Overview

On 29 April 2021, the Health and Safety Executive (HSE) as the Agency for UK REACH received a request under Article 69(1) of UK REACH from the Defra Secretary of State, with the consent of the Scottish Government and the Welsh Government, to prepare an Annex 15 restriction dossier assessing the risks to the environment and human health from lead in ammunition (projectiles). In the European Union (EU), a restriction has been adopted for lead in gunshot over wetlands (January 2021), and a restriction for lead in shot, bullets and fishing weights is in progress. This Annex 15 dossier prepared by HSE examines whether a similar restriction should be introduced into Great Britain (GB; England, Scotland and Wales) covering lead in ammunition in all habitats.

In the request, Defra asked HSE to consider the risks posed by the use of lead in ammunition and the potential need for further risk management measures beyond those already in place. Lead-containing propellants, and police and military uses are outside of the scope defined by Defra.

Article 69(6) of UK REACH requires HSE to publish proposals for restrictions on its website and invite interested parties to submit comments on the proposed restriction within 6 months of the date of publication. This public consultation fulfils this requirement.

An additional 60-day consultation on the draft socioeconomic opinion will be held at a later stage to invite comments and to inform the development of the final socioeconomic opinion. People wishing to submit information during these public consultations are strongly advised to submit information as early as possible and not to limit their comments to this second consultation. Only socioeconomic factors will be taken into account during this second consultation period.

The following documents are attached to this consultation:

The Annex 15 restriction dossier describing the risks to the environment and human health that lead creates if it is present in ammunition and the restriction options that HSE is proposing to manage these risks. This dossier also provides socioeconomic information to demonstrate that the proposed restriction options are effective, practical and monitorable.

An additional annex which provides further details about the risks and the availability of alternative substances.

UK REACH came into force at the end of the EU exit transition period (31st December 2020) and regulates the access of chemicals to the GB market. Under the Northern Ireland Protocol, EU REACH continues to regulate the Northern Ireland market.
Please support your contribution with references and reliable data (facts and figures).

HSE’s Confidentiality and GDPR statements

HSE tries to make its public consultations as thorough and open as possible.

Information provided in response to this public consultation may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the General Data Protection Regulations (GDPR) and the Environmental Information Regulations 2004 (EIR)). Statutory Codes of Practice under the FOIA and EIR also deal with confidentiality obligations, among other things.

If you would like us to treat any of the information you provide as confidential, please make this clear in your response. If we receive a request under FOIA or EIR for the information you have provided, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

An automatic confidentiality disclaimer generated by your IT system will be disregarded for these purposes. Requests for confidentiality should be made explicit within the body of the response.

HSE will process all personal data in accordance with the GDPR. This means that personal data will not normally be disclosed to third parties and any such disclosures will only be made in accordance with the Regulations.

How to submit comments

Basic information can be provided through the [survey on the website](#). More detailed information should be provided in document(s) which can be submitted as attachments at the end of each section.

The restriction opinion will take into account all comments received in the consultation. After the end of the restriction process HSE will publish a list of the comments that were submitted, together with a response to those comments. It will be helpful if you can provide a “public” non-confidential version of your information to make it clear which of your information we can publish in this response to comments document. If you also want to provide confidential information in your submission, please additionally complete a “confidential version” and submit both versions as attachments. We will take account of both non-confidential and confidential information in the restriction opinion.

When responding to this survey, please provide as much information and evidence as you can.

You have an opportunity to provide general comments and information relating to the specific questions we ask in this survey. If you need assistance to complete this survey, please use the general comments section to indicate what information you are willing to share and tick that you are willing to be contacted by HSE.

By submitting information as part of this public consultation, you agree that any data provided (excluding your personal details) can be shared with the Environment Agency under obligations under Article 2B, our independent scientific advisers and the appropriate authorities.
The public consultation lasts for six months and closes at 23:59 (London time BST) on 6 November 2022.