



INTERNATIONAL SHOOTING SPORT FEDERATION

Statement of the International Shooting Sport Federation (ISSF) regarding the European Commission's draft proposal on the restriction of lead ammunition

The ISSF, as the Olympic international shooting sport federation, regulates the shooting sport around the world and therefore must manage and reconcile the rules of the sport taking into account the differences in social, economic and environmental conditions in different parts of the world. The history and consistency of the disciplines of our sport are based on technical standards and sports rules that apply worldwide. These include the type of firearms and ammunition to ensure the best and equal conditions in international but also national competitions.

With the following statement, the ISSF would like to give its comment on the European Commission's draft proposal on an EU-wide restriction on lead ammunition in outdoor shooting.

The European Commission's restriction proposal contains significant improvements compared to the European Chemicals Agency (ECHA) report with the proposed derogation for the use of lead "bullets". At the same time, there are still several planned regulations that would lead to far-reaching, unjustifiable problems from the perspective of sport shooting. This concerns the planned restriction on the use and placing on the market of lead "gunshot" ammunition, which we consider to be particularly critical. The conditions imposed for the continued use of lead gunshot ammunition are not proportionate and cannot be generally implemented in practice.

Major international shooting sport championships such as Olympic Games, World Championships, World Cups etc. take place in large shooting sport centres that can and do meet the requirements of the proposed derogations. However, there are only a few such centres and an essential prerequisite for the continued success of our sport is a complex network of different sized shooting ranges, which are used by sports shooters at different levels. There are great differences in the size and use of the shooting ranges and for many regional and local facilities of our member federations, the requirements now proposed by the European Commission are neither practicable nor necessary given the risks they pose. In several European countries, most shooting ranges are small to medium-sized and are run by local shooting, hunting or reserve clubs on a voluntary basis.

In addition, most shooting ranges are currently not authorised and equipped for the use of lead-free ammunition. Alternative ammunition places significantly different demands on shooting ranges. Due to changes in ricochet behaviour, far-reaching structural changes would be necessary to ensure a safe shooting environment. The mostly non-profit organisations that run shooting ranges on a voluntary basis are far from being able to cope with this enormous financial burden on their own. The enormous cost and workload for those who could continue is not feasible in the timeframe set by the European Commission; the planning, bureaucratic procedures, construction activities, licensing etc. cannot be done within a timeframe of 5 years, even 10 years might not be sufficient in many cases. The proposed derogations – especially the limitation of the derogation for another 10 years after the transition period –

ISSF Headquarters

Widenmayerstr. 16 - 80538 Munich, Germany
T. +49 89 544 355 0 - E. munich@issf-sports.org
VAT: DE 129517043 - www.issf-sports.org





would mean the closure of many shooting ranges and thus severely endanger the EU-wide shotgun shooting range infrastructure. This is because it is not possible to simply switch from lead to lead-free shotgun ammunition.

The possible ban on the use of lead shotgun ammunition would also pose considerable challenges for the individual sports shooters on all levels. Particularly against the backdrop of international competitions (including the Olympic Games), where the use of lead ammunition is mandatory, this would be a major competitive disadvantage for all EU countries in shotgun shooting. The lack of competitiveness at an international level would mean the end of the sport of shooting with shotgun ammunition in the long term.

Therefore, the ISSF calls for an enduring derogation for the use of shotgun ammunition on all authorised shooting ranges that meet the requirements for preventing lead from entering the environment in accordance with national legal requirements.

This will manage the risk of lead and maintain the social and economic advantages of shooting sport. The relevant and criticised regulations are discussed in detail in the appendix.

In conclusion, the ISSF strives to achieve the sustainability goals of the United Nations and the International Olympic Committee by using knowledge and technology to foster the sustainable operation of our sport. This path however goes far beyond the timeframe set by the European Commission's proposal. In this context, we also acknowledge the wish to change from lead gunshot to gunshot made of alternative materials. However, under the current technical development level of alternative gunshot ammunition this change seems not (yet) to be possible due to several reasons (ballistic, safety, range installations, costs etc.). If future developments of lead-free gunshot ammunition allowed its use for outdoor sports shooting without the negative effects mentioned, ISSF is ready to adapt their rules towards a use of non-lead ammunition on all levels.

Hoping for a favourable consideration of our concerns regarding the current restriction proposal, we are ready to discuss alternative solutions.

INTERNATIONAL SHOOTING SPORT FEDERATION
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The ISSF is the international governing body for all Olympic and several non-Olympic shooting sport disciplines, composed of 163 Member Federations from 149 countries or territories; 57 of them are also Member Federations of the European Shooting Confederation.



Appendix: Critical provisions of the European Commission's restriction proposal

Para. 21 Use of lead gunshot: *After a transitional period of five years, the carrying or use of lead gunshot for outdoor sport shooting will be prohibited.*

The transitional period of five years mentioned here until the ban on the use of lead-containing shotgun ammunition for sport shooting is clearly too short. The majority of all shooting ranges are currently not authorised and equipped for the use of lead-free ammunition. Alternative ammunition places significantly different demands on the shooting ranges. The necessary conversion of the existing shooting range infrastructure, particularly against the backdrop of possible ground renovations and the closure of safety-relevant gaps on shotgun ranges, is not feasible within this short time frame. In addition, the shooting range operators, most of whom are non-profit organisations, will then urgently need financial support from the EU and the national governments to adapt the existing infrastructure to the new requirements through appropriate permits and, in some cases, very cost-intensive conversion and refurbishment. It is not possible to simply switch from leaded to lead-free ammunition.

Para. 24 Placing lead shot on the market: *The ban on placing leaded shot on the market applies after a transitional period of five years.*

Here too, the proposed transitional period of five years is clearly too short. This is because lead shot will continue to be used as the sole material at international competitions in the future. For European athletes competing in international competitions, it is customary for them to use their own ammunition, specially adapted to their shotgun, both during training at home and when travelling abroad for international competitions. To this end, it is imperative that they can continue to purchase lead shotgun ammunition beyond the transitional period mentioned above and use it at various shooting ranges (see also paragraphs 25 and 26). As an alternative to a total ban on marketing, the ECHA had proposed a general exemption from the marketing ban on shot (with shot sizes between 1.9 mm and 2.6 mm) for sport shooting (with certain labelling requirements). Otherwise, this would mean the end of the international competitiveness of athletes from the EU.

Para. 25 Derogation for the use of lead shot on open shooting ranges: *For a period of 15 years, lead shot between 1.9 mm and 2.6 mm may continue to be used on authorised open shooting ranges under strict conditions; comprehensive documentation and reporting obligations apply (further conditions are regulated in Appendix X):*

- only members of shooting sports federations may use lead shot ammunition on the very shooting range where they purchased it

- the recognised shooting range keeps records of:

- the quantities of shotgun cartridges supplied to active members of a shooting sports organisation for use on that range;*
- the average weight of the gunshot in those cartridges;*
- the persons the cartridges were supplied to;*
- the weight of such gunshot recovered;*



These new derogation conditions created by the European Commission, in conjunction with the requirements of Appendix [X], represent a central point of criticism in our opinion.

This is because the operators of the shooting ranges to which this derogation is to apply are, in most cases, non-profit, volunteer-run clubs that are confronted with massive investment requirements and considerable bureaucratic documentation and reporting obligations. In order to fulfil these obligations, additional, hard-to-recruit staff and equipment are required, which of course also entails additional costs for the associations.

In addition, the restriction to the use of ammunition that may only be purchased and used at the respective shooting range is a further obstacle that runs completely counter to practical reality. This is because national team athletes in particular often use a specific make of ammunition that is customised for their particular shotgun barrel, which cannot be kept in stock at all shooting ranges. This ammunition - often also provided by sponsors - is then also taken abroad for international competitions, which would also not be possible with the planned regulation and would therefore also have a direct negative impact on the international competitiveness of European athletes. Conversely, the same applies to EU member states hosting international championships, to which foreign athletes also bring their own ammunition.

The time limit of the exemption (10 years after the transition period) requires investments to fulfil the exemption requirements (conversion, development of the reporting and documentation system, obtaining an ammunition trading permit), in particular the infrastructural requirements of the risk management measures in Appendix [X] (e.g. walls, drainage and surface water treatment), which are unrealistic and unreasonable, especially for the non-profit, volunteer-run clubs as shooting range operators.

In conclusion, we therefore call for the time limit on the derogation and for the use of the ammunition to be tied to the shooting range where the ammunition was purchased to be abolished. The bureaucratic reporting and documentation requirements must be significantly reduced, for example by only documenting the number of rounds fired and the amount of lead recovered in the course of lead recovery as required. These adjustments would justify the creation of the required documentation and reporting obligations, whereby the risk management measures are discussed under Appendix [X].

Para. 26 Derogation to the ban on placing lead gunshot on the market for use on open shooting ranges: *Gunshot may only be supplied by manufacturers to the operators of authorised shooting ranges and by them to the end user only for use on the shooting range concerned.*

With regard to this new derogation introduced by the European Commission, it should be pointed out once again that the owners or operators of the shooting ranges to which this derogation is to apply are non-profit, voluntary organisations. The requirement will now force them to acquire trading licences for the purchase and sale of shotgun ammunition - with all the legal and financial obligations that this entails. In view of the already existing difficulties in recruiting and retaining volunteers, the importance of which is always emphasised in Sunday speeches, it is foreseeable that this will lead to a further decline in voluntary work in the clubs.



At the same time, we would also like to refer once again to our comments on paragraphs 24 and 25 that the use of ammunition at other shooting ranges, where the ammunition is not purchased, is of central importance in terms of the international competitiveness of EU athletes.

Therefore, as proposed by the ECHA committees, a general exemption from the ban of placing lead gunshot (with shot sizes between 1.9 mm and 2.6 mm) on the market for sport shooting is required.

Appendix [X]: The Appendix specifies the risk management measures that apply to authorised open shotgun shooting ranges. *These are, in particular, lead containment measures, the recovery of lead shot at least every three years, the monitoring of the pH value in the soil, the handling of drainage water and documentation obligations.*

With the appendix - in conjunction with the already excessive bureaucratic requirements of paragraph 25 - the European Commission is creating requirements for shooting ranges for the continued use of lead gunshot ammunition, some of which even go beyond the risk management measures proposed by the ECHA, that are disproportionately high and unachievable.

Particularly with regard to the structural requirements, i.e. the provision of at least two of the listed lead containment measures (walls, nets, berms, ground cover), we cannot understand the facts and data on which the Commission has based this proposal. This approach, a second mandatory structural measure, cannot be derived from the ECHA report at least. Creating these additional necessary structural measures in the planned transitional period of only five years in order to be able to continue operating the shooting range for a further 10 years, for which the derogation is limited, is simply unrealistic. It means an end to the use of lead shotgun ammunition and thus also the end for many club-run shotgun shooting ranges, which can neither afford to convert to a different bullet material nor to make the investments required to convert to the temporary continued use of lead gunshot - and thus also for the internationally successful European shotgun shooters.

In addition, the new requirements introduced by the Commission regarding the monitoring and, if necessary, treatment of pH values in the soil are completely impracticable (for example, in the presence of a surface cover). It is not specified how, where and by whom these complex, semi-annual monitoring and, if necessary, adjustment measures are to be carried out. However, it is clear that they represent a considerable additional financial and bureaucratic burden for shooting range operators. The effectiveness of this additional measure introduced by the Commission at short notice remains unproven.

The Commission did not take up the approach put forward by the ISSF and other federations concerned of analysing the individual shooting ranges, their structural, topographical, operational requirements, etc., which would be far more expedient and at the same time more proportionate.