



Canadian Wildlife Conservation Partners

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On behalf of thousands of hunters, trappers, and conservationists across Canada, we are writing in response to the Government's request for public comment on the proposal "*To prohibit the use of lead shot for the purpose of hunting.*"

The proposed regulation would prohibit the use of lead shot for the hunting of all species in British Columbia, while not restricting the use of lead shot for other purposes, such as target shooting or skeet shooting.

We have several substantive concerns regarding both the content of the proposal and how it is being presented for public comment.

To begin, the proposal asserts that "*waterfowl, raptors and other scavengers continue to be exposed to lead when they feed on animals that contain lead shot or fragments.*" This statement is inaccurate. Waterfowl do not feed on animals containing lead shot or fragments. In addition, references to "fragments" pertain to bullets rather than shot, making this assertion misleading and out of context.

While it is acknowledged that individual animals may experience lead exposure in certain circumstances, the proposal does not clearly identify the scale of this issue. Specifically, what evidence demonstrates a population-level threat to waterfowl, raptors, or other scavengers that is attributable to lead *shot* used in hunting?

The proposal further states that "*birds of prey and other predators can also be poisoned when they feed on waterfowl that were sick, dead, or crippled by lead shots embedded in their tissues.*" This directly contradicts existing regulations and the proposal's own acknowledgements. Lead shot has been banned for hunting waterfowl in British Columbia since 1995 and across Canada since 1997. Your document further states that "*research shows that restrictions on the use of lead shot for hunting waterfowl and coots in North America have significantly reduced lead exposure and poisoning in these species.*" Given these facts, it is unclear what evidence supports the claim that lead shot used in hunting continues to pose a significant threat to waterfowl or scavenging species.

The proposal also states that "*several other jurisdictions have implemented similar restrictions on the use of lead shot ammunition.*" This characterization is misleading. No other Canadian jurisdiction has implemented a prohibition of this kind. Aside from California, we are not aware of U.S. states that have enacted comparable, broad prohibitions on lead shot for all hunting. As presented, this comparison overstates the extent to which similar regulatory approaches exist elsewhere.

Additionally, the proposal claims that non-toxic ammunition is widely available and costs "roughly 10 cents more per cartridge" than lead shot. This does not reflect current market conditions. Common target and upland game loads used by many hunters are often available at approximately

half the cost of steel alternatives. Moreover, non-toxic options for small-gauge shotguns—frequently used for upland birds and small game—are limited in availability and, where available, are significantly more expensive.

Notably absent from the proposal is any discussion of [voluntary, incentive-based approaches, such as those implemented by the U.S. Fish & Wildlife Service](#). Where the objective is to reduce lead deposition while maintaining high levels of compliance, incentive-based programs that educate hunters and encourage voluntary adoption have proven to be more cost-effective and successful than blanket regulatory prohibitions.

In closing, we do not believe the government has demonstrated a clear need or provided sufficient evidence to justify a province-wide ban on lead shot for all hunting. Accordingly, we, the undersigned, do not support the proposed prohibition.

Sincerely,

Alberta Professional Outfitters Society

BC Trappers Association

Big Game Records of British Columbia

Born to Hunt, It's a Lifestyle

Canadian Coalition for Firearms Rights

Delta Waterfowl

Fur Institute of Canada

Hunters for BC

Manitoba Lodges and Outfitters Association

Manitoba Wildlife Federation

Northwestern Ontario Sportsmen's Alliance

SCI – Canada

University of Victoria Fish and Game Club

The Veteran Hunters

Wild Origins Canada

Wild Sheep Society of British Columbia