



Association Européenne de Commerce d'Armes Civiles
The European Association of the Civil Commerce of Weapons

AECAC POSITION PAPER ON LEAD IN SHOTS

I.- ABOUT AECAC

Our Association is formed from numerous national associations representing the interests of gun and hunting retailer businesses and specialized shops from all over Europe. AECAC defends efficiently the gun retailers at European level.

Currently the members of our federation are the following national trading associations:

1. **Austria:** Verband Österreicher Büchsenmacher (Bundesinnung der Metalltechniker)
2. **Belgium:** Wapenunie – Union Armes
3. **Cyprus:** Cyprus Gundealers Association
4. **Denmark:** Danske Vabenhandlerere
5. **Finland:** Asekauppiaiden Liitto ry
6. **France:** Chambre Syndicale Nationale des Armuriers
7. **Germany:** VDB - Verband Deutscher Büchsenmacher und Waffenfachhändler
8. **Greece:** Pan-Hellenic Association of Handcraft men & Professionals of Hunting Items
9. **Ireland:** Irish Gun Dealers and Shooters Association
10. **Italy:** ASSOARMIERI-Associazione Commercianti Armi-Munizioni Caccia Pesca Sport
11. **The Netherlands:** Nederlandse Vereniging voor de Wapenhandel
12. **Spain:** ACACE - Asociación de Comerciantes de Armería sus Complementos y Explosivos
13. **Sweden:** Sveriges Vapenhandlareforening
14. **Luxemburg:** Association Luxembourgeoise des Armuriers et Négociants d'Armes.

Since its foundation, AECAC has actively participated in all the procedures of the European Commission policies in which gun trading is involved.

AECAC is currently the only representative at a European level of the gun and ammunition retailers, in this capacity AECAC is being considered as a reputable stakeholder before all European Institutions.

Our principle target is to lower barriers that exist in the sector to small and medium-sized enterprises who are involved in gun, ammunition and hunting trading. By supporting the free market we aim to enhance the efficiency and competitiveness of the European companies.

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II.- THE GUN AND AMMUNITION RETAILERS SECTOR IN EUROPE

It is important to understand the gun and ammunition trade in Europe to evaluate the potential impacts of any legislative change concerning lead use in shots.

Gun and ammunition retail market is a very important sector in many European countries. These are the number of companies in the retail sector in some EU member states:

- Finland 600 dealers
- Hungary 500 dealers
- Poland 500 dealers
- Austria 700 dealers
- France 1.000 dealers
- Germany 1.500 dealers
- Italy 1.200 dealers
- Spain 700 dealers
- Belgium 250 dealers
- Greece 700 dealers

Such companies create more than 100.000 employments in Europe, and represent an important turnover.

To understand the importance of the sector it is also worth mentioning some of the figures of civilian users. Europe has more than **12 million** lead shot users. The largest number of hunters and sport marksmen are found in France with more than 1.600.000 hunters and marksmen, Spain with around 1.500.000 users and Italy with 1.150.000 users.

It is notable the high number of users compared to its small population in some northern countries. Sweden has more than 550.000 users, mainly hunters. Finland has more than 335.000 hunters and marksmen. Denmark accounts 289.000 civilian users.

III.- PRICE COMPARISON OF LEAD-BASED AND ALTERNATIVE SHOT

The average market price of lead shot cartridges is **0,35 €/unit** without VAT.

Average market (final user) prices of cartridges of alternative materials, VAT excluded are the following:

- **Zinc 1,60 € /unit**

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- **Steel - Iron 0,68 € /unit**
- **Tungsten 3,10 €/unit**
- **Bismuth 2,15 €/unit**

Currently the ammunition trading represents around 25 % of the retailers market in Europe. So such an increase of the prices would cause an enormous damage to thousands of small and medium enterprises in Europe.

As we will comment on later, steel or iron shots have technical and even security problems. The rest of the other alternatives are too expensive. The impact on the trading market could not be assumed with prices increasing more than 150 %.

Associated cost for customers in case of lead shots restriction

On average, non-lead shot gun ammunition for hunters cost normally 4 times as much as lead shot ammunition. Considering an average hunter with a cartridge consumption of 200 cartridges a year, its increase of cost would be of around **250 € more per year**.

Gun testing cost, approximately 100 €/ per gun. Considering an average hunter owning 3 shotguns: **300 €**.

Installation of new chokes (approximately 50 € per gun): **150 €**.

Purchasing of new guns (2 new shotguns per hunter): **2.500 €**.

Competitive shooters with very high cartridge consumption may face increased barrel wear due to steel shot forcing frequent replacement of weapons.

It should be noted that the average hunter has a limited budget and usually allocates a certain amount of money to his/her firearms and ammunition. A substantial increase in the prices related to these products will only result in a reduction in the quantities that are acquired and in some cases even the giving up of hunting.

All these numbers should be related to the number of users in Europe: more than **12 million**.

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III.- DRAWBACKS FOR CUSTOMERS USING ALTERNATIVE SHOTS COMPARED TO USING LEAD-BASED SHOTS

Ballistic performance. Major technical problem on all the alternatives to lead is the ballistic performance. None of the existing materials ensure a perfect ballistic performance on game as lead does.

The ballistic properties of steel and iron shot differ completely from lead shot.

Other alternatives as bismuth, tungsten and tin are available that do not suffer from the technical drawbacks of steel, its ballistic performance is better, but not equal to lead. However, these alternatives are much more expensive than the lead.

Suitability in gun types. Steel and iron shots cannot be used in all gun types. Only modern shotguns can be used with such materials. Restrictions could easily cause accidents in case people keep on using traditional guns.

Hunting or shooting technique. Alternatives are less effective than lead. The ballistic effect on game of all the alternatives is much worst than using lead. Specially iron, steel and zinc are less lethal and cause wounds.

High security problems. Iron steel and zinc shots should not be used in rocky and similar terrains due to the high risk to ricochet.

Impact on forestry economy. Steel and iron shots are often not allowed in forest from which trunks are sold for furniture and veneer making as the industrial cutting tools may be damaged.

Recyclability. Lead is a recyclable material. This is not the case of most of the alternatives.

III.- NEGATIVE IMPACT ON THE SMALL AND MEDIUM ENTERPRISES (SMEs)

Fact is that many companies which deal worldwide with sport and hunting guns and ammunition are Small and Medium Enterprises (SMEs). For these the implementation of any further restriction would have a negative strong impact on their economies.

SMEs would suffer more heavily the consequences of any restriction on lead use.

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The so-called “**Small Business Act**” (SBA) recognises the central role of SMEs in the EU economy and puts into place a comprehensive policy framework for the EU and its Member States concerning Small Companies.

The SBA aims to promote entrepreneurship, make legislation SME-friendly and help SMEs to grow. Furthermore, all new legislative and administrative proposals will be subjected to an “**SME test**” in order to assess their impact on SMEs. For example policy results should always be delivered while **minimising cost for business, lighter procedures can be foreseen to protect small and micro-enterprises** from unavoidable negative effects of new law.

Our general opinion is that any further restriction on lead use is unnecessary and it would affect - once again - negatively the competitiveness of European companies. Member States already have strict regulations concerning this issue.

IV.- BY WAY OF CONCLUSION

AECAC position concerning lead in shots is the following:

- Lead in shots, except in wetlands, has a **minimal environmental impact**.
- The risk of **game meat consumption** is reduced and only affects small children and pregnant women. No scientific study has stated that the alimentary risk makes advisable a ban on lead shots.
- **Alternatives to lead.** The cartridge production sector is developing several projects and innovations to find a possible alternative to lead shots. AECAC fully supports all actions in this line. Notwithstanding although some alternatives can be developed in the near future, today it does not exist any safe, economic and efficient alternative to lead which is produced at industrial level.
- **Restrictions on lead.** Our general opinion is that in the current situation any further restriction on lead use is unnecessary and it would affect - once again - negatively the competitiveness of European companies. It shall be stressed that any legislative change should be based on scientific evidences and should take in consideration its social and economic impact.

The minimal benefits of a complete lead ban should be compared to the dramatic economic and social impact that such a measure could cause.

No further restriction should be applied till the innovation processes enable to produce at industrial level a real alternative to lead.

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