

**TESTIMONY OF**  
**ASSOCIATION OF FISH AND WILDLIFE AGENCIES**  
**REPRESENTING THE 50 STATE FISH AND WILDLIFE AGENCIES**

**PRESENTED BY:**

**OSBORNE "BUDDY" E. BAKER, III**

**BEFORE THE**

**SUBCOMMITTEE ON FISHERIES, WILDLIFE, AND OCEANS**  
**COMMITTEE ON NATURAL RESOURCES**  
**U.S. HOUSE OF REPRESENTATIVES**

**ON THE**

**CONVENTION ON THE INTERNATIONAL TRADE IN ENDANGERED SPECIES**  
**AND THE**  
**PROPOSAL OF THE UNITED STATES TO DELIST THE BOBCAT (*LYNX***  
***RUFUS*) FROM CITES, APPENDIX II**

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**LONGWORTH HOUSE OFFICE BUILDING**  
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Madam Chair and members of the Committee, my name is Buddy Baker. I am a Regional Coordinator with the South Carolina Department of Natural Resources. I also serve as one of four persons who represent all 50 state fish and wildlife agencies on CITES issues through the Association of Fish and Wildlife Agencies' CITES Technical Work Group. With me today is Donald MacLauchlan, International Affairs Director for the Association of Fish and Wildlife Agencies. On behalf of the 50 state fish and wildlife agencies which we represent, I wish to offer the following comments on CITES and the proposal of the United States to remove the bobcat (*Lynx rufus*) from CITES, Appendix II.

As you know, the CITES is a trade agreement among countries to ensure that international trade in specimens of wild animals and plants does not threaten species survival. Unregulated international trade can push species over the brink, especially when combined with habitat loss and other pressures. CITES works by subjecting international trade of selected species to certain controls. These require that all imports, exports, and re-exports species covered by CITES must be authorized. CITES ensures the conservation and sustainable use of plants and animals globally.

The 28,000 plant species and 5,000 animal species covered by CITES are listed in three appendices according to the level of protection required to combat over-exploitation through international trade. Appendix I includes species threatened with extinction. International trade in specimens of these species is permitted only in extraordinary circumstances. Appendix II includes species not necessarily threatened with extinction, but in which international trade must be controlled in order to avoid utilization incompatible with their survival. Appendix III contains species that are protected in at least one country which has asked other, countries for assistance in controlling the trade.

While the CITES framework for ensuring sustainability is commendable, the ability of a country to successfully remove one of their native species from Appendix II or down-list it from Appendix I has proven to be difficult to impossible. The process requires the range country to formally propose the revision during the Conference of the Parties (which convenes only once every two to three years), successfully defend their position, and garner 2/3 support by the member countries in attendance. Given the difficulties of down-listing sustainably managed species, a country's ability to successfully change the listing status of species is hindered.

In the United States, CITES implementation is the responsibility of the Secretary of the Interior and handled through the U.S. Fish and Wildlife Service (USFWS). We commend the USFWS in their effective implementation of this treaty in this country and their ongoing efforts to enhance the process internationally. The states fully support the CITES process and have been diligent in our participation in guiding and enforcing the decisions of CITES. While the United States federal government ensures compliance with the terms of the treaty, they rely on expertise of the thousands of state wildlife biologists across the country who manage the wildlife resource on a daily basis. It is the 50 individual state fish and wildlife agencies which have the legal jurisdiction over and responsibility for the management of most species of wildlife. In addition, the state fish and wildlife agencies share important responsibility with the federal government for the management of federal trust species such as migratory birds. In the instance of the bobcat, it is the individual state wildlife agencies who professionally and capably manage this species.

The United States' proposal to de-list the bobcat (*Lynx rufus*) from CITES Appendix II (CoP14 Prop 2) was developed through a collaboration of state wildlife biologists and the U.S. Fish and Wildlife Service's CITES staff. This is just one of many instances where the states have worked alongside our federal allies, a partnership in the CITES process that spans nearly two decades.

We fully concur with the assessment that the bobcat does not qualify for listing in any of the CITES appendices. It is unfortunate that this widely distributed and relatively common North American species has been included in the CITES appendices for 30 years as a result of an impetuous decision in the early years of CITES implementation to ensure effective control of trade in all other felids. This decision has created an ongoing undue administrative and financial burden on our state and federal governments which diverts limited resources from other species conservation needs. In South Carolina alone we estimate that the administrative, management, and enforcement costs associated with managing bobcats as a CITES listed species to be approximately \$16,000 per year over the past 30 years. In South Carolina the process annually involves approximately 30 to 40 agency staff people in the implementation of the various encumbrances of the CITES obligations. Similar costs are incurred throughout the 47 bobcat range states. I think that most would agree that these dollars and staff hours could have been better spent on wildlife species with greater conservation needs. In South Carolina funding is sorely needed to complete restoration of marsh mink, to determine factors contributing to the decline of painted buntings, and to measure the impact of trade on turtle populations. I think that most would agree that these and other pressing wildlife management issues should not compete for funding with unwarranted levels of oversight related to well-managed, secure populations of wildlife such as bobcats.

Ongoing wild bobcat population monitoring and management programs continue to demonstrate that this species is not threatened but flourishing, and harvest and trade are well regulated. Our management programs are ensuring the long-term sustainable use of the species and support its conservation. It is important to understand that effective management and regulatory processes by state wildlife agencies were in place for bobcats long before their CITES listing and these programs will not be discontinued if the species is delisted.

The bobcat is the most widely distributed native felid in North America, ranging from as far north as central British Columbia (55°N) and south to Oaxaca, Mexico (17°N). The species utilizes a wide variety of habitats, from bottomland forests in Alabama to arid deserts in Mexico, and from northern boreal forests in Canada to the humid tropical regions of Florida. Geographic expansion of bobcat range and increases in bobcat density during the past decade suggest that population size is increasing in the U.S. Bobcat populations in Canada and Mexico also are reported as widespread and generally healthy. Evidence suggests that more bobcat habitat exists now than when North America was first settled by Europeans. It is my professional opinion that bobcat populations in the U.S. are probably at an all time high.

Delisting of bobcats is not expected to effect bobcat harvest levels. Current harvest levels are not limited by CITES and harvest throughout its range has historically never approached levels considered to be detrimental to the population. In South Carolina our models predict a population of approximately 69,000 bobcats. Last year we commercially harvested only 366 or one-half of one percent of the population. The peak harvest occurred in 1988 at 1505 or 2.2% of the population. We estimate that the annual harvestable surplus of the South Carolina bobcat population is approximately 22% of the population or 10 times the highest level ever recorded.

The inappropriate listing of bobcats under CITES has created a worldwide misconception that the species is “endangered, rare or over-exploited”. This misconception often results in political interferences to legitimate management programs. It has also become a hindrance to trade and the sustainable use of an abundant wildlife species.

Harvest in the U.S. is for game trophies, damage management, and the fur/parts trade. In Canada harvest is almost exclusively for the collection of pelts for the fur trade. In Mexico, bobcats are primarily harvested as game, and exports are mainly trophies. In trade whole skins are most common and account for 83% of the recent legal trade.

According to trade figures, the U.S. and Canada are the primary sources for bobcats accounting for 95% of the legal items exported or re-exported. Mexico, over the last 25 years, has only exported or re-exported 417 items or <0.05% of bobcat items in trade.

Most bobcat pelts exported from North America are handled through a small number of major fur distributors in Canada and the United States. The vast majority of furs are exported as prepared pelts used for the production of fur garments. Characteristics of the pelage and skull can be used to clearly distinguish bobcats from other members of the genus *Lynx*. Skins do not present a look-alike problem because the bobcat can be reliably distinguished from other *Lynx* species by the ears and tail. Taxonomic keys to distinguish bobcat skins from other *Lynx* species, including *L. lynx* and *L. pardinus*, are available.

The bobcat is similar in appearance to only three other Felid species including the Canada lynx (*Lynx canadensis*), Spanish or Iberian lynx (*Lynx pardinus*), and Eurasian lynx (*Lynx lynx*). Range countries for these other three *Lynx* species are to be commended for having in place appropriate and adequate controls to manage and enforce trade in these similar species. Listing of the bobcat in Appendix II has offered no additional protection for these *Lynx* species of conservation concern.

Illegal trade, based on the CITES trade database, represented only 0.2% of the total trade over the last 25 years. Of the illegal *Lynx* species seized, 87% were parts, pieces, or derivatives of bobcat. We agree with the conclusion that the volume of illegally traded *Lynx* species items does not suggest a major problem with illegal trade in *Lynx* species in domestic or international markets.

If the bobcat is removed from CITES, other *Lynx* species will continue to be listed, and CITES permits will continue to be required for trade. A survey of fur industry representatives that deal with *Lynx* species suggests that international, European, and Asian markets all seem to prefer both bobcat and Canada lynx. The ready availability of legally acquired bobcats in the market is a safeguard to the illegal take of and trade in other *Lynx* species. Harvest of Iberian lynx (*L. pardinus*) is not permitted and the Eurasian lynx (*L. lynx*) is either not allowed or highly regulated. Range countries have implemented adequate domestic legislation and regulations, management, and enforcement controls to manage harvest of and trade in other *Lynx* species.

Removing the bobcat from CITES Appendix II is a significant, priority issue for state fish and wildlife agencies in the U.S. We firmly believe that a fair and objective review of the available data strongly supports this delisting action. The removal of the bobcat from Appendix II will not compromise the conservation and legal trade of other listed *Lynx* species nor will it jeopardize the responsible conservation of bobcat populations.

Some parties may be concerned about excluding a single species from a higher taxon listing. Excluding a species from a listed higher taxon has already been done by the Conference of the Parties -- for parrots. Therefore, this proposal, if adopted, does not create a precedent.

On behalf of the 50 state fish and wildlife agencies being represented here today, I appreciate the opportunity to testify and encourage the advancement of this proposal at the 14<sup>th</sup> meeting of the Conference of the Parties and ardently advocate support from CITES member countries. We look forward to the continued state and federal government partnership in the conservation and sustainable use of our fish and wildlife resources.