

(English version)

**Priority question for written answer P-001769/25
to the Commission**

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(30 April 2025)

Subject: Proposed ban on lead in ammunition

We are writing to express our concern regarding the proposed near-total ban on the use of lead in ammunition under the REACH framework. While we acknowledge the importance of environmental and public health considerations, we urge the Commission to consider the significant strategic, industrial and security-related consequences that such a measure would have for the EU and its Member States.

The potential consequences of this ban are substantial. Industry estimates from 2021 (before the war in Ukraine) suggest that a lead ban without adequate transition measures could result in annual losses of up to EUR 4 billion, the loss of over 16 000 jobs across the European Economic Area and additional welfare costs exceeding EUR 1.4 billion.

Can the Commission therefore answer the following:

1. How does the Commission plan to compensate for or offset the projected industry and employment losses in the event that the lead ban is implemented as proposed?
2. What mechanisms will ensure that the Member States can maintain an uninterrupted, compatible supply of ammunition, especially in situations requiring rapid production scaling?
3. How will the Commission ensure that new dependencies on imported raw materials from third countries will not undermine the EU's strategic autonomy and environmental goals?

Submitted: 30.4.2025

Answer given by Executive Vice-President Séjourné on behalf of the European Commission
(13 June 2025)

The European Chemicals Agency's Committee for Socio-Economic Analysis concluded ⁽¹⁾ in its assessment that the proposed restriction of lead in ammunition is proportionate, i.e. the expected benefits compensate the expected costs.

The regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) ⁽²⁾ does not provide for compensatory mechanisms, because restrictions are proposed after thoroughly assessing their estimated costs and benefits.

In its proposal, the Commission paid close attention to preserving Member States' defence preparedness as well as the Union's strategic autonomy and security of supply.

To this end, it (i) excludes all military and defence applications from the scope, and (ii) allows the continued use of lead bullets (the most common ammunition used for defence purposes) in civilian sports shooting ranges, without conditions.

This will ensure that the demand for lead bullets remains at pre-restriction levels as the market for lead bullets is driven by bullets for sport shooting.

Production lines for lead bullets will therefore remain economically viable and available should there be a need to scale up production for military uses.

The restriction is not expected to bring new dependencies from third countries as most lead and steel used in ammunition already come from outside the EU. The proposed obligation to recover spent lead will rather help reduce the existing dependence.

⁽¹⁾ Committee for Risk Assessment (RAC), Committee for Socioeconomic Analysis (SEAC). Opinion on an Annex XV dossier proposing restrictions on Lead and its compounds (2 December 2022). <https://echa.europa.eu/documents/10162/2c82ef18-ce5d-4b4f-8ff0-002932154acc>.

⁽²⁾ Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) (OJ L 396 30.12.2006, p. 1). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1907-20241218>.