



Plenary sitting

B10-0431/2026

1.10.2026

MOTION FOR A RESOLUTION

pursuant to Rule 115(2) and (3) and (4)(c) of the Rules of Procedure

on the draft Commission regulation amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards lead in gunshot (D105447/07 – 2026/2824(RPS))

Pietro Fiocchi

on behalf of the ECR Group

European Parliament resolution on the draft Commission regulation amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards lead in gunshot (D105447/07 – 2026/2824(RPS))

The European Parliament,

- having regard to the draft Commission regulation amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards lead in gunshot (D105447/07),
 - having regard to 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), establishing a European Chemicals Agency (ECHA), amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC¹, and in particular Article 68(1) thereof,
 - having regard to the opinion delivered on 25 June 2026 by the committee referred to in Article 133 of the above Regulation,
 - having regard to Article 5a(3)(b) of Council Decision 1999/468/EC of 28 June 1999 laying down the procedures for the exercise of implementing powers conferred on the Commission²,
 - having regard to Rule 115(2) and (3) and (4)(c) of its Rules of Procedure,
- A. whereas measures adopted pursuant to Regulation (EC) No 1907/2006 must comply with the general principles of Union law, including proportionality and legal certainty;
- B. whereas lead is a hazardous substance of recognised concern for human health and the environment; whereas measures aimed at reducing unnecessary releases of lead into the environment can therefore pursue the legitimate objectives of public health and environmental protection, provided that such measures comply with the general principles of Union law;
- C. whereas scientific contributions, technical studies and observations have been submitted by the Fédération Internationale de Tir aux Armes Sportives de Chasse and the European Shooting Confederation to the European Chemicals Agency (ECHA) and the Commission between 2020 and 2025 in relation to clay target sport shooting and the proposed restrictions on lead;

¹ OJ L 396, 30.12.2006, p. 1, ELI: <http://data.europa.eu/eli/reg/2006/1907/oj>.

² OJ L 184, 17.7.1999, p. 23, ELI: <http://data.europa.eu/eli/dec/1999/468/oj>.

- D. whereas the assessment underpinning the proposed restriction identifies consumption of game meat from animals hunted with lead ammunition as a relevant pathway of human exposure to lead; whereas ECHA's Committee for Risk Assessment (RAC) identified the greatest concern in relation to infants and toddlers in hunter families, while considering the corresponding risks for adults likely to be low and acknowledging significant uncertainties concerning exposure; whereas those differentiated findings are relevant to whether the scope and intensity of the proposed restriction are proportionate across the populations, uses and exposure scenarios covered³;
- E. whereas the availability of lead-free ammunition on the Union market, including steel, bismuth, tungsten-based materials or copper, does not in itself establish that suitable alternatives are technically equivalent, safely interchangeable and practically available for every firearm, calibre, shooting discipline or hunting use; whereas differences in density, hardness, deformation and other physical and ballistic characteristics can affect firearm compatibility, pressure and velocity, effective range, terminal performance and ricochet behaviour; whereas safe substitution might therefore require adaptations in ammunition selection, firearms, shooting practices or range-safety measures⁴;
- F. whereas the Permanent International Commission for the Proving of Small Arms (CIP) sets internationally recognised standards for firearm proofing and ammunition testing, including requirements relevant to steel shot; whereas not all Member States are contracting parties to the CIP and equivalent proofing and testing conditions cannot therefore be presumed throughout the Union; whereas requiring large-scale substitution could result in alternative ammunition being used in older or previously proofed firearms despite material differences in pressure, compatibility and proof status; whereas high-performance steel ammunition used in firearms not designed or appropriately proofed for such loads can create serious safety risks; whereas a Union-wide substitution requirement should therefore be accompanied by a coherent framework ensuring safe firearm-ammunition compatibility, appropriate information to users and clear allocation of responsibility⁵;
- G. whereas the proposed restriction allows Member States, subject to specified conditions, to retain certain stricter existing national rules on lead gunshot; whereas directly applicable Union rules should provide a coherent framework across the internal market;
- H. whereas differences identified between official-language versions of the draft Commission regulation, including the Italian-language version, might affect the interpretation of the prohibition or conditions governing derogations; whereas, since all official-language versions of Union legislation are equally authentic, any material discrepancies should be resolved before the restriction applies in order to ensure legal certainty and uniform application throughout the Union;
- I. whereas substantial differences in hunting practices and ammunition use across the

³ ECHA, Supplementary Opinion of 1 December 2022 on the restriction dossier on lead in outdoor shooting and fishing, p. 12, <https://echa.europa.eu/documents/10162/e0a5c108-a7ed-dbd3-67ce-d00a6470d8ce>.

⁴ See: ECHA, 'Lead in ammunition for outdoor shooting and in fishing', Questions and Answers, 30 November 2022, Questions 2–4 on non-lead alternatives and firearm compatibility.

⁵ Permanent International Commission for the Proving of Small Arms (CIP), Decisions, Tables and Technical Regulations concerning proof of firearms and ammunition, including requirements applicable to steel-shot cartridges and firearms intended for their use.

Union mean that the practical feasibility and appropriate duration of the transition from lead gunshot cannot be assessed uniformly; whereas, while hunting in some Member States relies predominantly on rifles and single-projectile ammunition, in others, including parts of southern Europe, shotguns and lead shot remain extensively used for the hunting of migratory and other birds; whereas those Member States, regions and hunting practices will consequently be affected to a materially greater degree by the restriction; whereas the transition to non-lead gunshot raises particular challenges concerning the compatibility of existing firearms with alternative ammunition, the availability and affordability of suitable shot-shell loads across different calibres and hunting applications, and the capacity of manufacturers, distributors and users to adapt; whereas, in those circumstances, even the proposed seven-year transitional period might not be sufficient for certain uses and regions in which dependence on lead shot remains particularly significant and technically suitable, safely compatible and practically affordable alternatives are not yet available at the necessary scale; whereas transitional periods should therefore reflect demonstrated technical and practical conditions of substitution and, where justified by those conditions, allow sufficient additional time to ensure that the restriction can be implemented safely, proportionately and effectively across the Union;

- J. whereas the draft Commission regulation allows for the continued use of lead gunshot for outdoor sport shooting only through a derogation limited to gunshot between 1,9 mm and 2,6 mm, subject to cumulative conditions concerning, *inter alia*, federation membership, range-specific risk management and record keeping; whereas the necessity and proportionality of those conditions should be assessed against whether equivalent environmental protection could be achieved by less burdensome means;
- K. whereas shooting ranges benefiting from that derogation would be required to comply with prescribed lead-containment measures, periodic recovery of spent lead, monitoring of soil pH and drainage water, and record keeping; whereas applying the same combination of measures to ranges with different configurations, environmental conditions and risk profiles raises questions as to whether all such requirements are necessary and proportionate⁶;
- L. whereas, during ECHA's and the Commission's preparation of the proposed restriction, some sport shooting associations submitted scientific and technical material on risk management at clay-target shooting ranges; whereas this evidence has not been shown to have been adequately reflected in the assessments underpinning the proposed restriction, particularly as regards the derogation for sport shooting; whereas that material identifies soil pH as a key determinant of lead mobility and indicates that, in neutral-to-alkaline soils, lead is strongly immobilised, while acidity increases solubility and migration; whereas pH monitoring and, where necessary, liming might therefore offer a site-specific means of controlling transfer to groundwater without routine excavation of spent shot;
- M. whereas the requirement to recover spent lead at least every three years applies irrespective of the rate of accumulation or the rate at which environmental risk changes;

⁶ ECHA, restriction material on lead in ammunition for outdoor sports shooting and fishing: the assessed approaches include conditions and risk-management measures intended to minimise releases from shooting ranges.

whereas at small and medium-sized ranges, recoverable quantities could take substantially longer than three years to reach an economically viable level; whereas recovery frequency should therefore reflect environmental monitoring and actual accumulation rather than a uniform calendar interval⁷;

- N. whereas ECHA and the Commission were provided with information on the practical and economic feasibility of the proposed range-management conditions; whereas ECHA estimates of approximately EUR 300 000 to EUR 600 000 for certain physical containment measures at a one-line trap range, against annual budgets of only a few thousand or tens of thousands of euros for many small and medium-sized clubs; whereas some prescribed containment measures might also be impracticable on the sloping, wooded, rocky or vegetated terrain used for non-Olympic disciplines;
- O. whereas surface plastic sheeting, although listed as a containment option, can create separate environmental impacts; whereas the technical material identifies soil sealing, impaired water infiltration, fragmentation into micro- and nanoplastics and disruption of soil biological activity; whereas those impacts should be assessed before surface covering is required where less intrusive site-specific measures can control lead mobility⁸;
- P. whereas requiring shooting ranges to comply with technically or financially impracticable conditions can make it impossible for many clubs to benefit from the derogation in practice and thereby deprive that derogation of its intended effect; whereas this raises concerns under the principles of proportionality and legal certainty;
- Q. whereas experience at Member State and European Environment Agency level demonstrates the importance of assessing technical substitutability under actual conditions of use; whereas Sweden, having envisaged a comprehensive prohibition on lead ammunition for hunting, retained differentiated rules after concluding that suitable lead-free ammunition was not available for all hunting situations, taking into account, *inter alia*, ricochet risks and impacts on timber processing; whereas Norway, after extending its prohibition on lead shot to all hunting in 2005, revised that approach in 2015 to allow lead shot for specified non-wetland species; whereas those experiences demonstrate that commercial availability alone does not establish technical substitutability for every use⁹;

⁷ Lenoir, N., ‘Legal analysis of draft Regulation D105447/6 on restrictions (REACH) applicable to lead in gunshot’ (‘Legal analysis’), 16 September 2026, pp. 15-16 (paras 60-65), recording FITASC/ESC data on the economics of triennial recovery and the typical annual cartridge volumes of small and medium-sized clubs,

https://api.fitasc.com/userfiles/files/plomb/20260916_legal_note_noelle_lenoir_D105447_eng.pdf; see also Seveque J.-L., technical note, 3 September 2026, p. 2, on slow corrosion/migration kinetics and recovery once accumulation is technically and economically viable, https://api.fitasc.com/userfiles/files/plomb/20260915_jl_seveque_note_technique_eng.pdf.

⁸ Seveque J.-L., technical note, 3 September 2026, pp. 3-4, identifying soil sealing, impaired infiltration, fragmentation into micro- and nanoplastics, effects on soil biological activity and recycling difficulties associated with plastic surface covering, https://api.fitasc.com/userfiles/files/plomb/20260915_jl_seveque_note_technique_eng.pdf; see also Lenoir, N., Legal analysis, 16 September 2026, pp. 19-20 (paras 87-93), https://api.fitasc.com/userfiles/files/plomb/20260916_legal_note_noelle_lenoir_D105447_eng.pdf.

⁹ Norwegian Ministry of Climate and Environment, Prop. 1 S (2015–2016), section ‘Bruk av blyhagl –

- R. whereas the economic and practical effects of the restriction are liable to vary substantially between Member States and affected activities; whereas the 2025 study ‘The Firearms and Ammunition Sector for Sporting, Hunting and Civilian Use in Europe’¹⁰ estimates, for the countries analysed and including induced effects, an overall economic value of approximately EUR 180,4 billion and 1,13 million jobs, as well as annual expenditure by hunters and sport shooters, excluding firearms and ammunition, of approximately EUR 96,3 billion; whereas, while those sector-wide figures do not estimate the impact of the proposed restriction, they illustrate the scale and diversity of the activities potentially affected and underscore the need to assess how its costs and impacts are distributed;
- S. whereas the draft Commission regulation excludes military, defence, police, security and certain other applications from its direct scope; whereas those exclusions do not in themselves address potential indirect effects on shared civilian and defence production capacity and supply chains, including machinery, raw materials, components, subcontractors and skills; whereas a significant contraction or conversion of civilian production could affect economies of scale and capacity capable of supporting military demand or surge requirements; whereas several Member States have raised concerns in the REACH Committee and the Council regarding security of supply, industrial resilience, surge capacity and preparedness¹¹, which should be fully assessed in light of the Union’s objective of strengthening its European defence industrial base;
1. Opposes adoption of the draft Commission regulation;
 2. Considers that the draft Commission regulation fails to respect the principle of proportionality, as the Commission has not sufficiently demonstrated that the restriction, in its present scope and form, is necessary and proportionate to the unacceptable risks identified, in particular because it applies across a wide range of distinct uses, exposure pathways and risk-management circumstances, without sufficiently establishing the contribution of each to the identified risk or the corresponding benefits of their restriction;
 3. Stresses that the human-health justification must distinguish clearly between the populations, exposure pathways and individual uses contributing materially to the identified risk; notes RAC’s differentiated findings concerning game-meat consumption; calls on the Commission to demonstrate, for each use covered by the restriction, its actual contribution to population exposure, the populations affected and the resulting incremental reduction in health risk;
 4. Finds that the Commission has not sufficiently demonstrated that commercial availability of alternative ammunition establishes technical equivalence, practical availability and safe interchangeability across the firearms, calibres, disciplines and hunting applications affected; calls for any revised assessment to address firearm

vedtak nr. 379, 3. February 2015’. Following the Storting’s decision, Norway permitted lead shot for hunting species not predominantly associated with wetlands while retaining the prohibition at shooting ranges. See also Norwegian Ministry of Trade, Industry and Fisheries, ‘Lead in shotgun (for use in shooting range and hunting)’, updated 24 June 2021.

¹⁰ Musso, F., Cioppi, M., Francioni, B., Curina, I., Ferracci, S., ‘The Firearms and Ammunition Sector for Sporting, Hunting and Civilian Use in Europe’, *FrancoAngeli*, 2025.

¹¹ <https://data.consilium.europa.eu/doc/document/ST-9225-2025-INIT/en/pdf>.

compatibility and proofing, pressure and velocity, effective range, ricochet behaviour, user adaptation and training and, in hunting applications, animal welfare;

5. Is of the view that a Union-wide ammunition substitution requirement introduced through a directly applicable Regulation must be accompanied by an equally robust and coherent level of firearms-safety assurance throughout the Union; stresses that responsibility for foreseeable risks arising from pressure, firearm compatibility and proof status cannot simply be transferred to individual users, particularly where Member States do not participate in the same CIP framework; calls on the Commission, in any revised measure, to demonstrate how compatibility with applicable CIP standards and equivalent safety requirements in non-CIP Member States will be ensured before substitution is required, and to clarify the respective responsibilities of manufacturers, proof authorities, economic operators, Member States and the Union framework;
6. Considers that the assessment underpinning ECHA's Committee for Socio-Economic Analysis opinion does not sufficiently reflect the full costs and impacts of the restriction or their distribution across Member States, sectors and categories of users; calls for a revised assessment to take greater account of differences in the availability and suitability of alternatives, existing national requirements and shooting-range infrastructure, as well as the costs of ammunition substitution, firearm testing, modification or replacement, user training, range investment and recurring compliance obligations, and to assess those effects against the expected environmental and human-health benefits¹²;
7. Expresses serious concern that excluding military and defence applications from the direct scope of the restriction does not in itself shield European defence production from indirect effects where civilian and military ammunition depend on the same industrial base; stresses that shared production lines, machinery, raw materials, subcontractors and specialised skills mean that contraction or conversion of civilian production may affect economies of scale, critical suppliers and capacity available for military demand; underlines that civilian capacity may also support surge requirements in an armed conflict or other major security crisis and that rebuilding lost capacity may require substantial time and investment; calls on the Commission to quantify, before proceeding, the restriction's effects on production volumes, costs, investment, strategic skills, supply-chain security and military surge capacity;
8. Calls on the Commission to withdraw the draft regulation and submit a new one to the committee based on a new, transparent and comprehensive impact assessment demonstrating that its scope, conditions, derogations and transitional periods are necessary and proportionate to the risks identified, supported by evidence on the technical and economic viability of alternatives and taking due account of firearm safety, site-specific risk management, socio-economic effects, industrial resilience and supply-chain security, in accordance with Article 68(1) of Regulation (EC) No 1907/2006;

¹² ECHA, Committee for Socio-Economic Analysis (SEAC), Opinion of 2 December 2022 on an Annex XV dossier proposing restrictions on Lead and its compounds, <https://echa.europa.eu/documents/10162/2c82ef18-ce5d-4b4f-8ff0-002932154acc>; See also; ECHA, "Lead in shot, bullets and fishing weights", Overview and Q&A.

9. Considers that the scope and cumulative conditions of the derogation for outdoor sport shooting, including prescribed risk-management measures, have not been sufficiently justified as necessary and proportionate to the risks identified; calls on the Commission to reassess whether equivalent environmental protection could be achieved through less burdensome, risk-based or site-specific measures;
10. Calls on the Commission, in any revised measure concerning outdoor sport shooting, to assess site conditions explicitly and, where scientifically appropriate, allow pH monitoring and corrective liming as a lead-mobility management measure in place of unnecessary physical containment¹³;
11. Calls on the Commission to replace the fixed three-year recovery interval with a risk-based approach reflecting soil and water monitoring, actual lead accumulation and the technical and economic viability of recovery¹⁴;
12. Calls on the Commission to assess the environmental impacts of surface plastic coverings, including soil sealing and micro- and nanoplastic pollution, before treating them as a generally applicable containment measure¹⁵;
13. Calls on the Commission to verify systematically the consistency of all official-language versions of provisions determining the scope of the prohibition, definitions, derogations and compliance obligations, and to correct any divergent wording before submitting a revised measure, in order to safeguard legal certainty and uniform application of Union law;
14. Calls for a socio-economic assessment to quantify whether small and medium-sized civilian sport-shooting clubs can in practice meet the cumulative costs of physical containment, site assessment, pH monitoring, runoff management and lead recovery without rendering the sport-shooting derogation unusable in practice¹⁶;

¹³ Seveque J.-L., technical note, 3 September 2026, pp. 2 and 4, supporting site-specific pH monitoring and corrective liming as a means of controlling lead mobility, https://api.fitasc.com/userfiles/files/plomb/20260915_jl_seveque_note_technique_eng.pdf; Lenoir, N., Legal analysis, 16 September 2026, pp. 11-12 (paras 40-48), addressing pH-dependent risk and less restrictive alternatives, https://api.fitasc.com/userfiles/files/plomb/20260916_legal_note_noelle_lenoir_D105447_eng.pdf.

¹⁴ Seveque J.-L., technical note, 3 September 2026, p. 2, on slow corrosion/migration kinetics and recovery according to accumulated quantity, https://api.fitasc.com/userfiles/files/plomb/20260915_jl_seveque_note_technique_eng.pdf; Lenoir, N., Legal analysis, 16 September 2026, pp. 15-16, (paras 60-65), on recovery economics and recurring site-management costs, https://api.fitasc.com/userfiles/files/plomb/20260916_legal_note_noelle_lenoir_D105447_eng.pdf.

¹⁵ Seveque J.-L., technical note, 3 September 2026, pp. 3-4, on the potential soil and ecosystem effects of plastic surface coverings, https://api.fitasc.com/userfiles/files/plomb/20260915_jl_seveque_note_technique_eng.pdf; Lenoir, N., Legal analysis, 16 September 2026, pp. 19-20 (paras 87-93), discussing those effects in the context of proportionality and legal certainty, https://api.fitasc.com/userfiles/files/plomb/20260916_legal_note_noelle_lenoir_D105447_eng.pdf.

¹⁶ Lenoir, N., Legal analysis, 16 September 2026, pp. 13-17 (paras 49-70), on the socio-economic effects of containment, recovery and recurring compliance costs for small and medium-sized clubs, including ECHA cost estimates and FITASC/ESC club-budget data; see also pp.17-19 (paras 72-85) on whether the derogation remains practically usable, https://api.fitasc.com/userfiles/files/plomb/20260916_legal_note_noelle_lenoir_D105447_eng.pdf.

15. Instructs its President to forward this resolution to the Council and the Commission, and to the governments and parliaments of the Member States.