

Congress of the United States
House of Representatives
Washington, DC 20515

July 20, 2023

The Honorable Martha Williams
Director
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington, D.C. 20240

Dear Director Williams:

We write to express grave concern regarding the U.S. Fish and Wildlife Service's (USFWS) proposed rule to ban the use of lead ammunition and tackle on specified national wildlife refuge areas. While we appreciate the effort to promote public access for hunting and fishing on select national wildlife refuges (NWR), we are disappointed that these expansions provide for the use of non-lead hunting equipment only. In addition, we are further disappointed by the effort to phase out lead ammunition and tackle at eight other NWRs. Furthermore, we are concerned that USFWS has not provided any substantiated scientific evidence that clearly demonstrates lead ammunition and tackle has caused environmental harm within the identified refuges.

We believe strongly that banning the use of lead ammunition or tackle would result in a decrease in participation in hunting and angling due to increased costs on sportsmen and women. In 2021, the National Shooting Sports Foundation concluded that lead-free ammunition is on average 24.66 percent more expensive than lead ammunition.¹ In addition, the cost of raw materials to manufacture a lead alternative compared to traditional lead is substantial, with copper being four times more expensive than lead (\$8.49/kg vs. \$2.17/kg).² Raw materials for the two leading alternatives of lead-free fishing equipment, tin and tungsten, cost \$9.00/lb. and \$18.00/lb., compared to \$1.00/lb. for lead.³ These increased costs create participation barriers and decrease the number of Americans who can afford to enjoy hunting and fishing in the outdoors.

Banning these products could also cause a decrease in crucial conservation revenue for state fish and wildlife agencies. Revenues generated from hunting and fishing activities result in billions of dollars in conservation funding each year. As you know, the Pittman-Robertson Wildlife Restoration Act and Dingell-Johnson Sport Fish Restoration Act require that the sale of certain hunting and fishing equipment have an excise tax that is paid by manufacturers. In Fiscal Year 2023, the USFWS received a combined \$1.6 billion for wildlife conservation through these excise taxes.⁴ These funds are apportioned to states for their state-based fish and wildlife conservation

¹ "2021 Economic Impact of Ban on Traditional Ammunition in the United States." National Shooting Sports Foundation.

https://naturalresources.house.gov/uploadedfiles/2021_economic_impact_banning_traditional_ammunition_united_states_pdf.pdf

² <https://markets.businessinsider.com/commodities/copper-price> and <https://markets.businessinsider.com/commodities/lead-price>

³ "Position Statement on Lead Fishing Tackle." American Sportfishing Association. October 2022. <https://asafishing.org/wp-content/uploads/2023/06/ASA-Position-on-Lead-Fishing-Tackle-10-22.pdf>

⁴ "Certificate of Apportionment Pittman-Robertson Wildlife Restoration Act FY23". Martha Williams. U.S. Fish and Wildlife Service. 1/30/23. [Certificate of Apportionment Pittman-Robertson Wildlife Restoration.pdf \(fws.gov\)](#) and "FY 23 – Certificate of Apportionment for Dingell-Johnson Sport Fish Restoration." Martha Williams. U.S. Fish and Wildlife Service. 1/30/23. [Certificate of Apportionment for Dingell-Johnson Sport Fish Restoration.pdf \(fws.gov\)](#)

funding. Increasing participation costs for everyday Americans and the subsequent decrease in hunting and fishing participation would negatively impact conservation funding.

The timing of this announcement is also troubling. The day before the announcement the House Committee on Natural Resources passed H.R. 615, the “Protecting Access for Hunter’s and Angler’s Act of 2023,” out of Committee by a bipartisan vote. H.R. 615 would require that any proposed lead ban at a NWR be compatible with state law and based on scientific evidence related to the specific NWR. These are two essential factors when making as consequential a decision as banning lead ammunition and tackle.

With few exceptions, state wildlife management agencies are the agencies responsible for determining appropriate hunting and fishing regulations within their respective states. Creating arbitrary lead bans that effect only federal lands within a state that otherwise allows lead ammunition and tackle creates confusion for sportsmen and hinders participation. Should a state’s fish and wildlife management agency find substantiated scientific evidence that indicates the use of lead ammunition or tackle is detrimental to that states’ wildlife population, then it can choose how to regulate lead to the best interest of its citizens. In addition, without substantiated scientific data, making decisions to ban lead within a specific NWR hinders public trust and highlights everything that is wrong with the process being pursued by USFWS.

Without a doubt, America’s sportsmen and women are some of our country’s greatest conservationists. They play an invaluable role in conserving habitat for wildlife, ensuring there will be animals to hunt and fish for generations to come. We call on you to support our country’s sportsmen and women and withdraw the proposed rule. We believe that commonsense, science-based solutions that conserve fish and wildlife while promoting access to hunting and fishing on public lands across the country is the best course of action for the future. Unfortunately, the actions being pursued by the USFWS are not in line with that goal and we will continue to oppose them.

Sincerely,



Bruce Westerman
Member of Congress



Robert B. Aderholt
Member of Congress



Kelly Armstrong
Member of Congress



Cliff Bentz
Member of Congress



Jack Bergman
Member of Congress



Lauren Boebert
Member of Congress



Mike Bost
Member of Congress



Larry Bucshon, M.D.
Member of Congress



Jerry Carl
Member of Congress



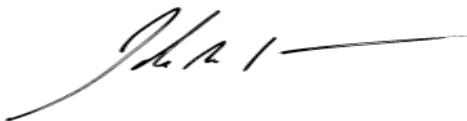
Earl L. "Buddy" Carter
Member of Congress



John Carter
Member of Congress



Mike Collins
Member of Congress



John Curtis
Member of Congress



Scott DesJarlais
Member of Congress



John Duarte
Member of Congress



Jeff Duncan
Member of Congress



Neal P. Dunn, M.D.
Member of Congress



Jake Ellzey
Member of Congress



C. Scott Franklin
Member of Congress



Russ Fulcher
Member of Congress



Paul A. Gosar, D.D.S.
Member of Congress



H. Morgan Griffith
Member of Congress



Glenn Grothman
Member of Congress



Michael Guest
Member of Congress



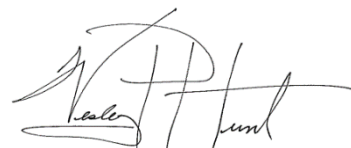
Harriet M. Hageman
Member of Congress



Andy Harris, M.D.
Member of Congress



Richard Hudson
Member of Congress



Wesley Hunt
Member of Congress



Dusty Johnson
Member of Congress



Mike Kelly
Member of Congress



Jen Kiggans
Member of Congress



Doug LaMalfa
Member of Congress



Robert E. Latta
Member of Congress



Michael Lawler
Member of Congress



Anna Paulina Luna
Member of Congress



Nancy Mace
Member of Congress



Tom McClintock
Member of Congress



John Moolenaar
Member of Congress



James Moylan
Member of Congress



Ralph Norman
Member of Congress



August Pfluger
Member of Congress



Guy Reschenthaler
Member of Congress



Matthew R. Rosendale, Sr.
Member of Congress



John Rutherford
Member of Congress



Austin Scott
Member of Congress



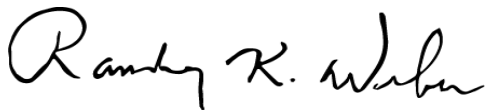
Pete Stauber
Member of Congress



W. Gregory Steube
Member of Congress



Tom Tiffany
Member of Congress



Randy Weber
Member of Congress



Roger Williams
Member of Congress



Robert Wittman
Member of Congress



Ryan Zinke
Member of Congress