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August 23, 2016

Hon. Catherine McKenna
Minister of Environment & Climate Change
200 Sacré -Coeur Boulevard
Gatineau, Quebec K1A 0H3

Dear Minister McKenna,

Re: ECCC Study on the use patterns of lead sinkers and jigs and their alternatives

The Canadian Sportfishing Industry Association (CSIA) represents the manufacturers, distributors, retailers and sales agencies which serve the 8 million Canadians who fish as an outdoor heritage activity. According to federal government figures our industry currently generates an annual national economy of over **\$8.6 billion dollars**. In tandem with hunting our customers support **over 100,000 jobs** in all regions of the country. More adult Canadians fish for recreation than play golf and hockey *combined*.

On August 11 your Ministry posted a Request for Proposals for conducting a study as titled above. We were surprised to see this replication of the previous Environment Canada (EC) review and risk assessment of lead fishing tackle in 2004-05 which included full cooperation and participation by CSIA and our members, including our 'Fish Green' campaign presentation. EC representatives promised that we would receive a copy of the results of this process within five years and IF the findings showed there was any reason to consider some type of regulation, we would be contacted for additional consultation. To date we have not received this report and we have not heard further from your ministry.

Attached please find a copy of a National Post article on this topic from "Junk Science Week" in June, 2005. It highlights the significant controversy that erupted over the release of a Canadian Wildlife Service publication that contained selective and highly questionable 'data' and subjective conclusions



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regarding lead fishing tackle and the degree of impact on waterfowl and wildlife. Information from an internationally respected senior member of the CWS Editorial Board confirmed this CWS document was not subjected to the normal professional scientific peer review process prior to publication. When he encountered resistance from the agency and then spoke out about this unprecedented threat to CWS scientific credibility, he was removed from the Editorial Board by the Director General.

When CSIA openly challenged the credibility and agenda based motive behind the CWS publication, we were told by an EC representative who said, "We can regulate you right out of business".

Today, the same unsubstantiated conclusions from that widely pilloried 2003 CWS publication still appear on the ECCC website and are cited in the RFP as the basis for this current ECCC study posting.

Our cooperation with the EC review of lead fishing tackle in 2004-05 was not as a result of being threatened or because of the CWS adoption of the World Wildlife Fund agenda against fishing and hunting. Federal Environment Minister David Anderson and CWS announced in February 2004 that they, "will soon propose regulations that will bring about an eventual prohibition on the import, manufacture and sale of fishing sinkers and jigs containing lead". This may not seem like a big deal since non-toxic sinkers and jigs have been available in tackle stores across Canada for years.

There was more. In response to public inquiries an EC spokesman suggested this ban will extend far beyond sinkers and jigs to include many other fishing tackle products popular for fresh and saltwater angling which contain lead or more than 1% lead by-product (e. g. brass, white metal) and weighing approximately two ounces (50 grams) or less.

We agreed to cooperate when we learned there is a formal process under law whereby EC conducts a thorough review of the environmental impact of any products



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containing a potentially toxic substance, including consultation and discussion with manufacturers and industry, long before any new regulation is proposed or even considered. The EC person who administered this process made it very clear to CSIA representatives that the Minister and CWS were not at liberty to sidestep this process regardless of what announcements they made.

The tackle industry has repeatedly been on the record that we have always been willing to cooperate with the government and look for ways to reduce lead or any toxic substances in the environment, as we already have with non-toxic sinkers, jigs and other lures. But we should be doing so for the right reasons, based on legitimate problems if they in fact occur. We are not interested in setting a new low standard by following an anti-fishing agenda which compromises scientific integrity. Wildlife policy based on credible and legitimate science and forthright conduct by the federal government in dealing with the recreational fishing community is a reasonable expectation.

Before giving consideration to cooperating in another duplicate ECCC study at additional taxpayer expense, we would ask that you please send us a copy of the final report of the 2004-05 review and risk assessment by your ministry, that your agency representatives promised would be completed and provided to us within five years (2010).

Yours sincerely,

Kim Rhodes
President

The longstanding practice of the Canadian Sportfishing Industry Association has been to engage with all levels of government, regardless of political affiliation, in an open and fair discussion for the continued sustainable use of our abundant fish and



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wildlife. To that end we hold a seat on the federal Hunting and Angling Advisory Panel (HAAP) and we have been an active supporter of the non-partisan Outdoor Caucus Association of Canada (OCAC) which acts as a liaison between the outdoor industry and the all-party Parliamentary Outdoor Caucus.

cc: Rt. Honourable Justin Trudeau, Prime Minister
Yvonne Jones, M.P. / Outdoor Caucus Co-Chair
Bob Zimmer, M.P. / Outdoor Caucus Co-Chair
Hunting & Angling Advisory Panel Members
Interested Parties

June, 2005
National Post Article
JUNK SCIENCE WEEK

Sinking science

Ottawa plans to ban lead fishing sinkers to save Canada's loons – though in fact the annual death toll is six

PETER SHAWNTAYLOR

This year's fishing season could be the last time Canadian anglers are allowed to use those ubiquitous lead fishing sinkers. That's because the federal government is proposing to ban lead tackle and force fishermen to find more expensive alternatives. But even non-anglers should be concerned with how and why the government is making this decision.

The circumstances surrounding the proposed lead-sinker ban reveal that whimsy and fabrication have replaced science in setting environmental policies. The government and the environmental group that has spearheaded this crusade, the World Wildlife Fund (WWF), claim the move is necessary to save Canadian loons from lead poisoning. Yet the actual evidence suggests the size and danger of the lead-sinker issue has been grotesquely exaggerated. And if the Liberals are prepared to pervert scientific evidence in order to justify new laws for picayune issues such as fishing tackle, what does this suggest for bigger and more significant policies?

Now urban folk might require a bit of background on the lead debate. In 1991, the U.S. banned lead shotgun pellets because of evidence that they found their way into lakes and rivers and were then ingested by water birds, causing lead poisoning in loons. Canada followed suit in 1997 with its own ban on lead shot.

But success on lead shot prompted a broader and bolder agenda, one that appears to be part lead hysteria and part anti-fishing campaign. Today the WWF and the federal government's Canadian Wildlife Service (CWS) argue that if banning lead shot makes sense, then it must also make sense to ban lead fishing tackle, since those small sinkers could get snagged or lost and end up on lake bottoms as well.

The WWF and CWS even came up with a catchy factoid — they claim 500 tonnes of lead sinkers are deposited in Canadian waterways annually. "That's the equivalent weight of dropping 500 cars into our lakes, rivers and streams each year," said former Environment Minister David Anderson last year in announcing the proposal to ban lead sinkers. And this is where policy parts ways with logic and science.

There's a fundamental difference between firing a shotgun shell over water and watching the pellets fall into the lake, and fishing with a sinker. Shotgun pellets are not designed to be reused. Sinkers are. In fact there is no reason why a careful fisherman couldn't use a handful of sinkers his entire life. That famous 500-tonne figure — and the image of an endless parade of cars being driven off piers into our lakes — assumes that every fisherman in Canada manages to lose his entire collection of sinkers at the end of every season. Selling a sinker is, in the government's mind, the same as ramming it down the throat of an unsuspecting loon.

Then there is the fact that a sizeable portion, perhaps even a majority by weight, of lead sinkers sold in Canada are not the tiny bits of metal you squeeze on your line, but what are called downrigger balls. These are 5 to 10-pound weights used for trolling for Great Lake salmon and other deep-water fish. And if there are loons out there swallowing 10-pound balls of lead, the environment has bigger problems than sinker ingestion.

But of course all this is just speculation. If there really is a credible danger to waterbirds from lead sinkers, then there should be a scientific process to determine the extent of the havoc being wreaked.

In fact, ingestion of lead sinkers has been studied extensively on both sides of the border. When environmentalists first began moving against lead sinkers, the U.S. National Wildlife Health Center in Madison, Wisc., was asked to study the issue. Scientists there examined 2,240 individual water birds over four years and found only 23 birds (including 11 loons) that had lead sinkers in their stomachs. A larger study in Illinois found one bird out of 16,651 was carrying a lead sinker. As a result of these findings, the U.S. government abandoned plans for a nation-wide lead-sinker ban.

Canadian research reveals the same basic level of lead-sinker mortality north of the border. Between 1964 and 1999, the CWS was able to identify 71 birds and one turtle that had died from swallowing lead sinkers. A more recent study shows much the same thing. A 2003 CWS publication says: "An average of six cases of wildlife mortality from sinker ingestion have been documented annually in Canada between 1987 and 1998." Six dead birds. Per year. It's not exactly a bird holocaust out there.

Now this might be compared with the thousands of loons that have died over the past three years on Lake Erie due to botulism. Or the fact that virtually the entire loon nesting habitat was wiped out in 2004 on Lake of the Woods when the water table rose precipitously. Or that the North American loon population is estimated at 700,000 birds.

Six dead birds nationwide due to lead sinker ingestion is insignificant to the point of amusing. Or it would be, if not for the fact that the federal government has seen fit to ignore its own scientific evidence when making policy. Brochures from Environment Canada call lead-sinker ingestion "the leading cause of death reported in adult common loons." The WWF for its part has claimed that the lead-based loonie death toll "could be as high as 30,000 birds per year" in Ontario alone. It is pure fantasy.

This winter, Environment Minister Stephane Dion claimed to hold a consultation on the lead-sinker debate. But with his department working hand in glove (or worm on hook) with the WWF and a ban already unveiled as the preferred policy of the government, the fishing community is bracing for an inevitable end to lead sinkers sometime this year.

The actual monetary impact of a ban is a question mark. Sinkers themselves are relatively inexpensive and phasing out lead might only add a few bucks a year to the cost of fishing. Yet the proposed regulation talks about banning any tackle with a 1% lead content, which would include brass fishing reels and a wide variety of spinners, jigs and other paraphernalia. And at a much greater cost to the industry.

Regardless of whether the cost is big or little, however, the key issue remains the process by which government is making this decision, since it appears to be driven by an egregious misrepresentation of scientific evidence.

Biologist David Ankney is a member of the CWS editorial board, but he takes a dim view of what passes for science at that government agency. "In my 30 years as a wildlife scientist, I've seen bad science and I've seen abuse of science," he says of the 2003 CWS report on lead-sinker ingestion. "But never have I seen so much bad science and abuse of science in one document."

If six dead loons can become the basis for a policy that could force Canadians to spend more money, change their habits or even give up fishing — in other words, if a fact-blind environmental agenda can drive government actions — then what else is Ottawa capable of manipulating? Easy question, of course. The answer is Kyoto.

Peter Shawn Taylor is a writer in Guelph, Ont.



JUL 26 2016

**RE: Upcoming study on lead
ammunition and lead sinkers and jigs**

On August 10, 2016, Environment and Climate Change Canada (ECCC) is planning to launch two studies which will gather use pattern information on lead ammunition and lead sinkers and jigs and their non-lead alternatives. These studies are part of initiatives undertaken to fulfil the Government of Canada's commitments under the *Risk Management Strategy for Lead* that was published in 2013.

Under this Strategy, the Government of Canada committed to further reduce Canadians' exposure to lead. Releases of lead from consumer products, such as lead ammunition, and jigs and sinkers, are two of the sources being investigated.

These studies will help the Government of Canada determine the appropriate path forward. Should further actions be considered, the government will engage stakeholders, including the provinces, non-governmental associations and industry.

If you would like to receive information on the studies, please contact M. Daniel Ekoualla:

Mail:

Products Division
Environment Canada
351 St. Joseph Blvd., 9th Floor
Gatineau QC K1A 0H3
Fax: (819) 938-4480 or
1-888-391-3695

**OBJET : Étude à venir sur les munitions
au plomb, les plombs de pêches et les
turlottes en plomb.**

Le 10 août, 2016, Environnement et Changements Climatiques Canada (ECCC) lancera une étude qui a pour but de collecter des informations sur l'utilisation des munitions au plomb, des plombs de pêche et turlottes en plomb ainsi que leurs alternatives. Cette étude s'inscrit parmi les initiatives entreprises pour remplir les engagements du Gouvernement du Canada énoncés dans la *Stratégie de gestion des risques pour le plomb* publiée en 2013.

Dans cette stratégie, le Gouvernement du Canada s'est engagé à réduire davantage l'exposition de la population au plomb. Le rejet de plomb à partir des produits de consommation comme les munitions, des plombs de pêche et turlottes en plomb sont parmi les sources examinées.

Ces études permettront au Gouvernement du Canada d'identifier la voie à suivre pour la gestion de ces produits. Si des actions s'avéraient nécessaires, les intervenants y compris les provinces, les organisations non-gouvernementales et l'industrie seront consultés.

Si vous désirez en savoir plus sur ces études, veuillez communiquer avec Daniel Ekoualla:

Courrier :

Division des produits
Environnement Canada
351, boul. St-Joseph, 9^e étage
Gatineau QC K1A 0H3
Télécopieur : (819) 938-4480 ou
1-888-391-3695

Email: ec.produits-products.ec@canada.ca

Please type "Study on the use patterns of lead ammunition and lead jigs and sinkers" in the subject line of your fax or email message.

For more information on lead, we invite you to consult the following website:

<http://www.chemicalsubstanceschimiques.gc.ca/fact-fait/lead-plomb-eng.php>

Yours sincerely,

Courriel : ec.produits-products.ec@canada.ca

Veuillez inscrire « Étude sur l'utilisation des munitions au plomb, des plombs de pêche et turlottes en plomb » à la ligne d'objet de votre message.

Pour plus d'information sur le plomb, nous vous invitons à consulter le site Web suivant :

<http://www.chemicalsubstanceschimiques.gc.ca/fact-fait/lead-plomb-fra.php>

Veuillez agréer l'expression de mes sentiments distingués.



Astrid Telasco
Director / Directrice
Products Division / Division des produits
Environmental Protection Branch / Direction générale de la protection de l'environnement