



“Working within CITES for the protection and conservation of species in international trade”

Bobcat ***Lynx rufus***

CoP14 Prop. 14.2 (United States of America) Delete from Appendix II

SSN VIEW: OPPOSE adoption of CoP14 Prop. 14.2

BOBCAT SPECIMENS IN TRADE CANNOT BE DISTINGUISHED FROM THOSE OF OTHER LYNX SPECIES.

The bobcat is listed on Appendix II under the higher taxon listing of the cat family Felidae. At CoP4, the Parties affirmed that the bobcat should remain on Appendix II for “*look-alike*” purposes; that is, under Resolution Conf. 9.24 (Rev. CoP13), Annex 2 b), because “*the form in which it is traded resembles specimens of species included in Appendices I or II such that enforcement officers are unlikely to be able to distinguish between them*”. Bobcat specimens are similar in appearance to skins, parts and products of other small spotted cats, including the IUCN-designated Critically Endangered Iberian lynx (*Lynx pardinus*), the Near Threatened Eurasian lynx (*Lynx lynx*), the Canada lynx (*Lynx canadensis*) (Threatened under the US Endangered Species Act) and the Mexican bobcat (*Lynx rufus escuinapae*) (Endangered under the US Endangered Species Act), all of which are listed on Appendices I or II of CITES. The skins are so similar that they cannot be distinguished even using forensic laboratory analysis. This similarity of appearance creates significant enforcement problems for other *Lynx* species which would be exacerbated if the bobcat was removed from CITES control. For this reason, Parties have repeatedly rejected proposals by the USA to delete this species from Appendix II, most recently at CoP13. In support of its proposal, the USA argues that 78% of *Lynx* spp. trade is whole skins and thus bobcat skin can be readily distinguished from other *Lynx* species by the ears and tail. However, this means that 22% of international trade in bobcats is in parts and manufactured products that cannot be distinguished from other *Lynx* species even by forensic analysis. The USA also argues in its proposal that, based on a study of the opinions of members of the fur industry (TRAFFIC 2007), people can be trained to distinguish bobcat specimens from specimens of the Canada lynx. However, this self-serving fur industry opinion is at odds with **the scientific view of the U.S. Fish and Wildlife Service National Fish and Wildlife Forensics Laboratory that pieces of bobcat skins cannot be distinguished from the other *Lynx* species.** Even if the opinions of the fur industry were true, it does not address the need for enforcement officers to be able to distinguish bobcat specimens from other *Lynx* species (the Iberian or Eurasian lynx for example). Indeed, though the terms of reference for the *Lynx* review included an assessment of the similarity-of-appearance issues for all *Lynx* species, Traffic (2007) limited its analysis only to the similarity of appearance between bobcat and Canada lynx pelts.

“... consultation with the USFWS National Fish and Wildlife Forensics Laboratory has revealed that pieces of bobcat skins cannot be distinguished from the other *Lynx* species.” (CoP14 Prop. 2, page 12)

THERE IS ILLEGAL TRADE IN SPECIMENS OF ENDANGERED LYNX SPECIES.

3,568 specimens of *Lynx* spp.—including the Critically Endangered Iberian lynx and the Near Threatened Eurasian lynx—were illegally traded between 1980 and 2004. If the bobcat was removed from CITES control, illegal trade would likely increase and laundering of other *Lynx* species into trade would be facilitated.

THE ANIMALS COMMITTEE IS CURRENTLY REVIEWING THE LISTING OF FELIDAE, INCLUDING THE BOBCAT.

At CoP13, at the request of the USA upon failure to gain support for a proposal to delete the bobcat from Appendix II, the Animals Committee was tasked to report to CoP14 its findings on a review of Felidae and particularly *Lynx* spp. However, only a preliminary and incomplete report, summarizing information from approximately 47% of the range States was presented at the 22nd meeting of the Animals Committee in 2006. Of the comments received, one range State identified illegal trade as a problem and seven stated that *Lynx* species are adversely impacted by trade or are likely to become so without continued listing of *Lynx* spp. in the Appendices.

SIZE OF THE BOBCAT POPULATION IS UNKNOWN, THE TREND OF THE POPULATION IS DECREASING, WHILE INTERNATIONAL TRADE IS INCREASING.

Despite being the most heavily traded of all cat species, populations of bobcats are not regularly monitored. **The last population estimate for the USA is from 1981 and is, therefore, over twenty-five years old.** No population estimates are available for Canada or Mexico. **IUCN (2006) considers the trend in the population to be decreasing.** Of the 42 states surveyed by Hansen (2007), only eight provided estimates of their bobcat population size ranging from an estimate 48 in Ohio to over 70,000 in California. Remarkably, though the majority of USA states lack population estimates, 31 claim that their populations are stable or increasing, 6 did not provide any trend data, 3 concede that they don't know the status of their populations, and 2 admit their population are decreasing. Considering the significant weaknesses and inaccuracies inherent to the various techniques used to census bobcats (such as mark-recapture studies, scent-station surveys, track-counts, hunter and trapper questionnaires), there is little, if any, scientifically credible evidence to substantiate these stated trends. Considering the substantial recent increase in bobcat kill statistics (e.g., Arizona 547 in 1996 to 4076 in 2004 (645%), Mississippi 293 in 1996 to 2071 in 2006 (607%), South Dakota 91 in 1996 to 721 in 2005 (692%)), this lack of data warrants serious concern in regard to the impact of increasing trade on the population. Moreover, the scientific basis for making non-detriment findings is unclear given that there is no credible data to substantiate the assertion that current trapping/hunting kill rates are sustainable and are not harming wild populations. **Despite the lack of accurate information on population sizes or trends, international trade is increasing exponentially.** International trade in skins, parts, and products of *L. rufus* has grown by more than 500% in the past ten years: up from 13,105 specimens in 1995 to 69,545 in 2006. During this time the number of skins in trade has grown by more than 460% from 11,515 to 53,409 (CITES Trade Database 2007).

Continued CITES regulation of this growing trade is needed to ensure that trade is not detrimental. If Proposal 14.2 were approved, and the bobcat were to be removed from the CITES Appendices, incentives for trade would be increased while exporting Parties would no longer have to make non-detriment findings. This would have a negative impact on the species because of the lack of scientifically sound, enforceable and actively enforced management plans. The bobcat meets the criteria in Resolution Conf. 9.24 (Rev. CoP13), Annex 2 a) due to the need for "*regulation of international trade to ensure that harvest from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences*", as well as the requirements for listing species subject to Article II.2(b) of the Convention.