



EUROPEAN COMMISSION  
Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs  
Ecosystems I: Chemicals, food, retail  
Directorate-General for Environment  
Circular Economy and Green Growth

**Directors**

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**NOTE FOR THE ATTENTION OF  
MR B. HANSEN, EXECUTIVE DIRECTOR, ECHA**

**Subject:** Request to the European Chemicals Agency (ECHA) to prepare an Annex XV restriction dossier on substances containing polycyclic aromatic hydrocarbons (PAHs) in clay targets for shooting

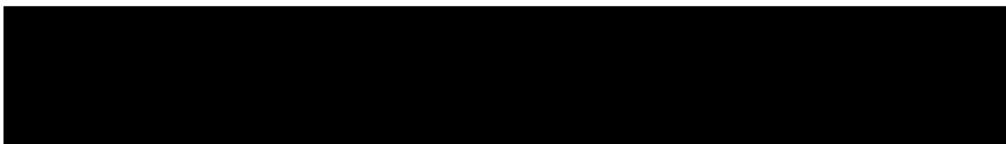
Clay target shooting is a sport involving shooting a firearm at special flying targets known as clay targets (or clay pigeons). Olympic disciplines include skeet and trap shooting. Clay targets can be manufactured with different types of binders, e.g. pitch, coal tar high temp.

Pitch, coal tar high temp. (mentioned hereafter as Coal Tar Pitch high temperature (CTPht)) was included in Annex XIV of REACH on 14 June 2017 due to its carcinogenic (Article 57 (a)), Persistent, Bioaccumulative and Toxic (PBT) (Article 57(d)), and very Persistent and Very Bioaccumulative (vPvB) (Article 57(e)) properties.

The sunset date (4 October 2020) for CTPht has passed, requiring ECHA to consider if the use of the substance in articles is adequately controlled, and if it is not, to prepare a dossier which conforms to the requirements of an Annex XV dossier for restriction (Article 69(2) of REACH).

Based on Article 69(2), ECHA has identified that the use of CTPht in clay targets (produced in the EU as well as imported) presents an EU-wide risk and therefore it will prepare an Annex XV restriction dossier to restrict this substance in such articles. Due to the complex nature of CTPht, in practice any restriction of CTPht in clay targets should be based on a concentration limit of the sum of indicator PAHs in the clay targets (as these are the SVHC constituents, due to which CTPht is identified as an SVHC and which are underpinning the identified risk).

Several alternatives to CTPht are currently in the market, such as Petroleum Pitch, Petroleum Resin, Eco Resin and Natural Resin. However, the exact identity of these



alternatives is not well known, in particular for the resins. Although most of the alternatives contain PAHs in concentrations lower than that of the CTPht, the PAH-containing alternatives also present a risk to the environment and human health.

It is well known that clay targets can be produced using different binders with varying PAH contents, but also using alternatives which are less harmful to the environment with substantially lower or no PAH-content.

In order to ensure a high protection of human health and the environment in the EU and avoid regrettable substitution, the Commission requests ECHA to prepare an Annex XV dossier on substances containing polycyclic aromatic hydrocarbons (PAHs) in clay targets for shooting. This restriction dossier should be closely linked/merged with the Annex XV restriction dossier pursuant to Article 69(2) that ECHA will prepare on the substance CTPht used as a binder in the clay targets.

### *Timing*

Based upon this request, ECHA shall enter the relevant notification into the Registry of Intentions (RoI) as soon as practicable and no later than 16 July 2021.

*(e-sign)*  
Kristin Schreiber  
DG GROW

*(e-sign)*  
Kestutis Sadauskas  
DG ENV