Griffin Archambault

Public Comment on Lead Tackle Regulation

To Safer Products for Washington members,

I, Griffin Archambault, am a member of the Loon/Diver Stewardship and Loon Rescue/Rehab Working Groups and I work as the Research Biologist for the Adirondack Center for Loon Conservation. I am writing to express my concerns about the use of lead in fishing tackle and sporting goods and its detrimental effects on both wildlife and human health. Lead poses significant risks to people, birds, and animals, and I strongly recommend 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.

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 sportswomen is critical to protecting public health.
2. **Threat to Wildlife**: Metallic lead in any form, like fishing tackle or gunshot, is toxic to birds and other animals when ingested. Many waterfowl mistake lead sinkers and jigs for food or pebbles that help them digest their meals. 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]). Research on mortalities of the Common Loon (a species of Greatest Conservation Need under the Washington State Wildlife Action Plan) 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. Only 3 lead shot pellets are sufficient to kill a 30-pound Trumpeter Swan (a Priority Species for conservation in Washington). Once ingested, lead poisoning often results in paralysis and death. The poisoning also affects an animal's 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**.**
3. **Non-Toxic Alternatives**: 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 ineffective in preventing mobilization and absorption of toxic levels of lead into an animal's body. Such coatings do not protect wildlife from lead poisoning.

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 recommend that the state includes 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,
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