

Concept Outline: USFWS Lead-Free Ammunition Voluntary Incentive Pilots

The U.S. Fish and Wildlife Service (the Service) prepared this concept document in response to recommendations from the Hunting and Wildlife Conservation Council, a federal advisory committee. The purpose of this concept document is to set out key elements and factors to consider in the design and implementation of a pilot program on units of the National Wildlife Refuge System (Refuge System) for providing direct incentives and related informative messaging that encourage hunters who currently use lead ammunition to voluntarily choose to switch to using lead-free ammunition. This overarching concept document will guide the Service in the development of the pilot program and the operation of multiple pilot sites in Fall 2024. At each pilot site, located within the Refuge System, the pilot effort will be conducted in cooperation with State wildlife agencies and other partners. The Service, with partner support, will direct the implementation of incentives for participating hunters and collect data to evaluate the effectiveness of the pilot program. As the pilot project concept is novel and being tested for the first time, individual pilots will likely not include all possible program elements, not draw on all funding sources, and/or not receive assistance from every type of potential partner organization discussed in this document. However, the Service will take all these factors and considerations into account in shaping viable and effective pilots suited to the individual refuges. Over time, we will test additional incentive and messaging options to improve the program outcomes. An overarching goal of this pilot program will be to determine an implementation model and best practices for incentivizing voluntary use of lead-free ammunition that can be replicated by the Service and other land and wildlife managers. The desired outcome is that this pilot program effort will result in a proven model to guide actions by the Service and others in addressing the risk of lead exposure and its impacts to wildlife health resulting from the use of lead ammunition for hunting.

Most Desirable Pilot Elements

- **Tests multiple incentives** (discount coupon, free ammunition voucher, raffle prizes, free ammunition, etc.) to maximize effectiveness.
- **Tests variations on messaging strategies**, including who should communicate the message, to determine which are most effective for reaching, informing, and engaging hunters and other members of the community.
- **Collects data** on use of lead-free ammunition, as well as human dimensions data about *why* incentives and messaging were or were not effective.
- **Evaluates collected data** to quantify the impact on reducing the risk of wildlife exposure to lead and to inform incentives and messaging that are better tailored to reach, inform, and benefit hunters. Also, pilots should be structured so that we also collect data from comparable control sites and thus can evaluate whether (and which of) our incentives are having a statistically significant impact.

- **Scales up for wider implementation.** Pilots should be designed to produce a model that the Service and our partners can implement more broadly while retaining the same effectiveness in reaching, informing, and benefitting hunters. Thus, we will geographically distribute pilot sites, work with representative hunter populations, and use incentives and delivery methods that are feasible at a larger scale.
- **Includes low-income and subsistence hunters.** All hunters face cost and availability barriers to adopting lead-free ammunition, but these categories of hunters are most impacted by the cost and availability differences between lead and lead-free ammunition. This, and good government principles, makes them the most critical groups for an effective incentive program to reach. Site selection and pilot design should ensure our incentives are tested on these subsets of hunters.
- **Includes sites with regulatory lead phase-outs.** This will allow us to incorporate data on how incentive programs perform at sites phasing out lead ammunition by 2026 in comparison with sites that are not phasing out lead use. This will allow us to compare the performance of regulation and voluntary incentives in combination to voluntary incentives alone.¹ It is also a limited-time opportunity with several stations in the process of phase outs now.

Pilot Design Considerations

Partners

- Need for Partners – The Service is committed to a collaborative approach to these pilots. Partners are an essential pre-requisite of our pilots and critical to every aspect of our pilot program from design to implementation to messaging.
- HWCC and/or Working Group – These pilots are directly responsive to the HWCC’s recommendation that the Service collaboratively pursue voluntary approaches to addressing the issue of lead poisoning in wildlife. We will work closely with these partners and seek their input throughout the development of the voluntary incentive pilots.
- State Agencies – The position of the applicable state agency is a critical consideration for siting and design of any pilot. Service collaboration with State agencies is essential for the Service’s actions generally and in the case of these voluntary incentive pilots specifically. The Service should work with State agencies and invite their input for the overall pilot project and, in particular, collaborate with the States in which each pilot site is located.

¹ As discussed in: Schulz, J. H., S. Tottoni, S. A. W. Stanis, C. J. Li, M. Morgan, D. M. Hall, E. B. Webb, and R. M. Rotman. 2023. Policy comparison of lead hunting ammunition bans and voluntary nonlead programs for California condors. *Wildlife Society Bulletin* 47:e1448. <https://doi.org/10.1002/wsb.1448>.

- Tribal Governments – We will consider how we may be able to partner with Tribes on pilots. We will endeavor to identify potential pilot sites near interested Tribes and to coordinate with them, including incorporating their input on pilot designs.
- Hunter NGOs – These groups are ideal messengers to hunters and are critical supporters of efforts that support hunters and hunting access. We should be seeking collaborative partnerships with these groups whenever possible.
- Ammunition Manufacturers – We should seek to collaborate with manufacturers on these pilots.
- Ammunition Retailers – We should consider how we might work with both national chains and small local retailers on incentives that will reach the hunters who use our pilot site refuges.
- Conservation/Environmental NGOs – These organizations vary in their views on hunting generally and their relationships with the hunting community. Some partner closely with or are directly engaged with the Service on wildlife conservation matters, including lead poisoning in wildlife, while others may only be interested parties related to the issue of lead. We may be able to work with organizations in this group that recognize hunting as a conservation tool but oppose the use of lead ammunition, as they would have an interest in assisting hunters with voluntarily transitioning to lead-free ammunition that reduces the potential for lead poisoning in wildlife.
- Friends Groups – Friends groups at individual refuges are best positioned to work with both refuge staff and hunters to facilitate pilot implementation and are consistently great partners on funding and operational needs. A strong Friends group is an important consideration in siting our pilots.
- Academic Institutions and Researchers – We should consider partnering with academics and other researchers, including proximity of our pilot sites to research institutions. Such a partnership could aid our funding and implementation of pilots, but is especially valuable in the additional capacity and expertise it provides for data collection and evaluation.
- Hunter Influencers – We should consider some manner of partnering with hunter influencers for messaging purposes. Their promotion of the choice to use lead-free and support for these voluntary efforts on one or more pilot sites would be valuable in reinforcing that the goal is not to reduce access to hunting on the NWRS.

Funding

- Sources – There is a clear need for funding to execute any pilots, and funding is the most likely source of limitations on the quality of our pilots and the data collected. We must consider all of the possible funding sources available to the Service and advise partners to consider all avenues available to them for securing funding.
- Cost Estimates – We should be estimating costs as a component of the pilot design to assess feasibility relative to our goals. These estimates will be very important in making our case for funding.

- Scalability – We should be designing the pilots to efficiently utilize funding and focus on building informative, viable pilots that contribute to a scalable and successful program.
- Longevity – We should also be thinking in terms of the longevity of the long-term implementation model. We want to identify funding sources that can continue at larger scales and in the longer term, but also designing and making data-informed improvements in the interest of long-term cost-effectiveness.

Logistics

- Phased Roll Out – Recognizing that there are many things we want to achieve with our pilots and many challenges to overcome, we anticipate needing to group aspects of the pilot program into different phases and build upon a simpler initial set of pilots. For example, we could launch with four refuges and one partner and one type of incentive and over time add additional refuges that expand the geographic distribution and add other desirable features, control refuges, additional partners, and different incentives and messaging strategies.
- Delivery of Incentive – We should think about the logistics of how we will deliver the incentives to meet hunter needs and program goals.
- Data Collection – We should consider how we will collect data that allows us to measure the impact of the pilot and that can be incorporated into the design of the pilot and selection of pilot sites. We want data that can be extrapolated and that provides insights on how to improve our ability to reach, inform, and benefit hunters.
- Compliance – The Service and our partners must ensure compliance with the many laws and regulations that apply to operating these pilots. For example, there are limitations on and procedures for our ability to solicit and use funds; our ability to solicit input from interested parties and form partnerships with external organizations; and our interactions with the public generally and our collection of information from the public specifically, even if it is voluntary.

Sites

- Station Capacity – We must factor in existing capacity at potential pilot sites. This includes considering how station capacity that goes to pilots could impact other programming at the station.
- Particular Activities – We may want to target particular hunting activities for a variety of reasons, such as working with a species-focused NGO partner; seeking particular hunter categories through mentored, youth, or subsistence hunts; narrowing in on permitted hunts, mentored hunts, or other hunts with a known number of hunters, to reduce participant fatigue and improve both data collection and comparability across sites.
- Geographic Distribution – We likely want to distribute our pilots throughout the country as much as possible to expand messaging reach, investigate regional variation, and inform scalability. We want to eventually work toward a model (or set of models) for voluntary incentives that works for hunters across the country.

- Controls – We should consider collecting data at both pilot sites and paired, comparable control sites. If there is another site that is very similar in terms of location, landscape, hunting activities, hunter demographics, and other variables, then it becomes much easier to evaluate the statistical significance of our results at the pilot site – and thus easier to make the case for scaling up strategies and incentives that we find to be effective.
- Impact – We may want to favor stations where success with incentives will have the most conservation impact, other things equal. The biggest example of increased impact is where lead-susceptible and T&E species are present. Pilots at stations where there are greater numbers of bald and golden eagles, stations within California condor range, and stations with T&E species (especially if they are raptors or other scavengers) would mean more conservation benefits during the pilot implementation.

Hunting Activities

- Hunter Demographics – We should aim for the hunting activities in our pilots to be hunts where the participating hunters are either (1) demographically very representative of the overall hunter population nationwide, (2) demographically very representative of the overall hunter population in that particular region of the country, or (3) demographically representative of a particular subpopulation of hunters that we want our pilots to reach (e.g., low-income hunters, subsistence hunters, Indigenous hunters, Amish hunters).
- Interactions – We should favor hunting activities with more interaction between those administering the hunts and the hunters, such as permitted hunts.
- Number of Hunters – We should favor hunting activities with a known number of hunters participating, to improve the quality and comparability of our data.
- Species – We might favor incentives for specific hunts based on the target species. This could allow us to focus on species hunts that line up with more common types of ammunition. It could also facilitate partnerships with species-specific hunting groups.
- Ammunition Types – We should favor incentives directed at ammunition types that are more popular and versatile, at least initially. This should improve the cost-effectiveness, reach, and impact of our pilots.