



July 10, 2023

The Honorable Sarah Strommen
Commissioner
Minnesota Department of Natural Resources
500 Lafayette Road
Saint Paul, MN 55155

Re: DNR Order Banning Lead Ammunition on Some State Lands

Dear Commissioner Strommen:

Federal Ammunition has been in Anoka, MN for more than 100 years. We are the world leader in ammunition design and manufacturing, and we proudly employ more than 1,500 Minnesotans. These are high quality local jobs. The city, county and neighbors have historically supported what we do because of the social, economic, and philanthropic benefits we bring to the region.

We are astonished by the recent Minnesota Department of Natural Resources (DNR) order banning the use of traditional ammunition on 56 Scientific and Natural Areas (SNAs) across the state. The order will affect thousands of hunters who pursue game within these SNAs each year, and greatly harms one of Minnesota's economic engines; the firearms and ammunition industries.

Federal's position on the use of lead ammunition is driven by science, therefore it must be concrete, not theoretic. We support science driven decisions by professional wildlife managers, which in this case is the consumer's choice. Those same professionals have a responsibility to implement regulations backed by the integrity of facts. Wildlife managers who fail to follow the North American Model of Wildlife Conservation undermine the foundation of the most successful wildlife management paradigms.

Minnesota DNR policy should focus on maintaining and growing hunting opportunities for all, not catering to the opinions of the extremes. This DNR decision was made in isolation – no alternative viewpoints or stakeholder perspectives considered. An issue as important as this should have full transparency as well as stakeholder input and should be determined through the legislative process and not via agency directives. Constituents have no recourse and therefore cannot hold anyone accountable at the ballot box.

This action builds barriers to resident and non-resident enjoyment of our hunting heritage and the great outdoors. It will contribute to a price spike for Minnesota ammunition consumers. Alternative hunting ammunition (made of copper, tungsten, or bismuth) is significantly more expensive to manufacture and to purchase than traditional counterparts.

It is our belief the action taken was done based on theoretic claims of population harm while Bald Eagles and other raptors flourish. In fact, the MN DNR states the eagle recovery is a "conservation success story" and that the population has exceeded its recovery goal and continues to grow by over 30 nesting pairs per year.

There are significant negative environmental and economic consequences that follow this short-sighted policy. Traditional lead ammunition is almost entirely composed of recycled materials sourced here in Minnesota whereas alternative types of ammunition require mining or resource extraction imported from overseas or other states. Sourcing and employing locally is the right thing for Minnesota's environment and economy.

We are consistently the largest contributor in the nation to the Pittman-Robertson Wildlife Restoration Trust Fund (WRTF). We are an important stakeholder in Minnesota's management of wildlife and wild places. We are proud to support conservation through the federal excise tax, an 11% excise tax on every ammunition purchase. In 2022, the firearms and ammunition businesses combined to generate more than \$3.6 billion in economic output throughout the nation, putting Minnesota in the Top 10 for jobs, economic activity, and excise tax contributions. This policy undermines that support and dismisses industry input and ironically will hurt the very population it is intended to help. With less ammunition sold, there will be less money funding conservation through the Pittman-Robertson federal excise tax program.

In summary, this decision is made in contradiction to the science as it creates no measurable wildlife benefit. It dismisses strong Minnesotan/American jobs while promoting unnecessary and intensive resource extraction. This is yet another razor's cut at an outright ban of traditional ammunition, and ultimately, hunting as a scientific management tool.

We respectfully request that this rule be withdrawn and request a meeting with you, your staff, and the Governor. This order did not include a legislative process, public comment period or industry dialogue and the only certain result is harming hunters, Minnesota's work force, and the future of wildlife management funding in Minnesota.

Sincerely,



Jason Vanderbrink
President and Chief Executive Officer
Sporting Products, Vista Outdoor
CCI, Federal, Hevi-Shot, Remington, Speer Ammunition