



**Comments from the Nordic Shooting Region on the
Opinion of the on an Annex XV dossier proposing restriction on Lead and its
compounds**

Committee for Socio-economic Analysis (SEAC)

Committee for Risk Assessment Committee (RAC)

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The Nordic Shooting Region (NSR) was established in 1921 and now comprises the shooting sport federations of Estonia, Finland, Sweden, Norway, Denmark, Great Britain, Iceland, and Faroe Islands – counties with nearly 100.000.000 citizens and a strong history for combining sport and high level on environmental issues.

The purpose of the Nordic Shooting Region is to maintain, to strengthen and to develop the Nordic regional co-operation in the field of shooting as a sport, primarily by organizing the Nordic Shooting Championships, in turn between the member federations

The Nordic Shooting Region shall directly or indirectly ensure the common interests of the national federations in the European Shooting Confederation and in the International Shooting Sport Federation.

NSR decided at the latest General Assembly to forward common concern comments on the proposed restriction on Lead and its compounds.

NSR has not concluded any comments on its own. But stands on the comments from our member nations of NSR.

The comments from our member nations regarding national concerns on time limits, expenses to implement the proposed restriction, is largely to comply for all the NSR member nations.

NSR are aware, as are the national health and pollution organizations in our countries, of the problems with human intake of lead. However, in the Nordic Region pollution control is strict and concise, and on many ranges environmental adaptations is already in place:

- Shooting Ranges is in many countries a closed area not used for any other purpose
- The use of Lead Gunshots is in many countries banned
- The Municipalities is very strict in making environmental permits
- There is often a commitment to solve issues locally with respect to possibilities in environmental and economical solutions

NSR member nations has forwarded comments on the proposed Lead restriction stating an enormous amount of time, and not at least an economical burden, that for NSR member nations is out of the ordinary.

It will be impossible to implement the proposal due to lack of funds and time.

NSR urge the Committee for Socio-economic Analysis (SEAC) and the Committee for Risk Assessment Committee (RAC) to take in consideration the comments from our member states (i.e., Finland, Norway, and Denmark):

- To consider the proposal on how to derogate Lead on Shooting Ranges to a more local implementation taking in on site risks and derogation at the local Shooting range since all ranges are different in location, soil, and risk
- To consider the proposals time frame since it will be impossible to implement the proposal due to the fact of the numbers of ranges and the numbers of possible contractors
- To consider the cost for establishing derogations as this will be substantial (several billion Euro) due to the number of Shooting Ranges that must undergo changes.

On behalf of the Nordic Shooting Region

Erik Balk Mouritsen
President

Lars Green Bach
General Secretary