December 30, 2024



To Safer Products for Washington members,

My name is Tracy Hart and I'm a member of the international Loon Community Science and Stewardship Working Group and also direct Maine Audubon's Loon Restoration Program. Maine Audubon has been instrumental in legislation to ban the use of lead fishing tackle in the state. I am writing to express my concerns about the use of lead in fishing tackle and sporting goods and its impacts on both wildlife and human health. Lead poses significant risks to people, birds, and animals, and I strongly urge Washington to take action to protect both its wildlife and its communities by considering fishing tackle, ammunition, and other sporting goods a priority product for the regulation of lead and lead compounds. My specific concerns include:

- 1. Harm to Humans: In the process of making and using tackle or ammunition, people and the environment are exposed to lead in many ways through mining, smelting, manufacturing, and the use of lead products. Lead poisoning can accumulate over time, especially in children or high-risk individuals who consume contaminated fish or meat that contains small lead particles. The harmful effects of lead exposure are well-documented, ranging from developmental and cognitive impairments in children to increased risk of heart disease and kidney problems in adults. As people continue to engage in angling and hunting, reducing lead exposure in sportsmen and women is critical.
- 2. Threats to Wildlife: An estimated 48 to 80 tons of fishing weights are lost annually in Washington (Washington State Department of Ecology & Department of Health. Lead Chemical Action Plan. 2009. [No. 09-07-008]). Metallic lead in any form, like fishing tackle or gunshot, is toxic to wildlife when ingested. Lead poisoned mammals often die or experience nervous system damage, causing them to stop foraging, walk aimlessly, become blind or be unresponsive. Many waterfowl, including the Common Loon (a species of Greatest Conservation Need under the Washington State Wildlife Action Plan), mistake lead sinkers and jigs for food or pebbles that they ingest to help them digest their food. Research on Common Loon mortalities in Washington state has shown that mortality due to lead toxicosis occurs across all habitat ranges and across the state's water bodies. According to the Northwest Swan Conservation Association, swans can also mistakenly eat lead shot to aid in digestion and it takes only 3 lead shot pellets to kill a 30-pound Trumpeter Swan, which is designated a Priority Species for conservation in Washington. Once ingested, lead poisoning frequently results in paralysis and death. Sub-lethal doses of lead effect their ability to feed, migrate, and reproduce. Given the significant bird populations in Washington, particularly along its coastal and freshwater ecosystems, this poses a serious ecological risk.

Fortunately, non-toxic alternatives to lead tackle are available and widely used. Materials like tungsten, tin, steel, and bismuth are safer options that do not pose the same ecological or health risks. It's also important to note that coatings such as paint on lead fishing gear have uniformly been found not to prevent digestion and absorption of the toxic metal. Such coatings do not protect wildlife from lead poisoning. Non-toxic alternatives to lead shot are

also available in steel, bismuth, and tungsten and bullets made of copper or brass can be used in place of lead bulltets.

By adopting uniform regulations to phase out lead in the manufacturing of fishing tackle and ammunition, Washington can protect its wildlife and create safer environments for residents and visitors. I strongly encourage the state to include fishing tackle, ammunition, and other sporting goods as priority consumer products to safeguard our wildlife, protect public health, and ensure a cleaner, safer environment for all.

Thank you for considering this important issue.

Sincerely,
Tracy Hart, Wildlife Biologist & Director of the Maine Loon Restoration Project
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