

To: Commissioner Thierry Breton
Cc: Commissioner Virginijus Sinkevičius

February 28th 2024

European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Subject: Delayed Commission's proposal for amendment to REACH Annex XVII – the restriction of lead in outdoor shooting and fishing

Dear Commissioner,

We are writing with concern about the Commission's delay to present Member States with a draft amendment to REACH Annex XVII regarding a restriction on lead in outdoor shooting and fishing.

It has now been a year since the European Chemicals Agency (ECHA) sent the opinions of its expert committees and a proposed restriction to the European Commission. Yet the Commission has not published its proposed amendment to the list of restrictions under the REACH Regulation. With every delay, lead continues to be dispersed into the EU environment from hunting, sports shooting, and fishing. If this remains unmitigated, an estimated 44,000 tonnes of lead will continue to be released annually from these sources, polluting our environment, and causing extensive and unacceptable toxic impacts on people, domestic animals, and wildlife.

The Commission has the opportunity to drive action to tackle this poisoning. We know that DG GROW and DG ENVI have worked hard to prepare a draft REACH restriction on lead in outdoor shooting and fishing, building from the thorough work of ECHA and its expert committees. Releasing the draft restriction to the REACH Committee now would leave a strong legacy for the current Commission and put us on a path towards meeting the zero-pollution ambition under the European Green Deal. It would also cement the EU as a leader in this space, alongside other countries and regions that are taking action, such as the USA.

We therefore urge you to present the draft restriction proposal to the REACH Committee for discussion and vote without further delay.

We are available for a meeting and can provide further information as necessary.

Sincerely,

Ariel Brunner, Director, **BirdLife Europe and Central Asia**

Katie-Jo Luxton, Director, **Royal Society for the Protection of Birds (RSPB)**

Patrick Ten Brink, Secretary General, **European Environmental Bureau**

Anais Berthier, Head of Brussels Office, **ClientEarth**

Angus Middleton, Previous Chief Executive Officer and Secretary General of the **European Federation of Associations for Hunting and Conservation (FACE)**

Dr Anna Watson, Director of Policy & Advocacy, **CHEM Trust**

Anthony David Fox, Professor of Waterbird Ecology, **Aarhus University**

Chris Baker, Director, **Wetlands International European Association**

Frida Hök, Deputy Director, **Chemsec**

Jesper Allan Frederiksen, Board Member, **Geology Society of Denmark**

John Swift, Retired Chief Executive of the **British Association for Shooting and Conservation (BASC)**; Previous Board Member, Bureau Member and Treasurer of the **European Federation of Associations for Hunting and Conservation (FACE)** and Chair of its Lead Ammunition Working Group

José Tavares, Director, **Vulture Conservation Foundation**

Sacha Dench, CEO, **Conservation Without Borders**; Ambassador for the **UN's Convention on Migratory Species (CMS)**

Dr Stefan Ferger, Deputy Head of Conservation, **EuroNatur Foundation**

Susana Fonseca, Vice-President, **ZERO – Association for the Sustainability of the Earth System**

Maria Reumert Gjerding, President, **Danish Society for Nature Conservation**

Mauro Furlani, President, **Federazione Nazionale Pro Natura**

Dr Niels Kanstrup, Hunter; Wildlife biologist, Department of Ecoscience, **Aarhus University**

Dr Oliver Krone, Head of parasitology and toxicology, **Leibniz Institute for Zoo and Wildlife Research**

Reineke Hameleers, CEO, **Eurogroup for Animals**