



To: Hon. Brian J. Feldman
Chair, Senate Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
Annapolis, MD 21401

Re: Senate Bill 634 – Hunting – Nonlead Ammunition, Fox Chasing, and
Deer Management

Position: Oppose in Current Form / Request Amendment

Date: 3/4/2025

Chairman Feldman, Vice Chair Kagan, and Honorable Members of the Maryland Senate Education, Energy, and the Environment Committee,

As the Assistant Manager, Mid-Atlantic States for the Congressional Sportsmen's Foundation (CSF), and as a generational Eastern Shore Native and a resident hunting and fishing license holder, I respectfully urge that the nonlead ammunition provision within Senate Bill 634 (SB 634) – Hunting – Nonlead Ammunition, Fox Chasing, and Deer Management, be amended out of this legislation. While CSF is in support of the Fox Chasing and Deer Management provisions in this bill, we cannot support this legislation in its current form as it contains the non-lead hunting ammunition provision.

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 capitals advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

CSF supports keeping hunting as the preferred method of wildlife management as it philosophically follows the North American Model of Wildlife Conservation and provides critical funding for state level wildlife and habitat management through the American System of

Conservation Funding (ASCF)¹. CSF is in support of bringing fox chasing in line with all other forms of hunting by requiring the purchase of a hunting license and also supports the laudable effort of bringing farmers and hunters together to manage the White-tailed deer populations and to help mitigate any potential crop depredation. Although we would like to offer our support for these items, we unfortunately must adamantly oppose SB 634 in its current form due to the inclusion of the nonlead hunting ammunition language.

The nonlead ammunition provision will require the Department of Natural Resources (DNR) to require the use of nonlead ammunition for all game species on or before July 1, 2029. The long-term effects of a statutory ban on lead hunting ammunition may be extremely detrimental to conservation funding, which is directly driven by hunters. Moreover, there are proven-successful voluntary and incentive-based programs run by other states to encourage hunters to switch to lead alternatives that avoid these unintended, but foreseeable consequences. CSF strongly suggests that Maryland look instead to a similar program that could be managed by the DNR which would allow them to address the social concerns that have been raised around lead hunting ammunition, without compromising their funding stream.

When it comes to lead ammunition bans, the negative impact to hunter participation, and ultimately conservation funding, is of concern to CSF. As of 2024, there were 113,460 certified paid hunting license holders in Maryland that generated \$6,379,820 in hunting license sales and \$9,217,537 in USFWS Wildlife Restoration dollars, totaling more than \$15.5M in conservation dollars from hunting alone. Hunters are boots-on-the-ground conservationists that continue to provide the most efficient and cost-effective method of managing wildlife populations.

In the current market, non-lead ammunition is not sufficiently available and is more costly, which will likely prevent hunters from participating in a time-honored tradition that is a pillar of the state's culture. Additionally, like many states in the region, Maryland is continuing to see a steady increase in human-wildlife conflicts, particularly with White-tailed deer populations. The nonlead ammunition provision within SB 634 will likely eliminate opportunity for hunters to take game, as they may not be able to hunt if they cannot access non-lead ammo. This unintended, but foreseeable consequence of the proposed lead ammunition ban will ultimately result in the legislature creating a new barrier for hunters to keep wildlife populations such as White-tailed deer within acceptable biological and social carrying capacities.

Creating this participation barrier harms more than just Maryland's sportsmen and women and the wildlife that will no longer be properly managed through hunting; it also has significant negative financial impact on both the DNR and the state's economy. As noted above, Maryland's DNR receives significant funding through the unique "user pays – public benefits" structure of the ASCF. Sportsmen and women support wildlife management through purchasing sporting licenses, as well as a manufacturer-level excise tax that is levied on outdoor goods such as firearms and ammunition (Pittman-Robertson). Because non-lead ammunition is not sufficiently available to hunters in the current marketplace or for all hunting calibers, phasing out lead ammunition will

¹ [American System of Conservation Funding \(ASCF\)](#)

ultimately lead to fewer sales of hunting licenses, and consequently the DNR will have less money to manage the state's wildlife resources.

Upon request, CSF is more than willing to provide this body and the DNR, years of documented evidence from existing voluntary and incentive-based programs. Management objectives to address localized concerns with the use of lead ammo can be addressed effectively, and in a manner that does not create the widespread and foreseeable unintended consequence of hurting all conservation efforts in the state through decreasing conservation funding. CSF encourages the legislature to work with the DNR to develop and implement such a program should science support the need.

In closing, CSF encourages the legislature and the Department of Natural Resources to work together to implement incentive-based programs for the use of non-lead hunting ammunition by hunters if there exists demonstrable scientific evidence that such an effort is needed to address population-level impacts of lead exposure in specific wildlife species. CSF further recommends that such a program be developed and tested prior to any further consideration of a statutory ban on lead ammunition with its attendant and consequential diminishment of conservation funding. For these reasons, we respectfully request the nonlead ammunition provision of this bill be removed.

Sincerely,



Kaleigh E. Leager

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Enclosed: Review of Options for Effectively Addressing the Issue of Lead Hunting Ammunition and Wildlife (North American Non-Lead Partnership)

Options for Effectively Addressing the Issue of Lead Hunting Ammunition & Wildlife

Voluntary Efforts Provide Engagement with Community as Partners in Success

Voluntary efforts have documented improvement in community support and participation in mitigation of lead exposure, while regulatory approaches have resulted in negative perceptions of scientists and agencies although neither have resulted in reductions in lead caused mortality.

California is currently the only state with statewide legislation requiring the use of lead-free hunting ammunition. Data from CDFW conservation officers indicated that deer hunters contacted on public land “self-reported” high rates of non-lead ammunition use following the implementation of the legislation. Voluntary efforts in AZ are restricted to two 2-week deer seasons with 87% participation for over a decade. If using lead poisoning as the measure of success in populations of CA condors, both populations (California/Mexico & Arizona/Utah) continue to experience unsustainably high levels of lead exposure and mortality. Neither approach has yet solved the problem. However, if attitudes and actions are measured within the hunting population, voluntary programs have demonstrated high levels of support. Further, recent human dimensions work documented negative and hostile opinions within California hunters regarding the regulation of ammunition, including increased distrust of science and scientists, and belief that the legislative requirement was connected to anti-hunting efforts, a distinct difference from other areas of the country, many of which have been engaged with voluntary programs.

Enforcing lead-free ammunition requirements for centerfire and other single projectile firearms is nearly impossible for enforcement officers. Lead-core, copper-jacketed projectiles are indistinguishable from lead-free options, and despite the greater than 15 years of existing regulation in parts of CA, no field tests have been developed to assist enforcement officers. Measures of compliance have not been conducted in California beyond self-reporting, in part due to the inability to differentiate between bullet types. This creates an unenforceable mandate for enforcement officers, which erodes legislative authority.

Collaborative Partnerships Are Growing Across North America- MD DNR is Actively Participating

States wildlife management agencies working in cooperation with stakeholders are finding proactive education and engagement results in measurable success.

MD DNR has participated in a combination of programs, including a regional engagement effort through NEAFWA. In 2024 alone, MD DNR has participated by hosting and supporting 4 separate modern hunting ammunition workshops with staff and stakeholders to learn more about lead exposure in wildlife from hunting ammunition, techniques for sharing information, information about the North American Non-lead Partnership and potential engagement with

hunters in MD. Support for voluntary, incentive based programs has been raised through these engagements, including with MD DNR commissioners interested in how voluntary programs may be effective in MD. Initial human dimensions work indicates positive response from staff and stakeholders for continuing to engage hunters as partners in addressing unintended lead exposure in wildlife from hunting ammunition. New hunter education content is being developed to increase the engagement with hunters across the region, including Maryland.

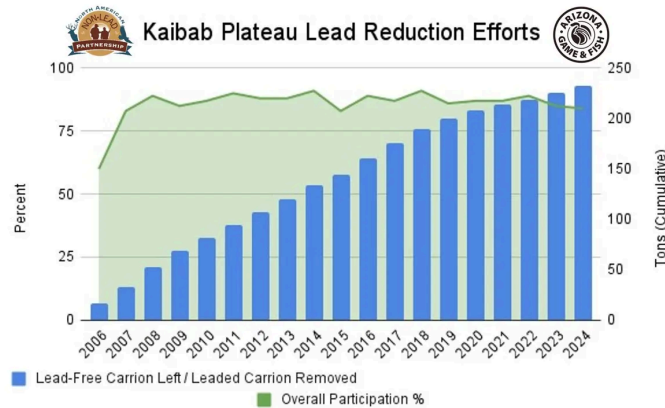
MD DNR has the skilled staff to navigate complex conservation challenges, and the ongoing regional work through NEAFWA provides a method for the state to maximize positive outcomes for constituents and wildlife, while maintaining support for the application of wildlife management. Wildlife management agencies have the appropriate processes to manage wildlife conservation with input from the public. Wildlife management through the department allows for the management of contentious conservation topics and ability to address challenges through adaptive management. Proactive actions conducted by states can assist in developing informed constituents, and improve conservation practices while maintaining necessary flexibility to respond to new challenges and information. MD DNR has already enacted a series of proactive efforts to support the adoption of conservation behaviors that reduce the risk of lead exposure in wildlife from hunting ammunition.

North American Non-lead Partnership Support for Fish & Wildlife Management Agencies

A formal way to demonstrate momentum in the state of Maryland for voluntary lead-free hunting education and incentive programs is through Maryland hunting conservation organizations, including MD DNR, joining the North American Non-Lead Partnership (the Partnership). Joining the Partnership demonstrates a formal commitment to promoting voluntary programs as evidenced by the [resolution](#) that all partners agree to. By joining the Partnership, [partnering organizations](#) have access to staff who are knowledgeable in communicating messages and implementing voluntary education and incentive programs that have been successful in other states. Through development of funding and incentive program goals, the Partnership has the demonstrated skills and abilities to implement education and incentive programs to increase hunter engagements in voluntary lead-free hunting programs. For example:

Example #1 [Arizona Strip Mule Deer Hunt](#)

- Working in collaboration with hunters on the Kaibab Strip, Arizona Game & Fish Department, The Peregrine Fund, and other partners built a voluntary, incentive program that supports the use of lead-free ammunition during the mule deer hunting seasons. Hunters have contributed to the conservation and stewardship of scavenging wildlife by using lead-free ammunition or removal of remains containing lead fragments from the field. For over a decade, 87% of hunters have volunteered to take action that reduces the amount of lead introduced into the food web.



The above graph shows the percentage of Kaibab Plateau deer hunters (green line/area, percent on left) voluntarily choosing to reduce lead available to scavenging wildlife by either using lead-free hunting ammunition or removing gutpiles of animals shot with lead hunting ammunition and the resulting tons of lead-free food removed from the food web/lead-free food made available to scavengers throughout the duration of the program (blue bars, tons on the right).

Example #2 [Utah DNWR Incentive Program](#)

- Utah Division of Wildlife Natural Resources works together with conservation organizations and hunters in southern UT to increase the use of lead-free ammunition. Over 80% of hunters in the area voluntarily choose to use modern lead-free hunting ammunition, providing valuable food sources free of accidental lead contamination for wildlife that feed on the remains left in the field.

Example #3 [Oregon Dept of Fish & Wildlife](#)

- Oregon Department of Fish & Wildlife has worked with partners, including the Oregon Zoo, hunting organizations, and others, to develop a statewide voluntary program. A pilot test on The Nature Conservancy's Zumwalt Prairie Preserve found that hunters chose to support conservation efforts through the choice of lead-free ammunition, going from less than 30% choosing lead-free hunting ammunition, to 77% choosing lead-free within 3 years of the program starting. Now hunters state-wide are offered opportunities to test, purchase, and [win hunting gear and other incentives](#) for voluntarily choosing lead-free ammunition.

To become an NANP partner, an organization agrees and formally commits to the Partnership resolution promoting voluntary education and incentive programs. To learn more about how to become a partner, organizations are encouraged to contact Partnership co-founder Leland Brown and Chris Parish to be sent a partnership packet to review.

Continental Efforts to Engage Communities as Partners

Positive engagement with stakeholders provides opportunities for success.

The work the MD DNR has engaged in is connected to efforts across the continent. The North American Non-lead Partnership has over 50 [partners](#) across the US and Canada, including North East Association of Fish & Wildlife Association (NEAFWA) and Midwest Association of Fish & Wildlife Agencies (MAFWA). The NEAFWA program is funded through 2025 and is pursuing additional funding to support member states with engagement with stakeholders and developing effective strategies to address unintended lead exposure without negatively impacting the ability of wildlife professionals and stakeholders to manage and remain engaged as partners in conservation. Through the support of NEAFWA members, including MD DNR, hunting education modules have been developed to support training of hunter education instructors, mentors, new hunters and others on options to reduce lead poisoning in wildlife from hunting ammunition. Additionally, updates to basic hunter education core curriculum have been approved and are in development for the instruction of every new hunter across North America.

MAFWA, in cooperation with the Partnership, and a broad variety of stakeholders including NGOs and industry, recently approved [Best Management Practices](#) to support wildlife management agencies and other stakeholders in addressing unintentional lead exposure from sporting practices (including hunting and fishing) in a proactive process. Partners across the country have developed and are implementing voluntary programs, supporting hunters' choice of ammunition that interrupts the introduction of lead into food chains, including in AZ, UT, OR, and AK. Hunters in AZ have consistently maintained over 85% participation in voluntary, incentivized programs, even during periods where access to lead free ammunition was severely reduced. This program has provided many tons of clean food sources, or removed tons of remains that may have contained lead, helping to reduce lead exposure in CA Condors on the Kaibab plateau. Human dimensions work from across the country shows that hunters and other stakeholders are supportive of collaborating to find solutions that maintain democratic access to hunting, and adequately address current challenges faced by hunters attempting to choose actions that interrupt lead in food chains. These challenges include accessibility, cost, questions about performance, understanding of the process of lead exposure, and identification of lead-free options. A regulation without support for addressing these challenges is unlikely to be successful, and may result in a decline in trust and support for other conservation efforts.

Opportunities for Policy Leaders to Learn More

Adam Miller is the Partnership's NE Program Manager, and is in position to share information with stakeholders, including legislators on the topic of lead exposure in wildlife, effective communication and mitigation, and maintenance of the North American Model of Wildlife Conservation. If requested, MD DNR staff can work with Adam to provide an informational presentation and ballistics demonstration to committees or bill sponsors to better understand the complexities of this economic, social, and conservation challenge.