



**To:** **Committee on Inland Fisheries and Wildlife**  
Cross Building  
Room 206  
Augusta, ME

**Re:** **LD 1015 – An Act to Ban Hunting with Ammunition That  
Contains Lead**

**Position:** **Oppose**

**Date:** **April 2, 2021**

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Honorable Chairs and Members of the Committee on Inland Fisheries and Wildlife:

My name is Joseph Mullin and I am the Assistant Manager, Northeastern States for the Congressional Sportsmen's Foundation (CSF). I respectfully urge you to oppose LD 1015 – legislation that would ban the use of lead ammunition while hunting. We are concerned that the proposed bill is not based on sound science, and if enacted, may cause significant negative impacts to both hunters and conservation funding for the state.

Since 1989, CSF has dedicated itself to the mission of working with Congress, governors, and state legislatures to protect and advance hunting, angling, recreational shooting and trapping. The unique and collective force of the Congressional Sportsmen's Caucus, the Governors Sportsmen's Caucus, and the National Assembly of Sportsmen's Caucuses, working closely with CSF, and with the support of major hunting, recreational fishing and shooting, and trapping organizations, serves as an unprecedented network of pro-sportsmen elected officials that advance the conservation interests of America's hunters and anglers.

Lead ammunition bans have become a priority issue for many raptor rehabilitation facilities after solitary cases arise of birds consuming fragments from lead bullets or shotgun pellets and later succumb to lead poisoning.<sup>1</sup> As is often the case with this type of legislation, it appears an emotionally-driven story about one particular bird – in this instance, a bald eagle – is the driving force. Although the case of Eagle 2U is tragic, we must remember that fish and wildlife

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<sup>1</sup> *Lead in Venison: Gray Toxin or Red Herring?* Deer and Deer Hunting, 2020. Attached as addendum.

management decisions in this nation are not, nor should they be, based on individuals. Rather, population-level trends and impacts are what sound, science-based management decisions are based on. When looking at bald eagles from the population-one quickly realizes that the species is flourishing throughout the nation. According to a U.S. Fish and Wildlife Service study from 2020, the number of bald eagles has more than quadrupled since 2009, resulting in a current estimated total of 316,700.<sup>2</sup> If the use of lead ammunition while hunting truly has such a detriment to the bald eagle population, then one would not expect this figure to increase so expansively – but it has.

Additionally, the rare occasion of individual birds ingesting lead shot often results in “aggressive campaign to make hunters aware of human health issues associated with consuming venison shot with lead bullets.”<sup>3</sup> Despite the claimed risks to human health and safety, an individual would have to eat significant “blood-shot burger frequently to maintain enough metallic lead in your digestive system for these fragments to be a dangerous source of lead poisoning.”<sup>4</sup> Drawing from the findings of this research, one may conclude that the occasionally cited argument that lead bullets will somehow cause human health concerns in the state’s water supply simply doesn’t hold up.

Wildlife management decisions must be left under the sound, scientifically-based discretion of the Maine Department of Inland Fisheries and Wildlife (MDIFW) – not the legislature. As the primary manager of the State’s fish and wildlife resources, the MDIFW is charged with managing wildlife at the population-level, not the individual-level, to ensure that management decisions are made in the best interest of conserving wildlife populations in the long run. Having said that, there does not appear to be any evidence that wildlife populations have been negatively impacted by the use of lead ammunition, and we therefore submit that LD 1015 is not a science-based decision.

Beyond the significant philosophical issues with legislatively managing wildlife rather than trusting the recognized scientific experts at MDIFW, we are also concerned with the general state of ammunition availability and prices. Hunters in Maine and across the nation presently find themselves in a bit of a tricky situation. The spring turkey season is quickly approaching yet demand for ammunition is so high that sportsmen and women are finding empty shelves at retail locations. Personally, with the upcoming season in mind, I have been driving to seemingly countless stores and standing in lines prior to the doors opening, in hopes of finding any shotgun shells. Considering the effect that this bill will have on hunters, nontraditional ammunition is significantly more expensive than lead shot and is not nearly as readily available for purchase as traditional ammunition. CSF researched some of the more popular calibers used for deer and bear hunting (i.e., 6.5 Creedmoor, .270 Win., .308 Win., etc.) that were in-stock online through Maine retailers, comparing the price discrepancies between lead and non-lead ammunition. The result was as one might expect – non-lead ammunition was, on average, 59% more expensive than lead options.<sup>5</sup> With manufacturers already struggling to meet the demand for traditional ammunition, they do not presently have the capacity to also increase production for non-traditional ammunition. Without the manufacturers being able to provide non-lead options, a ban on lead ammunition for

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<sup>2</sup> *U.S. Fish and Wildlife Service Final Report: Bald Eagle Population Size: 2020 Update*. U.S. Fish and Wildlife Service. Available at: <https://www.fws.gov/migratorybirds/pdf/management/bald-eagle-population-size-2020.pdf>.

<sup>3</sup> *Lead in Venison: Gray Toxin or Red Herring?* Deer and Deer Hunting, 2020. Attached as addendum.

<sup>4</sup> IBID.

<sup>5</sup> The data used in this calculation, collected by the Congressional Sportsmen’s Foundation on 03/30/2021, is included as an addendum.

all hunting throughout the state would result in many hunters being unable to participate. In turn, this would result in fewer licenses sold and less conservation funding for MDIFW. In short, by attempting to address a *perceived* issue for one species, this bill could negatively impact the conservation work of the MDIFW for countless others.

In 2020 alone, Maine's sportsmen and women generated over \$25.5 million for conservation through revenue derived from license sales and excise taxes on sporting-related goods in the unique "user pays - public benefits" structure known as the American System of Conservation Funding (ASCF). The funds collected through this program are the lifeblood of state fish and wildlife agencies (including the MDIFW) – the primary managers of our nation's fish and wildlife resources. These critical conservation dollars fund a variety of efforts including: enhanced fish and wildlife habitat and populations, recreational access to public and private lands, shooting ranges and boat access facilities, wetlands protection and its associated water filtration and flood retention functions, and improved soil and water conservation – all which benefit the public at large, not just sportsmen and women. Increases in ammunition costs, and forcing hunters to use a type of ammunition that is not readily available is a barrier to participation that would lead to reduced funding for the MDIFW.

In consideration of the reasons stated above, I respectfully urge the members of the Committee on Inland Fisheries and Wildlife to oppose LD 1015. Thank you for the opportunity to provide comments on this issue. Should you require any additional information on this, or any other sportsmen-related topic, please feel free to contact me at any time.

Sincerely,



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**Enclosed:**    *Lead in Venison: Gray Toxin or Red Herring?*  
                  *Lead Ammunition and Fishing Tackle – 2021*, an Issue Brief from the  
                  Congressional Sportsmen's Foundation.  
                  Price Data on Lead vs. Non-Lead Ammunition Presently Available Online from  
                  Maine Retailers – Data Collected on 03/30/2021.

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