

PROTECT TRADITIONAL AMMUNITION

Background

The National Shooting Sports Foundation (NSSF), the trade association for the firearms, ammunition, hunting and shooting sports industry, opposes efforts to ban or restrict the use of traditional ammunition containing lead components for use in hunting or shooting unless there is sound science conclusively establishing that the use of traditional ammunition is causing an adverse impact on a wildlife population, the environment or on the human health of those consuming game harvested with traditional ammunition, and that other reasonable measures, short of restricting or banning the product, cannot be undertaken to adequately address the concern.

Recently, some have falsely claimed that the use of traditional ammunition poses a danger to (1) wildlife, in particular raptors such as bald eagles, that may feed on entrails or unrecovered game left in the field and (2) that there is a human health risk from consuming game harvested using traditional ammunition. Some also wrongly claim that the use of traditional ammunition at shooting ranges amounts, in essence, to polluting the environment, even though the U.S. Environmental Protection Agency does not consider expended ammunition at shooting ranges to be a problem. Furthermore, the Interior Department's U.S. Geological Survey data show traditional ammunition uses only about 5 percent of all lead used in the U.S.

Wildlife Populations

Wildlife management policy is based on managing population

- **There is no scientific evidence that the use of traditional ammunition is having an adverse impact on wildlife populations that would require restricting or banning its use beyond current limitations.**
- **Studies show the population of bald eagles and other raptors are soaring in recent years throughout the U.S.**
- **A ban on traditional ammunition would have a serious negative impact on wildlife conservation. The federal excise tax that manufacturers pay on the sale of the ammunition (11 percent) is a primary source of wildlife conservation funding. The higher cost of alternative ammunition will price everyday consumers out of the market.**

impacts, not on preventing isolated instances of harm to specific individual animals in a species. Absent sound scientific evidence demonstrating a population impact caused by the use of traditional ammunition, there is no justification for restricting or banning its use.

With very limited exceptions, such as waterfowl and possibly the California condor – where the evidence of a causal connection to spent ammunition fragments is far from conclusive, there is simply no sound scientific evidence that the use by hunters of traditional ammunition is causing harm to wildlife populations. In the case of raptors, there is a total lack of any scientific evidence of a population impact. In fact, just the opposite is true. Hunters have long used traditional ammunition, yet raptor populations have significantly increased all across North America – a trend that shows no sign of letting up. If the use of traditional ammunition was the threat to raptor populations some make it out to be, these populations would not be

soaring as they are.

Considering that traditional ammunition accounts for only about 5% of all domestic uses of lead, according to the USGS, it is no surprise that traditional ammunition does not cause harm to animal populations.

Benefits of Traditional Ammunition and Threats if a Ban Occurs

The excise tax dollars (11 percent) manufacturers pay on the sale of ammunition – the very ammunition some groups choose to demonize – is the primary source of wildlife conservation funding in the United States and the financial backbone of the North American Model of wildlife conservation. The bald eagle's recovery, a truly great conservation success story, was made possible and funded by hunters using traditional ammunition. In fact, recent statistics from the United States Fish and Wildlife Service show that from 1981 to 2006 the number of breeding pairs of bald eagles in the United States increased 724

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percent. And much like the bald eagle, raptor populations throughout the United States are soaring.

Needlessly restricting or banning traditional ammunition absent sound science will hurt wildlife conservation efforts as fewer hunters take to the field thereby undercutting financial wildlife management resources.

Alternatives to traditional ammunition are not practical. The higher costs associated with this ammunition will price everyday consumers out of the market. This is evidenced by the low 1 percent market share of metallic non-traditional ammunition. The higher cost is simply not justified, especially at the expense of good paying jobs here in the U.S.

Consuming Game Harvested with Traditional Ammunition

For more than a century, hundreds of millions of Americans have safely consumed game harvested using traditional hunting ammunition. Yet, in 2008, when a dermatologist from North Dakota who is on the board of the Peregrine Fund – a group whose stated mission it is to ban the use of traditional ammunition for hunting – claimed to have collected from food pantries packages of venison that contained fragments from lead bullets, many people became concerned and some officials overreacted to the allegations made at the time that this proved that consuming game harvested with traditional ammunition posed a human health risk.

North Dakota failed to conduct its own study. Instead, they merely

accepted the lead-contaminated samples hand-picked by the dermatologist and submitted those samples to a lab in Iowa for testing. Based on those test results, North Dakota health officials ordered state food pantries to destroy all donated venison and to stop accepting further donations. The Iowa lab official in charge of the testing, Rick Kelly, was highly critical of North Dakota, “I think North Dakota is drawing the wrong conclusions. We did what they asked, but they did not take an arbitrary sample.”

To put this issue in perspective, consider this statement from the Iowa Department of Public Health (IDPH), a state agency that has tested the blood lead level of Iowa residents for over 15 years: “IDPH maintains that if lead in venison were a serious health risk, it would likely have surfaced within extensive blood lead testing since 1992 with 500,000 youth under 6 and 25,000 adults having been screened.” Iowa has never had a case of a hunter having elevated lead levels caused by consuming harvested game.

CDC Results

A study from 2008 by the U.S. Centers for Disease Control and Prevention (CDC) on blood lead levels of North Dakota hunters confirmed that consuming game harvested with traditional ammunition does not pose a human health risk. Calls to ban or restrict the product by groups opposed to traditional ammunition, like the Peregrine Fund, and anti-hunting

groups, like the Humane Society of the United States (HSUS), are scientifically unfounded and nothing more than a scare tactic to advance their political agenda.

In looking more closely at the CDC study results, perhaps most telling is the fact that the average lead level of the hunters tested was lower than that of the average American. In other words, if you were to randomly pick someone on the street, chances are they would have a higher blood lead level than the hunters in this study.

The Toxic Substance Control Act

The Toxic Substance Control Act (TSCA) expressly exempts ammunition from the oversight of the Environmental Protection Agency. However, this exemption is now being challenged by anti-hunting groups in court. Because of this, members of the firearms industry are urging members of Congress to support legislation that would clarify Congress’ original intent to exempt ammunition.

A ban on traditional ammunition will affect not only hunters and sportsmen, but also law enforcement, military and target shooters who may never go afield as well as the ability of the firearms industry to continue growing and creating more jobs for Americans. Passing an amendment that will necessarily lessen the military and law enforcements ability to train puts the safety and well-being of all Americans at risk.

