

INTERAGENCY STAFF COMMITTEE COMMENT

WP24-01

The Interagency Staff Committee reviewed the Staff Analysis Addendum for deferred wildlife proposal WP24-01 developed by the Office of Subsistence Management (OSM) regarding the sale of brown bear hides harvested by federally qualified subsistence users.

The revised OSM modification adds new information in response to the Board's requests following deferral at its February 2025 meeting. It limits sales to purchases for personal use only within the United States, thereby complying with the provisions of Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Further, the OSM modification allows a hide to be sold "with or without claws attached". This will allow a subsistence user to remove a claw or claws for a handicraft and then sell the hide separately. Current Federal subsistence edible meat salvage requirements will help protect brown bears from overharvest, while allowing for sale of the hide with an OSM Customary Trade Permit.

The OSM modification also removes from Federal regulations the requirements in some areas of Alaska that at the time of sealing the Alaska Department of Fish and Game (ADF&G) authorized sealing official must remove and retain the skin of the head and the front claws of the bear hide. Removing this clause from Federal regulation will align with current ADF&G general hunt regulation requirements for sealing of brown bear hides. However, it will then be out of alignment for federally qualified subsistence hunters who are utilizing a State subsistence registration permit for harvest of brown bear in Units 9B, 9E, 17, 18, 19A and 19B, 21D, 22, 23, 24, and 26A identified in Federal Subsistence Management regulations.

All 10 Regional Advisory Councils (Council) reviewed the revised proposal during their winter 2025 meetings with nine supporting the proposal as modified by OSM. The Kodiak Aleutians Council opposed for reasons stated in the analysis. On statewide proposals such as this, the Board can choose to adopt regulations by region in recognition of each region's unique cultural traditions, local community feedback, and recommendations by the Councils.

If adopted by the Board, the regulation will not be effective until the Office of Management and Budget (OMB) approves the development of a new Federal permit allowing for the sale of brown bear hides under Federal regulations.