



October 18, 2019

Commissioner Sarah Strommen
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Re: Petition for Adoption of Rules Prohibiting Lead Fishing Tackle and Lead Ammunition
Filed by Friends of Minnesota Scientific and Natural Areas – September 3, 2019

Dear Commissioner Strommen:

The Animal Law Section of the Minnesota State Bar Association submits this letter in support of the “Petition for Adoption of Rules Prohibiting Lead Fishing Tackle and Lead Ammunition,” filed on September 3, 2019 by Friends of Minnesota Scientific and Natural Areas.

On February 21, 2018, the Minnesota Department of Natural Resources prepared a report for the Minnesota Legislature, entitled “Deposition of Lead Shot on State Lands in Minnesota, pursuant to Minn. Laws. Ch. 93, art. 1, § 3. This report estimated that “178 tons (357,048 pounds) of lead were deposited on state lands during the 2017 small game hunting season.” It is reasonable to infer that a similar percentage of Minnesota hunters are not using non-toxic bullets.

The Petition of the Friends of Minnesota Scientific and Natural Areas quotes a November 24, 2018 article in the New York Times, which notes that between 10 million and 20 million animals, including eagles, hawks, bears, vultures, ravens, and coyotes, die each year not from being hunted, but from lead poisoning. Ian Urbina, “Poisoned Wildlife and Tainted Meat: Why Hunters are Moving Away from Lead Bullets,” N.Y. Times, Nov. 24, 2018.

Public education on the adverse impacts of lead ammunition and lead fishing tackle is not enough to protect Minnesota’s wildlife and our food chain. We support the efforts of the Friends of Minnesota Scientific and Natural Areas to strengthen our State’s regulations with the goal of eliminating the use of lead-based tackle and ammunition. Non-toxic tackle and non-toxic ammunition are readily available in the marketing place at reasonable cost to consumers. The Star Tribune recently published an editorial supporting the efforts to ban the use of lead ammunition and fishing tackle in this State, citing the many risks associated with lead both to animals and humans.

We hope the Department of Natural Resources takes these concerns seriously. The Animal Law Section thanks you in advance for adopting rules that adequately protect human health and the environment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine E. Hinrichs", is displayed on a light gray rectangular background.

Christine E. Hinrichs
Chair, Animal Law Section