



Species Survival Network

CITES COP15 2010 • Doha, Qatar

SSN RESPONSE TO COMMENTS ON CITES CoP15 PROP. 3 TO TRANSFER THE POLAR BEAR (*Ursus maritimus*) FROM APPENDIX II TO I

COMMENT	RESPONSE
1. Destruction of polar bear habitat is the main threat to the species.	THE BIOLOGICAL CRITERIA FOR LISTING SPECIES ON APPENDIX I INCLUDE POPULATION DECLINE CAUSED PRIMARILY BY HABITAT LOSS. Resolution Conf. 9.24 (Rev. CoP14), Annex 1, states that species qualify for listing on CITES Appendix I if they show a “marked decline in the population size in the wild, which has been inferred or projected on the basis of <u>a decrease in area of habitat and a decrease in quality of habitat</u> ”. Polar bears are extremely vulnerable to over-exploitation of adult bears, as their survival depends on high adult survivorship. In some heavily exploited northern populations (e.g. Baffin Bay and Kane Basin) overexploitation is a major threat, while in southern populations (e.g. Western Hudson Bay) habitat loss is the greater threat. The two are acting synergistically to reduce populations.
2. There has been no marked decline in the global polar bear population, so the criteria for listing on Appendix I are not met.	THE POLAR BEAR MEETS THE BIOLOGICAL CRITERIA FOR LISTING ON APPENDIX I BECAUSE POPULATIONS ARE “PROJECTED” TO HAVE A “MARKED DECLINE IN THE POPULATION SIZE IN THE WILD.” Resolution Conf. 9.24 (Rev. CoP14), Annex 1, paragraph C) ii) states that a species is considered to be threatened with extinction – a condition for listing on Appendix I – if it can be <i>projected</i> to experience a marked decline in population size. Annex 5 of the Resolution states that “a <u>general guideline</u> for a marked recent rate of decline is a percentage decline of 50% or more in the last 10 years or three generations, whichever is the longer.” In 2007, the U.S. Geological Survey (USGS), using the best science available, predicted range-wide polar bear population declines of approximately 71% of total population within 45 years (three generations) and 80% within a century (Amstrup et al. 2007). The USGS projection must be viewed as conservative because the actual observed rate of sea ice loss has exceeded that used to make the projection.
3. The projected level of habitat destruction is insufficient to meet the criteria for listing on Appendix I.	CLIMATE MODELS PREDICT A COMPLETE LOSS OF SUMMER SEA ICE IN ABOUT 30 YEARS AND SOME EXPERTS HAVE CONCLUDED THAT POLAR BEARS WILL NOT SURVIVE THIS LOSS. Resolution Conf. 9.24 (Rev. CoP14), Annex 5, states that “a <u>general guideline</u> for a marked recent rate of decline is a percentage decline of 50% or more in the last 10 years or three generations, whichever is the longer”. Arctic sea ice overall has been reduced by 8 percent in the past 30 years alone (three generations for polar bears is 45 years), while summer sea ice has been reduced by 15-20 percent in that period. Climate models predict an additional decline of 10-50 percent of annual average sea ice extent by 2100 and the complete loss of summer sea ice in the Arctic in about 30 years. Some experts have concluded that polar bears will not survive the complete loss of summer sea ice (Amstrup et al. 2009).
4. Trade is not the main threat to the species.	APPENDIX I LISTING DOES NOT REQUIRE THAT TRADE BE THE MAIN THREAT TO THE SPECIES. Both the Convention and Resolution Conf. 9.24 (Rev. CoP14) state that species qualify for listing on CITES Appendix I if they “are or may be affected by trade” (CITES Article II (1)). This Resolution states that a species “is or may be affected by trade” if it is known to be in trade and that trade has or may have a detrimental impact on the status of the species. The life history strategy of the polar bear relies on high adult survivorship: bears who make it to adulthood experience little mortality (other than by humans), whereas cubs experience very high mortality. Therefore hunting, which takes only adult bears, and which in historic times never reached today's levels, poses a significant threat. Polar bear parts are in significant trade: in 2007, 554 skins were traded internationally for commercial purposes, the largest figure in the past ten years; in addition 128 trophies were also traded that year, one of the largest years on record. Furthermore, of 13 populations in Canada, 7 have been over-exploited according to experts and importing country reviews: Baffin Bay and Kane Basin (IUCN/SSC PBSG 2009); Norwegian Bay and Lancaster Sound (Taylor 2008); Gulf of Boothia, M'Clintock Channel, and Viscount Melville Sound (USFWS 2008). In December 2009, Canada issued a polar bear non-detriment finding that states, “The best available scientific information indicates that the Baffin Bay subpopulation is substantially over-harvested in Canada and subsequent international export of polar bear products is therefore considered detrimental.” Clearly, trade is “affecting” the species.

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5. A total ban on hunting might be detrimental.	A CITES APPENDIX I LISTING WILL NOT PROHIBIT HUNTING OR EXPORT OF HUNTING TROPHIES. An Appendix I listing will only prohibit international trade that is for “primarily commercial purposes”, such as the trade in skins. An Appendix I listing will not ban hunting. It may affect the international movement of polar bear trophies, but export and import of hunting trophies will still be possible as long as it is not for “primarily commercial purposes”.
6. A CITES Appendix I listing is not the best or most effective means to protect polar bears.	POLAR BEAR PROTECTION ULTIMATELY DEPENDS ON CONTROLLING CLIMATE CHANGE, BUT THIS WILL REQUIRE DECADES; TRADE ADDS SIGNIFICANTLY TO THE PRESSURE ON AN ALREADY-STRESSED SPECIES. Transfer to Appendix I is necessary to ensure that commercial trade does not compound the threats posed to the species by loss of habitat. It is a solution with immediate effect to provide polar bears with protection from a major source of mortality by preventing hundreds of polar bears from being killed annually for international trade.
7. A CITES Appendix I listing might distract attention away from the need to address climate change.	A GLOBAL DECISION BY CITES TO ENHANCE PROTECTION FOR POLAR BEARS—AN ICONIC ARCTIC SPECIES —WILL EMPHASIZE THE NEED TO ADDRESS CLIMATE CHANGE, NOT UNDERMINE IT. Polar bears are the poster animal for climate change. Actions to provide them with greater protection—such as the 2008 listing under the US Endangered Species Act—have sent a powerful message that climate change urgently needs to be addressed. There are many pressing reasons why climate change needs to be addressed and will continue to be addressed independently from steps to conserve the polar bear. It is ridiculous to suggest that decision-makers will stop addressing climate change because polar bears are deemed to be safe.
8. Management of polar bears by range States is good.	IN CANADA —THE ONLY RANGE STATE CURRENTLY EXPORTING POLAR BEAR SPECIMENS FOR COMMERCIAL PURPOSES—OVER HALF OF THE POPULATIONS ARE DECLINING AND HAVE BEEN OVER-EXPLOITED. Although Canada claims that levels of take and export are sustainable, there is strong evidence to the contrary. At its July 2009 meeting, the IUCN/SSC Polar Bear Specialist Group (PBSG) determined that of the 13 populations in <u>Canada</u> , seven are declining, three are stable, one is increasing and the remaining populations are data deficient. By comparison, the 2005 status report by the IUCN/SSC PBSG categorized five as declining, five as stable, two as increasing and the remaining populations as data deficient. The status of polar bear populations in Canada has therefore deteriorated in the past four years, with two more populations categorized as declining and one fewer as increasing or stable. Also, of the 13 populations in Canada, seven have been over-exploited according to experts and importing countries: Baffin Bay and Kane Basin (IUCN/SSC PBSG 2009); Norwegian Bay and Lancaster Sound (Taylor 2008); Gulf of Boothia, M'Clintock Channel, and Viscount Melville Sound (USFWS 2008). Canada continues to allow hunting in declining and overexploited populations. As a result, importing countries (EU and US) have banned imports from some but not all over-exploited populations.
9. Potential overexploitation in Canada can be handled through EU import bans for certain populations.	THE EU IS A SIGNIFICANT—BUT NOT THE ONLY—CONSUMER OF POLAR BEAR PRODUCTS IN COMMERCE. In the past ten years, the EU imported about 40 percent of the nearly 9000 polar bear specimens traded for commercial purposes. However, the largest percentage of imports—about 47 percent—was by Japan. EU import bans alone will not address ongoing overexploitation in Canada because most exports do not go to the EU.
10. The EU has a positive opinion for all but two Canadian polar bear populations implying trade from other sources is sustainable.	THE MOST RECENT POLAR BEAR SPECIALIST MEETING AGREED THAT MORE THAN HALF OF THE CANADIAN POLAR BEAR POPULATIONS ARE DECLINING. In December 2008, the EU formed a negative opinion on the polar bear populations of Baffin Bay and Kane Basin and a positive opinion on all other Canadian populations. However, in 2009, the IUCN/SSC Polar Bear Specialist Group agreed that of the 13 populations in Canada, seven are declining, three are stable, one is increasing and the remaining populations are data deficient. By comparison, the 2005 status report by the IUCN/SSC PBSG categorized five as declining, five as stable, two as increasing and the remaining populations as data deficient. The status of polar bear populations in Canada has therefore deteriorated in the past four years, with two more populations categorized as declining and one fewer as increasing or stable. The EU needs to update its decisions to reflect the rapidly changing status of polar bear populations.