



THE WILDLIFE SOCIETY

5410 Grosvenor Lane • Bethesda, MD 20814-2144

Tel: (301) 897-9770 • Fax: (301) 530-2471

E-mail: tw@wildlife.org

15 September 2010

Lisa P. Jackson
Administrator
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Dear Administrator Jackson:

The Wildlife Society appreciates this opportunity to submit comments on the recent petition requesting that EPA adopt regulations prohibiting the manufacture, processing, and distribution in commerce of lead shot, lead bullets, lead fishing sinkers, and other lead-containing fishing gear, pursuant to the Toxic Substances Control Act (Docket # EPA-HQ-OPPT-2010-0681).

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 9,100 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

Lead poisoning related to spent ammunition and lost fishing tackle has been extensively studied in birds, and at least two studies indicate that the ban on the use of lead ammunition for hunting waterfowl and coots in North America has successfully reduced lead exposure in waterfowl. Nonetheless, other species such as upland game birds (e.g., doves and quail) and scavengers (e.g., vultures and eagles) have been documented to be exposed to lead, and the California condor population may be at risk. Despite the prohibition on lead shot for waterfowl hunting, current data for raptors and avian scavengers indicate increases in lead exposure in these species, especially during hunting season. The hazard of ingested lead sinkers and fishing tackle is well-documented in swans and loons.

Several manufacturers have developed nontoxic ammunition that can be used safely in all gauges of modern shotguns, as well as nontoxic rifle bullets for hunting large game. However, the widespread manufacture of this shotgun and rifle ammunition depends on assured markets provided by regulation and enforcement. Nontoxic shot may be used in all clay target sports and currently is required by some shooting facilities. Dozens of substitutes for lead fishing tackle have entered the marketplace in recent years. A few, but not all, alternative metals in fishing tackle have been deemed safe if ingested by waterfowl and some other birds and mammals.

More information about the effects of lead ammunition and fishing tackle on wildlife is available in the attached report, co-published by TWS and the American Fisheries Society, *Sources and Implications of Lead Ammunition and Fishing Tackle on Natural Resources*.

The Wildlife Society recognizes that lead has been known for centuries to be a broad-spectrum toxicant to humans and wildlife. We advocate the replacement of lead-based ammunition and fishing tackle with nontoxic products, while recognizing that complete replacement may not be possible in specific circumstances. Please see the attached position statement on lead ammunition and fishing tackle.

The removal of lead for hunting, fishing, and shooting will require collaboration among affected stakeholders (including wildlife professionals, ammunition and tackle manufacturers, sportsmen, policymakers, and the public). It may require a phased-in approach, and will require explicit and targeted educational strategies at both the national and international levels, thereby acknowledging and supporting the crucial role that hunters and anglers play in wildlife management and conservation.

Thank you for considering the views of wildlife professionals.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce D. Leopold". The signature is fluid and cursive, with a prominent loop at the end.

Bruce D. Leopold, Ph.D.
President