

Brussels, 11 June 2025
(OR. en)

9964/25

ENV 481
COMPET 497
MI 362
CHIMIE 43
IND 176
INDEF 42

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the Council (Environment) on 17 June 2025 The proposed ban on lead in ammunition and fishing tackle under the REACH Regulation - Information from Czechia, Lithuania and Slovakia

At the REACH Committee meeting on 27 February 2025, the Commission presented a draft Commission regulation amending Annex XVII to Regulation (EC) No 1907/2006 (REACH) as regards lead in ammunition and fishing tackle. The draft Commission regulation is now under consideration in the REACH Committee. Given the substantial implications of the proposal, Czechia, Lithuania and Slovakia consider it essential to highlight this issue at Council level too.

Czechia, Lithuania and Slovakia fully recognise the harmful effects of lead on human health and the environment and support the European Union's efforts to reduce exposure. However, in its current form, the proposed restriction raises serious concerns that extend beyond toxicological risks. A sound and proportionate regulation – particularly one as far-reaching and consequential as this – must also consider the broader industrial, strategic, environmental, and ethical implications. Several essential elements are currently missing, making it impossible to fully assess the consequences of the proposal and to move forward in a responsible and informed manner.

Given the unprecedented security crisis in Europe, and Russia's ongoing war of aggression against Ukraine, Czechia, Lithuania and Slovakia have serious concerns regarding the proposed ban on lead in ammunition. We are worried that this measure might have a **negative impact on ammunition producers, the related supply chain** and, as a result, on the **armed forces and overall defence capacity of Member States**. This measure also contradicts the EU's objective of strengthening its defence industry and strategic autonomy, as stated in all recent defence initiatives (**White paper for European Defence Readiness 2030, Strategic Compass for Security and Defence**).

While the proposal excludes armed forces and law enforcement from its scope, it does not sufficiently consider the **consequences for ammunition manufacturers** and the stability of the supply chain. Although the possible economic impact of the ban on ammunition manufacturers is mentioned in the final opinion of the Scientific Committees of the European Chemicals Agency, the proposal does not provide a **comprehensive impact assessment** of the economic and security implications and critically fails to reflect the changed geopolitical context. Such an impact assessment is, in our view, essential considering the current security threats.

The ammunition industry is highly interconnected, with the civilian and military sectors sharing similar technologies, machinery, and raw materials. In the EU, both sectors also rely on the same subcontractors. Civilian use of lead ammunition represents a substantial part of manufacturers' revenue. A transition to the production of lead-free ammunition requires significant investment both in terms of finance and time, making the proposed transition period unrealistic and detrimental to supply chain security. Ammunition producers would therefore face increased production costs stemming from the need to adapt their production lines and acquire new machinery, leading to potential disruptions and ultimately affecting the supply of ammunition for both military and civilian use.

In times of crisis, civilian ammunition production lines **can be quickly repurposed** to strengthen military capabilities. This is only possible if the technology and supply chain of civilian production correspond to those of military production, which would cease to be the case after a forced transition to lead-free ammunition. We consider this a major interference in Member States' defence capabilities.

The proposal acknowledges potential impacts on **civilian outdoor shooting ranges** but fails to adequately address their role in terms of security and defence. Shooting ranges are essential not only for recreational and competitive shooting but also for the training of law enforcement personnel and civilian firearm owners. The proposed environmental risk management measures are, in many cases, technically impractical. Moreover, the 15-year transition period is not sufficient and does not reflect the **important role played by civilian shooting ranges in national security**, with the current security crisis expected to worsen in the medium term. Restricting the operation of civilian shooting ranges could therefore weaken national resilience, preparedness and mobilisation capacities going forward.

Beyond defence considerations, it should be stressed that while substitutes for lead, such as copper and bismuth, may indeed reduce toxic exposure, they often entail higher energy use, greater raw material demands, and an increased environmental burden in terms of extraction, production and disposal. Without a comprehensive life cycle assessment, the actual environmental benefits of this switch remain a matter of speculation. A robust comparative life cycle analysis of lead and non-lead ammunition is therefore indispensable to assess the true environmental impacts across the full supply chain.

Regarding **steel, the main alternative to lead ammunition**, it is important to consider that unlike lead ammunition, most steel shot is sourced outside EU and NATO countries, further exposing the EU to strategic vulnerabilities. From an environmental point of view, steel shot production is much more energy intensive, leading to a higher carbon footprint. Alternative raw materials such as copper, zinc, tungsten and bismuth also originate from non-EU countries, and their extraction is unlikely to comply with EU environmental standards. Other alternative materials are not yet sufficiently available, which could again lead to supply shortages and increased costs. In this context, the current volatility in the markets makes it impossible to predict the impact on the availability of these raw materials.

Regarding civilian use, it is also important to note that lead-free alternatives lack the ballistic properties and penetrability of lead-based ammunition. Their tendency not to deform upon impact increases the likelihood of dangerous ricochets posing a **risk to both hunters and the public**.

Finally, it is essential to keep in mind that EU citizens might not understand why **the Commission and the Member States** are moving ahead with a ban that might jeopardise ammunition supply chains at an unprecedented time of looming trade wars, the dismantling of traditional transatlantic relations and a grave security crisis.

Based on the arguments outlined above, we believe that the security implications outweigh the environmental objectives. **Therefore, Czechia, Lithuania and Slovakia invite the Commission to reconsider the matter and withdraw the submitted proposal at this stage.**
