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

**Specific information requests:**

1. Have EU sanctions on Russia in response to the Ukraine war affected the availability of resins with low PAH content? If so, how? Can the quantity be adequately replaced by supplies from other trading partners?

1. Is there any experience with the use of crude tall oil (CTO) as a raw material for binders for clay targets that would comply with the conditions of the proposed restriction?
2. To producers of clay targets: Could you describe and provide figures of the switching costs that you would face in case of an immediate change to binder materials that fulfil the conditions of the restriction (CTs with <0.005% PAHs).
3. To chemical suppliers: Could you describe and provide numerical estimate of the amount of resins with low PAH content (if possible, define the content explicitly) that are placed in the market in EU? What are the market expectations for the coming years in terms of availability and price development?

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| Ref. | Date/Type/Org. | Comments |
| 1168 | Date/Time:2022/11/12 11:44Type:BehalfOfAnOrganisationOrg. type:CompanyOrg. name:LAPORTEOrg. country:France | General Comments:Dear Sir or MadamI am writing to you in my capacity as President of the Laporte Group, Europe's leading supplier of Clay Targets, official partner of the ISSF and supplier of targets for 9 Olympic Games.Since 1927, Laporte has never stopped innovating and investing in research to offer its customers quality products. We pay great attention to the ecological impact of our activity. For example, we were the first to stop using coal tar to manufacture our targets.We have taken note of the recommendations of the risk assessment committee of the European Chemicals Agency (ECHA), which has decided to limit the total authorized PAH content of clay targets. In the context of the consultation open until November 14, 2022 on this draft JRC opinion, I would like to draw your attention to the following points:- Laporte uses the Veritas office toControl the raw material before using itControl the finished product, the target, made from this raw material- 2/3 of a target is made of calcium carbonate without PAHThe results obtained have been constantly improving for years. As a result, the presence of PAH in our targets, considering the percentage of resin used, is low. The trend is therefore encouraging. Unfortunately, the production of this quality of resin does not yet reach the level of conventional petroleum resin, which makes it more expensive and, above all, more difficult to obtain.The main purpose of this letter is to draw your attention to the international situation (war in Ukraine, the main supplier of petroleum resin with Russia) which is a major obstacle to our raw material supply. The impact on prices (+30% to 60%), lead times and even the sustainability of the Clay Shooting Sport industry in Europe is very important.Therefore I urge you to reconsider the implementation of the standard by extending the transition period from 3 to 5 years.The current grades of petroleum resins that we can still get until HCR is produced in sufficient quantities are very suitable. An additional period would be the solution that would guarantee the sustainability of an Olympic and popular sport in Europe.Dear Sir or Madam, I am ready to discuss with the people concerned, including in partnership with other actors of the profession to unite our efforts towards a solution that would satisfy all parties.I am at your disposal,Best regardsJean-Michel LAPORTECEO |
| Specific information 1:The war in Ukraine is blocking deliveries and preventing our suppliers from producing the necessary quantities of resin. The prices are increasing considerably as well as the delivery times. |
| Specific information 2:Still in the testing phase |
| Specific information 3:the increase in the selling price of our products due to the replacement of the binder is about 30 to 50% depending on the raw material |
| SEAC Rapporteurs response:Thank you for your comments. In the opinion SEAC acknowledges that the war in Ukraine likely impacts the availability of raw material for the production of eco-friendly clay targets. Considering these circumstances, SEAC concludes that a one-year transition period adopting a PAH concentration limit of 0.1% seems justified. According to the available evidence, Russia is an important, but not the only supplier of eco-friendly binder material. Furthermore, the expected impacts of the restriction on producers and consumers have to be balanced against expected impacts to human health and the environment, which can be expected to increase and which will, given the persistence of PAHs, be long-term. Considering this SEAC considers a one-year transition period sufficient. |
| 1169 | Date/Time:2022/11/14 18:37Type:BehalfOfAnOrganisationOrg. type:National NGOOrg. name:Norwegian Association of Hunters and Anglers (NJFF)Org. country:Norway | General Comments:The Norwegian Association of Hunters and Anglers (NJFF) is the only nationwide interest organisation for hunters and anglers in Norway.Key numbers:116 000 members573 member clubsLargest clay shooting organization in NorwayIt seems clear from the draft opinion of SEAC that several consequences of the proposed restrictions are not assessed properly from a socio-economic perspective. The restriction seen from a consumer perspective, and the impact of potential decline in demand of clays, resulting in less shooting activity (and less trained hunters), is particularly missing.In Norway almost 10% of the population (528 408 persons) are registered hunters, and in our organization (NJFF) we have more than 10 000 active competitive clay target shooters. Competition shooters are generally not sponsored in any way, and highly increased cost will most certainly influence the demand – resulting in reduced activity amongst both hunters and competition shooters. We find it remarkable that SEAC finds it unlikely that the price increase if switching from petroleum resin to natural resin, will affect demand. The cost of almost all consumer products is increasing due to inflation, including clays. Other shooting related products, eg. ammunition, has had substantial price increase (more than most consumer products) the last years.Hunters need to practice in order to be good shooters and perform the hunting activity in accordance with animal welfare standards, and competition shooters must practice to be competitive. If we reach a point were “ordinary people” cannot afford to shoot clays, that will have significant consequences on the activity level.It is acceptable to convert to eco-friendly targets, but the RO4 seems to be a step too far, too soon. Besides the higher price, both availability and quality of natural resin clay targets are uncertain.The situation from a Norwegian perspective is that RO3, limiting PAH to 0.005% is a suitable goal, but there should be a reasonable transition period of at least one year. We don’t see the need for a transition period including CTPHT-targets, but a transition period allowing petroleum resin clays, 0.1% (RO2), should be a proportionate measure. That would be in line with the voluntary transition to eco-resin clay targets containing less than 0.005% PAH.A factor that is underestimated from SEAC, is the need of several suppliers of targets. In our experience different producers have targets with slightly different properties, even if the same binder materials are used. Reliability is important, and different clay target machines, different weather/temperature, and different clay disciplines may affect the choice of brand/clay producer.Sport shooting, and hunting in particular, is a cultural important activity and a major contribution to public health for several hundred thousand people in Norway alone. It also brings a lot of eco-friendly food to the table and contributes to environmental consciousness in the population.Regarding availability and timeframe for the restriction, we encourage SEAC to listen to the industry, and from our perspective we will point out the importance of having several suppliers/brands available before RO3 (0.005% PAH) enters into force. Due to the uncertainties regarding binder material, a transition period (RO2 / 0.1%PAH) should apply for at least a year, and with an option to prolong the transition if necessary to avoid disruption in supply.We sincerely hope and expect SEAC to take the information supplied by us and other stakeholders into consideration when making the final SEAC opinion.Norwegian Association of Hunters and Anglerswww.njff.no |
| SEAC Rapporteurs response:Thanks for the information and for the support of the proposed restriction. The analysis of impacts arising from the proposed restriction considers impacts on both producers, consumers, and possible impacts on human health and the environment. The assessment accounts for an increase of market prices of clay targets as a result of increasing prices for binder material. Furthermore, it is acknowledged that an increase of market prices for clay targets can impact demand. Given available evidence, this is more likely to be the case when switching to clay targets using natural resin (RO4). This is also reflected by average and incremental costs of RO4. SEAC does not consider the provided information to be strong enough to deviate from the conclusion that demand for clay targets is price inelastic as no information on the impact of price changes on demand was provided. If demand were more price elastic than assumed by the Dossier Submitter, clay target producers would likely pass on less of the cost increase in input prices to consumers to avoid impacts on the quantity demanded which would lead to lower impacts on customers at the expense of higher producer surplus losses. This does, however, not necessarily lead to a welfare loss from a social perspective. Furthermore, SEAC notes that a continued or prolonged use of PAHs in clay targets will increase the expected negative impacts to human health and the environment from such use, which are likely long-term considering the persistence of the substances. Therefore, a one-year transition period is considered sufficient by SEAC. |