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Re: Require lead-free projectiles in ammunition and lead-free fishing tackle

The undersigned 66 organizations support a nationwide ban on the use of toxic lead in hunting ammunition and fishing tackle, to protect wildlife from unnecessary lead poisoning, and to protect human health. The organizations support the August 2010 petition to the Environmental Protection Agency under the Toxic Substances Control Act by the Center for Biological Diversity, American Bird Conservancy, and other conservation, hunting, and veterinarian groups requesting regulation to eliminate use of lead bullets and shotgun pellets in hunting, and to require non-toxic fishing sinkers and lures.

Lead has long been identified as a highly toxic substance with lethal properties and numerous pathological effects on humans and wildlife. The petition references nearly 500 peer-reviewed scientific studies that starkly illustrate the widespread risks from lead in ammunition projectiles and fishing tackle. Lead is dangerous to people and wildlife even at low levels. Lead exposure can cause a range of health effects, from acute poisoning and death to long-term problems such as reduced reproduction, inhibition of growth and damage to neurological development. Each year in the United States, 3,000 tons of lead are shot into the environment by hunting, another 80,000 tons are released at shooting ranges, and 4,000 tons are lost in ponds and streams as fishing lures and sinkers.

Scientists estimate that lead from spent hunting ammunition and lost lead fishing gear cause the needless lead poisoning deaths of an estimated 10-20 million birds annually in the United States. At least 75 wild bird species are known to be poisoned by lead from spent ammunition, including bald eagles, golden eagles, ravens and endangered California condors. Swans, cranes, ducks, geese, loons and other waterfowl consume lead-based fishing tackle lost in lakes and rivers and lead shot pellets, often with deadly consequences.

In recent decades, the federal government has implemented regulations to reduce human exposure to lead in drinking water, paint, gasoline, toys, toxic dumps, lead wheel balancing weights and lead-acid batteries. However, lead from spent ammunition and lost lead fishing tackle are uncontrolled and lead from these sources remains widely distributed in the environment, where it is encountered by wildlife.

Lead from spent ammunition also poses health risks to people. Lead bullets explode and fragment into minute particles in hunter harvested game and can spread throughout meat that humans eat. Studies using radiographs show that numerous, imperceptible, dust-sized

particles of lead can infect meat up to a foot and a half away from the bullet wound, causing a greater health risk to humans who consume game harvested with lead bullets than previously thought. A recent study found that up to 87 percent of cooked game killed by lead ammunition can contain unsafe levels of lead. State health agencies have had to recall venison donated to feed the hungry because of lead contamination from lead bullet fragments. Lead bullets and shot are implicated in elevated blood lead concentrations in subsistence hunters in Alaska and elsewhere in the U.S.; nearly 10 million hunters, their families and low-income beneficiaries of venison donations may be at risk.

Lead-based bullets, shot and fishing tackle can be replaced with commercially available, non-lead alternatives. At least two dozen ammunition manufacturers now make certified lead-free bullets of copper or other metals in a wide array of calibers; the U.S. Fish and Wildlife Service has certified a dozen nontoxic, non-lead shot types; and fishing sinkers and tackle are available in at least 10 different non-lead materials. The petition for regulation of these products could not legally be filed until alternatives were available. Non-lead alternatives for bullets and shot in ammunition and for fishing tackle are compatible with traditional good sportsmanship ethics of hunters and anglers to preclude the needless killing and harm of non-target species.

Several states and the National Park Service currently have regulations or policies to use lead-free alternatives, but these cover limited areas and no national standards are yet in place. The EPA has the authority to halt toxic lead deposition into the environment from hunting and fishing activities. We respectfully urge the EPA to act on the petition and develop regulations to require lead-free alternatives to lead sporting products, to get the lead out of the food chain for wildlife and humans.

Sincerely,

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