anymore. Same as with a lot of other decisions from EU that there must be a reasonable alternative before you forbid something that has little or no impact on the environment. |
| Specific information 6:  As CAS and other uses steel targets (no other option I feasible) it would be extremely dangerous to shoot with steel bullets/ pellets |
| Specific information 7:  I would be interested to know how this practically be carried out? |
| SEAC Rapporteurs response: |

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| 1020 | Date/Time:  2022/07/22 15:58  Type:  Individual  Country:  Denmark | General Comments:  As a sportsman in CAS and WB. Lead ammunition is used in hand gun, rifle and lead shot in shotgun for firing at steel targets that are in front of a ground barrier. By change to a hard material, there will be returning ricochets from the steel/sound plate towards the shooter and the audience. In order for the sport to continue after this proposal comes into effect, it is necessary to have a soft projectile material that deforms and transfers its energy into the steel/sound plate as it does not ricochet back, at the moment there are no other alternatives to such a material that has these properties than lead. Alternatives are being worked with, however it must be noted that these materials will also have a health risk as a composite projectile containing brass or copper grains glued together has a greater probability of defragmenting to a degree where collection will not be effective. |
| Specific information 5:  As a sportsman in the sport called CAS cowboy action shooting, lead shot is used in a shotgun to shoot at drop targets that are in front of a ground barrier. A sequence of 24 shots is fired, four of which are normally shot, these cannot be replaced with steel as there will be a return of steel shot during the firing of steel, it is necessary to use a material which deforms so that the impact energy continues into the steel target without risk of shooter and audience who will be exposed to steel or the like as they will ricochet back from the steel plate towards shooter and audience. In Denmark It requires permission for the purchase and use of lead shot from our national authorities. |
| Specific information 6:  Certain shootings require specific courses and there should be an exception for shooting with lead shot at targets standing on the ground in front of an earth ramp where collection can be done. This ensures the collection of lead shot |
| Specific information 7:  As a sportsman in the sport called CAS cowboy action shooting, lead shot is used in a shotgun to shoot at drop targets that are in front of a ground barrier. As suggested regarding collection, a sand trap will collect the shot and fragments that come when shooting at drop targets. Thereby, the request for re-collection is on the same line as the proposal. 4. By way of derogation: d. Paragraph 2f shall not apply if: |
| SEAC Rapporteurs response: |

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| 1021 | Date/Time:  2022/07/23 15:14  Type:  Individual  Country:  Austria | General Comments:  No Comment |
| SEAC Rapporteurs response: |

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| 1022 | Date/Time:  2022/07/24 18:36  Type:  Individual  Country:  Poland | General Comments:  Good day. Regarding the consultations that arose on the elimination of lead in sport and hunting, I would like to say that I realize how poisonous lead is, but in the light of the current situation in Ukraine, where not only regular military but also ordinary citizens defend country, obstructing the use of shooting and hunting sports, reduces the chances of European Union citizens to be protected against Russia. Ukrainians who are not soldiers, if they had not been trained in the use of weapons, would not be able to defend themselves as well as before. The withdrawal of lead from ammunition will increase the costs of shooting in the European Union countries, and thus will reduce the number of people practicing shooting and providing additional support for the army and citizens during the war. As a result, the European Union's ability to defend itself against aggression against other countries will be reduced in the European Union. The amount of lead that enters the ecosystem annually will be nothing compared to the amount of lead that will fall as a result of artillery fire during one day of the war that is already taking place in Ukraine. Russia will not be affected or limited by these restrictions, and they will be for us. The only sensible solution is to find an alternative that will not increase the cost of ammunition production. Regards and I hope that my voice will be heard. |
| Specific information 2:  In Poland, the ban on the use of lead in ammunition may impede access to ammunition due to legal regulations, and this would, inter alia, limit the right to defense. ORDINANCE MINISTER OF THE INTERIOR AND ADMINISTRATION of 20 March 2000 on types of particularly dangerous weapons and ammunition and types of weapons corresponding to the purposes for which a license for the weapon may be issued. Based on Article. 10 sec. 5 of the Act of May 21, 1999 on weapons and ammunition (Journal of Laws No. 53, item 549), it is ordered as follows: § 2. The following are particularly dangerous ammunition: ... 3) ammunition with shell shells containing a core made of a material harder than lead alloy |
| SEAC Rapporteurs response: |

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| 1023 | Date/Time:  2022/07/25 15:47  Type:  Individual  Country:  Sweden | General Comments:  Problemet med bly i ammunition för sportskytte har blivit starkt överdrivet – det saknas helt proportioner mellan ett blyförbuds skadeverkningar och den påstådda miljönyttan. Metalliskt bly i ammunition har extremt begränsad miljötillgänglighet och spridning från kulfång mm Regler måste baseras på vetenskapligt bevisade underlag, annars tappar de sin legitimitet. Självklart är bly farligt om man konsumerar eller inhalerar det, men förbud ska motiveras väl, och det ter sig konstigt att man inte tar bort t ex alla telefonkablar som ligger nedgrävda runt om i Europa, om det nu är så farligt som man framhållit i debatten (blyammuntion utgör enligt svenska pistolskytteförbundet endast c:a 2,8% av blyförbrukningen i Sverige) Om ett förbud mot bly i ammunition för sportskytte träder i kraft (trots att vetenskaplig grund för detta detta uppenbarligen saknas) behöver staten säkerställa att de ideella skjutbanorna runt om i landet kan fortsätta sin verksamhet – och står för alla omställningskostnader. Dessutom behöver det finnas undantag från blyförbudet i de fall alternativ ammunition saknas. Slutligen: Sportskyttet är en del av totalförsvaret och genom att försämra förutsättningarna för sportskyttet påverkas även totalförsvaret negativt. |
| Specific information 4:  Det saknas realistiska alternativ till blyammunition. |
| SEAC Rapporteurs response: |

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| 1024 | Date/Time:  2022/07/25 21:40  Type:  Individual  Country:  Sweden | General Comments:  We only really need to make sure that grazing birds do not feed on lead. This can be achieved by not allowing lead ammunition over water, where water depths is less than perhaps 1-2 meters.  If we are concerned about lead dissemniation in nature, we shoudl firts learn some basic chemistry, then address the issue of lead lining of e.g. telephone lines (which has not been a problem for forever, so...), before looking at ammunition. The only plausible reason to try to forbid lead in ammunition is to prohiboit hunting ans sport shooting. The former provides the most ethical and environmentally friendly meat, the latter is something we should encourage greatly to make us (yes, Spain, I know you think you are far enough away, but not all of us live by the Atlantic and yes Netherlands and Belgium, I realise you forgot about WW2) less attractive as a target for Russian and/or Chinese and/or other aggression. |
| Specific information 1:  There's no way of using steel loads in all shotgunf hunting contexts if we also want to be able to harvest wood. For bullet hunting, steel just does not work. Precision (and therefore ethics) is suboptimal. For target shooting, steel cannot be used uxcept for in shotguns. |
| Specific information 2:  This just doe snot work. The pressures and deformation of bullets do not permit this. In addition, the only provider that claims to have this technology (even though it's been shown not to work) is US based and using their patents would increase costs for EU citizens significantly. Additionally, even if an EU based provider was to be found, this would costs huge amounts of money. And would still not help with criminal cases, if somebody had that idea. Oh, and hand loading would implicitly become forbidden, which is a really bad idea for thos of use who shoot 10-20k rounds per year for reasons of competetive shooting. |
| Specific information 3:  Why? Just why? Muzzle loaders are rare in hunting and regulating this woudl make no difference whatsoever, even if one has missed chemistry classes and think that lead in huting is a problem. |
| Specific information 4:  Non-lead projectiles provide much poorer precisions. I don't see why this even needs to be answered. Please prove that the lead projectiles used actually pose a problem greater than any other lead "problem", such as the telephone line linings mentioned earlier. Oh and without fudging the research or faking results, please. |
| Specific information 5:  Steel shots for clay pigeon shooting works but let's not regulate just because. There are a lot of people with older shotguns that cannot use steel shot and again, lead does not disseminate into water (without acid, remember highschool chemistry?) so this is not an issue. |
| Specific information 6:  In Sweden it takes 8-20 weeks and anything from 1000 EUR to 5000 EUR to get a secondary shotgun that can shoot steel shot. And in somce cases you cannot get such a gun at all, due to limitations in how many guns you can own. DON'T REGULATE JUST BECAUSE IT IS THE ONLY TOOL YOU HAVE and DON'T REGULATE WHEN IT'S NOT NEEDED. |
| Specific information 7:  Yeah everyone loves more administration because everyone loves more cost. When it's not needed. Or very much not. Lead is not a disease, it does not spread. Lead is not dissolved by water, it does not spread unless you add acid. |
| SEAC Rapporteurs response: |

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| 1025 | Date/Time:  2022/07/26 13:18  Type:  Individual  Country:  Sweden | General Comments:  In regards of the lead ban.  To whom it may concern.  Is there a study that can be proven to be unbiased? As there is no such prof why banning lead in ammunition would be of any good. Lead in its solid for can not spread more then a few millimeters. No ground water is or such thing is in the danger zone. |
| Specific information 1:  Lead in hunting can be banned. But not in practice and competitions ammunition. |
| Specific information 3:  Such a ban would be horrific for the guns. New guns would have to be made and that’s not good for the environment. |
| Specific information 4:  There is no functioning substitut for lead pellets. |
| SEAC Rapporteurs response: |

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| 1026 | Date/Time:  2022/07/28 17:01  Type:  Individual  Country:  Sweden | General Comments:  I noticed it is the OPINION of RAC and SEAC, what about the FACTS? Should decisions, that have severe consequences on industries, businesses and private citizens, really be based on feelings and opinions?  Lead is a natural common metal in the soil and in its untouched state its surface is oxidized and does not emit anything into water. Lead in gas form is not healthy, agreed, but this is not applicable on ammunition and fishing sinkers.  Phone cables, protected by a lead jacket, buried in the ground for a hundred years have been analyzed and show no danger at all and we are talking of hundreds of thousands of metric tons in Sweden alone (https://www.sverigesnatur.org/aktuellt/gamla-kablar-innehaller-mycket-bly/).  Swedish forestry will suffer large costs if steel ammunition would be used, it destroys the saws. Some sport shooting is using steel plates, shooting at these with steel ammunition is dangerous because of the large risk of ricochets.  This is a political decision similar to closing nuclear power, based on unjustified fear, lack of knowledge and not a clue about the consequences. |
| Specific information 1:  This is not an issue since lead ammunition should not be banned. Steel ammunition can co-exist for particular purposes, but it cannot replace lead. |
| Specific information 2:  This is just as ridiculous as the Swedish tax on plastic bags in grocery stores. It does not have ANY positive effects, it just puts an extra tax burden on the private citizen. |
| Specific information 3:  This does not only affect historic guns, many contemporary guns would suffer damage, even risk of exploding, if steel ammunition is used. |
| Specific information 4:  Lead is relatively cheap and environmentally safe, replacing it with something of similar density would be extremely expensive. |
| Specific information 5:  There are many other shooting sports than clay shooting where the use of steel is impossible. |
| Specific information 6:  As mentioned before, steel is not possible in many shooting sports so time spent on switching from lead to steel is not applicable. |
| Specific information 7:  This is possible with INDOOR shooting ranges, but those are mainly for the police and not accessible for private citizens. |
| SEAC Rapporteurs response: |

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| 1027 | Date/Time:  2022/07/30 10:09  Type:  Individual  Country:  Sweden  Attachment:    Privacy statement:  No reason what so ever. | General Comments:  investigations carried out by the Swedish FOI in 2008 and which are reported in a white paper, (http://213.132.113.238/app/uploads/2017/10/Vitbok\_kulfang.pdf), show that lead in bullet traps has no leaching to groundwater (except in one case of 10,000 investigated firing ranges) and thus poses no danger to the environment. If shooting ranges, where large amounts of lead accumulate in one place, pose no danger to the environment, it is unlikely that small amounts of lead here and there would have any environmental impact at all. |
| Specific information 3:  http://213.132.113.238/app/uploads/2017/10/Vitbok\_kulfang.pdf |
| Specific information 4:  http://213.132.113.238/app/uploads/2017/10/Vitbok\_kulfang.pdf |
| Specific information 7:  http://213.132.113.238/app/uploads/2017/10/Vitbok\_kulfang.pdf |
| SEAC Rapporteurs response: |