



INTERNATIONAL SHOOTING SPORT FEDERATION

The Secretary General

To the European Commission

Munich, June 1, 2023

ISSF position on the restrictions proposed by ECHA regarding the use of lead in outdoor shooting

Dear Sirs/Madams,

The International Shooting Sport Federation is the international governing body for Olympic target shooting sport disciplines, and we have grave concerns regarding the currently proposed restrictions on the use of lead ammunition for sport shooting prepared by ECHA and now submitted to the European Commission.

ISSF would like to address the outcomes of the risk assessment performed by ECHA and the resulting recommended derogations. We must highlight that our federation regulates shooting sports all over the world and therefore we consider and reconcile situations and conditions even outside the EU. The history and consistency of our sport's discipline are based on technical standards applied all over the world. This includes the type of firearms and ammunition and the local supply chain for their production and supply, ensuring equal conditions in international competitions. Any modification of these technical standards requires in-depth evaluations together with all national federations. While it is likely possible for shooting facilities that host our major events (World cups, and major games) to meet the requirements of the lead use derogations identified by ECHA, the requirements are not viable or necessary for many of our member federation's regional and local facilities nor are they necessary given the risks that they pose.

The major events, such as World Cups, and major games, and Olympic Games are often taking place in large showcase shooting sport centres that can and do meet the requirements of the ECHA's derogations. However, there are only few such centres and a vital condition to the shooting sport's continued success is a complex network of different sized shooting ranges containing different kinds of disciplines utilised by sport shooters hunters, voluntary military training, recreational shooters, police, border guard, customs, historical weapon collectors, persons in charge of animal protection at the airports and technical test shooters. There is also a great variation in the sizes of shooting ranges. In several European countries, most of the shooting ranges vary from small to medium size and they are operated by the local shooting, hunting or reservist clubs with volunteers. The ISSF will not specifically address the impacts of the lead munitions ban to public safety, and national security but we urge decision makers to ask questions as to the unintended consequences of the loss of firearm proficiency and access to munitions and their components manufactured in EU countries.

In the sports shooting portion (shooting ranges) of the restriction proposal, ECHA's knowledge on all various shooting disciplines and their specific features and demands is inadequate. They inappropriately assess the risk by ignoring the complexity in the proportionality of these ranges and ignore the socioeconomic impacts and with broad strokes propose a simple solution that creates great difficulties, costs and impracticalities for many EU countries. The ISSF, having also reviewed the science with experts, believes that the ECHA risk assessment does not adequately assess the variability of both the environment and geography of shooting ranges and the multiple different types of shooting ranges existing in the European community. ECHA demonstrates they do not understand target shooting sports and they make errors in assumptions because they do not take into consideration the variability of volume, uses, and sports practised at the shooting ranges. The actual risks that the majority of shooting ranges pose to the environment are minimal and many have already taken precautions recommended or required by their nation. Two examples of many of our concerns include: The actual risk of lead ingestion by wildlife in shooting range areas, which is the focus of the problem, does not seem to have been adequately considered in relation to the relatively low density of wildlife on these ranges as the activities deter the animals feeding presence. Secondly, in many locations, it is the shooting range that preserves the natural plant habitat in the region surrounding the facility in areas that would otherwise suffer degradation due to urban sprawl or other uses and thus it is a preferred activity on the landscape.

Based on the available scientific knowledge of lead in the environment, we believe that there are multiple ways to ensure our sport minimises its impact on the surrounding environment. Because of this, we believe the best approach is for facilities to use techniques to simply assess the site specific risk of lead, contain and manage this risk using the Best Available Techniques (BAT's) suitable for the particular environment of that shooting range.

The United Nations' sustainability goals take into account economic and social sustainability. We believe that the Socio-economic assessment committee (SEAC) has grossly underestimated the socio-economic value and impacts of the sport and the ranges. Shooting ranges provide a lifelong sport suitable for athletes with a disability and all genders over a great range of ages and physical abilities. It is a welcoming low-impact sport providing the opportunity to participate in both competition and recreation. Shooting ranges have long histories of providing a valuable social and economic advantage to many rural areas in our European Nations. The currently proposed solutions would mean the mass closure of shooting ranges and the loss of shooting disciplines. The huge cost and workload for those that might be able to continue for the economically advantaged will not be feasible in the timeline identified by ECHA. The derogations proposed will needlessly put many small shooting ranges out of business and the sport will be unavailable for rural residents. We strongly believe in the need to balance the benefits of sports participation with globally shared rules with the minimal risks posed by their shooting ranges. We believe it is possible to make scientifically supported decisions to ensure the environmental compatibility of each shooting discipline, with specific and local requirements, rather than having broad requirements to apply to all disciplines and all shooting ranges.

No need for restriction as there already is a sustainable solution.

There is an existing and tested approach for the risk assessment and management of shooting ranges that enable the practising and competing at the shooting ranges and does not threaten sport shooting.

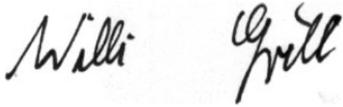
Shooting ranges should be left totally out of the restriction and alternatively Risk Management Measures (RMM's) based on agreed to sound risk management principles should be accepted. Actions like Best Available Technology solutions for that shooting range instructed by the national authorities should be acceptable. This will manage the risk of lead and maintain the social and economic advantages of shooting ranges.

The ISSF has developed a set of guidelines to identify ways in which our sport can become more environmentally, socially and economically sustainable while hosting our major competitions. The reduction of paper use, plastics reduction, and recycling, and lead containment and recycling are all a part of our risk management guidelines.

The ISSF is committed to achieving the sustainability goals of the United Nations and the International Olympic Committee; to use knowledge and technology to implement these goals into the operation of our sport following a path that takes into account all variables and that is shared globally. This continuous improvement path takes into account global variables including further studies and adoption of new technology. This path however goes far beyond the timeframe set by the ECHA proposal, with respect to which, and for the reasons set out in this letter, we express our disagreement.

Please contact our office should you want to further explore our position or discuss the issues.

Respectfully yours

A handwritten signature in black ink, appearing to read 'Willi Grill', written in a cursive style.

Willi Grill