

Scientists' statement of opposition to rescind the adopted rules phasing out lead ammunition and fishing tackle use on U.S. National Wildlife Refuges and other agency lands and waterways

June 25th 2026

We, the undersigned, with scientific expertise in lead and environmental health, strongly oppose the proposed 2026-27 hunting and fishing regulations for the National Wildlife Refuge System, which rescind the prior lead phase-outs for refuges that were adopted in the [2022-23](#) and [2023-24](#) rulemakings.

We are discouraged that, instead of advancing measures to protect environmental and human health, the proposed 2026-27 hunting and fishing regulations perpetuate known and preventable harm to the wildlife these lands are meant to conserve as well as the public that uses these lands for recreation.

We emphatically affirm the overwhelming scientific evidence demonstrating the toxic effects of lead on human and wildlife health, as summarized in the [Consensus Statement of Scientists](#), and we strongly supported the prior rulemakings to phase out the use of lead ammunition and fishing tackle in National Wildlife Refuges and other agency lands and waterways. In particular, we highlight the following key facts:

- The discharge of lead into the environment via the use of lead-based ammunition for hunting remains one of the most significant and largely unregulated sources of environmental lead contamination.
- The discharge of lead-based ammunition and the accumulation of spent lead-based ammunition in the environment pose significant health risks to humans and wildlife.
- Lead is among the most well-studied anthropogenic toxicants, and overwhelming scientific evidence demonstrates that lead is toxic to multiple physiological systems in vertebrates, including the central and peripheral nervous, renal, cardiovascular, reproductive, immune, and hematologic systems. In particular, there is no identified blood lead level in children without deleterious health effects.
- Scavengers such as bald and golden eagles experience frequent and widespread lead poisoning that suppresses their population growth.
- The lead ammunition bans in California (AB 821, AB 711) have reduced the risk of lead poisoning in California condors, demonstrating the efficacy of legislation requiring non-lead ammunition for hunting to protect wildlife health.

As there are viable alternatives to lead-based ammunition and fishing tackle, banning these materials on National Wildlife Refuges will not adversely impact those who hunt or fish for recreation or food.

Signed,

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