

EFTTA Position Lead Ban 2022

- 01/17/2022
- News

Instead of use ban EFTTA pleads for sales ban, import control and consumer information

EFTTA has given inputs previously, including a response to the RAC (Risk Assessment Committee) opinion consultation. During the process EFTTA has changed its opinion on a couple of points:*

1 – Use ban?

Previously we have argued in favour of a use ban. However, having listened to the arguments against we agree a use ban is not needed. A sales ban, import control and consumer information should be enough to achieve what is intended within a reasonable timeframe.

2 – Derogation for lead in brass:

Previously EFTTA has argued in favour of a derogation for lead in brass of 4% (instead of the proposed 1%). EFTTA members now accept 3% but less than that would require new costly machinery and product design changes. We understand the intention of making things easy by setting 1% as a limit for all products. However, the SEAC draft opinion does suggest 3% for some ammo: “Updated proposal: The updated proposal would allow lead in concentrations of up to 3 % w/w in bullets and pellets primarily made of copper or copper alloys (e.g., brass). This derogation would need to be reviewed before entry into force to determine if a concentration of less than 1 % can be achieved.”

Concerning the mention, that “SEAC points out that the threshold in the restriction of lead gunshot in or around wetlands is also 1 % w/w”. We would like to stress that when that 1 % limitation was discussed and decided for ammo in wetlands, we were not part of that discussion as this was and is about ammo only, not fishing tackle.

3 – Derogation for small dust shots of 0.06 grams or less:

We have argued, and still do, in favour of a derogation for these small dust shots as anglers tell us that there are no durable alternatives. Tungsten putty is not prudent our informants tell. It often falls off the line when used in small quantities. Here an angler explains that to avoid putty falling off the line you should stick it onto the split shot (sic): From time 2 min 10 sec: https://youtu.be/3C0lyp3Bl_4

This derogation would be the same as the one in place in the UK today since 1986:

“Since the introduction of The Control of Pollution (Anglers’ Lead Weights) Regulations 1986 there has been a substantial reduction in incidences of lead poisoning of swans”

https://www.legislation.gov.uk/ukxi/2015/815/pdfs/ukxiem_20150815_en.pdf

*) Committee for Risk Assessment

The Committee for Risk Assessment (RAC) prepares the opinions of ECHA related to the risks of substances to human health and the environment in the following REACH and CLP processes. The final decisions are taken by the European Commission.

ECHA: European Chemicals Agency

The European Chemicals Agency (ECHA) works for the safe use of chemicals. It implements the EU's groundbreaking chemicals legislation, benefiting human health, the environment and innovation and competitiveness in Europe. [More...](#)

Understanding REACH

REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals. REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry. It also promotes alternative methods for the hazard assessment of substances in order to reduce the number of tests on animals. [More...](#)

Understanding CLP

CLP stands for the Classification, Labelling and Packaging (CLP) Regulation ((EC) No 1272/2008). The regulation is based on the United Nations' Globally Harmonized System (GHS) and its purpose is to ensure a high level of protection of health and the environment, as well as the free movement of substances, mixtures and articles. [More...](#)

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