



POLGÁRI KÉZILŐFEGYVER- ÉS LŐSZERVIZSGÁLÓ Kft.

Civilian Small Arms and Ammunition Examiner Ltd.

The Hungarian Proof House

Banc d'épreuve de Hongrie

Ungarisches Beschußamt



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In order to support of the Committee of Socio-economic Analysis (SEAC) through consultation on its draft opinion regarding aspects of the proposed lead ban, the Hungarian Proof House hereby summarizes its position:

1. Transition period of the ban on use of lead gunshot in hunting:

For those shotguns and their ammunition already in use, which are not suitable or not certain whether they're suited for steel shot use there should be exemption from lead content ammunition ban. There should be no transition period for these guns and their ammunition, as lead-shot ammunition supply should be ensured for them till they are in use.

For those shotguns in hunting use, which are suitable for hard lead free shot, the transition period for ammunition should be minimum 5 years. Ammunition industry needs to modify their recent production lines to be able to load steel shot ammunition to meet the future demand. Additionally, the manufacturing technology and supply chain of crucial components must also be changed: propellant, wads, made of different plastic with different technology, and additionally the necessary lead-free shot manufacturing capacity have to be established. This takes time, as in general, the procurement of new, specialized manufacturing machinery requires ~ min 2-3 years, and establishing stable manufacturing process also require ~ 1 further year after setting up the manufacturing line.

It is also necessary to give fair enough time for suppliers of lead shot ammunition components (propellant, shot, wad) to switch to other technologies, or to different product ranges, to prevent financial losses on their previous investments in development, machinery, production sites, marketing, etc.

2. Labelling of individual bullets and gunshot cartridges:

There is hardly enough space on individual cartridges to place information about their lead-content. The maximum manageable possibly on shotshells would be the "Pb" distinguishing mark. On metallic rifle and pistol cartridges, even this marking would be difficult to place. On rimfire rounds this type of marking is absolutely impossible.

Colour coding is not a feasible option:

Different military organizations have sometimes standardized bullet tip or other colour code markings for their rifle ammunition for field ID purposes. But the colour coding system is different from state-to state outside these organizations, that make cartridges sourced from different parts of the World practically un-identifiable on the field by their colour code. For shotshells the only part which could be colour coded is the case body (hull). But if we consider that the marking rules would apply only for

ammunition manufactured within EU, imported, or personally imported ammunition - where these marking rules do not apply - could result faulty ammunition identification on the field. Additionally, individual reloaders of ammunition use the available cases of different colours for reloading, so colour of the cartridge case would not necessarily proof whether the shot is lead, or lead-free.

Control of the ammunition by the authorities on the field is hardly reliable or feasible.

3. Impacts of the proposed ban on use of lead ammunition on the use of historic guns in hunting:

It is technically not possible or safe to use lead free ammunition (bullets) in antique muzzleloading firearms and their reproductions, and in vintage breech loading firearms designed for lead bullet use.

([http://pklv.hu/ECHA_lead_ban_on_black_powder_guns-](http://pklv.hu/ECHA_lead_ban_on_black_powder_guns-Study_of_the_Hungarian_Proof_House.pdf)

[Study_of_the_Hungarian_Proof_House.pdf](http://pklv.hu/ECHA_lead_ban_on_black_powder_guns-Study_of_the_Hungarian_Proof_House.pdf)) The number of shots taken with these guns in hunting is just a fraction of the number of shots with modern ammunition. We are confident, that the environmental impact of the lead bullets fired from these firearms is marginal. **Bullets and ammunition for antique muzzleloading firearms, their reproductions and vintage breech loading firearms designed for lead bullet use must be an exemption from the lead bullet ban.**

Hunting with these arms is not only a recreation, but part of the common European heritage and traditions. These activities also play important part in history researches and experimental archaeology research projects.

4. Impacts of the proposed restriction on the use of air gun/rifle pellets:

Up to now there are no any lead-free alternative pellets, which would ensure equal hunting and sports shooting accuracy and hunting range, as lead pellets.

5. Suitability of steel gunshot as an alternative to lead gunshot in clay target shooting:

Clay target shooting disciplines have mostly internationally organized rules. With the capabilities of steel shot, it is not possible to reach similar efficiency as with lead shot. This is especially true for trap shooting and parcour shooting, where shooting distances are long. As these disciplines are ruled by international, worldwide shooting organizations, it cannot be expected that the rulebooks would be changed due to an EU level lead ban. **This would cause definite handicap to European sports shooters or would force them to reside and practice outside EU.**

There are disciplines, as IPSC, or Cowboy Action Shooting, where steel shot is prohibited, as they are shooting at metal targets, where bounce back of steel shots would cause injury of the shooters and bystanders.

6. Switching between using steel and lead gunshot for sports shooting:

The capabilities of lead and steel shot differ so much, that switching between them within the same shooting discipline is not possible.

7. Lead gunshot recovery with more than 90% effectiveness:

Lead gunshot recovery with high effectiveness is possible at skeet or trap shooting ranges, even if the cost of range setup, and recovery is high. But control is not feasible, as it is hardly possible to keep records on each fired shot, to keep records whether a cartridge was loaded with 24 g or 36 g shot, etc. So, the weight base which the 90% should be calculated is uncertain.

At some disciplines like Parcour, due to the huge area used for shooting, which is covered with rich vegetation (trees, bushes, etc.) the re-collection of the min 90% of the lead gunshot is not feasible.

