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PUBLIC COMMENT
NATURAL RESOURCES COMMISSION MEETING
THURSDAY, FEBRUARY 13, 2020, 12:30PM
LANSING COMMUNITY COLLEGE, GANNON BUILDING, MICHIGAN ROOM
422 NORTH WASHINGTON SQUARE, LANSING 48933

Chair Schlaybaugh and members of the Natural Resources Commission:

My name is Julie Duke and I am a member of Attorneys for Animals, Inc. (AFA), and represent the organization today. Thank you for the opportunity to address the Commission. AFA is a Michigan non-profit and 501(c)(3) organization of legal professionals and animal advocates.

AFA frequently testifies before the Senate and House Natural Resources committees. We share with you a strong interest in the laws and policies affecting wildlife, although we may not always agree on what those laws and policies should be.

I am here today because of AFA's concern about the effects of lead and other toxic ammunition on wildlife and humans; and to call upon the NRC to regulate its use.

On January 21, 2020, a juvenile bald eagle thought to be female, was released on the east side of the Superior Dome in Marquette. Rescued by the DNR in December, she had undergone treatment at a rehabilitation center for about six weeks before recovering enough to be set free.

DNR officials had observed the eagle feeding on a deer for two days and that she did not fly away when approached. Tests indicated that the bird "was suffering from lead poisoning with lead levels exceeding the test's upper limit and more than three times what is considered toxic, which is usually fatal."ⁱ But this eagle was fortunate and recovered.

The U.S. Fish and Wildlife Service banned the use of lead ammunition to hunt migratory waterfowl in 1991 due to concern for the number of animals dying from ingesting spent lead pellets.

The DNR website has comprehensive information about lead poisoningⁱⁱ, and notes that eagles, loons, ducks, geese and swans are most commonly affected by lead poisoning, although upland game birds and small mammals also can be impacted. "The switch from lead to non-toxic shot has significantly reduced the number of waterfowl dying from lead poisoning in Michigan and in the U.S. Mortality still continues to be seen however in loons and eagles, as the sources of lead consumed by these two species are still legal to use ... " in Michigan, which has "no restrictions on the use of lead fishing tackle or lead ammunition used for upland game bird, small game or big game hunting."ⁱⁱⁱ

A common claim that non-toxic ammunition is more costly is disputed by a 2013 study by the National Center for Biotechnology Information. It concluded: “There is no major difference in the retail price of equivalent lead-free and lead-core ammunition for most popular calibers.”^{iv} The website huntingwithnonlead.org reaches a similar conclusion.^v

Governments, organizations and individuals, including sportsmen, are calling on hunters to stop the use of “outdated” toxic lead bullets^{vi}. California banned the use of lead for any hunting as of July 1, 2019. As many as 26 states have banned their use in small game hunting.^{vii} Utah provides incentives to go “unleaded”: according to a state official, “these methods have been successful in reducing the number of big-game hunters using lead by around 80 percent.”^{viii}

This spring, the Wisconsin DNR will begin seeking input on requiring nontoxic ammo in state-owned and state-managed wildlife areas.^{ix}

We call on the NRC and DNR to begin regulation of toxic ammunition.

Very truly yours,



Beatrice M. Friedlander, JD
Board President

Julie Duke
Member

ⁱ <https://www.mlive.com/news/2020/01/rescued-bald-eagle-that-had-lead-poisoning-to-be-released-in-up.html>

ⁱⁱ https://www.michigan.gov/dnr/0,4570,7-350-79136_79608_85016-26676--,00.html

ⁱⁱⁱ Ibid

^{iv} <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3758820/>

^v <http://huntingwithnonlead.org/>

^{vi} <https://www.wyofile.com/switching-to-nontoxic-ammo-makes-us-better-hunters-humans/>

^{vii} <https://www.duluthnewtribune.com/news/government-and-politics/4754997-Minnesota-DNR-wont-ban-lead-tackle-ammunition-without-Legislature-acting-first>

^{viii} <https://www.nrdc.org/onearth/hunter-asks-why-are-lead-bullets-still-thing>

^{ix} <https://doorcountypulse.com/state-takes-shot-at-spring-hearing-advisory-questions/>