



LEAD IN FISHING TACKLE QUESTIONNAIRE

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The European Chemicals Agency (ECHA) is currently investigating the need and potential scope for a restriction on the use of lead in ammunition and fishing tackle. The restriction dossier is currently intended to be submitted to the EU in October 2020.

REACH Restriction is a tool for protecting human health and the environment from the risks posed by chemicals. Restrictions usually limit or ban the manufacture, placing on the market or use of a substance. In some cases, a restriction may set out specific conditions such as technical measures or labelling requirements.

As part of the preparation of this restriction dossier, ECHA is currently collecting information on companies and the various players in the supply chain likely to be affected by such a restriction and on the potential consequences for the sector, this includes an analysis of the socio-economic impacts. The objective is to propose a restriction which constitutes the most appropriate and proportional risk management measure to prevent identified risks.

The current focus is on lead sinkers/weights, and jigs used for recreational/sport and commercial fishing (marine and fresh-water) that might be ingested by birds. However, we would also be interested to receive separate information on ropes, lines, nets, and ballasts containing lead, as well as on moulds used for the home casting of fishing tackle.

ECHA would like to emphasize that at this stage, there is no restriction scenario/option which is decided yet, it is still in the investigation phase, it is therefore important that you provide your inputs and opinions to the questions below. The information received, especially if substantiated, will be used to prepare a better and more informed assessment of the impacts of different restriction options, and the overall scope of the restriction.

The information, or data gathered will remain anonymous if requested, i.e. not referring to individual companies or contact persons but rather, if relevant, refer very generally to the data, e.g. "an SME producing XYZ product types for sector X".

We would appreciate your feedback to the questions below by 31 July 2020. Do not hesitate to contact me (sandrine.lefevre@echa.europa.eu, phone: +358 9 6861 8368) or my colleague Anna-Lena (anna-Lena.REHRL@echa.europa.eu) in case you need some clarification, or you would prefer to discuss the issues over the phone



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Company name:

Business Address:

Telephone number:

Website:

Your name:

Function in Company:

Email address:



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FISHING TACKLE: SINKERS/WEIGHTS/JIGS USED FOR RECREATIONAL AND COMMERCIAL FISHING (MARINE AND FRESH-WATER))

1. Do you manufacture/import/place on the market fishing tackles such as sinkers/weights/jigs? Are you a manufacturer, importer, wholesaler, and/or retailer? Where are you located? What is your market (country specific, European, export?)

2. Do your fishing tackles contain lead? What are the types and dimensions of the fishing tackles?

3. What is approximately the quantity of lead placed yearly on the market as sinkers/weights/jigs by your company?



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4. What is the approximate proportion of the company's sales that could be attributed to sinkers/weight/jigs (with and without lead)? What is the approximate proportion of the company's sales that could be attributed to smaller sinkers/weight/jigs (i.e. < 50 g and/or <2 cm dimensions) with and without lead?

Answers can be provided in a table format like this one:

Type/Description of fishing tackle	With/Without lead?	Min-Max weight	Min-Max dimensions	Public price	Approx. sales proportion for your company	Import/Export (in/outside EU)/national market?



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5. What happens to sinkers/weights/jigs after use for fishing (are they lost? recycled? disposed of? How?)?

6. Do you have estimates on the proportion or quantity of sinkers/weights/jigs that are lost/released in the environment yearly by the fishers?

OTHER FISHING TACKLES: ROPES, LINES, NETS, BALLAST (CONTAINING LEAD)

7. Do you manufacture/import/place on the market other fishing tackles/gears (for fishing) containing lead (e.g. ropes, lines, nets, ballast, other)? Are you a manufacturer, importer, wholesaler, and/or retailer? What is your market (country specific, European, export?)



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8. What is approximately the quantity of lead placed yearly on the market as ropes /lines/nets by your company? Average concentration/content of lead in this equipment?

9. What is the approximate proportion of the company's sales that could be attributed to ropes/lines/nets?



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10. Can you please describe (pictures are welcome, please attach to your email) the ropes, lines, nets, ballast containing lead? In particular, is lead embedded in the structure of the equipment or are lead elements added to the structure?



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11. What happens to ropes, lines, nets containing lead at their end of life? (are they lost?, recycled?, disposed of? How?) What is the average life time of ropes, lines, nets containing lead? Can they be repaired/recycled? How? By whom?

12. Do you have estimates on the proportion or quantity of ropes, lines, nets, ballast containing lead that are lost/released in the environment yearly by the fishers? Is it possible for the lead in ropes, lines, nets, ballast to detach/break down in small pieces during or after use?



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13. Any other type of fishing tackle or gear used for fishing that would contain lead?

Answers can be provided in a table format like this one:

Type/ Description of fishing tackle	With/ Without lead?	Min-Max weight	Min-Max dimensions	Public price	Approx. sales proportion for your company	Import/ Export (in/ outside EU)/ national market?



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MOULDS FOR HOME-CASTING FISHING TACKLES

14. Do you manufacture/import/place on the market moulds for home-casting fishing tackles? Are you a manufacturer, importer, wholesaler, and/or retailer?

15. According to your expert knowledge, is home-casting a common practice (e.g. in your country, in Europe)? Do you have more details on this practice? (e.g. from where fishers get/purchase the lead, and the moulds/casts for this activity?)



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EXPERIENCES OF SUBSTITUTION

16. Do you already offer a substitute lead-free product within your product list for fishing (e.g. sinkers/weights/jigs, ropes, lines, nets, ballast, other), or have you tried to substitute lead in your fishing tackles? With which substance/material? What was the outcome?

17. How long would it take to replace lead in your company's products by lead-free products? What steps and costs would replacement involve? (note that the question is applicable to all supply chain actors)

18. What are the prices of lead fishing tackle vs that of alternatives?



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SOCIO-ECONOMIC ANALYSIS

19. Considering each of the following scenarios (with or without transition period to adapt):

Scenario 1: Ban of lead in all fishing tackles (i.e. weights, sinkers, jigs, ropes, nets, lines, ballasts, other?)

Scenario 2: Ban of lead in all weights/sinkers/jigs

Scenario 3: Ban of lead in weights/sinkers/jigs below 50 g and/or 2 cm max dimension

How would your company react in case of the different restriction scenarios on lead fishing tackles (e.g. move to alternative, stop business)? What would be the consequences for your companies (e.g. costs, benefits, impacts for consumers, employment etc...)?



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FURTHER INFORMATION

20. Who else would be able to give pertinent information?

21. Could ECHA contact you again if needed?



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IN ADDITION TO THE QUESTIONS ABOVE SOME FEEDBACK ON THE EXISTING LEAD BAN IN FISHING TACKLE IN THE UK WOULD BE WELCOME.

What are your experiences?

Is it effective?

Where do you see the limitations of the regulation?



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How is the availability of alternatives on the market?

How is the acceptance of the regulation and the alternatives by the fishers?

What was the reaction/impact of the ban on the manufactures /wholesalers / distributors /retailers (development of alternatives/production stop/shift of lead fishing tackle to markets outside of UK - export/etc.)?



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How is the ban enforced and monitored?

How is the trend of home casting since the lead ban came into place?

**PLEASE EMAIL YOUR FILLED IN FORM TO:
leadintackle@anglingtradesassociation.com**

Use a clear subject line: Lead in fishing questionnaire

THANK YOU FOR YOUR ANSWERS AND OPINIONS.