

Specific information requests

Hunting

1. **Alternatives to lead for rim calibres:** As indicated in the Annex XV report, there is contradictory information on the accuracy of lead-free ammunition for rim calibres (such as .17 HMR, .22 LR, etc) for hunting. In some studies, lead-free ammunition for these calibres is claimed to be sufficiently accurate while in other studies it is disputed. Please provide information on the accuracy of lead-free ammunition for these calibres in the form of tests, field reports, or similar, as well as information on the development of lead-free alternatives for this type of ammunition in the future.
2. **Alternatives to lead for certain types of hunting:** The Annex XV report indicates that the suitability of lead-free ammunition for small game hunting with Full Metal Jacket bullets and for the population management of seals (where this is allowed) should be further explored in the consultation.
 - a. For **small game hunting with Full Metal Jacket bullets** (e.g. Nordic bird hunting), please provide information on (i) whether, and under what circumstances, the use of Full Metal Jacket bullets is permitted in the EEA and (ii) whether lead-free alternatives are available and their technical performance/suitability for this type of hunting.
 - b. For the **population management of seals**, please provide information that helps ECHA's Committees to better understand in how many EEA countries this takes place and whether lead-free alternatives are available and their technical performance/suitability for this type of hunting.
3. **Distinction between large and small calibres:** The current cut off between large and small calibres (5.6 mm) is based on a cut off for hunting roe deer found in hunting legislations throughout Europe. The smallest tested alternatives are in the calibre range of .222 and .223 (5.55 mm). Does the proposed cut off between small and large calibres adequately reflect the differences in the suitability and availability of alternatives?

Sports shooting

4. **Use of shooting ranges/areas for agricultural purposes:**
 - a. Please provide information on the use of shooting ranges/areas for agricultural purposes, including production of crops or horticultural products for human or animal consumption and other farming activities (e.g. cattle and poultry farming during periods when shooting is not practised). If possible, please provide quantitative information, such as the number of shooting ranges and areas (used either permanently or temporarily) in your country or region (with a focus on the EEA) that are used for agricultural purposes.
 - b. Does the current legislation in your country set limits to lead concentration in soil used for agricultural purposes?
5. **Measures to limit releases to the environment at trap and/or skeet ranges:**
 - a. What number and proportion of trap and/or skeet ranges (in your country or region or the EEA) have measures in place that allow the regular (at least once a year) recovery of more than 90% of the spent lead shot? How many individual trap and/or skeet stands are usually available at such a range? Please clarify how the estimates of the number of ranges and stands were derived and provide supporting evidence.
 - b. Please provide information on the types of measures that are used to reach this recovery rate and information on the costs of such measures (please provide details from example cases).

- c. Please provide information on measures required for containment of lead gunshot and the monitoring and, where necessary, treatment of surface (run-off) water – including information on the type and cost of such measures (also in relation to the number of stands covered).
6. **Measures to limit releases to the environment at outdoor rifle/pistol ranges:**
 - a. What number and proportion of outdoor rifle/pistol ranges (covering all firing lines) in your country or region or EEA have bullet traps in place? Please clarify how this estimate was derived and provide supporting evidence. Are measures in addition to bullet traps implemented to limit releases to the environment?
 - b. If bullet traps are not used, which other measures are in place to limit releases of lead to the environment?
7. **Measures to limit exposure of shooters:**
 - a. Please provide information on the recommendations and measures that are implemented at outdoor shooting ranges to limit lead exposure of the shooters.
 - b. Are there any recommendations on the blood lead monitoring of sports shooters or any data on the lead exposure of sport shooters in your country or region?
8. **Remediation of shooting ranges/areas:**
 - a. Is remediation of shooting ranges and areas at the end of life foreseen by national legislations in your country or region (with a focus on the EEA)?
 - b. If this is foreseen, who is responsible for financing and carrying out the remediation?
 - c. How are risks managed at the end of life if no remediation takes place (considering that runoff water may also contaminate land, groundwater and surface water outside the perimeter of the site)?
9. **Substitution of lead ammunition in outdoor sports shooting:**
 - a. For **gunshot**, are there initiatives (in Europe or elsewhere) to phase out the use of lead ammunition in international sports shooting? What would be a reasonable timeframe to reach a decision on this matter and to implement this in international sports shooting competitions?
 - b. For **bullets**, the Annex XV report describes limitations in the availability and suitability of lead-free alternatives due to the accuracy requirements in sports shooting. Please provide information in the form of tests, field reports, or similar, as well as information on the development of alternatives for this type of ammunition in the future.

Fishing

10. **Home-casting of lead fishing sinkers and lures:** The Dossier Submitter assumes that home-casting is a popular activity among fishers. Furthermore, it is assumed that if a restriction only applied to the placing on the market but not to the use of lead fishing tackle, home-casting would become more popular. Please provide any supporting information that would allow ECHA's Committees to evaluate these assumptions, such as information on the proportion of fishers making their own lead fishing sinkers and lures or information on the proportion of home-cast lead fishing sinkers and lures compared to purchased ones.
11. **Alternatives to lead in fishing tackle:** Please provide information and supporting evidence on the availability of lead-free alternatives for the different types of lead fishing tackle (i.e. sinkers and lures ≤ 50 g and > 50 g, as well as lead wires). If no alternatives exist, please explain what analysis this conclusion is based on.

Horizontal issues

12. **Impacts of the proposed restriction:** The Annex XV report proposes a concentration limit of 1% w/w for placing on the market and use, as well as different transition periods for different types of hunting (gunshot / small calibre bullets / large calibre bullets), sports shooting (gunshot / bullets) and fishing tackle (lead wires and 'intentional release weights' / sinkers and lures \leq 50 g / sinkers and lures $>$ 50 g). Please provide information on the impacts of the proposed restriction (costs and benefits to society, including industry and SMEs) and consider how these impacts would vary dependent on the concentration limit and the duration of the proposed transition periods. Please refer to Annex XVI of REACH for an overview of the elements that should be included in an impact assessment.
13. **Monitoring of environmental exposure:** Please provide information on any organisations in Europe regularly monitoring the impacts related to the exposure of wildlife to lead ammunition and lead fishing tackle.
14. **Voluntary military training:** The Annex XV report describes the practice of 'voluntary military training' that is reported to take place in some EEA countries. Please provide further information on this practice including a justification for why lead ammunition is required and why a specific derogation for this activity is needed beyond the existing proposed scope and derogations.