



Comments by Reserviläisurheiluliitto ry (Finnish Reservist Sports Federation) and two of its member associations Suomen Reserviupseeriliitto ry (Finnish Reserve Officers' Federation) and Maanpuolustuskieltojen liitto ry (The Defence Guild's Federation of Finland) regarding the Opinion on an Annex XV dossier proposing restrictions on lead and its compounds Committee for Socio-economic Analysis (SEAC) Committee for Risk Assessment Committee (RAC)

**Ref.: ECHA/RAC/RES-O-0000007115-80-01/F,
Published on 3 June 2022**

The proposal by ECHA should be re-examined and corrected to ensure fair treatment of all shooting sports. Moreover, the proposal fails to add any value to the solutions adopted by Finland.

ECHA's proposal aims to address risks to human health and the environment by reducing the use of lead ammunition in hunting and other shooting activities. ECHA underlines that the proposal to ban lead ammunition is not intended to put an end to shooting or hunting, but to protect people and the environment. However, in its present form, the proposal would present a major setback for shooting as an activity. For all practical purposes, only government use would be exempted from the restrictions.

The strict environmental licensing procedure adopted by Finland, site-specific risk assessment and the use of best available technology at shooting ranges are more cost-effective ways of managing the environmental risks of shooting range operations than the proposed ban on lead ammunition, providing essentially the same level of safety. The information on shooting ranges referenced by ECHA and its background data display a number of gaps and conflicting conclusions. Based on this evidence, it cannot be shown that responsible shooting activities at the ranges would result in lead residues in game animals. Hence, shooting activities at environmentally licensed shooting ranges should be excluded from the restrictions regarding lead ammunition.

The risks associated with the use of lead as shot material on the other hand can be mitigated with lesser, yet efficient and more practical means than the restriction proposed by ECHA without endangering the goals of ECHA.



In order to achieve fair and equal treatment of all shooters, the proposed measures should be re-assessed based on input from organizations such as IPSC, RESUL (SRA) and other sport shooting organizations before taking the process forward.

Finland's defence doctrine is based on universal conscription and a large number of well-trained reservists. The voluntary shooting practices that reservists engage in play a crucial role in maintaining the shooting skills of the reserve. More often than not, reservists practice on shooting ranges other than those operated by the Defence Forces. A ban on lead ammunition, if implemented as proposed, would considerably limit reservists' opportunities for shooting practice. If implemented, the restrictions on the use of lead ammunition would result in a substantial reduction in the number of shooting ranges. Moderately priced non-lead ammunition is simply not available for reservists' shooting activities. Based on the foregoing, it is of utmost importance to be able to continue shooting activities using lead ammunition on licensed shooting ranges.

In all other respects, we concur with the comprehensive and well-founded opinion of the Finnish Shooting Sport Federation.

Veli-Matti Kesälahti
Executive Director
Reserviläisurheiluliitto ry

Erkki Saarijärvi
Chairperson
Reserviläisurheiluliitto ry