



**Attn:** Commissioner Sarah Strommen  
**Re:** DNR Order Prohibiting Lead Ammunition on SNAs  
**Date:** July 14, 2023  
**Position:** Opposed

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Dear Commissioner Strommen,

I write to you today on behalf of the Congressional Sportsmen's Foundation to respectfully request that the Minnesota Department of Natural Resources (DNR) withdraw its recent emergency order prohibiting the use of lead ammunition on Scientific and Natural Areas (SNAs). This rule is not supported by the same rigor of verifiable and repeatable scientific evidence that typically guides wildlife management decisions, would cause damage to the state's economy, and would have negative consequences for wildlife conservation by decreasing the revenue the agency relies on to carry out its critically important mission. Moreover, should the DNR still wish to address lead in the environment there presently exist numerous examples of voluntary, educational, and/or incentive-based programs other agencies have employed which have a proven track record of reducing lead in the environment while also avoiding the unintended consequences of an outright ban.

Founded in 1989, the Congressional Sportsmen's Foundation (CSF) is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus (CSC), the Governors Sportsmen's Caucus (GSC), and the National Assembly of Sportsmen's Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

In August of 2022, the Minnesota DNR issued a similar emergency rule that banned the use of lead ammunition during special hunts on SNAs or in state parks. This order was reversed by a second emergency order two months later in October, which stated, "Ammunition that meets non-toxic requirements for hunting in state park special hunts is not readily available and could significantly reduce participation this year. This would reduce the deer population management benefits of these special hunts, adversely affecting other natural resources in state parks."<sup>1</sup> The market conditions of ammunition, including non-lead ammunition, have not changed in the months since the DNR issued this reversal. Minnesota hunters rely on being able to hunt the fifty-six SNAs contemplated under this rule, but without sufficient accessible ammunition, as the DNR admitted was the case just mere months ago, those hunters will be unable to participate in special hunts. In a time where fewer and fewer sportsmen and women across the country are participating in hunting, this rule continues to increase barriers to participate (except for those wealthy enough to hold title to private property or lease ground to hunt on) and undermines efforts to conserve the state's wildlife populations.

Creating this participation barrier harms more than just Minnesota's sportsmen and women and the wildlife that will no longer be properly managed through hunting; it is also likely to have negative financial impacts on both the DNR and the state's economy. As the Minnesota DNR is aware, through the unique "user pays – public benefits"

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<sup>1</sup> *Minnesota State Register*, 47 SR 394, October 24, 2022. [https://mn.gov/admin/assets/SR47\\_17%20-%20Accessible\\_tcm36-544924.pdf](https://mn.gov/admin/assets/SR47_17%20-%20Accessible_tcm36-544924.pdf).

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structure of the American System of Conservation Funding, sportsmen and women support wildlife management through revenue derived from purchasing sporting licenses, as well as excise tax revenue that is levied on outdoor goods such as firearms and ammunition. According to the U.S. Fish & Wildlife Service (USFWS), last year hunting licenses alone generated more than \$34 million dollars for the Minnesota DNR, which when matched by the USFWS with Wildlife Restoration dollars, amounted to more than \$68 million being collected by the DNR thanks to hunters.<sup>2</sup> Because non-lead ammunition is not sufficiently available to hunters, under this rule the DNR will sell fewer hunting licenses, the USFWS will receive less Pittman-Robertson revenue, and consequently the DNR will have less money to manage wildlife and their habitats. Additionally, the most recent estimates indicate that hunting contributes nearly \$1.4 billion to the state's economy.<sup>3</sup> The DNR's recent emergency rule jeopardizes this significant economic impact by reducing opportunities for Minnesotans to participate in the time-honored outdoor tradition that is hunting.

Wildlife management decisions made by state agencies across the country, including the Minnesota DNR, are made at the population-level rather than based on individual instances, and there is no known verified and repeatable scientific evidence that has determined lead ammunition impacts wildlife species at the population-level. Furthermore, the often-made claim that the use of lead ammunition is harmful to humans is also unfounded. According to the European Shooting Sports Forum, "Lead ammunition has been used for centuries and the behavior of the lead metal in the environment is known. Its aging and wreathing behavior in soils is known. Lead metal slowly forms compounds like oxides, hydroxides and sulfides depending on the soil chemistry and the precipitation. These are poorly soluble and do not leach ions readily, meaning that lead shot and projectiles are not generally bioaccessible in soils."<sup>4</sup> Therefore, because lead is not bioaccessible, it is unavailable for uptake by plants, including crops, meaning the use of lead ammunition does not introduce lead into the food supply. Further, the U.S. Center for Disease Control and Prevention (CDC) conducted a study of hunters and others that have consumed game containing fragments from lead shot to determine whether they have an elevated level of lead in their blood attributable to the ammunition used to harvest the game. The North Dakota Department of Health, a participant in the CDC study, released indications that show none of those tested had unsafe levels of lead in their blood.

Despite the lack of verified and repeatable scientific evidence supporting the notion that using lead ammunition impacts wildlife at the population-level, if the Minnesota DNR is intent on reducing lead use by hunters, there are successful examples of voluntary, incentive-based programs implemented by state fish and wildlife management agencies to reduce lead use without reducing the positive impact that hunters have on conservation. Arizona, Oregon, and Utah have adopted voluntary programs which provide hunters with incentives to utilize non-lead ammunition or carry entrails from harvested animals out of the field in certain areas. Recently, the New York State Department of Environmental Conservation announced a program offering rebates on non-lead ammunition to hunters participating in pre-and-post hunt surveys.<sup>5</sup> These programs allow hunters to transition away from lead ammunition without the access, economic, conservation funding, and wildlife management drawbacks that stem outright bans such as the DNR recently implemented.

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<sup>2</sup>*Hunting Licenses, Holders, and Costs by Apportionment Year*, U.S. Fish & Wildlife Service, Accessed July 11, 2023, [https://us-east-1.quicksight.aws.amazon.com/sn/accounts/329180516311/dashboards/48b2aa9c-43a9-4ea6-887e-5465bd70140b?directory\\_alias=tracs-quicksight](https://us-east-1.quicksight.aws.amazon.com/sn/accounts/329180516311/dashboards/48b2aa9c-43a9-4ea6-887e-5465bd70140b?directory_alias=tracs-quicksight).

<sup>3</sup> *2020 Economic Impact of Hunting and Shooting Technical Report*, Southwick Associates, p. 9, Accessed July 11, 2023, <https://www.southwickassociates.com/2020-economic-impact-of-hunting-and-shooting-technical-report/>.

<sup>4</sup> *The Effects of Lead Ammunition on Soil*. European Shooting Sports Forum. 2023.

<sup>5</sup> *DEC Announces Multi-Year Research Study to Improve Bald and Golden Eagle Conservation Efforts – Rebate Available for Eligible Hunters to Purchase Non-Lead Ammunition*, NYSDEC, July 12, 2023, <https://www.dec.ny.gov/press/128058.html>.

With the above points in mind, CSF respectfully requests that the Minnesota DNR withdraw this rule which would prohibit the use of lead ammunition on SNAs for special hunts. To do otherwise would harm the strong community of Minnesotan sportsmen and women by creating an unnecessary barrier to participation that runs contrary to the DNR's mission of conserving the state's wildlife populations and contradicts the current science, which does not show verified and repeatable evidence that lead ammunition impacts wildlife at the population-level.

Sincerely,

A handwritten signature in black ink that reads "Robert A. Matthews". The signature is written in a cursive style with a large initial 'R' and 'M'.

**Robert Matthews**

Senior Coordinator, Great Lakes States

Congressional Sportsmen's Foundation

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