EU ban on lead in shotgun ammunition

EU ban on lead shot ammunition enters into force

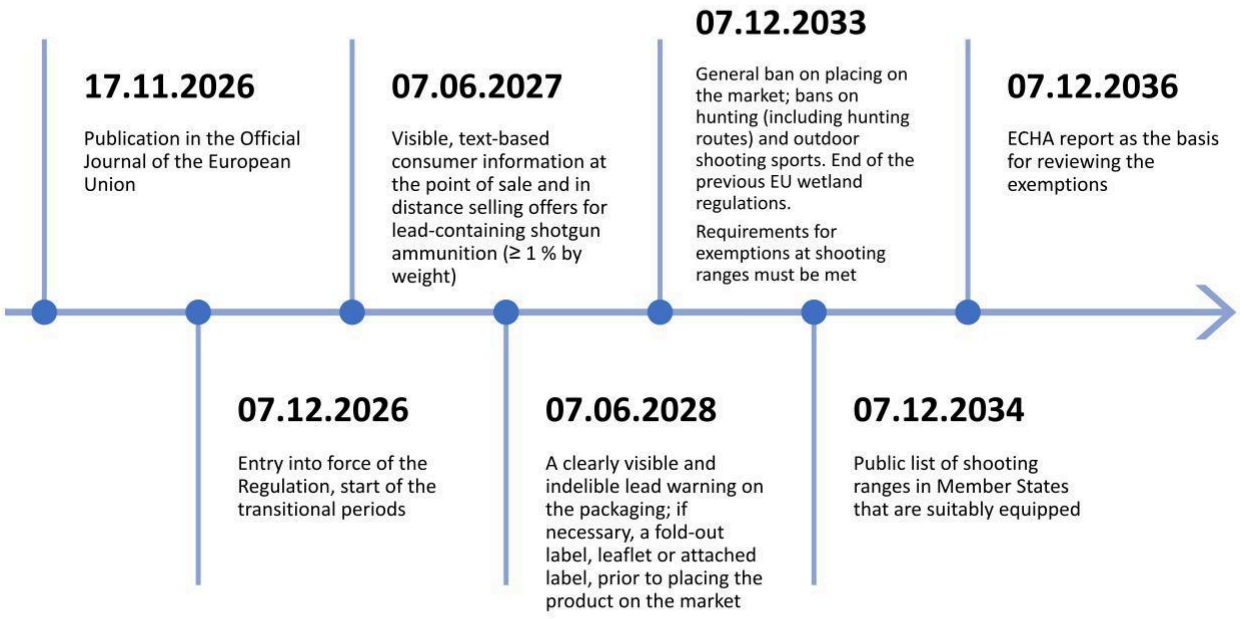
Obligations, transitional periods and responsibilities for firearms dealers, manufacturers, importers and shooting facilities

The REACH Committee approved the revised draft ban on lead in ammunition in June 2026. The scrutiny period for the European Parliament and the Council ended on 9 October 2026 without objections. The regulation was published in the Official Journal of the EU on 17 November 2026. This establishes implementation deadlines that are relevant to holders of commercial firearms licences and must be observed.

The information obligation for retailers begins just six months after entry into force. By contrast, labelling of ammunition packaging will not become mandatory until 18 months after entry into force. The general ban on use and placing on the market will follow after seven years. Of particular relevance to our member businesses: the six-month information obligation already applies while the sale of lead shot ammunition remains permissible in principle. It should therefore be implemented at an early stage in physical retail outlets and online shops. The subsequent packaging labelling requirement is a separate obligation.

The obligations affect firearms dealers as well as manufacturers, importers, suppliers and shooting range operators. In particular, the exemption for organised clay target shooting is subject to extensive conditions.

Below, we provide a timeline giving an overview of the deadlines, together with the mandatory warning texts, a responsibility matrix for the various economic operators, all key exemptions including the requirements for shooting facilities, and a practical checklist for ammunition dealers.



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Which ammunition is affected?

Shotgun ammunition containing at least 1% lead by weight (as a metal) is affected. Ammunition containing exactly 1% lead is already subject to the restrictions. Shotgun ammunition refers to pellets intended to be used together in a single load or cartridge in a smoothbore shotgun.

Rifle bullets, shotgun slugs and airgun pellets (diabolos) are not covered by the restriction.

What information obligations apply to retailers?

From 7 June 2027, every retailer selling the shotgun ammunition concerned must provide the following information in a clearly visible manner and in the official language(s) of the country (please note: for cross-border offers, check the destination countries and the relevant languages). This means that, in physical retail outlets, the notice must be displayed in the immediate vicinity of the product and, in online shops, within the respective product listing. A general legal notice on the website or at the shop entrance alone is not sufficient.

The prescribed mandatory wording according to the English-language Council draft is as follows:

WARNING: This product contains lead, which is very toxic to the environment and may damage fertility or the unborn child. The use and sale of lead gunshot for hunting and sports shooting are restricted in the EU from 7 December 2033. More information, including on the availability of lead-free alternatives, are available at www.echa.europa.eu.

Sample notices for display in various languages are provided attached (A4 format; it can also be printed at a smaller size).

Recommendation for implementation: Check whether you sell any of the goods in question. Ensure that the relevant notice is displayed on the relevant products in your online shop by 7 June 2027. Check where notices need to be displayed in your shop. Train your sales staff accordingly.

Packaging labelling from 7 June 2028

From 7 June 2028, suppliers must ensure, before placing the product on the market, that the packaging (not each individual cartridge) of the affected shotgun ammunition bears the following warning in a clearly visible and indelible manner:

"WARNING: This product contains lead, which is very toxic to the environment and may damage fertility or the unborn child."

A supplier of an article is the producer or importer, distributor or another actor in the supply chain who places the article on the market. The labelling must be in the official language of the country in which the product is placed on the market.

If the packaging is too small, the warning may be provided on a fold-out label, leaflet or hang tag.

This obligation applies without prejudice to other relevant provisions on classification, packaging and labelling.

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The draft does not provide for a general grandfathering provision for unlabelled packaging produced before that date. Rather, the legally decisive factor is the (re-)placing on the market. Existing stocks may therefore need to be labelled retrospectively. The AECAC is currently examining whether suitable labels can be made available for this purpose.

Recommendation for implementation: Review your stocks to determine which ammunition packages would be affected. Allow sufficient time to apply the required labels to the packaging before the deadline.

Ban on Carrying, Discharging and Placing on the Market Outdoors After Seven Years

From 7 December 2033, carrying and discharging lead shot ammunition while hunting or travelling to a hunt, as well as discharging it in outdoor shooting sports, will be prohibited. Under the definition, “shooting sports” also includes training and practice shooting in preparation for hunting. In theory, the placing on the market of shotgun ammunition with a lead concentration (expressed as metal) of at least 1% by weight will also be prohibited.

However, extensive exemptions apply. For example:

- shot pellets measuring between 1.9 mm and 2.6 mm that are supplied and discharged at an outdoor shooting range which has implemented the prescribed risk-management measures and maintains the relevant records of use.
- the use and placing on the market of shotgun ammunition for muzzleloaders and historical firearms, including modern replicas. Note: this exemption does not constitute a blanket exemption for all products that could theoretically be used in a historical firearm.
- the use of shotgun ammunition for:
  - indoor shooting
  - police, law enforcement and other security purposes
  - military and defence-related applications
  - the protection of critical infrastructure, commercial shipping or cash-in-transit operations
  - the protection of public buildings and public spaces
  - self-defence (not while travelling to a hunt)
  - technical testing and inspection of firearms and ammunition
  - testing and development of materials and products for ballistic protection
  - forensic analysis
  - historical and technical research or investigations
  - primers and wads

The provisions do not establish a general obligation to take back, destroy or compensate for existing stocks. It remains to be seen how practicable it will be to keep the relevant products in stock and place them on the market after the transitional period has expired, as it is not yet possible to predict, for example, how many indoor shooting ranges will be operating by then. Private possession will not be prohibited in general; however, carrying ammunition while hunting and certain uses will be prohibited.

We provide a responsibility matrix attached to help you determine which steps need to be taken.