



# THE WILDLIFE SOCIETY

*Leaders in Wildlife Science, Management and Conservation*

8 August 2022

Attn: FWS-HQ-NWRS-2022-0055  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
MS: PRB (JAO/3W)  
Falls Church, VA 22041-3803.

Re: 2022-2023 Station-Specific Hunting and Sport Fishing Regulations [Docket No. FWS-HQ-NWRS-2022-0055]

Dear U.S. Fish and Wildlife Service:

The Wildlife Society appreciates the opportunity to provide comment on the proposed regulation to open 19 National Wildlife Refuge System units to new and expanded hunting and fishing opportunities. Our organization is supportive of the U.S. Fish and Wildlife Service's (hereinafter "the Service") annual evaluation of hunting and fishing access. We also support the implementation of thoughtful policies related to the future use of lead ammunition and fishing tackle on Refuge System lands.

Founded in 1937, The Wildlife Society (TWS) and its network of affiliated chapters and sections represent more than 15,000 professional wildlife biologists, managers, and educators dedicated to excellence in wildlife stewardship through science and education. TWS' mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitat through science-based management and conservation.

Regarding the Service's inclusion of proposals to restrict the use of lead fishing tackle and hunting ammunition, The Wildlife Society has strong expertise in this arena. In 2008, TWS published a comprehensive technical review, "[Sources and Implications of Lead Ammunition and Fishing Tackle on Natural Resources](#)." This document remains the best single source compilation of the science associated with lead use in hunting and fishing.

Lead has no functional or beneficial role in biological systems and has well-established lethal and sublethal impacts to individuals from a diversity of species. Lead fragments in viscera or carcasses, lost lead fishing tackle, and spent ammunition deposited at shooting sites can remain on the landscape for decades and result in unintended consequences to wildlife.

Informed by best available science, technical workshops and symposium, TWS revised our position statement on "[Lead in Hunting Ammunition and Fishing Tackle](#)" in June 2022. It is both balanced and realistic, and we encourage the Service to consider the ten principles of our policy as you shape the final form of your proposed rule.

Outreach focused on encouraging the voluntary use of non-lead products by hunters has proven to be an effective way of changing behavior. To that end, while TWS' policy on lead makes clear that we support the ultimate phase-out of lead hunting ammunition and fishing tackle through "educational efforts, policies, practices, and regulations," we urge the Service to focus on education, information, and outreach of its own employees and the public regarding the lethal and sublethal effects of lead on wildlife during the transition period. These programs should be developed and implemented with the cooperation and involvement of state fish and wildlife agencies, tribal authorities where applicable, and other local leaders on this topic.

The proposed rulemaking notes that "the best available science, analyzed as part of this proposed rulemaking, indicates that lead ammunition and tackle may have negative impacts on both wildlife and human health, and that those impacts are more acute for some species." However, there are few if any specific studies on the impacts to other wildlife resulting from using lead ammunition to hunt common and popular game species such as gray squirrels, Eastern cottontail, foxes, raccoon, coyote, ruffed grouse, and wild turkeys. Therefore, we recommend that your outreach efforts should be based on complete transparency with the public of what data are being used and how they are being used. There are numerous studies on hunting big game with the known and potential impacts on scavengers, including birds of prey. For those species where less is known, the Service should clearly state how the results of related work influenced your decision making. This science-based approach will prove important as you step-up your engagement with stakeholders during the phase-out period.

We also urge the Service to advance or support the scientific basis for policies related to lead hunting ammunition and fishing tackle. This should include, but not be limited to, research on stakeholder attitudes toward the use of lead and non-lead products. We believe that human dimensions research will help illuminate several social, cultural, and economic factors that may need to be considered as you implement actions to implement your new policies. The Service should also consider research to monitor lead levels in a broader range of wildlife than those commonly studied. This would be an important contribution to the scientific basis for addressing lead-caused lethal and sublethal effects on wildlife.

It is vital that the Service work with state fish and wildlife agencies, tribal agencies, and public stakeholders on comprehensive strategies to inform hunters and anglers about the use of lead products, and the availability of non-lead alternatives. Conflicting messaging at the federal, state, tribal, and local levels can have the unintended consequence of sowing confusion about the issue, as well as deterring retention of hunters and anglers. To that end, we urge interagency coordination with your partners to ensure that "messaging" on this topic is consistent and purposeful. Moreover, we strongly recommend that the Service institute technical training for appropriate personnel who may manage new programs or regulations related to hunting ammunition and fishing tackle. This would strengthen your expertise as you engage with partners and stakeholders on these policies. The Wildlife Society has strong expertise in this arena, and we would welcome the opportunity to assist with this important work.

Thank you for taking the time to review input provided by members of the wildlife profession. The Wildlife Society thanks the Service for grappling with this important issue. Please contact our policy team at TWS ([policy@wildlife.org](mailto:policy@wildlife.org), 301-968-1902), with any questions on the comments provided.

Sincerely,

A handwritten signature in black ink that reads "Gordon R. Batcheller". The signature is written in a cursive, flowing style.

Gordon R. Batcheller  
Certified Wildlife Biologist®  
President | The Wildlife Society