



WWF World Wide Fund For Nature  
ADENA

WWF España

Santa Engracia, 6  
28010 Madrid  
Tels. 410 24 01. 02  
Telegramas: Pandadena 28010 Madrid

Madrid, January 31, 1989

Mrs. Lydia Klös  
ZOO Wuppertal  
Hubertusallee 30  
5600 Wuppertal 1  
Fed. Rep. Germany.-

Dear Mrs. Klös,

Thank you so much for your response, dated 25 January, to my earlier letter. We are very pleased to hear that you have introduced a proposal for inclusion of *Lynx pardinus* in Appendix I of CITES.

I am writing you to inform you of something of grave concern here in Spain. As of this past year, the rabbits here have been hit with a new deadly virus. I am quite sure you have heard of this so called viral haemorrhagic pneumonia as rabbits in Germany suffer from it also. This virus has taken its toll on our rabbits.

Recently we went out in the field to collect specimens for autopsy and were after-gasted to find dead rabbits only 20-30 meters from each other. This was at Montes de Toledo, where - the largest population of *Lynx pardinus* exist. Generally, two-month-old and adult rabbits are affected. With the main reproductive group, the adults, being affected, the rabbit population will adsurely decline making it even more difficult for the Spanish lynx to survive.

So you can see that now it is even more important that the - Spanish lynx be protected on the international level while - we try to strengthen and enforce our own local and national - laws protecting this precious cat.

I have enclosed some information and articles concerning the virus and the effects it's having on Spain's human and wildlife populations. Thank you so much for your time again.

Sincerely,

*Sergio P. Villarreal*

Sergio Villarreal  
Student assistant to Carlos  
González Vallecillo.  
Director of Conservation

Registered as:  
Fondo Mondiale per la Natura  
Fondo Mundial para la Naturaleza  
Fonds Mondial pour la Nature  
Fundo Mundial para a Naturaleza  
Welt Natur Fonds  
World Wildlife Fund

Presidente de Honor:  
S. M. El Rey D. Juan Carlos I  
Presidente:  
S.A.R. D. Carlos de Borbón Dos Sicilias,  
Duque de Calabria

Other Proposals

A. PROPOSAL

Inclusion of Callorhinus ursinus in Appendix II.

B. PROPONENT

The United States of America.

C. SUPPORTING STATEMENT

1. Taxonomy

11. Class: Mammalia
12. Order: Pinnipedia
13. Family: Otariidae
14. Species: Callorhinus ursinus (Linnaeus, 1758)
15. Common Names: English: North Pacific fur seal  
French: Otarie à fourrure du Pacifique Nord  
Spanish:
16. Code Numbers:

2. Biological Data

21. Distribution: During the reproductive season (May through July) most Callorhinus are found in the eastern and western Bering Sea (between the Aleutian Islands and St. Matthew Island, and in the Sea of Okhotsk - the Robben Island population). A few immature animals remain south of the Aleutian Islands during this season, and the entire San Miguel Island population probably remains in California waters all year.

In early August, adult males leave their territories and go to sea; most do not return until the following year in May. The distribution of adult males at sea is not well known, but from the small number collected pelagically it appears that most of the Pribilof Island males winter South of the Aleutian Islands and eastward into the Gulf of Alaska. A few remain in the Bering Sea all winter.

Adult females and juveniles of both sexes begin to migrate South in October. They appear to fan out over the North Pacific Ocean at first, but their density soon becomes much greater along the eastern and western edges than in mid-Pacific. Immature animals do not usually migrate as far South as do the adult females, which occasionally reach the Mexican border in the eastern Pacific and the Honshu coast of Japan in the western Pacific (30° to 32°N). Immature animals leave the breeding island last. Pups born on the Pribilof Islands reach the Aleutian passes by

November and early December; early pups reach South-East Alaska, British Columbia, and Washington coasts by late December. A few animals reach the southern ends of the range, but most do not. Little else is known of the movements of young of the year until they return to the breeding islands in large numbers as three-years olds.

While at sea in the Bering Sea, most fur seals (37.7%) are solitary or occur in pairs (26.9%); the remainder (35.4%) occur in groups of three or more.

Although the percentages vary by area and by year, this trend has been found in other parts of the range. Seals concentrate in areas of upwelling over seamounts and along the continental slopes. For that reason they are rarely found within 18-28 km of shore. They are also more likely to be found in waters of 6-11°C than in colder or warmer waters. These temperatures probably reflect local abundances of fish rather than thermoregulatory needs of the seals. Because their distribution is patchy, the densities at sea may vary from zero to more than 20 seals per square kilometer. The sex ratio in these patches varies greatly; juvenile males are occasionally more numerous than females in parts of the western Pacific, but females always predominate in the eastern Pacific. The intermixture rate of eastern and western Pacific breeding stocks at sea is low; fewer than 10% of animals found on either side of the Pacific are from breeding islands on the opposite side. The San Miguel Island colony in California was founded by both Pribilof-tagged and Commander Island-tagged females.

22. Population: The fur seal was commercially harvested in the North Pacific under the auspices of a series of international treaties from 1911 to 1984. The Interim Convention on Conservation of North Pacific Fur Seals of 1957 expired in 1984 and the resulting lack of regulations on the international trade in this species constitutes a continuing threat to its declining population.

Since the early 1940's and 1950's, the North Pacific fur seal population (North Pacific Ocean from 35° to 60°N latitude) has declined from almost 3 million to 1.1 million animals. The breeding population in the United States is centered on the Pribilof Islands and constitutes 75% of the world population. This population has declined from 2.2 million in the 1950's to a current estimate of about 800,000. The last commercial harvest in the United States occurred in 1984. The Soviet Union has similarly stopped its harvest in the western Pacific. This species has been the subject of international trade since the species' discovery on the Pribilof Islands in 1786. Furs and other by-products have been marketed in the United States, Europe and Asia. Tens of thousands of processed pelts have been sold to European manufacturers of fur coats. More recently and as late as 1988, penis bones ("seal sticks") and testes have been harvested by Aleut residents of the Pribilof Islands apparently intended for sale to Korean importers for use as aphrodisiacs.

Many studies and analyses of historical data have been made to ascertain the causes of a precipitous population decline of the Pribilof Islands stocks. Entanglement in discarded fishing gear has been identified as a significant cause of mortality, although

it has not been identified as a singular cause of the population decline. Mortality due to entanglement in active fishing gear is another potential cause of significant mortality due to the existence of a multinational high seas drift gillnet fishery which operates throughout the North Pacific and well within the pelagic distribution of stocks. Animals taken incidental to commercial fishing by foreign vessels can readily enter into international trade.

A commercial harvest of female fur seals that occurred between 1956-68 on St. Paul Island, Pribilof Islands, Alaska, is thought to have caused most of the population decline in the Pribilof population through 1970. About 25,000 sub-adult males were harvested commercially each summer on St. Paul Island through 1984 and this has been considered as a possible contributing factor in the population decline. Soviet scientists reported a relationship between sex ratio and reproductive rates in fur seals and there is some evidence indicating that the problems identified by the Soviet scientists could be involved in the decline on the Pribilofs. However, the limited data available are not consistent with reduced reproduction rates as a cause of the Pribilof Island population decline. The likely principal factor behind this decline in abundance is an increased mortality at sea.

### 3. Trade Data

31. National Utilization: Since the Interim Convention on Conservation of North Pacific Fur Seals lapsed in 1984, this species is protected in areas under U.S. jurisdiction by the Marine Mammal Protection Act (MMPA) and the Fur Seal Act. In 1988, the Pribilof Island population was designated as a depleted stock under the MMPA since it had declined below its optimum sustainable population level. Amendments to the MMPA in 1988 provide a limited exemption to the prohibition on taking of depleted stocks: up to 50 fur seals may be killed each year through 1993 incidental to commercial fishing operations. No fur seals may be taken for public display purposes by zoos and aquaria. However, scientific research and subsistence taking are still allowed. A small harvest for food by Aleut residents of the Pribilof Islands is limited to less than 2,000 annually. Theoretically, nonedible by-products of the meat harvest may be used in the manufacture of native handicrafts; however, no history of handicraft use of these by-products has been demonstrated. Sealskins and bacula or seal sticks (penis bones) have been preserved and stored on St. Paul Island by subsistence harvesters.
32. Legal International Trade: The following table of U.S. exports of sealskins demonstrates the extensive nature of previous international trade in this species for fur products. The Tanadgusix (TDX) Corporation, a native village corporation on St. Paul Island, entered into a partnership agreement with a Canadian furrier for processing of the remaining commercial skins (harvested before 1985). In earlier years, a U.S. processor (the Fouke Company) had processed all skins harvested on the Pribilof Islands and sold them to European coat manufacturers. The TDX Corporation contacted skin processors in Japan and Taiwan concerning sale of skins harvested in 1984. Thousands of seal sticks have been shipped to Hong Kong since 1987, apparently for use as aphrodisiacs.

U.S. EXPORTS OF SEALSKINS (DRESSED)

	1979	1980	1981	1982	1983	1984	1985	1986
Argentina	33							
Belgium/Lux	629	130	92			211		
Canada	10,691	4,484	6,121	28,592	5,530	10,182	12,468	10,807
Denmark					7	24		
El Salvador				462				
France	1,435	801	950	53	756	2,736	108	30
Germany, F.R.	965	4,455	676	430		70	20	
Hong Kong	181	885	509		223	60		
Italy	3,226	3,105	1,635	807	193	229		
Israel					20			
Japan	1,745	33	1,164	15	88	309	422	
Korea, Rep. of							11	
Lebanon					25			
Mexico			198	200				
Spain	90	205			120			
South Africa		46		5				
Suriname				72				
Switzerland	3,478	6,028	2,786	84	717	124		
U.K.	949	1,420	703	403	181	644		
TOTALS	23,422	21,592	14,834	31,123	7,870	14,589	13,029	10,837

33. Illegal Trade:

34. Potential Trade Threats:

341. Live Specimens: Less than 100 North Pacific fur seals have been taken for public display either under the Fur Seal Act of 1966 or the MMPA of 1972. There is no information currently available on fur seals taken for public display purposes in the Soviet Union. The current listing as a depleted species by the United States prohibits any taking for public display of this fur seal in the jurisdiction of the United States.

342. Parts and Derivatives: Regulations established in 1985 under the MMPA and the Fur Seal Act allow only a small subsistence harvest of Pribilof Island fur seals. No commercial trade is allowed. In 1987, the U.S. National Oceanic and Atmospheric Administration (NOAA) seized 3,400 fur sealskins from the 1985 subsistence harvest that TDX Corporation had sent to the Fouke Company in South Carolina. At that time, Fouke was not a registered tannery under the MMPA and there was no evidence that the skins were to be used for native handicrafts. For over 50 years, during the time of the commercial harvests, the Fouke Company sold processed skins to foreign buyers for use in the manufacture of coats. Under the terms of a 1988 Settlement Agreement, TDX paid a US\$ 5,000 penalty and forfeited the skins to the United States.

Unfortunately, no strict inventory control was ever maintained of legal skins and seal sticks, i.e., those resulting from harvests conducted before 1985. Thus, there

is a reservoir of perhaps tens of thousands of skins and seal sticks that appear in international trade but for which there is no proper documentation or international control. NOAA Fisheries enforcement officers report several incidents each year involving shipments of fur seal skins or seal sticks. In 1987, three shipments of over 3,000 units (baculum plus testes) were detained that were consigned to a company in Hong Kong. Over 10,000 units were detained in 1988. Nations involved in drift net fisheries are known to take fur seals incidental to their operations outside U.S. jurisdiction. In light of the value of fur seal parts (estimated US\$ 25 per seal stick) in current international markets, it is likely that these parts will enter into international trade and could provide an incentive to take additional seals for commercial purposes.

#### 4. Protection Status

41. National: The United States, the Union of Soviet Socialist Republics, Canada, and Japan, as former fur seal treaty parties, have domestic laws and regulations which limit the taking and possession of fur seals and their parts or products. Although trade is substantially restricted by the subsistence provisions of U.S. law, there have been attempts to enter fur seal parts or products into illegal international trade. The Fur Seal Act Amendments of 1983 protect the Pribilof Islands rookeries.
42. International: The International Convention for the High Seas Fisheries of the North Pacific Ocean of 1952 (INPFC) set regulations and provided for enforcement inspection of fishing vessels primarily for salmon. Japanese access to the U.S. Exclusive Economic Zone (200 mile limit) under INPFC conservation programmes was precluded in 1988 due to domestic U.S. court actions that prohibited issuance of MMPA incidental take permits to Japanese fishermen. The Interim Convention on Conservation of North Pacific Fur Seals of 1957 (expired in 1984) prohibited the harvest of North Pacific fur seals on the high seas (pelagic sealing). This combination of international management of commercial harvesting of the seals on land and the prohibition of pelagic sealing was augmented by the nearly simultaneous declarations by the United States and Union of Soviet Socialist Republics of respective 200 mile Exclusive Economic Zones including vigorous enforcement of the multiple regulations and prohibitions of all of the treaties' conservation and management measures. Throughout this thirty-year period of increasing control over the resources, a low number but chronic series of violations regarding a pelagic take of seals was documented. Of particular concern is the fact that the majority of seals taken pelagically in the Bering Sea (based on pelagic research conducted during the 1970's) are females. As noted above, harvests of female seals have been shown to have an adverse effect on population dynamics.
43. Additional Protection Needs: Domestic legislative and regulatory regimes of signatories to the earlier multinational treaty system appear to have been maintained. However, while these domestic measures restrict the taking of fur seals in local waters such restrictions apparently do not apply to the rapidly growing multinational high seas fisheries in the North Pacific (i.e.,

squid driftnet fisheries) which are known to entangle fur seals. This concern has been heightened by reports of animal retention by vessels for the purpose of introduction into international trade of a variety of parts and products. In 1988, the United States added the Pribilof Island population of North Pacific fur seals to a candidate species list for consideration for listing under the Endangered Species Act of 1973. Addition of this species to Appendix II of CITES will provide a level of trade protection equal to that which exists for fur seals of the Genus Arctocephalus of the southern hemisphere.

5. Information on Similar Species

The Guadalupe fur seal (Arctocephalus townsendi) is listed in Appendix I of CITES. The range of this species overlaps that of the North Pacific fur seal in the extreme South-East corner of the latter's range. The Guadalupe fur seal is not known to have a pelagic range greater than the 200 mile Exclusive Economic Zones of its two range states, Mexico and the United States. This species is the only known representative of the genus in the northern hemisphere. The other seven species of this genus are found in the southern Atlantic and Pacific Basins and the circumpolar southern ocean. These species are listed in Appendix II of CITES. Two species, Arctocephalus pusillus and A. australis, are under regimes of national harvests and products of these species enter into international trade.

6. Comments from Countries of Origin

None requested.

7. Additional Remarks

The rapid growth of the extensive driftnet fisheries of the North Pacific during the past eleven years has generated international attention because of the incidental taking of a wide variety of marine organisms, in addition to the target fish species. The seasonally adjusted northernmost extent of certain of these fisheries now overlaps some forty percent of the pelagic range of the North Pacific fur seal. The absence of an international treaty and management regime for the resources involved poses a serious threat to seal stocks such as the Pribilof Island population which has declined by one-third since the 1970's. CITES Appendix II listing for this species will provide a needed measure of control over international trade.

8. References

