Transfer of North American endemic subspecies of cougar, *Puma concolor coryi* and *Puma concolor couguar*, from Appendix I to Appendix II

**Proponent: Canada**

**Summary:** The Cougar *Puma concolor* is a very widely distributed member of the family Felidae, occurring in 23 range States in the Americas. It is included in Appendix II under the general listing of the family Felidae. A number of subspecies have been recognised although the validity of many of these has been questioned. Three subspecies, *P. c. coryi*, *P. c. costaricensis* and *P. c. couguar*, are currently included in Appendix I. Two of these, both from North America, are proposed for transfer from Appendix I to Appendix II. The current standard taxonomic reference for the great majority of CITES-listed mammals (Wilson and Reeder, 2005)\(^1\) does not recognise these as separate subspecies, considering all North American cougars to belong to a single subspecies *P. c. couguar*. For this reason, the current CITES standard reference for *Puma concolor* is the 1993 edition of Wilson and Reeder.

*Puma concolor coryi* exists in a small remnant population in the State of Florida, USA where it occupies less than 5% of its former range. It was reduced to 12-20 individuals in the early 1970s, but now numbers 100-160 following recovery actions. The population is closely monitored and managed in accordance with a recovery plan which aims to achieve long term viability. However there are indications that the population might be at or approaching carrying capacity due to limited availability of suitable habitat in the area. It is affected by habitat loss, degradation, and fragmentation, while lack of human tolerance negatively affects its recovery, and mortality due to collisions with vehicles affects population expansion.

*Puma concolor coryi* is listed as endangered under the US Endangered Species Act (ESA) of 1973 and is on the State endangered lists for Florida, Georgia, Louisiana, and Mississippi. This prohibits (among other things) import, export, and shipment in foreign commerce without a permit.

There is no national use of *P. c. coryi*. One instance of export to Germany in 2009 of two museum specimens (bone, wild sourced) for scientific research is recorded in the CITES Trade Database. Other records in the CITES Trade Database are either confirmed or likely reporting errors.

*Puma concolor couguar* is considered to have been extinct in eastern North America since the late nineteenth century. Sightings of cougars within its former range are thought to be misidentifications, escaped or released exotic pets, or cougars which have migrated in from other areas. *P. c. couguar* is federally listed as endangered under the ESA, which prohibits hunting or trade. The U.S. Fish and Wildlife Service’s most recent review (2011) of the subspecies recommends de-listing based on extinction. In Canada, it is classified as “data deficient” based on doubts as to whether it ever merited recognition as a separate subspecies.

The very few records in the CITES Trade Database for this subspecies are either of old specimens for scientific research or being reporting errors.

The species *Puma concolor* is believed to number at least 30,000 in the USA and 7000-10,000 in Canada. It thrives in a wide range of habitats and is a generalist predator. Although extirpated from its former range in Midwestern and eastern North America, it is attempting to recolonize this region\(^2\). In the USA its management is under the jurisdiction of individual state and wildlife agencies; most of the Western States with viable populations allow strictly regulated sport hunting. It is not popular in the fur trade and there is no significant commercial market. Most international trade is as hunting trophies (skins and trophies), with an average of 120 trophies and 215 skins per year recorded in the CITES Trade Database for 2005-2014. In Canada the species is managed under the Provincial or Territorial Wildlife Acts.

This proposal is based on the outcome of the Periodic Review of the Appendices for Felidae. The transfer would place the two subspecies *P. c. coryi* and *P. c. couguar* in Appendix II under the listing of Felidae spp. If this proposal is adopted, it is suggested that CoP17 adopt Wilson and Reeder 2005 as the taxonomic reference for *Puma concolor*; Regardless of reclassification under CITES, the two subspecies will continue to be recognised and regulated by the US Endangered Species Act of 1973, as amended, as well as by regulations of the States of Florida, Georgia, Louisiana, and Mississippi.
**Analysis:** It would appear that the subspecies *Puma concolor coryi* still meets the biological criteria for inclusion in Appendix I, having a small and fragmented population and a restricted area of distribution. It is subject to intensive recovery actions that have led to increases in its population. There appears to be no demand in international trade for this subspecies, or reason to expect its transfer would stimulate such demand. Transfer of this subspecies to Appendix II would result in this taxon being included as *Puma concolor* under the general listing of the family Felidae in Appendix II. Trade in *P. concolor* is predominantly in trophies. The subspecies would remain federally protected with strict domestic trade restrictions; hunting and trade would remain unlawful. Assuming *P. c. cougar* were also transferred to Appendix II, the only remaining cougar subspecies in Appendix I would be the Costa Rican Cougar *P. c. costaricensis*, which is geographically isolated from *P. c. coryi*. There is no reason to expect that transfer of *P. c. coryi* to Appendix II would stimulate trade in, or cause enforcement problems for any other species in Appendix I.

There is no risk to *P. c. cougar* from trade as this subspecies is considered extinct and has been since the late nineteenth century. In the unlikely event that the subspecies were it to be re-discovered, currently the subspecies would be protected from hunting and trade by the ESA. However, de-listing the subspecies from the ESA based upon extinction has been proposed.

**References:**
Information not referenced in the Summary section is from the Supporting Statement.