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Lead Ammunition/Tackle: Center for Biological Diversity Petition to U.S. Fish and Wildlife Service Requesting National Wildlife Refuge Phase Out

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The Center for Biological Diversity and two other organizations (collectively “CBD”) submitted a June 8th Petition to the United States Department of Interior and United States Fish and Wildlife Service (collectively “USFWS”) requesting a phase out of lead ammunition and tackle across the National Wildlife Refuge System (“Refuge System”).

The other two organizations executing the Petition include:

- Texan Physicians for Social Responsibility
- Sierra Club

CBD describes lead as a highly toxic substance which can affect various biological functions. The organizations argue that the use of lead ammunition in fishing tackle exposes various wildlife species to toxic effects.

Cited as particularly susceptible are scavengers that encounter lead shot or bullet fragments in carcasses left in the wild or from animals cleaned in the wild. Some of the scavengers are stated to include rare and protected species.

The Petition includes a section providing the legal authority CBD believes is available to USFWS to address the issue and proposed regulatory language. Additional arguments in support of the Petition include:

- Lead bans would protect the Refuge System, as mandated by the Refuge Act
- Lead bans would protect migratory birds, eagles, as required by the Migratory Bird Treaty Act and Bald and Gold Eagle Protection Act
- Lead bans would protect endangered species and other wildlife, as required by the Endangered Species Act and the Fish and Wildlife Act

The Petition requests the following specific actions:

- Issue a Director’s Order requiring a phase out of toxic lead ammunition and tackle on the Refuge System; and
- Promptly initiate formal rulemaking procedures to require a nationwide phase out of toxic lead ammunition and tackle on the Refuge System by September 30, 2024.

A copy of the Petition can be downloaded [below](#).

