



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

February 10, 2017

Jim Kurth, Acting Director
U.S. Fish & Wildlife Service
1849 C Street NW, Room 3358
Washington, D.C. 20240

RE: Letter in Support of a Coordinated Approach to Phasing in the Use of Nontoxic Ammunition and Tackle on FWS Lands

Dear Acting Director Kurth,

The Wildlife Society (TWS) expresses our support of the intent in Director's Order No. 219, which provides a timeline to phase in the use of nontoxic ammunition and fishing tackle on Service lands and for some Service-regulated species. We request improved communication among stakeholders and additional study, as needed, to implement the Order.

TWS represents nearly 10,000 professional wildlife biologists and land managers. We are dedicated to enabling wildlife professionals in their efforts to sustain wild populations through science-based practices. Part of our mission is to ensure policies are based on scientific information—to that end, we published a technical review with the American Fisheries Society on the [*Sources and implications of lead ammunition and fishing tackle on natural resources*](#) in 2008 that provides an analysis of scientific research and regulation information on the subject.

TWS recognizes metallic lead as a broad-spectrum toxicant that can cause a range of biochemical, physiological, and behavioral effects (lethal or sub-lethal) when ingested by wildlife, potentially leading to population-level impacts in some species. Deleterious effects of spent lead ammunition on waterfowl populations ushered in the 1991 federal regulations banning its use in waterfowl hunting. Regulations aimed at protecting the health of other species known to be affected by spent lead ammunition and fishing tackle, such as other water birds, upland birds, scavengers, and raptors, have been slow to follow – though several states and tribes have implemented their own regulations.

While TWS supports the intent of the Order, we recognize that questions remain on the appropriate scope and potential effects of this Order not only for wildlife health, but also on hunting and angling activities. These questions can only be addressed effectively through collaboration on research and cooperative management. We request that future action by the Service to implement this Order involve greater input from and communication with state and tribal fish and wildlife agencies and academic researchers to help address these questions. Collaboration between the federal, state, tribal agencies and other natural resource professionals on issues such as this is paramount to ensure the natural resource profession works together to protect the health of the nation's fish and wildlife.

Sincerely,

Bruce Thompson, PhD, CWB®
President

cc: Cynthia Martinez, Jerome Ford