March 4, 2022

Martha Williams

Director

U.S. Fish and Wildlife Service

1849 C Street, NW

Washington, DC 20240

**Re: Phase Out Lead Ammunition in National Wildlife Refuges**

Dear Director Williams,

On behalf of our organizations and our millions of members and supporters, we request that the U.S. Fish and Wildlife Service phase out the use of lead ammunition within National Wildlife Refuges to protect wildlife, the environment, and human health. In February, a comprehensive eight-year scientific study found that half of this nation’s bald eagles and golden eagles are likely suffering from lead poisoning as a result of eating gut piles left behind by hunters using lead ammunition.[[1]](#footnote-1) Phasing out lead ammunition in wildlife refuges is urgently needed to protect these iconic birds as well as the many other wildlife species that continue to be poisoned. With nontoxic, cost-effective alternatives widely available, there is no valid policy reason why our national wildlife refuges should continue to be places where wildlife is poisoned.

The scientific literature overwhelming demonstrates that lead ammunition harms many species of wildlife including red-tailed hawks, trumpeter swans, mourning doves, sandhill cranes, coyotes, and black bears. Meanwhile, endangered species like the iconic California condor continue to have their recovery hamstrung by lead poisoning.

Lead ammunition also poisons hunters, their families, and others that consume wild meat, causing or contributing to a range of health risks such as cardiovascular disease, kidney failure, and fertility issues.[[2]](#footnote-2) Pellets and fragments of lead ammo have been found in the intestines of these people. In children, even miniscule exposure to lead ammunition can produce lasting neurological deficits in intelligence and behavior.[[3]](#footnote-3) Numerous studies have linked consuming game meat with dangerously elevated blood lead levels in children and newborns.[[4]](#footnote-4)

Decades ago, the U.S. Fish and Wildlife Service took the bold and visionary step of banning the use of lead ammunition in waterfowl hunting because of the severe threat of lead pollution in our waters. Today, lead ammunition remains one of the largest unregulated sources of lead entering the environment.[[5]](#footnote-5) Since there is no safe level of lead, and the toxic effects are numerous and often irreversible, it is critical that every effort is made reduce any exposure to lead by phasing out lead ammunition especially in the places where wildlife seek refuge.

At the very end of the Obama administration, former U.S. Fish and Wildlife Service Director Ashe implemented a policy to end the use of lead ammunition on wildlife refuges, which was quickly reversed by the following administration. We hope you move forward with an open process that involves public comment and the input of the scientific community to achieves a durable policy that protects our wildlife refuges and public health into the future. Bald eagles are not only the symbol of our country but are culturally significant to many Native American tribal nations. They should not be poisoned in our nation’s unparalleled network of national wildlife refuges.

Sincerely,

Center for Biological Diversity

1. Vincent A Slabe et. al *Demographic Implications of Lead Poisoning For Eagles Across North America* 375 Ecotoxicology 779 (2022). [↑](#footnote-ref-1)
2. Rhys E. Green & Deborah J. Pain *Risks to Human Health from Ammunition-Derived Lead in Europe* 48 Ambio 954 (2019). [↑](#footnote-ref-2)
3. Micheal J. Kosnett *Health Effects of Low Dose Lead Exposure in Adults and Children, And Preventable Risk*

   *Posed By the Consumption of Game Meat Harvested with Lead Ammunition* in Ingestion of Lead from Spent Ammunition: Implications for Wildlife and Humans (2009) DOI 10.4080/ilsa.2009.0103 [↑](#footnote-ref-3)
4. Benoit Levesque *Monitoring of Umbilical Cord Blood Lead Levels and Sources Assessment Among the Inuit* 60 Occupational & Envtl. Medicine 693 (2003). [↑](#footnote-ref-4)
5. David C. Bellinger *Health Risks from Lead-Based Ammunition in the Environment - A Consensus Statement of Scientists* UC Santa Cruz: Microbiology and Environmental Toxicology (2013). [↑](#footnote-ref-5)