



February 10, 2023

Senator David Bullard, Chair
Tourism and Wildlife Committee
Oklahoma Senate

Dear Chairman Bullard,

Thank you for allowing the Archery Trade Association (ATA) an opportunity to comment on proposed legislative changes regarding archery hunting in Oklahoma. Please know that ATA stands in opposition to any expansion of arrow-shooting airguns into traditional archery only seasons. More specifically, we strongly oppose SB 352 which removes the specification “when rifles are a legal means of take” as it relates to using airbows as a legal hunting method during any open season.

The Archery Trade Association (ATA) is an organization comprised of manufacturers, retailers, distributors, sales representatives, and others working in the archery and bowhunting industry. The ATA has served its members since 1953 and is dedicated to increasing participation in archery and bowhunting. ATA monitors related national and state policy issues and was alerted to this bill via a newsletter published by a partner organization.

ATA’s position on arrow-shooting airguns, commonly but inappropriately referred to as “airbows”, is that they lack the basic components of standard archery equipment (e.g., a string system and limbs) and should therefore not be authorized for use during archery hunting seasons. The Airgun Sporting Association (ASA), which is the trade association for the airgun industry, agrees! ASA’s “Guidelines for State Wildlife Agency Regulations” clearly conveys that “Arrow shooting airguns should not be considered “archery” equipment”. They further conclude that “Airguns should be identified as a legal method of take for hunting during firearms and primitive or restricted weapons seasons (muzzleloader / shotgun only)”.

The National Deer Association (NDA) – a national organization dedicated to ensuring the future of wild deer, wildlife habitat and hunting – shares similar views on the categorization of arrow-shooting airguns and their exclusion in archery hunting seasons. These sentiments prevail among related industries, constituencies, and state legislatures across the United States as

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there are currently no states that allow airguns (regardless of the type of projectile used, including arrows) during archery only seasons.

The archery industry's manufacturing members have contributed well over 1 Billion dollars in federal excise taxes since 1973 through the Pittman-Robertson Fund, also known as the Wildlife Restoration Program. The firearms industry has contributed a significantly greater amount and has been doing so since 1937. Last year alone, the Oklahoma Department of Wildlife was apportioned over \$27 million from this fund to conduct critical wildlife activities across the state. Unlike bows and firearms, airguns (including arrow-shooting airguns) are not included in the items taxed under the Pittman-Robertson Act, and therefore do not contribute to conservation funding in a manner that is consistent with other authorized methods of take. To date, ASA has not supported the inclusion of airguns into this proven and beneficial conservation funding model.

Archery deer hunting has a long-standing tradition, is a highly valued commodity and strong economic driver for Oklahoma and the outdoor recreation industry with over 117,000 archery hunters participating each year. Like you, ATA strongly supports Oklahoma's pro-hunting initiatives and believes that archery deer hunting remains one of Oklahoma's primary gateway opportunities as well as a premier opportunity for the avid outdoorsman. As such, we are keenly interested in maintaining one of the strongest archery deer hunting constituencies in the country and oppose SB 352 which serves to deviate from and greatly diminish Oklahoma's traditional archery seasons.

Thank you again for the opportunity to provide ATA's perspective and comments in opposition to SB 352. Please let me know if you have any questions.

Regards,



Dan Forster, Vice President & Chief Conservation Officer
Archery Trade Association

cc: Senate tourism and wildlife committee members
Senator Casey Murdock

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