



April 10, 2006

Supervisor
Marine Mammals Management Office
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Via email to: AK_Polarbear@fws.gov

Re: Comments by Defenders of Wildlife in Support of Listing the Polar Bear (*Ursus maritimus*) as Threatened under the U.S. Endangered Species Act

Dear Supervisor:

Defenders of Wildlife (“Defenders”) is a non-profit conservation organization with over 490,000 members dedicated to the protection of wildlife in its native habitat. Since it was founded in 1947, Defenders has been an advocate for the conservation of wolves, bears, and other predators in North America. In particular, Defenders works to protect Arctic ecosystems, such as the Arctic National Wildlife Refuge in Alaska, from harmful development by the oil and gas industry, the effects of climate change, and other threats. Arctic ecosystems provide the only habitat for polar bears.

On February 9, 2006, the U.S. Fish and Wildlife Service (“Service”) published notice in the Federal Register soliciting information relevant to whether listing the polar bear as Threatened under the U.S. Endangered Species Act (“ESA”) is warranted.¹ As discussed in detail below, Defenders of Wildlife believes listing is warranted.

I. STATUS OF POLAR BEAR POPULATIONS

The polar bear is distributed among 19 subpopulations in the Arctic region, two of which—the Chukchi and the Southern Beaufort Sea populations—are located within the jurisdiction of the United States.² The total number of polar bears is thought to be between 20,000 and 25,000, however, information about several of the subpopulations is poor or lacking.³ The Polar Bear Specialist Group of the World Conservation Union (“IUCN”) recently upgraded the status of the polar bear on the Red List from Least

National Headquarters
1130 Seventeenth Street, NW
Washington, DC 20036
Telephone: 202-682-9400
Fax: 202-682-1331
www.defenders.org

¹ Petition to List the Polar Bear as Threatened, 71 Fed. Reg. 6745 (Feb. 9, 2006).

² IUCN/SSC Polar Bear Specialist Group, Population Status, at <http://pbsg.npolar.no/> (last visited Apr. 3, 2006).

³ Press Release, IUCN/SSC Polar Bear Specialist Group, 14th Meeting of PBSG in Seattle, USA 2005 (June 2005) at <http://pbsg.npolar.no/> (last visited Apr. 3, 2006).

Concerned to Vulnerable due to the likelihood of a decline in the size of the total population of more than 30% within the next 35 to 50 years.⁴ The primary reason for the reclassification is the loss of polar bear habitat caused by the effects of climate change in the Arctic.⁵ However, the polar bear is also experiencing pressure due to overhunting and contamination from PCBs and other pollutants.

II. FACTORS THAT THREATEN THE SURVIVAL OF THE POLAR BEAR

The Service may list a species as threatened or endangered if it finds that any of the following factors apply: (A) the present or threatened destruction, modification, or curtailment of its habitat or range; (B) overutilization for commercial, recreational, scientific, or educational purposes; (C) disease or predation; (D) the inadequacy of existing regulatory mechanisms; or (E) other natural or manmade factors affecting its continued existence.⁶ Our comments will address factors A, B, and D, each of which supports the listing of the polar bear.

A. Present and Threatened Destruction of Polar Bear Habitat from Climate Change Warrants Listing

Defenders would like to commend the Center for Biological Diversity (“CBD”) on the thorough discussion in its petition of the threat posed to the polar bear by climate change. We do not wish to duplicate their work here, but would like to highlight a few recent studies that further support the argument that climate change is threatening the habitat of the polar bear.

The health and survival of the polar bear is directly tied to the extent and thickness of sea ice, the species’ preferred habitat, hunting, and breeding ground.⁷ The southern limit of the polar bear’s range is determined by the distribution of the sea ice.⁸ CBD’s petition documents the early break-up of sea ice in Western Hudson Bay, but recent studies have found that the total amount of sea ice throughout the Arctic is shrinking. Research conducted by experts at the U.S. National Snow and Ice Data Centre in Colorado show that for the second year in a row, Arctic sea ice has failed to reform after the summer melt.⁹ Last September, satellite images showed ice cover to be at its lowest extent since monitoring began in 1978, a reduction of 8.7 percent per decade,¹⁰ and scientists predict that this year will see similar results.¹¹

⁴ *Id.*

⁵ *Id.*

⁶ 16 U.S.C. § 1533(a)(1).

⁷ RONALD M. NOWAK, WALKER’S CARNIVORES OF THE WORLD 124 (2005).

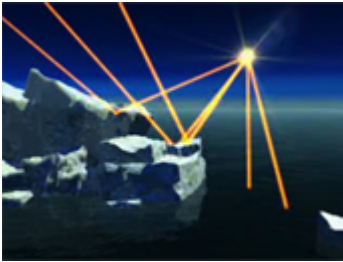
⁸ *Id.*

⁹ Andrew C. Revkin, *Climate Data Hint at Irreversible Rise in Seas*, N.Y. TIMES, Mar. 24, 2006.

¹⁰ *Satellites Continue to See Decline in Arctic Sea Ice in 2005*, EARTH OBSERVATORY, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION, Sept. 28, 2005, at <http://earthobservatory.nasa.gov/Newsroom/NasaNews/2005/2005092820527.html> (last visited Mar. 27, 2006).

¹¹ Steve Connor, *Climate Change ‘Irreversible’ as Arctic Sea Ice Fails to Re-Form*, INDEP., Mar. 14, 2006, at 7.

The extent of sea ice on the Arctic Ocean fluctuates with season. The ice melts during the six months of daylight, reaching its minimum point in September. Normally, during the winter, sea ice forms to compensate for what was lost over the summer, but last winter the Arctic experienced warmer than usual temperatures preventing ice from forming and causing the ice that did form to be thinner.¹² Reduction of the extent of sea ice in both the winter and summer is an indicator that the Arctic is experiencing a positive feedback effect whereby warmer temperatures melt sea ice causing more open water which absorbs sunlight, which, in turn, causes more ice to melt (see figure below). In addition, emissions of black carbon, or soot, may also be accelerating the melting of sea ice by reducing its reflectivity.¹³ If this cycle continues, models predict that there will be no sea ice left by 2070, or within three generations of polar bears.¹⁴ Already parts of the Arctic Ocean remain ice-free year round, such as a large area in the Barents Sea, home to an estimated 2,000-5,000 polar bears.¹⁵



Source: NASA

As documented in CBD's petition, loss of sea ice results in dire consequences for the polar bear. Sea ice provides a platform from which polar bears hunt for food, primarily ringed seals. As seals follow the receding sea ice, they may be too far from land for polar bears to reach them.¹⁶ Polar bears, though good swimmers for short distances, are not able to traverse large open expanses of water. In 2004, The U.S. Minerals Management Service (MMS) found four bears that had drowned off the northern coast of Alaska where the ice cap had retreated 160 miles north of land.¹⁷ Unable to reach the sea ice, the polar bears that remain on land will come into conflict humans, leading to killing of nuisance bears.¹⁸

¹² *Id.*

¹³ NASA Study Finds Soot May be Changing the Arctic Environment, EARTH OBSERVATORY, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION, Mar. 23, 2005, at <http://earthobservatory.nasa.gov/Newsroom/NasaNews/2005/2005032318608.html> (last visited Mar. 27, 2006).

¹⁴ Adrienne Appel, *Arctic Ice Isn't Refreezing in the Winter, Satellites Show*, NAT'L GEOGRAPHIC NEWS, Mar. 17, 2006, at http://news.nationalgeographic.com/news/2006/03/0317_060317_arctic_ice.html (last visited Mar. 27, 2006).

¹⁵ Connor, *supra* note 11.

¹⁶ CENTER FOR BIOLOGICAL DIVERSITY, PETITION TO LIST THE POLAR BEAR (*URSUS MARITIMUS*) AS A THREATENED SPECIES UNDER THE ENDANGERED SPECIES ACT vi (2005) [hereinafter CBD].

¹⁷ Jim Carlton, *Is Global Warming Killing Polar Bears?* WALL ST. J., Dec. 14, 2005, at B1.

¹⁸ CBD, *supra* note 16, at vi. See also Doug Struck, *Inuit See Signs in Arctic Thaw: String of Warm Winters Alarms 'Sentries for the Rest of the World'*, WASH. POST, Mar. 22, 2006, at A01 (A woman in a

In particular, lack of sea ice will have a negative impact on female bears. In the last ten years, the MMS found that 60 percent of female polar bears were denning on land and 40 percent on ice, where previously the percentage was reversed.¹⁹ Those polar bears which den on land will have more difficulty traveling between land and ice, forcing them to leave the ice and stop hunting earlier before the ice has retreated too far for them to find their preferred denning areas.²⁰ Less and thinner ice might also disrupt the rearing of polar bear cubs for those populations that den on the ice.

Two recent studies published in the journal *Science* indicate that Arctic warming may be occurring at a much faster pace than originally thought. Researchers at the Jet Propulsion Laboratory and the University of Kansas found that Greenland's glaciers were losing ice at a rate that has doubled in the last five years.²¹ In the second study, scientists from Harvard and Columbia Universities documented earthquakes in Greenland caused by glaciers that "lurch" forward as they melt.²² The earthquakes, which occur more often in summer, have increased in frequency and intensity over the last five years.²³

Carbon dioxide is not the only gas contributing to the warming in the Arctic. Scientists at the National Aeronautics and Space Administration have found that one-third to one-half of the increase in temperature is caused by tropospheric ozone emissions transported from the industrialized countries in the Northern Hemisphere to the Arctic during the winter and spring.²⁴ Ozone, produced from burning fossil fuels, cement manufacturing, fertilizer application and biomass burning, is regulated by the U.S. Environmental Protection Agency under the Clean Air Act.²⁵

Unlike some species that, in theory, could move north in order to follow habitat shifts caused by climate change, eventually the polar bear will have nowhere to go. Scientists have recently found that the Arctic is heating up faster than previously predicted, resulting in the loss of sea ice critical to the polar bear's survival. And what we have seen is only the beginning.²⁶ Regardless of whether the Service recognizes that climate

Hudson Bay village charged a polar bear that was stalking her seven-year-old son. To defend the woman, the bear was shot by a hunter.); NOWAK, *supra* note 7, at 126.

¹⁹ Proposed Rule, Incidental Take During Specified Activities, 71 Fed. Reg. 14,451 (Mar. 22, 2006).

²⁰ CBD, *supra* note 16, at v.

²¹ Eric Rignot & Pannir Kanagaratnam, *Changes in the Velocity Structure of the Greenland Ice Sheet*, 311 SCIENCE 986 (2006). See also Alan Boyle, *Greenland's Glaciers Losing Ice at Faster Rate: Satellite Observations Add New Factor to Global Warming Debate*, MSNBC, Feb. 16, 2006, at www.msnbc.msn.com/id/11385475/ (last visited Apr. 3, 2006).

²² Göran Ekström et al., *Seasonality and Increasing Frequency of Greenland Glacial Earthquakes*, 311 SCIENCE 1756 (2006). See also Revkin, *supra* note 9.

²³ Ekström et al., *supra* note 22.

²⁴ NASA Study Links "Smog" to Arctic Warming, EARTH OBSERVATORY, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION, Mar. 15, 2006, at <http://earthobservatory.nasa.gov/Newsroom/NasaNews/2006/2006031521918.html> (last visited Mar. 27, 2006).

²⁵ Clean Air Act, 42 U.S.C. §§ 7401-7671q (2002).

²⁶ Scientists estimate that in the last 10 years, we have only seen about 10 percent of the warming expected during the next 100 years. Revkin, *supra* note 9.

changes is the cause, the current and threatened future loss of the polar bear's habitat requires it to find that listing of the polar bear is warranted.

B. Over-utilization of the Polar Bear for Commercial and Recreational Purposes Warrants Listing

Already under stress caused by loss of habitat due to climate change, the polar bear can ill afford the additional threat posed by hunting and trade. Though not as rampant as in the 1960s and '70s, data reported by the Parties to the Convention on International Trade in Endangered Species ("CITES")²⁷ and a brief internet search conducted by Defenders demonstrates that international trade in polar bear trophies and parts remains significant.

1. Convention on International Trade in Endangered Species

The polar bear was one of the first species listed on Appendix II of CITES, which requires each exporting country to issue a permit certifying that the specimen was harvested in accordance with its laws, and that the export will not be to the detriment of the species.²⁸ The protection provided by CITES curbed the most egregious trade in the species. However, continued harvest prompted the CITES Animals Committee at its twentieth meeting to consider the inclusion of the polar bear in the Review of Significant Trade. At that time the United Nations Environment Programme World Conservation Monitoring Centre ("UNEP-WCMC"), which collects data on CITES-listed species, recommended that it not be included in the Review.

However, it appears that a discrepancy in reporting may have obscured the total number of polar bears in trade. UNEP-WCMC, in its report to the Animals Committee, only looked at exports from countries—not Parties—with native populations of polar bears. Thus, it examined Greenland's exports, home to several populations of polar bears, but not exports from Denmark, which has none. But Greenland, as an autonomous region of Denmark, is not a Party to CITES in its own right. In theory, Denmark should be reporting all of Greenland's exports, but UNEP-WCMC's database contains records for both countries. Furthermore, trade between Greenland and Denmark would be considered internal and not require the issuance of CITES export permits, and, as a result, trade between the two could be occurring unseen. As shown in Table 1, which includes data from both countries *and* Parties with native polar bear populations, Denmark reports a significant number of exports in 2004.²⁹ However, Denmark was, in effect, re-exporting those polar bear specimens from Greenland.

²⁷ Convention on International Trade in Endangered Species of Wild Fauna and Flora, Mar. 3, 1973, 993 U.N.T.S. 243 [hereinafter CITES].

²⁸ *Id.* at art. IV.

²⁹ CITES Notification 2002/022 provides guidance to the Parties on how to classify exports and imports for the purpose of reporting them in their Annual Reports to the Secretariat. The guidelines define "specimen" as "scientific specimens – includes blood, tissue (e.g. kidney, spleen, etc.), histological preparations, preserved museum specimens, etc."

In addition, the table shows an increase in the export of skins and trophies from Canada over time. With the possible exception of the specimen category,³⁰ the total exports can be directly translated into the number of polar bears taken.

TABLE 1: GROSS EXPORTS OF WHOLE POLAR BEARS

Country	Category	2000	2001	2002	2003	2004	Total
Canada	Bodies	20	40	34	27	23	144
	Skins	172	131	176	515	238	1232
	Specimens	44	136	13	41	0	234
	Trophies	88	82	94	83	129	476
Denmark	Bodies	0	0	1	0	0	1
	Skins	11	40	26	27	8	112
	Specimens	0	0	75	0	444	519
Greenland	Skins	69	74	80	62	29	314
	Specimens	3	94	0	2	23	122
	Trophies	0	0	1	0	0	1
Norway	Bodies	1	1	0	0	1	3
	Skins	2	8	8	9	15	42
	Specimens	31	4	16	6	17	74
	Trophies	1	0	0	0	1	2
Svalbard and Jan Mayen Islands	Bodies	0	0	0	1	0	1
	Skins	0	0	0	6	22	28
	Specimens	0	0	0	0	101	101
	Trophies	0	0	0	1	0	1
Russian Federation	Skins	0	0	0	1	0	1
United States	Specimens	73	4	54	117	0	248
TOTAL		515	614	578	898	1051	3656

Source: CITES trade statistics derived from the *CITES Trade Database*, UNEP World Conservation Monitoring Centre, Cambridge, UK.

Table 2 shows the international trade in polar bear parts. Unlike Table 1, it is not possible to estimate how many polar bears were taken to provide the parts for this trade. However, the data demonstrate that there is a consistent trade in parts, and an increasing trend in the trade of claws and skin pieces.

³⁰ *Id.*

TABLE 2: GROSS EXPORTS OF POLAR BEAR PARTS FROM CANADA, DENMARK, GREENLAND, NORWAY, AND THE UNITED STATES³¹

Category	2000	2001	2002	2003	2004	Total
Claws	231	165	469	389	414	1668
Skin Pieces	79	10	479	493	308	1369
Skulls	100	128	126	127	127	608
Teeth	106	418	432	508	319	1783

Source: CITES trade statistics derived from the *CITES Trade Database*, UNEP World Conservation Monitoring Centre, Cambridge, UK.

In addition to exporting polar bears parts and products, the United States also imports a significant number of skins, skulls, and trophies with an increase in the quantity for the last year data are available. The number of trophy imports shown in Table 3 differs somewhat from the number reported by the Marine Mammal Commission (“MMC”): 76 in 2000, 71 in 2001, 48 in 2002, 68 in 2003, and 110 in 2004.³² Just as in the CITES data, the MMC also reports in increase in U.S. trophy imports in 2004. The discrepancy between the data notwithstanding, it is unclear how the skulls and skins are being imported into the United States when the Marine Mammal Protection Act (“MMPA”)³³ prohibits the import of marine mammals or their parts and products without a permit, which in the case of polar bears could only be issued for sport-hunted trophies from Canada or for scientific research, public display, or enhancing survival or recovery of the species.³⁴

TABLE 3: U.S. GROSS IMPORTS OF POLAR BEAR PARTS

Category	2000	2001	2002	2003	2004
Skins	63	62	40	1	97
Skulls	1	84	61	1	93
Trophies	68	65	64	49	98

Source: CITES trade statistics derived from the *CITES Trade Database*, UNEP World Conservation Monitoring Centre, Cambridge, UK.

At the very least, the inconsistencies and irregularities in the trade data show that the reporting guidelines need to be clarified. However, the data we have show that the legal trade in polar bear trophies and parts is significant.

³¹ The very few exports reported by the Russian Federation are in the categories of live polar bears and skins, and, consequently, are not included in this table.

³² MARINE MAMMAL COMMISSION, 2004 ANNUAL REPORT TO CONGRESS 278 (2005), available at <http://www.mmc.gov/reports/annual/pdf/2004annualreport.pdf>.

³³ Marine Mammal Protection Act, 16 U.S.C. §§ 1361-1421h (2002).

³⁴ 16 U.S.C. 1371(a), 1374(c).

2. Internet Trade in Polar Bear Trophies and Parts

Several environmental NGOs have recently highlighted the extent of the trade in wildlife products over the internet.³⁵ Polar bears are no exception. A very brief internet search conducted by Defenders found several websites in the United States and Canada where polar bear trophies and mounts could be purchased. Copies of those websites are attached in the Annex.

U.S. regulations allow the import of polar bear trophies from Canada for “personal, noncommercial use.”³⁶ As such, the trophies are not to be transferred except by inheritance, and only with legal documentation showing that the transferee is the legal heir.³⁷ The Marine Mammal Protection Act prohibits the purchase, sale, and offer for sale of any marine mammal or product, taken after December 21, 1972,³⁸ that is not for the purpose of public display, scientific research, or enhancement of the survival of the species.³⁹ By prohibiting the sale of polar bears, the law reduces the market demand and, consequently, limits the incentive to hunt. Unfortunately, the lax enforcement of the sale of wildlife over the internet provides an opportunity for the trade in polar bears to continue, reaching people who would otherwise not have easy access to vendors.

Indeed, the internet search Defenders conducted demonstrates that there is still a demand for polar bear rugs and mounts. In the classifieds of Simpson Taxidermy, located in Wisconsin, there were four ads looking to buy polar bear mounts. Western Canadian Raw Fur Limited Ltd. reports a good demand for polar bear skins, estimating a nine-foot skin would sell for \$1,400 Canadian dollars.

Defenders also found several polar bear mounts offered for sale. In the Simpson Taxidermy Classifieds, there were five mounts or rugs for sale ranging in price from \$7,500 to \$10,000. Though several of the items listed were located in Canada, there was no mention that the sellers could not or would not ship the products to the United States. In addition, we found a polar bear, mounted on its hind legs, to be auctioned on April 6, 2006, by Lolli Brothers Livestock Market in Macon, Missouri.

As the polar bear faces increasing pressure due to loss of habitat, it becomes even more critical that countries enforce their laws to prevent the illegal take or sale of polar bears.

³⁵ See e.g. INTERNATIONAL FUND FOR ANIMAL WELFARE, CAUGHT IN THE WEB (2005); INTERNATIONAL FUND FOR ANIMAL WELFARE, ELEPHANTS ON THE HIGH STREET (2004); THE HUMANE SOCIETY OF THE UNITED STATES, AN INVESTIGATION OF IVORY MARKETS IN THE UNITED STATES (2002); DOUGLAS F. WILLIAMSON, TRAFFIC NORTH AMERICA, TACKLING THE IVORIES: THE STATUS OF THE US TRADE IN ELEPHANT AND HIPPO IVORY (2004); COMMISSION FOR ENVIRONMENTAL COOPERATION & NORTH AMERICAN WILDLIFE ENFORCEMENT GROUP, ILLEGAL TRADE IN WILDLIFE: A NORTH AMERICAN PERSPECTIVE (2005).

³⁶ 50 C.F.R. 18.30(b)(1).

³⁷ 50 C.F.R. 18.30(a)(3).

³⁸ 50 C.F.R. 18.25(a).

³⁹ 16 U.S.C. 1372(a)(4)(B).

C. CURRENT INTERNATIONAL AND NATIONAL LAW IS INADEQUATE TO PROTECT POLAR BEARS

When the Agreement on Conservation of Polar Bears (“Treaty”) was negotiated in 1973, climate change had only begun to receive public attention, however the language of the treaty is broad enough to encompass threats to polar bear habitat caused by climate change: “Each Contracting Party shall take appropriate action to protect the ecosystems of which polar bears are a part.”⁴⁰ The United States regards the Marine Mammal Protection Act as the implementing law for the treaty, but the MMPA primarily governs the take, import, export, and sale of polar bears, and does not adequately protect its habitat. Listing the polar bear under the ESA would provide habitat, and other, protection that is lacking under current law.

The Agreement between the Government of the United States of America and the Government of the Russian Federation on the Conservation and Management of the Alaska-Chukotka Polar Bear Population (“the Agreement”)⁴¹ negotiated in 2000, and ratified by the United States in 2003, contains even stronger language in article IV that would require the United States to prevent the loss or degradation of polar bear habitat:

The Contracting Parties **shall undertake all efforts necessary** to conserve polar bear habitats, with particular attention to denning areas and areas of concentration of polar bears during feeding and migration. To this end, they **shall take steps necessary to prevent loss or degradation of such habitats** that results in, or is likely to result in, mortality to polar bears or reduced productivity or long-term decline in the Alaska-Chukotka polar bear population.⁴²

As documented in CBD’s petition and section A above, climate change is the biggest threat to the polar bear’s habitat. Because of warming temperatures in the Arctic, combined with industrial pollution that accelerates the ice melt by decreasing its reflectivity, polar bear habitat is literally disappearing. Notwithstanding this threat and despite the language of the Agreement, there is nothing in the implementing legislation currently pending before the Senate that addresses this issue.⁴³ Instead, the bill provides only for the establishment of the U.S.-Russia Polar Bear Commission described in article VIII of the Agreement and for the implementation of the take restrictions agreed to by the Commission. The ESA would further implement the Agreement, if the polar bear were to be listed, by requiring the designation of critical habitat,⁴⁴ prohibiting the take of polar bears, which may include significant habitat destruction which actually kills or injures

⁴⁰ Agreement on the Conservation of Polar Bears, Nov. 15, 1973, art. III, 13 I.L.M. 13.

⁴¹ U.S.-Russ. Agreement on the Conservation and Management of the Alaska-Chukotka Polar Bear Population, Oct. 16, 2000, 40 I.L.M. 397 [hereinafter U.S.-Russ. Polar Bear Agreement].

⁴² *Id.* at art. IV (emphasis added).

⁴³ United States-Russia Polar Bear Conservation and Management Act of 2005, S. 2013, 109th Cong. (2006).

⁴⁴ 16 U.S.C. 1533(b)(2).

polar bears,⁴⁵ and the implementation of habitat conservation plans should incidental take permits be issued.⁴⁶

Climate change also has the curious effect of altering the definition of the area to which the Agreement applies. Article III of the Agreement describes its jurisdiction according to geographic reference points, the southern border of which is demarcated by “a line describing the southernmost annual formation of drift ice.”⁴⁷ As the consequences of climate change become more pronounced in the Arctic, the retreat of the sea ice will result in a shrinking area to which the Agreement applies. Such a modification might require notification to the Senate. As a condition of ratification, the Senate stipulated that the Secretary of State notify the Senate Committee on Environment and Public Works and the Committee on Foreign Relations if, pursuant to article III, the Contracting Parties modify the area to which the Agreement applies.⁴⁸

Despite the obligation the United States has under international treaties to protect polar bear habitat from degradation or destruction caused by climate change, the Service, even while it considers listing the polar bear as threatened under the ESA, published a proposed rule in the Federal Register on March 22, 2006, for incidental take of polar bears on the northern coast of Alaska by the oil and gas industry.⁴⁹ However, in its analysis, the Service completely fails to take into consideration that it is the very activities conducted by the oil and gas industry that is the root cause of the polar bear’s melting habitat.⁵⁰ Emissions from the use of oil and gas extracted from, among other places, the North Slope of Alaska are contributing to the build up of carbon dioxide in the atmosphere causing an increase in global average temperature, with the most extreme effects felt at the poles.⁵¹

Though not mentioning climate change by name, the Service does recognize that “environmental conditions” are causing the sea ice to retreat from the northern coast of Alaska trapping an increasing number of polar bears on land. But despite finding more polar bears competing for land occupied by the oil and gas industry, including denning females, the Service concluded that the industry’s activities would have a minimal impact on the bears’ habitat. The Service also concluded that onshore oil spills would have “little impact” on polar bear populations because of the “small volume of oil associated with onshore spills.”⁵² However, in March 2006, it was discovered that 267,000 gallons

⁴⁵ 16 U.S.C. 1538(a)(1)(B). *See also* 50 C.F.R. 17.3 (definition of “harm”).

⁴⁶ 16 U.S.C. 1539(a)(2)(A).

⁴⁷ U.S.-Russ. Polar Bear Agreement, *supra* note 41, at art. III.

⁴⁸ S. Ex. Rept. 108-7, 108th Cong. (2003) (enacted).

⁴⁹ Proposed Rule, Incidental Take During Specified Activities, 71 Fed. Reg. 14,446 (Mar. 22, 2006).

⁵⁰ INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, CLIMATE CHANGE 2001: THE SCIENTIFIC BASIS (SUMMARY FOR POLICYMAKERS) 7 (2001) (“About three-quarters of the anthropogenic emissions of CO₂ to the atmosphere during the past 20 years is due to fossil fuel burning.”).

⁵¹ ARCTIC CLIMATE IMPACT ASSESSMENT, IMPACTS OF A WARMING ARCTIC 8 (2004) *available at* <http://amap.no/acia/> (last visited Apr. 5, 2006).

⁵² Proposed Rule, Incidental Take During Specified Activities, 71 Fed. Reg. 14,460.

of oil had spilled on the tundra from a leak in a corroded pipe leading to the Trans-Alaska Pipeline.⁵³

III. CONCLUSION

Defenders of Wildlife believes that listing of the polar bear as a threatened species is warranted. Present and threatened destruction of polar bear habitat due to climate change and other causes, over-utilization of polar bears, and the inadequacy of existing regulatory mechanisms are all factors which warrant the listing of the polar bear. Accordingly, Defenders urges the Service to move expeditiously to propose listing of the polar bear as a threatened species.

Defenders of Wildlife will continue to work with the Service to protect the polar bear and its Arctic habitat. If you have any questions regarding these comments, please contact Kris Genovese, Associate International Counsel, at (202) 772-3234 or KGenovese@defenders.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Wm. Robert Irvin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Wm. Robert Irvin
Senior Vice President, Conservation Programs

Enclosure

⁵³ Felicity Barringer, *Large Oil Spill in Alaska Went Undetected for Days*, N.Y. TIMES, Mar. 15, 2006.

ANNEX



Simpson Taxidermy Studio

" Turning Outdoor Memories into Wildlife Art "

523 West Main Street - Winneconne, WI 54986

(920) 582 - 7004

ITEMS FOR SALE

Click below on the link you want.

[Mounts for Sale that I have done](#)

[Taxidermy Classifieds](#)

[For Sale](#)

[Wanted to Buy](#)

[Other Sites to Buy & Sell Taxidermy items](#)



[Artificial Taxidermy Art](#)

Mounts Done By SimpsonTaxidermy Studio

I currently have the following Fish & Fish Replicas available for sale. **There is only 1 of most items and they will be sold on a first come, first serve basis.** Prices do not include shipping or WI tax if you are a WI resident. **I can now accept credit cards thru [PayPal](#),** but there is an additional 3% handling fee for orders paid this way. A also accept cash, money order, cashier, travelers or personal checks. Click on description for photo & more details. Give me a call if you have questions

Finished Reproductions

I currently have the following replicas ready to sell

Male Brook Trout - 16"

Bluegill - 13.5"

Musky - 42"

Arctic Grayling - 18"

To see photos of these mounts - [click here](#)

Fish mounts

These are real skin mounts, not replicas, that are either older shop mounts or newer mounts that have not been picked up by customers. I'll try & get more listed ASAP

9/22/05 - available

Several Largemouth Bass Perch Pair Walleye

To see photos of these mounts - [click here](#)

[back to top](#)

Other Mounts Available

Whitetail Bucks - several in different poses

Whitetail Doe

Black Bear shoulder mount

Lifesize Raccoon

Ringtail Cat

Red Fox rug

Flying Pheasant - Black and White

Golden Pheasant

To see photos of these mounts - [click here](#)

If you are looking to buy or sell a mount, I have given a couple of options below that you should find helpful

TAXIDERMY CLASSIFIED ADS

Since I do not offer much for retail sale, I am using this page to help link up buyers & sellers of taxidermy items. This is a C to C (customer to customer) exchange and the only thing I do is post the ads. I am not be involved in any sale or in any other way. These items are not mounted or inspected by me & I am am not responsible in any way for any item listed here. THINK OF IT AS A CYBER GARAGE SALE AND USE ALL DUE CAUTION & COMMON SENSE.

If you have something to **sell**, send me an [e-mail](#) with the word **4sale-sell** in the **subject line**.

If you are looking to **buy** a mount, send an [e-mail](#) with the word **4sale-buy** in the **subject line**.

I will copy & paste the e-mail **as is**, so please include the following in the BODY of your message:

1. A description of what you are selling or looking to buy
2. Price - How much you are asking or willing to pay
3. Your name or other contact person
4. A phone # or e-mail address where you can be reached
5. **PLEASE - DO NOT SEND ME PICTURES**

Please let me know when you sell an item so I can remove it from the page.

I am not planning to charge anything at this time, but if it gets to big, I may have to charge non customers. It would remain a free service to my clients. Let me know what you think.

WARNING
USE ALL DUE CAUTION WHEN DEALING WITH BUYERS AND SELLERS LISTED HERE. SCAMMERS AND CON-MEN PROWL THE INTERNET TO FIND UNSUSPECTING VICTIMS. BE SUSPICIOUS OF ANYONE ASKING FOR BANKING OR PERSONAL INFORMATION.

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FOR SALE

Latest Update **March 6, 2006**

3/06/06 - I am leaving the country and want to sell several items:

Bengal tiger skin, head mounted.

Polar Bear skin, head mounted, beige felt.

Lioness skin, head mounted.

Zebra skin.

3 elephant legs made into stools, with zebra skin seats.

Every skin in good condition. I also have a **cheetah skin**, head mounted in poor condition.

Everything in US For more information, please email to cdesignchallenge@aol.com

3/04/06 - Royal Bengal Tiger rug. Circa: 1962 - CITES Pre-convention certificate - Export Permit Available

Date of entry into Canada: Fall 1963

Condition: Excellent

Description: Reddish orange with narrow black, gray and brown stripes, generally in a vertical direction. The underside is creamy and white. Eyes: Blue

Dimensions: Nose to Tail Length: 9 Feet 5 Inches 287.02 centimeters

Nose to Rear Length: 6 Feet 9 Inches 205.74 centimeters

Tail length: 2 Feet 8 Inches 81.28 centimeters

Left Paw to Right Paw extended: 6 Feet 7 Inches 200.66 centimeters

Price: \$5,500.00 Canadian Photos available Contact bruce.mclaren@multiviewcorp.com

3/2/06 - I have an older **grizzly bear rug** for sale. It is an older mount, recently restored by a local taxidermist. It looks awesome! The rug is almost 7 feet square, and has all the original claws, and has the real teeth! I am asking \$3,750 or best offer. Serious inquiries only please. I have pictures available. Email: mtmc25c@icehouse.net My name is Mark McWhorter

2/16/06 - I have **LEOPARD RUG MOUNT** for sale in absolutely perfect condition and with open mouth, claws and everything. It has been my family hairloom and prior to CITES. Europe based buyers. Asking price ?5000. mail me at iffika@yahoo.com
Also - 4 taxidermy AA class **ZEBRA skins with felt**. Brand new. Asking price U\$1300 each. For a lot we can negotiate. email me at iffika@yahoo.com

2/7/06 - Antique Brazilian Leopard/Jaguar Skin For Sale. Head attached, no feet. Tanned and in fantastic condition. Purchased by my grandfather in 1934. Asking \$4000 (negotiable). Send an email to the following address for pictures or additional information. tai@awardpc.net

2/03/06 - Bengal tiger mount. This tiger is a cub about 30" in length (without tail) and about 19" tall. Condition is rough. It will need some restoration work. The straw is coming out of the feet and the seam in the tail is opened up. E-mail me for pictures if you are interested. I am asking \$500.00 USD. I live in Illinois and have a permit to sell this animal. However, It can only be sold in Illinois. I will ship it but only to an Illinois address so please do not ask me to ship out of state because I will not. Thank you in advance for your cooperation. contact me, Curtis Snider at mudslinger196043@yahoo.com

1/22/06 - I am looking to sell a Canadian **Black Bear Rug** - It measures 72 inches from nose to tail 64 inches front toe to toe and 56 inches hind toe to toe. It was shot with a muzzle loader in Ontario Canada in September of 2000. It is mounted on maroon flecked and solid black double felt. asking price.....\$1,200 negotiable. millerjulie@earthlink.net

1/16/06 - POLAR BEAR RUG; Huge, immaculate full skin, head and claws. Oversize 10' X 9' with black felt trim. Always wall mounted. Taken in 2000 from Nunavut under government license.. All permits and \$ 10,000. CDN appraisal included. Too large for owners residence. Have pictures available thru email. Price; \$7850. US funds. Seller; Robert Holland
Winnipeg, Manitoba email rwholland2002@yahoo.ca

1/11/06 - Large **Black Bear half mount** in perfect condition . Open cup mouth, with one foot raised and scenery. Professionally mounted by award winning Taxidermist. \$8000. If you would like to see digital pictures please contact me via email: nelson97@hotmail.com

1/7/06 - Adult Male Syncerus **Caffer Buffalo**. Size: 36" High, Horn (Tip to Tip 33" wide) Email me for additional Pics. This Mounted African Syncerus Caffer Buffalo is priced at \$2400 and Located in New York City. Serious inquires please. Contact: gapoletti@yahoo.com for more info and Pictures.

12/30/05 - Huge **Moose Head** taxidermy. 46" wide antlers 25 points. (40" Nose to wall). canadian, shoulder mount. Best offer. 619-200-7172

12/13/05 - I have a **black bear full body mount** with habitat for sale for \$1500.00 It was mounted by a professional taxidermist. It has a panting mouth and stands around 48 inches high. The base is around 28 inches by 55 inches. If interested or want to see pics e-mail me at bowmans@chilitech.net

12/11/05 - have a **black bear rug** for sale. This bear was harvested 3 years ago. It has red around the outside of the skin. It was tanned and mounted by a professional. Mouth is open and hide is in excellent condition. Please let me know if anyone is interested in purchasing this. Connie clu715@aol.com

12-10-05 - Two large mounted **African Elephant heads**. Mounted with the real skin. Taken in 1952 with all legal paperwork. Both need work, but very repairable. Mounted with trunk up and curled, over 9' coming out from wall. One head has the tusks broken and the other needs minor repair, and of course the tusks are not the real ivory. Both these heads are enormous, when taken each had over 140 LB tusks on each side. The ears are removable. Must be picked up in the Memphis, TN. area. Email me with any questions at jgc4433@aol.com. 12,000.00 or best offer.

12/06/05 - Description of collection offered:

Shoulder mounts :

1- Bull Kudu - 45 (?) inch +

1- Bull Nilgai - 8 to 10 "

1 - Cow Nilgai

1 - Zebra

Full body Wall mounts:

1 - Canadian Lynx

1- Jennett Cat

All professionally done - excellent condition. Pictures available on request. Price for all = \$2000

E-mail : koltakdl@bissell.com

12/06/05 - I have a **full mount zebra** for sale I am asking \$8000.00 canadian for this item. My name is Marlene Cobeil and you can reach me at lengobeil@sasktel.net

11/29/05 - **Antique Bengal Tiger Skin**. Legally taken before 1963. Is a family heirloom. Approx. 9 ft. long and 6 ft. wide. Good condition and color. Will send photos upon request. Email me at LenStyron@bellsouth.net Asking 15,000. or best offer.

11/23/05 **African lioness rug** mount good condition, with the felt slightly worn but in good condition. Can send pictures on request. Asking \$3500.00. Speak with Olda or Irena. Phone 775-265-5858 or email at Mikulik@charter.net.

11/03/05 - James L. Clark -- **Zebra full shoulder mount**. This zebra mount measures 28" from tip of muzzle to the base of mount and 15" across at the base. This mount has been kept in storage for over 40 years and is in superb condition: full mane, eye lashes, beautiful colors. The mount is from the 1930s and includes a brass tag on the base that reads: "Mounted by James L. Clark - New York". This is a rare opportunity to own a piece produced by one of the masters of modern taxidermy. A great investment in American Natural History at \$35,000. Please email me for photos or questions at

corinalarks@hotmail.com.

11/01/05 - Male **Bengal Tiger Skin** for sale in great condition appraised at \$30k - please email serious offers of over \$10k and request photos . Large Skin over 8 feet and has head and claws. missbrentwood@charter.net will also consider trades of similar value.

10/28/05 - I have a **polar bear rug** in perfect cond . IT's 7' 6" from tip of nose to tip of tail & 7' from front pow to front pow and 7' 11" from rear pow to tip of nose. Full mount head , teeth and claws with black felt boarder , alway wall mounted never walked on. Telesky taxidermist ltd of wpg had done the rug. Have all necessary paper work also have photos will ship.
\$6,000 obo .you can contact me at 1-250 579- 2077 or email at cndabe@telus.net

10/28/2005 - We have a nice, large **Muskox rug** with prime winter hide for sale. Head mount. It was shot it in NWT Canada near the small community of Colville Lake in winter, 2003. This rug has never been walked on or hung. It has been in storage since taxidermy was done. Legs were removed so we would have a nice rug that lay flat on the floor with no hooves to trip over or get in the way when hung. Asking \$6500.00 USD. We also have another larger size muskox rug, head mount, complete with legs and hooves. (We will only let this one go for the right price, as the size is assumed to be in the top 20). It has been hanging in our living room on a custom built display since it was shot, also in 2003. Both rugs are in excellent condition. We will take care of shipping costs from here. Will ship to the states, you will have to pay any additional states duties or taxes upon pick up of item. Please e-mail nicnacker@yahoo.com with any questions or if you would like to see pictures.

10/27/05 - **Black Rhino full shoulder mount** for sale with real skin and real horns. Full documents and permit and was hunted and mounted prior to being mandated an endangered species. Superb condition always maintained in climate controlled home or office. This superb mount is for the discriminating collector/investor at \$99,500 plus shipping charges. There is nothing like viewing this magnificent Black Rhino specimen mounted on our office wall!! Take the time to visit. Please contact Claude at 817-926-6543 and chligeti@yahoo.com for information.

10/26/05 - South Texas **White-tailed deer** from the King Ranch area for sale. This is the price that the taxidermist told me to ask. This does not include the shipping. That will be the responsibility of the buyer. You can e-mail me or call my cell phone. Here is the e-mail address that I would like to use: sandysixpack@yahoo.com Jeanie Alexander 361-720-0863

Deer 1	19" wide	8 Points	\$450.00
Deer 2	27" wide	11 Points	3295.00
Deer 3	20.5" wide	13 Points	650.00
Deer 4	18" wide	10 Points	850.00
Deer 5	22" wide	9 Points	650.00
Deer 6	17.75" wide	13 Points	850.00
Deer 7	23" wide	14 Points	1495.00
Deer 8	21.5" wide	11 Points	650.00
Deer 9	17.5" wide	15 Points	850.00
Deer 10	19.25" wide	10 Points	650.00

10/19/05 - My uncle has a **Tiger skin rug** with head mounted he is selling. He brought it over

from India about 35 yrs ago. He has had it in his possession since then and is now wanting to get rid of it. Some damage. I can send photos upon request. Please contact me at xotic2021@aol.com or 703-395-5618. Thanks! Anna :) See pix of rug at - <http://photobucket.com/albums/c331/aoberoi/Tiger Rug/>

10/18/05 - **Leopard Rug**. (Barbary Leopard, *Panthera pardus panthera*) . Hunted on the spanish Marocco on early XX century by my Grand Father who was on the spanish colonial Army. This a very very RARE specimen and in very good state. New backfelted in black colour felt. No motheaten , all the moustaches and all the claws. You can find information about this sub-species on <http://www.pantera.nl/species.php?lang=en&sp=Panthera%20pardus> and http://en.wikipedia.org/wiki/Barbary_Leopard

This species was announced by the Cambridge University and the London Royal Geographical Society as extinguished on 1995, but actually some biologists have found a few specimens in the middle Atlas (north Africa) Officialy is actually as critically endangered status. **I can only send it inside the European Union, as this is a PRECONVENTION specimen.** A rare and unique opportunity of owning an IMPOSSIBLE TO FIND ITEM. Only serious and interested people, please. 20,000 USD\$ or 18,000 €Euros Contact me at introcar@gmail.com

10/12/05 - Beautiful **Alaskan Brown Bear** {grizzly} mount for sale. Habitat style pedestal mount {3ft.x6ft.} on casters. Taken on hunt in Alaska by former Indianapolis Colt. Style is on all fours with raised paw and open mouth. Fantastic coat with gorgeous color. Appraised at \$10,000. Will sacrifice for \$5,000. Please e-mail me at timsutterfield@insightbb.com or feel free to call me at 765-438-5123 if you have questions.

9/27/05 - **Iberic Bulls mounted heads**. Bullfighting. Authentic "toro de lidia" also known as "iberic bull" killed by sword in Spain´s plazas. Superb quality. Prices starts from 2,000.00 Euros. Average of the animals is 550-600 Kg alive. We Ship all over the world. We are just the best in Bullfighting art. Call **00 34 687239500** or mail to magarcia@edu.gov.org

8/23/05 - I have a collection of north american animals(taxidermy) that I would like to sell, 500 + mounts from a mouse to a moose. the mounts I don't have are the 4 sheep,the Grizzly,polar bear or the brown bear and the musk ox.many lifesize ,some shoulder mount. would like to get \$65,000 for the complete collection. I do have pictures. Brad Yonker 48577 Petersburg Lane,Gays Mills, WI. 54631 phone 608 735-4664 nova57@mwt.net

8/13/05 - I have a standing **life size Kodiak bear** and a cape buffalo shoulder mount for sell. Please email for photos or with questions. rogersig@charterinternet.com

8/13/05 - I am a Cameroonian who is specialised in the Exportation of **Birds and Animal Skulls**. if you are interested you kindly contact me for details. Best Regards, [David](#).

8/9/05 - Look what i've got for sale,the price is about US \$860: **Pike** - 19lbs - fin perfect, original glass, no restoration in fabulous condition by cooper & sons. Gold lettering to glass reads ,(Pike 19lbs Taken by Captain G.F Blackesley at Christchurch ,Feb 14th 1924.) Label inside case reads Preserved by J Cooper & sons 28 Radnor street St Lukes London EC. The pike is fin and scale perfect ,the case is excellent with no refurbishment. I'm from London,UK.Thanks for your patience! Contact - Shleporcelain@aol.com photos available

7/27/05 - **Buffalo Head** for sell – 1300 Contact me if interested cmfuller@usxpress.com

6/29/05 - **GENUINE ANTIQUE BENGAL TIGER RUG**. Complete with full head, barred teeth and claws. 9½ ft. long from tip of nose to end of tail and 7 ft. wide from claw to claw. Legally brought into the country prior to 1963. An irreplaceable heirloom for someone's bar, exotic library floor, or wall display. Owner has owned it for 40 years, but now has no place for it in new home. Could be worth as much as \$40,000 to \$50,000. Buy it now for \$20,000. Full satisfaction guaranteed.

For photos of the rug, go to: http://www.villagephotos.com/pubbrowse.asp?folder_id=1378574
Potential buyers can email me at tigerskinrug@hotmail.com

6/19/05 - **polar bear** world record? taken 1960 from baffin island area legally. All paperwork including original permit and entire history. **full mount** including head and claws. no skull. (ouch!) measures about 8 1/2 feet long. 95% certain original skull exceeds world record of 1963 . EXCELLENT condition., Hide/hair stunning. original skull est. is app. 20 inches by 14. perhaps bigger. id part with it for \$10,000. let me know thanx [rod](#)

6/03/05 - I have **2 whitetail deer** that are in a LOCKED position. One is an 8 point and one is an 11 point. They are mounted on an oak platform 21X24 from the shoulders up. I have photos that show them from every angle. I also have photos of the original tag that the ranger signed of on so that they could be removed from the field. I can email a photo if you are intrested. This is VERY unique and hard to find. I am asking \$22,000.00. Please email me if you are interested. [Cameo](#)

6/03/05 - I have a **7' long Mountain Lion** for sale, it is on a wooden base This cat was a pet that was put down due to a medical condition in the prime of his life. The taxidermist did a wonderful job. He stands 24" high at the shoulder, 32" high at his ears with his paws being 5" in diameter. I was told he weighed 350 lbs. I'm asking \$1500.00. He needs to be professionally crated and shipped, the buyer could pick up, or depending on location delivery might be able to be arranged.
Email Sarah @ Sarah@waitefieldfarm.com or call 508-963-7741

4/15/05 - A large beautiful fresh **frozen** mature (5 year old) **black shouldered peacock!** Full tailed and in pre-breeding condition. Please make an offer! Contact Cindy at mchoff@tds.net

4/15/05 - I have a **polar bear rug** in perfect cond. 8 feet by 9 feet complete with head, paws etc... the price of the polar bear is 7500\$ Contact Mario @ 506-383-3333 mariocharlebois@hotmail.com

3/24/05 - I have a **full body mountain lion** mount for sale. I am asking \$975 for it plus shipping and crating charges. Please e-mail Greg533@aol.com for pictures and question. Greg Mathews

3/24/05 - I have a **life size**, professionally mounted **large mountain lion** for sale. It is a wall hung mount on a artificial rock and log with vegetation and snow accents. Mounted in 2000 and is perfect in every way. We're asking \$3,500 but would consider any reasonable offer. Pictures available by email at john.tillotson@honeywell.com. Shipping or pick-up in Grand Junction, CO can be arranged. Please email me for details. John S. Tillotson Honeywell / Mobile PKS Product Manager (970) 204-6122

3/15/05 - I am selling a **full size bobcat** laying on a large driftwood. This is a extremely nice mount. I

am asking \$650 or highest offer. Buyer will pay shipping. Contact me at artimpressions@sbcglobal.net or 760-754-9391 for pictures or questions.

3/15/05 - I have an **antique leopard skin** for sale. From the 1920's. A full skin with head, and claws. Asking \$5,000. If you would like to see pictures, or have any questions, please email me. wick9@tds.net

3/12/05 - I have a **full shoulder white Rhino** for sale with real skin and real horns. Legally taken in 1983 with full documents and permit. This is a high rank taxidermy and in great condition. Ranking from 1 to 10, it would rank at 9.9. Asking for \$30,000. If interested, please e-mail me at Lcthao@hotmail.com for photos and other informations. Thank you. Lo Thao

3/12/05 - **Black Bear Rug** - Double felted w/claws, open mouth and teeth expertly tanned and mounted by a skilled taxidermist. No holes, no worn spots. Claws on right front paw are broken up, but hardly noticeable. Measures 50" from nose to tail, 55" across front legs, 28" across back legs. Asking \$450.00. My name is Judy Gillespie. You can email me at cowboys4christ7@msn.com. I can email you pictures if you would like

3/07/05 - I have a nice 5" x 7" Open - Mouth **Mountain Lion Rug**. This is an attractive older mount. The fur has no visible fading and the felt borders are excellent. I have numerous photos that I can send through email. My asking price which includes shipping is \$899.00. Contact Tim at ewc@wildapache.net

3/01/05 - i have a **leopard skin** for sale, could use some restoration - has most claws missing, small bullet hole in centre of back. Dates probably from 1900-1930. Reasonable offers considered - photos available - email duhoody@aol.com

2/18/2005 I have a **black leopard, full body mount**. crouching on a limb, hang on wall, or fireplace. fantastic condition, & done by an award winning taxidermist. In the right light, you can just barely see its spots. no idea of its worth, but am assuming pretty high. Thanks contact - [Dave](#)

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WANTED TO BUY

Latest Update 2/7/2006

2/7/06 - I am looking to buy any parts of **Rhino** including foot ashtray, horns and whole shoulder mount for my collections. Will purchase in U.S ONLY. Please contact me at Lcthao@hotmail.com

1/31/06 - Looking for **Male Lion Mount Rug** Looking to pay \$1500-\$2500 [Mike Long](#) Fax: 832-778-8098

1/31/06 - I AM INTERESTED IN BUYING A **FULL SIZE MOUNT OF A GRIZZLY (GOLDEN) AND A POLAR BEAR**. ALSO INTERESTED IN **TIGER AND LEOPARD SKINS/MOUNTS**.

NEED TO BUY FOR MY COLLECTION. PLEASE FAX DETAILS/PRICE: 559-438-8200 - ATTN: [ANDY](#).

1/23/06 - Looking to buy a **bustard** mount. The bustard is the largest flying bird with many subspecies and is a gamebird in Europe and the Middle East. Would prefer the **Kori Bustard** but others would be OK. Email hcc@jhmi.edu. Thanks

1/13/06 - I am looking for two mounts. One would be a **large mountain lion** the other would be a **standing polar bear mount** approx. 10 feet tall. Thanks for the help [Steve](#)

12/07/05 - I would like to purchase a **bob cat rug**. I am trying to find a replacement (never quite the same) for one that was taken in a burglary at our home. I have looked for 2 years without really knowing how to go about finding one. If someone would like to find a "very very good home" for theirs.....please [email me w/price](#). [CJ](#)

9/12/05 - We are looking for a high quality, full size standing mount of a Polar Bear between 8 and 10 Ft. tall. Prefer one from 1940's or prior. Please contact Ron@LoomBritannia.com with description, price and photos. Thanks.

8/9/05 - I AM INTERESTED IN BUYING FULL SIZE STANDING MOUNTS OF POLAR BEARS. MUST BE BETWEEN 7-10 FT TALL contact - andygill1@sbcglobal.net

4/26/05 - looking to buy a **male peacock with tail erect/displayed**, price is negotiable, email victoria.hammond1@virgin.net. Price should include shipping cost to the UK Thankyou and Kind Regards Victoria Hammond

3/15/05 - I'm looking for **old rhino mounts** in any condition and old horns. Will pay fair top dollar. Also looking for pre-act ivory. In US only. Email me at pc4433@aol.com. Jay

2/15/05 - Looking to buy **kodiak, grizzly or large black bear claws**. Please contact Ken @ kennethjohnson3@cox.net or call 602-315-3219.

2/15/05 - WANTED---Hello, looking for large **antlers**, clubs, cactus, droptines, freak, non typ , B&C etc, antlers can be sheds sets, old mounts, singles,etc, and i buy chalk antler, will buy 1 antler to whole collection,, email me first or email me last but please email me, prices and pictures and info helps out alot, if you don't know what you want on them i can make a offer, antlers@elltel.net

1/25/05 - Looking for a quality full size mount of an African Caracal. Please contact me at wmabey@comcast.net Please send photos and price/

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VANCOUVER, B.C.

October 18, 2005

CANADIAN TRAPPER

Dear Trapper:

The 2005 season ended strong on Sables, whereas, Lynx, Lynx Cat, Otter, Beaver, Fisher, heavy Foxes and Coyotes ended up easier. Good demand also for Wolverine, Arctic Wolf, Polar Bear, Grizzly Bear and Cougars. There is also better demand for big Wild Mink and Muskrats at increased prices.

As usual, Sable and Lynx were the highlights of our February and May 2005 Sales. In comparison to Eastern Sales, our averages on Sable were again fully \$5.00 - \$6.00 U.S. higher. Below are our conservative price basis. We are still the only auction to give you an idea of what you may expect this coming year. Prices quoted are in **Canadian Dollars**.

WILD MINK Fair Demand. Select - #1, XXL \$24, XLGE \$20, LGE \$16, MED&SM \$12-\$9.

SABLE Very Good Demand. XXL, #1 -#2 – Select \$90-\$125, Gd #2, hvy \$75-\$85. XLGE, #1 & #2 – Select \$75-\$80, Gd #2, hvy \$60-\$65. LGE #1 - #2 – Select \$60-\$70, Gd #2, hvy \$48-\$50. MED #1 - #2 – Select \$40-\$45, Gd #2, hvy, \$32-\$36. SM #1 - #2 – Select \$30-\$32, Gd #2, hvy \$20-\$22.
COAST SABLE – XLGE #1 - #2, hvy \$35, LGE \$28-\$30, L.MED \$20-\$22. MED&SM \$15-\$16.

NOTE – All Sables should be trapped **after November 15th**. Wider board base should be used, Males 4-1/2" and Females 3-1/2". Narrow boards are discounted one size by buyers.

FISHER Good Demand. Select - #1, clear, LGE \$45-\$50; MED&SM \$35-\$42.

LYNX Good Demand. For Good Color Basis – Pale, XLGE \$225, LGE \$200. L.MED \$150, MED&SM \$100-\$125. Lt Brown 25% less, Brown 40% less. All Lynx should be trapped **after December 15th** for better color.

LYNX CAT Good Demand. XLGE&LGE, clear, pale \$250-\$300, Lt tawny \$200-\$250. MED&SM, clear, pale \$125-\$130, tawny \$90-\$110, Brown, XLGE&LGE \$75-\$85, MED&SM \$40-\$45.

BOB CAT Good Demand. #1, Brown, XLGE&LGE \$55-\$65, MED&SM \$25-\$35.

BEAVER Good Demand. Select & #1, XXL \$45-\$50, XLGE \$38-\$40, LGE \$24-\$25. L.MED \$20, MED \$14, SM \$10. Gd Slights & Gd #2's 25% less.

OTTER Good Demand. Select, #1 hvy, Brown XXL \$130, XLGE \$100, LGE \$70-\$80. MED&SM \$35-\$45. All Gd #2's 20% less. Pale Colors 20% more.

MUSKRAT Good Demand. Select, Spring Trapped, Juicy XL&LGE \$2.75-\$3.25, MED&SM \$1.25-\$1.35. XLGE & LGE, Slight \$1.75-\$2.25, MED&SM \$.75-.85.

RED FOX Good Demand. #1, XLGE&LGE, hvy, gd col \$35-\$40, MED&SM \$22-\$25. Gd #2's, hvy XLGE&LGE \$27-\$28, MED&SM \$16-\$18.

<u>CROSS FOX</u>	<u>Good Demand.</u> #1, XLGE&LGE, hvy, \$50-\$55, MED&SM \$24-\$26. Gd #2's, XLGE&LGE, hvy \$35-\$40, MED&SM \$18-\$20.
<u>WHITE FOX</u>	<u>Fair Demand.</u> #1 hvy, XLGE&LGE \$35, MED&SM \$18-\$20. Gd #2's, hvy, XLGE&LGE \$22-\$24, MED&SM \$12. Lower Grades, proportionately less.
<u>COYOTE</u>	<u>Fair Demand.</u> Select #1, Alta-Sask, gd color, hvy, XLGE \$55-\$60, MED&SM.\$25-\$26. Hvy Gd #2's 30% less.
<u>ERMINE</u>	<u>Fair Demand.</u> #1, XLGE&LGE \$4.50, L.MED \$3.00, SM \$1.10. Gd #2's XLGE&LGE \$2.50, L.MED \$1.75, SM .75.
<u>SQUIRREL</u>	<u>Fair Demand.</u> Select #1, \$1.75-\$1.80, SI Dmg & Gd #2's \$1.10-\$1.15.
<u>RACCOON</u>	<u>Fair Demand.</u> #1, hvy XLGE&XXLGE \$18-\$22, LGE \$11-\$12, MED&SM \$5-\$7.
<u>TIMBER WOLF</u>	<u>Good Demand.</u> Arctic, Select #1, Pale & Black, soft XXLGE&XLGE \$350, LGE \$250-\$260. Off Colors & Gd #2's \$175-\$250. Regular Canadian Timber Wolf - #1's \$125-\$175. Off Color & Gd #2's \$90-\$110. <u>Paws on Wolves should be left on in a "fist" form, not skinned out individual claws.</u>
<u>POLAR BEAR</u>	<u>Good Demand for Good skins.</u> #1, hvy, 9'+ \$1,400, 8'+ \$1,100, 7'+ \$900, 6'+ \$750. Poorer skins – proportionately less. <u>Please do not hunt Polar Bear too early, hunt them the end of December.</u>
<u>GRIZZLY BEAR</u>	<u>Excellent Demand.</u> Hvy, Prime, XXL-XLGE \$1,400-\$1,500, LGE \$1,100-\$1,200.
<u>COUGAR</u>	<u>Good Demand.</u> Prime, Tom #1 XLGE \$375, LGE \$275.
<u>BLK/BRN BEAR</u>	<u>Fair Demand.</u> XXLGE-XLGE, hvy #1, \$150-\$175, LGE \$90-\$125, MED&SM \$40-\$50.
<u>WOLVERINE</u>	<u>Good Demand.</u> #1, XLGE&LGE, hvy, full, \$350. #2 XLGE&LGE, hvy \$200-\$225. #1, MED&SM, hvy \$150-\$175. #2, MED&SM \$85-\$100.

PLEASE NOTE - Lynx Cat, Bob Cat, Timber Wolf, Bears, Cougar and Wolverine should have paws and lips left on, pads preferably for Taxidermy purposes. This will bring you a Premium Price. As mentioned above, Paws on Arctic Wolves should be left on in a **FIST FORM**, not skinned out individual claws.

We would like to thank our Shippers for their continued support this past year, and trust we can serve you again this coming season. Please insure your shipments with any carrier for for up to \$1,000.00 as we have our own insurance policy on all incoming shipments of fur.

Our **First Sale** of the season will be held on **February 17, 2006**. Make every effort to have your furs on this sale, as it usually is the best sale of the season. Last Receiving Date for this sale is **February 1, 2006**.

Wishing you all the very best in 2006. With kindest regards, we remain

WESTERN CANADIAN RAW FUR AUCTION SALES LTD.

TED PAPPAS - PRESIDENT

1st Sale – Feb. 17, 2006 ~ Last Rec. Date: Feb 1
2nd Sale – May 17 ~ Last Rec. Date: May 1

LOLLI BROS. LIVESTOCK MARKET, INC. ~ Updates for the April 5-8, 2006 Sale ~ Updated 3/29/06

TAXIDERMY SALES~ APRIL 6, 2006 - 11 am

Be ready for another incredible lineup of quality full body and shoulder mounts from museums and private collections across the US!! Monitor this web page frequently as consignments are confirmed for the April 2006 Auction.

[LINK HERE TO VIEW MOUNTS SELLING IN THE "BLOW OUT SALE"](#)

- ◆ [Click here for a list of price results for Taxidermy sold at our September 2005 Sale.](#)
- ◆ Taxidermy Buyers!! Now you can buy selected items from our Gift Shop on a "year round" basis!! [Link here to view this merchandise](#) & PHONE our office at 660-385-2516 for specific information

EARLY APRIL 2006 CONSIGNMENTS ~ Updated 3/29/06

MISCELLANEOUS CONSIGNORS



Very nice British Columbia Grizzly (new mount)



FOSSILS - Pictured ABOVE, left to right: Huge Cave Bear Skull; Sabertooth Tiger Skull - 4 1/2 to 5 million years old from Mongolia; and Duckbill dino eggs- these have been cat scanned and have baby Dinosaur inside them. 90% eggshell is still intact.

At LEFT - Mosasaur jaw piece with 7 teeth in it. 65 million years old.



Pictured above: At LEFT - Ivory weighing 58 lbs (each side), measuring 66" long with a circumference of 16 3/4"; At CENTER - Ivory weighing 68 lbs. (each side) measuring 78" in length with a circumference of 16 1/4 "; At RIGHT: Excellent standing Polar Bear. Measures 8' 4" from top of head to feet. From top of head to floor (including base) is 9' 4".