



March 4, 2025

Chair Brian J. Feldman

Members of the Senate Education, Energy, and the Environment Committee

Re: Earthjustice support of SB 634:

Hunting – Nonlead Ammunition, Fox Chasing, and Deer Management

Earthjustice¹ strongly supports the passage of SB 634, which would require the Department of Natural Resources to adopt regulations requiring the use of nonlead ammunition for all hunting by July 1, 2029, along with earlier nonlead requirements for hunting certain species. This bill represents a vital, common-sense measure to protect people and wildlife from the unnecessary harm posed by hunting with lead ammunition while maintaining the full range of existing hunting opportunities available to the public.

Ingestion of residual lead ammunition from hunting is the primary source of lead poisoning of birds and other wildlife, which injures or kills millions of birds each year.² Lead poisoning harms numerous species, and particularly severe impacts have been documented for certain of them, including waterfowl and bald and golden eagles.³ For example, a major 2022 study in the journal *Science* found that nearly half the dead bald and golden eagles tested nationwide had lead levels indicating chronic lead poisoning and the observed rates of lead poisoning were sufficient to significantly slow both species' rate of recovery from near extinction.⁴ While lead poisoning can kill birds immediately, it also causes lasting, potentially fatal damage even when not immediately lethal.

Hunting with lead ammunition also harms people. Lead fragments can be found in wild game meat despite best attempts to remove sections surrounding a bullet wound.⁵ And studies have found that eating game shot with lead ammunition is associated with increased levels of lead in the human body—a clear danger given the well-known harmful impacts of lead on human health.⁶

¹ Earthjustice is a non-profit public interest environmental law organization that represents other non-profits free of charge. Earthjustice uses the power of law and the strength of partnerships to advance clean energy, combat climate change, protect people's health and preserve magnificent places and wildlife.

² Deborah J. Pain, et al., *Effects of lead from ammunition on birds and other wildlife: A review and update*, 48 *Ambio* 935–953 (2019), <https://doi.org/10.1007/s13280-019-01159-0>. (“Pain et al. (2019)”)

³ Pain et al., (2019); U.S. Fish & Wildlife Serv., 2022–2023 Station-Specific Hunting and Sport Fishing Regulations, 87 Fed. Reg. 57108 (Sept. 16, 2022), <https://www.federalregister.gov/documents/2022/09/16/2022-20078/2022-2023-station-specific-hunting-and-sport-fishing-regulations>

⁴ Vincent A. Slabe, et al., *Demographic implications of lead poisoning for eagles across North America*, 375 *Science* 779–782 (2022), <https://www.science.org/doi/10.1126/science.abj3068>, (“Slabe (2022)”).

⁵ National Park Service, *Lead Bullet Risks for Wildlife & Humans*, Pinnacles National Park, <https://www.nps.gov/pinn/learn/nature/leadinfo.htm>.

⁶ Eric J. Buenz, *Lead Exposure Through Eating Wild Game*, *American Journal of Medicine*, 129(5): 457-58 (May 2016), [https://www.amjmed.com/article/S0002-9343\(16\)30021-3/fulltext](https://www.amjmed.com/article/S0002-9343(16)30021-3/fulltext); David Bellinger, et. al., *Health Risks from Lead-Based Ammunition in the Environment - A Consensus Statement of Scientists* (2013), https://www.biologicaldiversity.org/campaigns/get_the_lead_out/pdfs/Scientists_Health_Impacts_letter_3-13.pdf.

Thankfully, these are avoidable problems. Non-lead ammunition is widely available, just as effective, and comparably or even lower priced than premium lead ammunition. A 2013 study found that lead-free ammunition is available in the United States in “all of the common and less-common rifle calibers,” and found “no major difference” in the price of lead-free and lead-core ammunition for most popular calibers.⁷ The Maine Department of Inland Fisheries and Wildlife notes on its website that the overall price differential between lead and non-lead ammunition is less than \$10 per year for a typical hunter and lead-free ammunition is available in “a large array of calibers, weights and designs that meet or exceed the performance of their lead counterparts.”⁸ Studies confirm that non-lead ammunition is just as effective as lead ammunition for hunting, while avoiding harm to non-target animals and producing game meat that is much safer for people to eat.⁹ Given the comparable price, wide availability, and equivalent effectiveness of non-lead ammunition, it is not surprising that the U.S. Fish and Wildlife Service has observed no declines in hunting attributable to phasing out lead ammunition on the federal lands where lead ammunition is now prohibited.¹⁰ In sum, requiring the use of nonlead ammunition solves a serious wildlife conservation problem while maintaining Maryland’s traditional hunting opportunities.

SB 634 thus represents a crucial, common-sense step to protect people and wildlife from the harmful effects of lead ammunition. Earthjustice strongly supports its passage.

Respectfully submitted,



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⁷ Vernon G. Thomas, *Lead-Free Hunting Rifle Ammunition: Product Availability, Price, Effectiveness, and Role in Global Wildlife Conservation*, *Ambio* 42(6):737-45 (October 2013), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3758820/>.

⁸ Maine Department of Inland Fisheries and Wildlife, “Hunting with Nonlead Ammunition,” <https://www.maine.gov/ifw/hunting-trapping/hunting/nonlead-ammunition.html#effectiveness>.

⁹ See, e.g., Anna Trinogga, et al., *Are lead-free hunting rifle bullets as effective at killing wildlife as conventional lead bullets? A comparison based on wound size and morphology*, *Science of The Total Environment* 443: 226–232 (January 2013), <https://www.sciencedirect.com/science/article/pii/S0048969712013848>.

¹⁰ U.S. Fish & Wildlife Serv., 2022–2023 Station-Specific Hunting and Sport Fishing Regulations, 87 Fed. Reg. 57108 (Sept. 16, 2022), <https://www.federalregister.gov/documents/2022/09/16/2022-20078/2022-2023-station-specific-hunting-and-sport-fishing-regulations>.