



**To:**           **Honorable Members of the Joint Committee on Inland Fisheries and Wildlife**  
State House  
Cross Building, Room 206  
Augusta, ME 04333

**Re:**           **S 208 – An Act to Require Biodegradable Hooks and Lures for  
Freshwater Fishing**

**Position:**    **Oppose**

**Date:**        **February 27, 2019**

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

I write today to express the Congressional Sportsmen's Foundation's (CSF) opposition to Senate Bill 208 (S 208), legislation that would prohibit fishing in inland waters using nonbiodegradable hooks or certain nonbiodegradable artificial lures.

Since 1989, CSF has maintained a singleness of purpose that has guided the organization to become the most respected and trusted sportsmen's organization in the political arena. CSF's mission is to work 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 interests of America's hunters and anglers.

As a point of clarification, S 208 raises a relatively moot issue that the Maine Department of Inland Fisheries and Wildlife (MDIFW) had already addressed in a 2014 report that researched the effects of soft plastic lures (SPLs) and non-degradable hooks on freshwater fish. S 208 attempts to resurrect and accomplish roughly the same goals that a 2013 bill, LD 42, had identified, which led to the development of MDIFW's study. The research that MDIFW undertook regarding LD 42 can and should be applied to same situation that S 208 currently presents.

Much of MDIFW's 2014 study reflected data that had been compiled through field assessments, studies, and evaluations into the potential conditions SPLs may have on freshwater fish. Ultimately, this extensive, science-based study led MDIFW to assert the following recommendation on the issue:

Requiring the sale and use of only biodegradable SPLs is currently not a solution. There is currently no standard national or international definition for what constitutes biodegradable

plastic” and SPLs specifically. Based on the information presented in this report, the Department does not recommend any legislation at this time.

Unambiguously, MDIFW recommended that no legislation was necessary in addressing the topic of SPLs. The opinion that MDIFW issued was based on an approach in which it assessed the following four categories: summaries of published literature regarding the effects of SPLs and non-degradable hooks on freshwater fish; field and observational data collected by the Department in 2013; reviews of information obtained from the fishing tackle manufacturing industry; and recommendations regarding angler education and outreach, enforcement, and Department initiatives. Through all of these efforts, MDIFW still saw no reason to propose legislation curbing the use of SPLs.

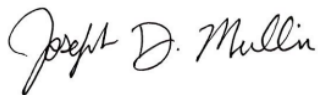
Through its recommendations, MDIFW did advise as to steps that could be taken in the future. MDIFW proposed an educational campaign, which would increase public awareness and lead to outreach efforts regarding limiting the discarding of SPLs. MDIFW directly made the following suggestions towards these efforts: “Education and outreach materials could be in the forms of permanent signage at boat launches, SPL collection boxes at boat launches for recycling, newspaper and television advertisements, and printed material in the fishing law books and on the Department’s website.” S 208 disregards MDIFW’s suggestions and acts counter to the initiatives that resulted from a science-based study. CSF offers its full support of the educational efforts that MDIFW has identified.

Regarding S 208’s proposed prohibition on nonbiodegradable hooks, MDIFW’s study found no literature on the effects that nonbiodegradable hooks have on freshwater fish, but it did go so far as to state that steel hooks will usually degrade in freshwater. S 208 attempts to regulate the use of hooks, whereas MDIFW already saw no detrimental evidence that would lead it to make a similar decision. The regulation of nonbiodegradable hooks will eliminate the majority of options available for anglers in the state of Maine. It would place an undue burden on sportsmen, curtailing tourism and business within the state, nor would it result in any appreciable benefits to the state’s freshwater fish populations, all while failing to achieve any of the goals set by MDIFW through its 2014 study.

CSF firmly believes that management decisions regarding fish and wildlife should be guided by the best available science. The professional biologists at MDIFW have studied this issue extensively and saw no reason for alarm. Fish and wildlife management in this nation is conducted at the population level. While it is no doubt true that individual fish may ingest and retain SPLs, population-level impacts as a result of either SPLs or non-degradable hooks have not been documented. Should this change, the professional fish and wildlife managers at MDIFW are fully capable of addressing it through the existing open and transparent regulatory framework.

For these reasons, we urge the Committee to reject S 208.

Sincerely,



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