



May 7, 2017  
Senate Committee on Environment and Natural Resources  
900 Court St. NE  
Salem, OR 97301

Re: HB 2525, Amendment A3

Dear Senators Dembrow, Olsen, Linthicum, Prozanski, and Roblan,

Thank you for the opportunity to provide comments on House Bill 2525 (HB 2525). Audubon Society of Portland recognizes and supports the contribution made by hunter donation organizations to the reduction of food insecurity in our state through donation of game meat. However, we also believe that it is critical to include amendment A3 to require that the game meat inspection process include screening to ensure that it is free of lead contamination.

Lead is toxic to multiple human organ systems, affecting the central nervous, renal, cardiovascular, reproductive, immune, and hematologic systems, as well as being potentially carcinogenic (Consensus Statement of Scientists 2013). The Center for Disease Control (CDC) has determined that there is no safe blood lead level for children without deleterious effects (CDC 2012). Lead-based ammunition has been shown to pose “a significant source of lead exposure in humans that ingest wild game” (Consensus Statement of Scientists 2013, Cornatzer 2009, Iqbal 2009, Johansen 2005, Levesque 2003, Pain 2010, Tsuji 2008, Verbrugge 2009). It has been posited that “no rational deliberation about the use of lead-based ammunition can ignore the overwhelming evidence for the toxic effects of lead, or that the discharge of lead bullets and shot into the environment poses significant risks of lead exposure to humans and wildlife” (Bellinger 2013). Responsible certification of donated meat as “fit for human consumption” should include verifying that this food source does not expose families to lead.

We believe that it is critical to protect the most vulnerable populations in our state, particularly those that access food via charitable organizations such as those listed in HB 2525, which includes the Department of Human Services, Oregon Health Authority, Oregon Youth Authority, low-income nutritional centers, public school nutritional centers, state hospitals and other charitable organizations. Patrons of food pantries and other low cost sources of food are not currently being adequately or consistently warned about the potential health risk of lead contamination in game meat.

As of 2012, the CDC estimated that 450,000 children in the US between the ages of one and five had significant exposure to lead (Sykes). In addition to well-known exposure pathways like paint and lead pipes, a large body of research also demonstrates that game meat harvested with lead ammunition can be readily contaminated with lead fragments or lead dust, creating a potential exposure pathway for those that ingest game meat. Lead can fragment into hundreds of very small pieces. In a 2009 study on lead fragmentation in venison, radiographs of 30 white-tailed deer shot with lead-core, copper-jacketed bullets, showed lead fragments in all carcasses (mean = 136 fragments, range = 15–409 fragments) as well as widespread fragment dispersion (Hunt 2009). Fragments have been shown to travel an average of 11 inches and up to 14 inches from the wound channel and readily escape detection without the aid of x-ray technology (Cornicelli 2008). Kosnett 2009 found that “regular consumption of game meat harvested with lead ammunition and contaminated with lead residues may cause relatively substantial increases in blood lead compared to background levels, particularly in children.” A 2008 study tested 100 randomly selected

packages of venison that had been donated to a food pantry program in North Dakota. The study found that “59% of 100 randomly selected packages... were contaminated with lead fragments” (Cornatzer 2009). In 2008, the CDC and the North Dakota Department of Health conducted a field study in which they found that North Dakota residents who consumed wild game shot with lead ammunition had a small but statistically significant increase in blood lead levels compared to residents that did not consume wild game. As a result, the North Dakota Department of Health issued a Fact Sheet indicating that wild game shot with lead ammunition is an important risk factor in elevated lead levels (October 2008). It warns consumers that “most lead particles in venison will be too small to see, feel or sense when chewing” and recommends that pregnant women and children not eat venison harvested with lead bullets. The North Dakota Department of Health is also one of two states (along with Alaska) that include questions about the consumption of game meat in its lead blood level screening process. In 2014, the University of Minnesota Food Policy Research Center issued a brief that evaluated risk potential from different types of ammunition, and cites that “All hunter harvested venison in Minnesota must be x-ray scanned prior to donation” (Ponder, UMN Issue Brief 2014). Health Consultation Letters have been prepared for both the State of Michigan and Wisconsin addressing the risk of lead in venison (ATSDR 2010, ATSDR 2008). Both the CDC and the Advisory Committee for Childhood Lead Poisoning Prevention have indicated that the best way to protect children is to prevent, control or eliminate lead exposures in the first place.

Because of this type of evidence, the Audubon Society of Portland believes that lead screening, as proposed by amendment A3 to HB 2525, is an appropriate precaution to take to ensure that we are not exposing children and families unknowingly to lead risk. This is a common sense amendment to protect Oregon’s children.

Thank you for the opportunity to comment in support of House Bill 2525 with amendment A3.



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