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NOTE

From: General Secretariat of the Council
To: Delegations

Subject: AOB item for the meeting of the “Agriculture and Fisheries” Council on 26 May 2025:
The proposed ban on lead in ammunition and fishing tackle under the Regulation on the registration, evaluation, authorisation and restriction of chemicals (REACH)
- Information from Czechia and Slovakia

In February 2025, the Commission presented a proposal to ban the use of lead in certain ammunition and fishing tackle under the REACH Regulation. The draft Commission Regulation is currently under consideration by the REACH Committee. Given the substantial impact of the proposal on agricultural matters, the delegations of Czechia and Slovakia consider it essential to highlight this issue within this formation as well.

The undersigned countries fully recognise the harmful effects of lead on human health and the environment and support the EU’s efforts to reduce exposure. However, in its current form, the proposed restriction raises serious concerns that go beyond toxicological risks. A sound and proportionate regulation must take into account broader industrial, strategic and environmental implications.

With respect to hunting and nature protection, the proposal lacks sufficient scientific analysis to confirm a significant negative impact of lead ammunition on biodiversity. Even species that feed on lead-containing offal and the remains of hunted game, such as common raven or white-tailed eagle, are increasing in population, suggesting that the impact might not be as extensive. Moreover, regular national monitoring of hunted game for lead content has not detected values exceeding permitted limits.

In addition, the large-scale introduction of lead-free ammunition could pose safety risks for hunters and the public due to differing ballistic properties. Lead-free ammunition tends not to deform upon impact, which increases the likelihood of dangerous ricochets. There is also a valid concern that, in short-term, the ban could jeopardise ongoing efforts to reduce populations of ungulate game and prevent damage to forests and many agricultural assets.

Similarly, the undersigned countries are concerned that the ban may have a disproportionately negative impact on the fishing sector. Recreational fisheries, aquaculture and marine fisheries would have to find alternatives to lead weights, which would lead to further increases in the price of fishing equipment, fish and fish products. The adequacy of alternatives for lead is not sufficiently supported by scientific studies, and it is possible that alternatives may also have an adverse effect on biodiversity or human health.

Most importantly, given the unprecedented security crisis in Europe and the ongoing Russian aggression against Ukraine, Czechia and Slovakia have serious concerns that this measure could negatively affect ammunition producers, their supply chains, and, consequently, the armed forces and the overall defence capacities of Member States. This proposal runs counter to the EU's objective of strengthening its defence industry and strategic autonomy, as outlined in recent defence initiatives such as the White paper for European Defence - Readiness 2030 and the EU Strategic Compass for Security and Defence.

Although the proposal excludes the armed forces and law enforcement from its scope, it does not adequately consider the consequences for ammunition manufacturers or the stability of the supply chain. While the final opinions of the Risk Assessment Committee and the Committee for Socio-Economic Analysis of the European Chemical Agency acknowledge the potential economic impact on ammunition manufacturers, they do not offer a comprehensive assessment of the economic and security implications, nor do they reflect the dramatically changed geopolitical context. In our view, such an assessment is essential in light of current security threats.

The ammunition industry is highly interconnected, with the civilian and military sectors sharing technologies, machinery, and raw materials. Both sectors in the EU also rely on the same subcontractors. Civilian use of lead ammunition constitutes a substantial portion of manufacturers' revenue. Transitioning to lead-free production would require significant investment in both time and capital, rendering the proposed transition period unrealistic and potentially detrimental to supply chain security.

In times of crisis, civilian ammunition production lines can be swiftly repurposed to strengthen military capabilities. This is only possible if the technology and supply chain in civilian production remain compatible with military production, which would no longer be the case after a forced transition to lead-free ammunition. Czechia and Slovakia consider this a serious interference with Member State's defence capabilities.

Finally, it is essential to recognise that EU citizens may not understand why the Commission and Member States are proceeding with a ban that could jeopardise ammunition supply chains at a time of looming trade conflicts, erosion of traditional transatlantic relations, and a grave security crisis.

For the reasons outlined above, Czechia and Slovakia urge the Commission to reconsider the matter and withdraw the current proposal at this stage.
