



Global Arctic Programme

A rebuttal to “Response to WWF/TRAFFIC Report on Polar Bear Trade”

The document *Response to WWF/TRAFFIC Report on Polar Bear Trade*, issued jointly by NRDC, IFAW, HSI and Pro Wildlife has raised unfounded concerns that both the report and WWF’s position against Appendix I listing are unsound.

The response is a critique of *Icon on Ice: International Trade and Management of Polar Bears*, a report written by TRAFFIC and part funded by WWF, available at: panda.org/arctic/iconreport

The response is deeply flawed and highly selective in its arguments. This rebuttal addresses the criticisms in detail.

POLAR BEARS AND CITES: THE REALITY

Polar bears do not meet the CITES definition of “threatened with extinction”.

CLAIM

“The report’s findings show that the polar bear is “threatened with extinction”.

Resolution Conf. 9.24 (Rev. CoP15) states that a species is considered to be “threatened with extinction” if it is characterized by, or likely to be characterized by, a marked decline in population size in the wild which has been inferred or projected on the basis of a decrease in area of habitat or a decrease in quality of habitat. Many of the report’s findings show that the polar bear meets this requirement and is thus “threatened with extinction.”

REALITY

The report’s findings show that the polar bear is not “threatened with extinction” according to CITES definitions.

“Threatened with extinction” is a term with a specific meaning in CITES, implying that a ban in commercial trade (i.e. Appendix I listing) is required to avert the threat. The criteria laid down by CITES in order for a species to meet this definition (Resolution Conf. 9.24 (Rev. CoP15)) require that:

1. The wild population is “small” (i.e. less than 5,000 individuals); and/ or
2. The wild population has a “restricted area of distribution” ; and/ or
3. The wild population has undergone a marked decline (of at least 70% and perhaps more) – either on the basis of current and historical figures, or inferred from, for example, a decline in area of habitat or decreasing recruitment.

NRDC do not contest the fact that the first two criteria are not met. The current population estimate for polar bear is of the order of 20,000-25,000, while in Canada alone the extent of occurrence estimated at 8.7 million km² and the area of occupancy at 5.6 million km². However, they argue that the third criterion is. In fact, when one looks at their advocacy material, they are not contending that this criterion is met as of today but that it will be met decades into the future.

There are two issues of dispute here:

- Whether the projected decline in habitat due to sea ice loss will ever be sufficient to meet this criterion; and
- Whether or not a projected decline 45 years into the future is admissible as a basis for CITES Appendix I listing in the short term.

On the first point, NRDC quote a modelling exercise that predicts a potential decline of 70% from current population estimates by mid century. However, IUCN and TRAFFIC consider an estimate of 50% to be more realistic. It should be noted, as the report states, that the actual response of polar bears to the loss of sea ice across regions is not fully understood, likely complex, and may not be linear or direct, though it is highly likely to be negative for the species. Essentially, polar bear will become more vulnerable in the next 50-100 years but it is not evident when the Appendix I threshold may be met.

However, even taking the more precautionary figure, both WWF and the CITES Secretariat are clear in the interpretation of the criteria as regards declines that are projected 45 years hence. In its preliminary assessment of the proposal, the Secretariat states:

"According to the guidelines provided in Annex 5 of Resolution Conf. 9.24 (Rev. CoP15), in order to meet the criterion in paragraph C of Annex 1 of that resolution, a species should exhibit a marked historical decline to around 5 %-30 % of its population baseline or a recent decline of 50 % in its population size during the last three generations. However, the supporting statement speaks more of potential population declines in the future, rather than declines which have already occurred."

If it were manifestly clear that trade is overwhelmingly driving the projected decline one might be tempted to interpret the criteria differently. However, while disputing the extent of the threat proposed by trade, NRDC do not dispute the fact that climate change is the main driver. Therefore, if nothing else is done except to list the species on Appendix I, the same decline may be anticipated.

Future decline does not make the polar bear eligible for uplisting.

CLAIM

"The report acknowledges the science showing that polar bear decline due to climate change will be substantial, and acknowledges that climate change has impacted, and will impact, habitat and recruitment."

Acknowledges the 2007 USGS study, which projects that "over two-thirds of global polar bear population could disappear by mid-century due to restriction of habitat." Although the TRAFFIC/WWF report notes WWF's disagreement regarding how these projections should be applied under the CITES biological criteria, the report does not dispute the USGS projections. Pg. 22."

REALITY

Yes, the report does agree that there will likely be a substantial decline in polar bear numbers over time in response to projected habitat loss. As shown above, the timing of that projected decline does not make the polar bear eligible for uplisting.

The same considerations that applied in the previous section regarding the extent of the projected decline and the timescale also apply here.

“Reiterates the substantial impacts climate change has and will have on polar bears, including “quantitative evidence for the effects of climate change on polar bear population dynamics,” “a statistically significant relationship between the timing of the spring [sea-ice] break-up and condition of polar bears,” and impacts on reproduction. Pgs. 18-21.”

“Recognizes that as polar bears become more and more scarce, the demand for and price of skins will only increase over the long-term. Pg. 5(“[b]ecause polar bear skins have increased in value recently, combined with the likelihood that polar bears might become scarcer due to climate change, the demand for and price of skins will face upward pressure over the long-term”).”

Yes, climate change is likely to affect habitat and recruitment, though as outlined above, CITES will do nothing to remedy this.

The monetary value of a species is not a criterion for Appendix I listing. It is a function of demand for the species but also of the extent to which the population is managed; if it is in demand but the supply is restricted by precautionary harvest levels in line with the current Appendix II listing then the price can be expected to go up.

Regarding the issue of any increased demand arising from perceived increasing scarcity, the report has this to say:

“...because polar bear skins have increased in value recently, combined with the likelihood that polar bears might become scarcer due to climate change, the demand for and price of skins will face upward pressure over the long-term. More consistent reporting of trade data and improved analysis and monitoring of trade in the species will be necessary to ensure international trade does not become a significant threat in the future.”

“Admits that the response of polar bears to climate change will likely be influenced by hunting pressures. See, e.g., pgs. 1-2 (“the responses of polar bears will differ between regions and will likely be influenced by ice conditions, availability of prey and hunting pressures”). See also pg. 17.”

The report fully recognizes that hunting, whether increased or decreased will affect populations.

However, the manner in which this issue is presented in the response, with the use of the word “admits”, is an example of the way in which the document resorts to selectivity and pejorative “spin” to make its case.

In this context, the report was not implying that hunting pressures were a negative influence on the decline but, rather, that lowering or raising hunting levels could impact either positively or negatively on the degree of decline. It is also true that, if hunting decreases, some feel more bears could die from human conflict events, or even compete with other bears for food.

“Acknowledges that Canadian harvest management has been unsustainable in certain instances. See pg. 38 (describing the unsustainable Baffin Bay polar bear hunt that resulted in a 2009 negative non-detriment finding by Canada and Greenland and an import restriction in the EU of Baffin Bay and Kane Basin polar bears), pg. 39 (describing the ongoing Western Hudson Bay hunt that was deemed unsustainable by both the PBSG and Environment Canada in 2011), pg. 115 (acknowledging that “there remain valid concerns in regard to the information used in recent management discussions on harvest levels for at least two population units (Baffin Bay and Western Hudson Bay)”).”

The report does not downplay management problems where they exist. In fact WWF (alone among conservation organizations) comments on management quotas and works with the organization concerned to ensure that they are sustainable.

Again the document is selectively picking anecdotes that reinforce its case and extrapolating from these to convey the impression that Canada’s overall management is defective. It could equally be argued that these are examples of active and adaptive management. The 2011 Southern Hudson Bay hunt is actually a 1 year anomaly that was rapidly addressed. The following more balanced assessment in the report is omitted from the response:

“Although concerns have been raised on the harvest levels in some jurisdictions and in specific years, the regional and national authorities are working to address such concerns by adjusting or implementing harvest limits where needed, and by monitoring the harvest across Canada (e.g. voluntary harvest limits or quota for Southern Hudson Bay management unit, a negative NDF for Baffin Bay management unit).”

In any event, to the extent that there are shortcomings in the management of the population, these can be remedied through better implementation of the existing Appendix II listing; they do not by-pass the requirement to assess the species by reference to the Appendix I criteria. If this argument were to be accepted for polar bear then logic would demand that most of the 33,000 species listed on Appendix II should be transferred to Appendix I.

“Acknowledges that poaching in Russia “may be a significant challenge for the Chukchi Sea management unit,” pg. 57, and further notes the “concern that imported Canadian polar bear parts and derivatives could be used to launder a poached bear from Russia,” pg. 81.”

Key words “may be” and “could be”. The problem is that we do not know how much illegal hunting and trade is occurring. The report states that:

“Due to the lack of reliable data, it is difficult to quantify how much, if any, illegal hunting is occurring and what kind of an impact it is having on the species. More robust information is needed to validate and quantify the amount of illegal hunting and/or illegal trade, as well as baseline population trend data across Russia.”

In any event, as with the previous issue, this does not constitute a valid argument by itself for Appendix I listing.

The existence of trade does not mean that a species is eligible for uplisting.

CLAIM

“The report clearly acknowledges that polar bears “are or may be affected by trade.”

Resolution Conf. 9. 24 (Rev. CoP15) states that a species is or may be affected by trade if (1) “it is known to be in trade” and (2) “that trade has or may have a detrimental impact on the status of the species.” Many of the report’s findings show that the polar bear meets both of these requirements.”

REALITY

Yes, polar bears are in trade—that is why they are on appendix 2 of CITES.

“Affected by trade” is essentially CITES parlance for a situation whereby international trade from the wild population is taking place and, therefore, that the species must be assessed for inclusion in Appendix I or II; it does not mean that the species qualified directly for Appendix I.

CLAIM

“The report acknowledges that polar bears are “known to be in trade”.

Summarizes CITES export data from 1987-2009 and documents a total of 32,033 polar bear commodities traded, including 8,227 skins and 2,279 skulls. Pg. 86. Estimates that nearly 400 polar bears (or roughly half of the average 735 bears harvested annually) are traded internationally each year. Pgs. 116, 106.”

REALITY

The same consideration applies here as with the previous point; 400 bears in trade is of no relevance to whether or not the species meets the Appendix I criteria. In any event, analysis of the CITES trade data indicated that the authors of the response have inadvertently double-counted some trade transactions and made doubtful extrapolations to correlate trade in polar bear parts with whole animals.

Media reports about “Icon on Ice” are not a reliable source of information.

CLAIM

“The report acknowledges that “trade has or may have a detrimental impact on the status of the species”.

Recognizes that the number of polar bears harvested in Canada has risen at the same time that the demand for and value of their skins has increased. Indeed, citing a CBC News article, the report states that over the past few years the demand for polar bear skins has increased in importing countries such as Russia and China. The cited article found that auction houses “cannot meet the soaring demand for polar bear hides.” Pg. 79; CBC News (2011). With respect to the value of skins, the report states that the price of an 8-foot rug doubled in value between 2006 and 2010, from \$6,200 CAD to \$12,000 CAD. Pg. 3. It also shows that the average price of polar skins advertised on the internet increased from \$7,338 CAD in 2006 to \$18,833 CAD in 2010. Pg. 109; Table 5.7. At the same time, the report acknowledges that more polar bears are being killed. For example, the report shows that, in 2010/2011, significantly more bears were killed in Canada than in the four previous years. Pg. 30.”

REALITY

This comment confuses the content of the Traffic report with the content of media reports.

Here the response is not, in fact, quoting the TRAFFIC report but, rather, a CBC news report, that the TRAFFIC report referenced. The implication is that increasing values of polar bear hides is somehow a threat but it has already been demonstrated that this is not necessarily the case. The suggestion that “significantly” more bears were killed in Canada in 2010/2011 is their interpretation. In any case they neglect to mention that the increased numbers of bears hunted in Canada in 2010/2011 was due to the spike in numbers hunted in Quebec that year, which, as point out above, was subsequently addressed.

“Citing these and other facts, a Macleans article from 2012 concluded that “[t]here’s good evidence the spike in polar bear prices has contributed to over-harvesting” in northern Quebec (Macleans 2012).”

Here again the quote is from a media article and not from the report. The issues regarding the Quebec hunt and the price of skins are dealt with above.

WWF works to ensure quotas are sustainable.

CLAIM

“The report downplays serious problems with the management of several polar bear populations in Canada.”

REALITY

The report does not downplay management problems where they exist. In fact WWF (alone among conservation organizations) comments on management quotas and works with the organization concerned to ensure that they are sustainable.

“It suggests that historical and continued overharvest of the Baffin Bay population was “resolved” when the local management authority reduced quotas; that unsustainable harvest from the Western Hudson Bay population may be “resolved” when surveys clarify the status of the population; and that recent overharvest of the Southern Hudson Bay population will not be repeated because of a voluntary quota and the promise of future government action. Pg. 38-39. In fact, the management of each of these populations raises serious questions about sustainable harvest and quotas:

Baffin Bay: due to unsustainable hunting (according to the IUCN SSC/PBSG (2010), 212 on average killed when 176 sustainable), the Canadian federal government imposed a prohibition on exports, which it maintains today as the local management authority's quota continues to be unsustainable."

This is an example of on-going management. The management of this unit is contentious and open for debate. It was dealt with openly in the report; it was not "downplayed".

Canada operates in a co-management regime, working with user groups and local managers; not by unilateral legislation from the Federal level. There will always be a lag time from when a situation/concern arises to when a solution/action can be implemented. Canada has actually responded quite quickly especially considering the many layers to the co-management regime (various jurisdictions and stakeholders involved in making decisions).

"Western Hudson Bay: while acknowledging that the quota was nearly tripled in 2011 and that "[s]ome scientists and managers considered this number to be above sustainable limits" pg. 38, the report neglects to note that the IUCN SSC/ PBSG opposed the quotas as unsustainable and that the federal government opposed the quota. It also failed to note that this quota was exceeded and that the local management authority increased the quota again for 2012/2013 against the advice of the IUCN SSC/ PGSB."

WWF also opposed the quota increase. However, temporary adjustments to harvest in a single management unit- in this case due to social carrying capacity concerns (conflict), are hardly a reason to invoke significant changes to an International trade agreement that will do nothing to resolve this situation.

"Southern Hudson Bay: while acknowledging that the number of polar bears legally hunted from Nunavik (northern Québec) was significantly higher in 2010/2011 than in previous years (74 polar bears compared to the four taken annually by Nunavik from 2006 to 2010), the report does not acknowledge concern by polar bear biologists that the one year voluntary quota established for 2011/2012 of 60 bears is not sustainable (Marine Mammal Commission 2012)."

WWF is also concerned about the status of this management unit, which is why we are working with the government of Quebec and EC to update the population information while respecting the co-management process underway. Once again, this is not justification for an Appendix I listing.

"Icon on Ice" uses the most current data available.

CLAIM

"The report misstates and omits key information regarding the status of the polar bear and the projected impact climate change will have on the species."

The report incorrectly describes the science-based trends for the Davis Strait and Lancaster Sound populations as stable or increasing. In fact, the IUCN SSC/PBSG (2010) finds the trends for these populations to be declining."

REALITY

The report used more up to date numbers than the PBSG 2010 findings.

The initial draft cited the accepted references for these management units for 2011 (when it was written). When Environment Canada peer reviewed the report, they provided the updated information on these two management units. It also says the information was sourced from Lunn et al, 2010 and PBTC, 2012.

IUCN SSC/PBSG (2010) does have a table that lists these management units as declining. However, this is misleading if the actual text of the report is not taken into consideration. For example, regarding Davis Strait [from IUCN SSC/PBSG (2010)]:

"There was considerable discussion over whether to categorize the Davis Strait subpopulation as declining or stable, given that a recent capture-recapture study indicated that the subpopulation may be declining

from a recent peak in abundance, possibly as a result of density dependent or ice factors. E. Peacock emphasized that although there is strong evidence to indicate Davis Strait is currently in decline, given the recent trajectory of the subpopulation it may be categorized as stable, depending on the temporal window used for the current trend column. S. Amstrup and E. Born felt the most recent data should be used and the subpopulation should be listed as declining. A. Derocher noted that the Group has traditionally deferred to the management agency to determine how to populate the current trend field.”

In other words, there is no consensus within PBSG as to whether the Davis Strait (and Lancaster Sound) populations are stable or increasing. In any case, PBSG is no longer up to date. The 2012 Polar Bear Administrative Committee Assessment table is more up to date, and has these management units as stable.

“Icon on Ice” considers only relevant information.

CLAIM

“The report fails to cite scientific papers on the impact of climate change on polar bear body condition, reproduction, and survival that were available at the time the report was prepared.

For example, the report cites only three original scientific papers published on this topic since 2010, when in fact there have been at least a dozen. In all, key papers missing from the report include:” [list follows]

REALITY

Few reports cite all available knowledge on a topic, they just choose representative materials, as did this report.

The report deals with the effects of trade on the status of polar bears. Nobody involved would disagree with any of those publications. Moreover, none of the reviewers, several of whom were authors on those uncited papers, felt they were relevant to this report.

CLAIM

“The report falsely states that the 2007 U.S. Geological Survey report (Amstrup et al. 2007) “was fully considered by the PBSG when making their Red List Assessment of vulnerable and therefore might be expected to decline by greater than 30% but less than 50% in the next three generations.”

Pg. 72. This is false. The polar bear was listed as Vulnerable in 2006 (Schliebe 2008), a year before the 2007 USGS report was published. IUCN has not reassessed the status of the species since then.”

REALITY

The significance or otherwise of the U.S. Geological Survey report, which is more pessimistic in its projections than any of the other studies on future population trends, has been discussed above. As regards the implication that the report deliberately ignored it, when the report was originally written the IUCN red list website actually said “assessed in 2008”

The critique of “Icon on Ice” misstates, ignores or misrepresents key facts.

CLAIM

“The Report Misstates or Ignores Several Key Facts:

The report incorrectly implies that trade in polar bears has been and will continue to be stable.”

REALITY

The HSI/IFAW/NRDC/ Pro wildlife document misstates or ignores or misrepresents key facts as presented in the Traffic report.

The report only says that polar bear trade has been stable in the past, a fact that is borne out by the data. It actually went on to say that trade should be monitored in the near future to ensure trade is not detrimental to the species.

CLAIM

“Analyzing limited CITES data, the report states “the total number of skins imported...did not increase significantly” between 2005 and 2009. Pg. 106. In fact, recent market demand for polar bears has increased substantially as reflected both in hides offered at auction and prices for skins:

- The number of polar bear hides offered at auctions in Canada more than tripled from 40 hides being offered in 2007 to 150 hides offered in 2012 (Fur Harvesters Auction Inc. 2012; CBC News 2011; Nunatsiq News 2012; Macleans 2012).
- The average prices of hides sold at auction more than doubled from 2007 (USD 2,079) to 2012 (USD 5,211). Fur Harvesters Auction Inc. 2012; CBC News 2011; Nunatsiq News 2012; Macleans 2012.
- Maximum hide prices achieved at auction more than doubled from 2007 (USD 6,100) to 2012 (USD 12,514). Fur Harvesters Auction Inc. 2012; CBC News 2011; Nunatsiq News 2012; Macleans 2012.”

REALITY

The fact that more hides are offered at auction in Canada is not an indicator of an increase in international trade. International trade is the focus of CITES, and of the TRAFFIC report.

The report discussed the period of time between 2005 and 2009; the response is making an issue of the difference between 2007 and 2012. The report did not analyze trade or market data for 2012.

Moreover, auction data is domestic information that fails to distinguish between the trade within Canada and those specimens exported out of Canada. For this reason the CITES trade data were used and these only reached up to 2009 for all range states. However, it did include information for Statistics Canada on furs, not to analyse or interpret, but to provide as simple information. The Canada statistics data included more complete data as it was not selecting from one particular auction house. Many of the information from the fur harvesters were likely included in the Statistics Canada data but it would not have been appropriate to mix the two sources.

The number of hides offered for sale at auction is not necessarily a good indicator of market demand. It could also (for example) be an indicator that Inuit hunters are seeking a new source of income and increased marketing efforts by fur traders. An increased number of hides for sale in 2012 is likely linked to the spike in bears hunted in Quebec in 2010/2011 (see above).

The response fails to mention that sport hunting also declined substantially during this time (after ESA listing). Therefore Inuit instead decided to auction the hides. Just because there are more hides auctions or available, does not mean more bears were killed.

Conclusion

It is regrettable that the authors of this document chose to be so selective in their use of facts and quotes, to the extent of misrepresenting information from other sources as coming from the report.

1. The species does not currently meet the criteria for inclusion in Appendix I;
2. Whether or not these criteria will be met in 45 years time is questionable at best, but it is not a basis for a decision to list the species on Appendix I at this time;
3. Climate change, not trade, is the driver of the projected decline, so that if no steps are taken other than to list the species on Appendix I, the effect will be negligible.
4. The significance of the deficiencies in Canada's management of some sub-populations is, at best, overstated by the critique and is not a justification for Appendix I listing.
5. The increasing price for pelts is likewise no reason to uplist.



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Information

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