

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA

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Nineteenth meeting of the Conference of the Parties  
Panama City (Republic of Panama), 14 – 25 November 2022

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

Transfer of *Pycnonotus zeylanicus* from Appendix II to Appendix I in accordance with Resolution Conf. 9.24 (Rev. CoP17), Annex 1, Criteria A(i) & (ii) and C(i).

B. Proponents

Malaysia, Singapore and United States of America\*

C. Supporting Statement

1. Taxonomy

1.1 Class: Aves

1.2 Order: Passeriformes

1.3 Family: Pycnonotidae

1.4 Genus, species, including author and year: *Pycnonotus zeylanicus* (Gmelin, 1789)

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\* The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

1.5 Scientific synonyms: N/A

1.6 Common Names:	English:	Straw-headed bulbul, straw-crowned bulbul
	Bahasa Indonesia:	Cucak Rawa, cangkurawa
	Malay:	Barau-barau
	Dutch:	Geelkruinbuulbuul
	French:	Bulbul à tête jaune
	German:	Gelbscheitelbülbül
	Spanish:	Bulbul Corona de Paja, Bulbul Cabeciamarillo
	Thai:	นกปรอดแม่ทะ

1.7 Code Numbers: N/A

## 2. Overview

The straw-headed bulbul (*Pycnonotus zeylanicus*) has experienced a marked population decline across its range in Southeast Asia resulting from its popularity in the caged bird trade, compounded by habitat loss (BirdLife International, 2001, 2021). Due to the extremely rapid decline, the straw-headed bulbul has been listed as Critically Endangered in the IUCN Red List of Threatened Species since 2018 (BirdLife International, 2021), within a short span of two years after it was uplisted from Vulnerable to Endangered as recently as 2016.

Overall wild population is small, with the latest IUCN Red List Assessment for the species conducted in 2020 placing global estimates at a mere 600–1,700 mature individuals (BirdLife International, 2021). Historically common throughout its large range, there is evidence that the species has been extirpated from Thailand, Myanmar, and Java and Sumatra in Indonesia (BirdLife International, 2021; Chiok et al., 2019; Eaton et al., 2015). The species is now limited to Singapore, parts of Malaysia, and remote parts of Kalimantan in Indonesia (BirdLife International, 2021). Some individuals were observed in Brunei, but population numbers remain unknown (BirdLife International, 2021). The largest subpopulation, residing in Singapore, is very small, comprising 200–500 mature individuals (Yong et al., 2018; Chiok et al., 2020). The IUCN Red List Assessment reported that population decline is rapid and likely ongoing, estimated to exceed 80% in the previous three generations (15 years) (Asian Songbird Trade Specialist Group in litt., 2018, cited in BirdLife International, 2021). The species is also listed on Tier 1 of the IUCN SSC Asian Songbird Trade Specialist Group's priority taxa list as a conservation priority (ASTSG, 2022).

Highly sought-after for its distinctive calls, trapping for the songbird trade is the primary cause for the straw-headed bulbul's decline (Bergin et al. 2017; Eaton et al. 2015; Harris et al., 2016; Shepherd et al., 2013). Its loud, distinctive calls make it easy to locate them in the wild. Nests are usually constructed in accessible areas, making them relatively easy to spot and trap. While some extent of captive breeding is known, it has been reported that wild-caught straw-headed bulbuls are considered superior and can fetch higher prices than captive-bred birds (Bergin et al., 2017). Decreases in the extent of lowland forests, especially near rivers and other watercourses, have also contributed to the decline of the species (BirdLife International, 2021).

Consequently, *P. zeylanicus* qualifies for inclusion in Appendix I in accordance with the biological criteria in Annex 1 of Resolution Conf. 9.24 (Rev. CoP17). It fits criterion A, as a small wild population characterised by (i) an observed/inferred decline in the number of individuals or the area and quality of habitat and (ii) small subpopulations; as well as criterion C, a marked decline in the population size in the wild which has been (i) observed as ongoing or as having occurred in the past (but with a potential to resume).

### 3. Species Characteristics

#### 3.1 *Distribution*

*P. zeylanicus* occurs in Southeast Asia. Historically, their range extended from southernmost Myanmar and Thailand through Peninsular Malaysia to the islands of Borneo, Sumatra, Java (BirdLife International, 2021). Though once widespread and common, there is evidence that the species has been extirpated from Thailand, Myanmar, and Java, Sumatra, Nias and Sipora in Indonesia (BirdLife International, 2021; Chiok et al., 2019).

The species is now limited to Singapore, parts of Malaysia (Peninsular Malaysia, Sarawak and Sabah), remote parts of Kalimantan in Indonesia and possibly Brunei (BirdLife International, 2021). In Malaysia, the species is now absent from national parks and wildlife sanctuaries in which it was previously common (J. Eaton in litt., 2016; R. Kaur in litt., 2020). In Sabah, Malaysia, the species remains present in several locations, but poaching has been reported even in Danum Valley. In Kalimantan, Indonesia, the species is largely confined to areas furthest from human habitation. In the 2010s, trappers had seemed to obtain individuals (Brickle et al., 2010), but today, even remote areas lack the species and it has apparently been lost from all protected lowland areas (A. Miller in litt., 2018; Rentschlar et al., 2018). In Brunei, five individuals were observed along the Kuala Belait River in 2013 and populations may still persist in areas inaccessible to trappers, though population numbers remain unknown (BirdLife International, 2021). Of 19 sites where the species was recorded in Borneo pre-2000, recent records indicate it was observed in less than half (47%, Chiok et al., 2019). This is in spite of extensive surveys undertaken at some of these sites (such as Gunung Mulu National Park and Gunung Nyiut Nature Reserve).

The only population that appears to be increasing is found in Singapore, which has been present since at least the 1920s (Yong D. L., in litt., 2018) and was estimated to have 202 individuals in 2016 (Yong et al., 2018). Pulau Ubin is considered a stronghold for the species here due to minimal development, although it is thought it may be reaching its carrying capacity on the island as expansion of the population inevitably extends into more unsuitable habitats (Keita et al., 2019).

#### 3.2 *Habitat*

*P. zeylanicus* occupies successional habitats bordering rivers, streams, marshes and other wet areas, usually where bordered by broadleaf evergreen forest and secondary growth. These include

secondary forest and woodlands, disturbed primary evergreen forest, gardens, plantations, gardens and cultivation fringe, scrub, reedbeds, and mangroves (Birdlife International, 2021). It is most frequently in lowlands, but has been recorded up to 1,100 m (historically) and 1,800 m (on Borneo and Sumatra) (Birdlife International, 2021; Fishpool et al., 2020).

### 3.3 Biological characteristics

*P. zeylanicus* breeds between January and September, constructing large and shallow nests in trees a few meters off the ground. A breeding pair generally lays two eggs in a clutch, and the eggs and chicks are raised by both parents. Evidence suggests that non-parents will sometimes assist with the rearing of young (del Hoyo et al., 2005). Generation length is reported at 6.4 years (BirdLife International, 2021). It is generally seen in pairs or family parties of up to five (BirdLife International, 2021).

It sings frequently, heard all year, powerful, mainly of repeated two-note phrases producing rich, melodious, bubbling, rising and falling cadence, often sustained in antiphonal duet or chorus. It also emits semi-constant low gurgles or weak chattering when foraging and prior to roosting.

*P. zeylanicus* is a sedentary, non-migratory species (Birdlife International, 2021). It is known for its loud, rich and melodious song, often with two or more birds singing together. It consumes berries and fruit, swallowing them whole and dispersing the seeds. It is also known to also eat small invertebrates and lizards, capable of catching flies and beetles while in flight. Unlike many forest bulbuls, it often feeds on the ground.

### 3.4 Morphological characteristics

The straw-headed bulbul is largest of all bulbul species, with adults being around 29 cm in length and weighing 80 to 90 grams (del Hoyo et al., 2005; Fishpool et al., 2020;). General plumage is a pale brown-grey streaking turning olive-green as towards the tail, with golden-yellow crown, black stripes on its face and a white throat. There is no sexual dimorphism, and juveniles appear duller with less streaking. Adults have red eyes.

### 3.5 Role of the species in the ecosystem

It swallows fruit whole and passes seeds out intact, which makes them important seed dispersers throughout their range (Levey et al., 2002).

## 4. Status and trends

### 4.1 Habitat trends

Given that it's predominantly a lowland species, its habitat is decreasing throughout its range, primarily due to logging and development, including clearance for agricultural plantations. Declines in lowland forests have caused declines in this species, while also increasing trappers' accessibility

(Birdlife International, 2021). Much of the secondary forest and woodlands where the straw-headed bulbuls occur do not fall within protected areas, and in many cases have been cleared (Yong et al., 2017). Expansions of residential and industrial areas throughout its range have also contributed to its habitat loss (Lim, 2009).

#### 4.2 Population size

The latest IUCN Red List Assessment for the species revised the population estimate in 2020 based on an appraisal of the areas where populations were then-persisting: principally in protected areas in Malaysia and in Singapore. It places the number in the band of 1,000–2,499 individuals, considered to represent 667–1,667 mature individuals, rounded to 600–1,700 mature individuals (BirdLife International, 2021). The Singapore population is estimated to comprise 200–500 mature individuals (Chiok et al., 2020; Yong et al., 2017).

Specific to Peninsular Malaysia, no specific survey on the species population has been conducted before. Based on wildlife inventory checklist data, the species can be found throughout Peninsular Malaysia in a very remote area in protected areas and forest reserves such as Belum-Temenggor Forest Complex, Greater Taman Negara Forest Complex and Endau-Rompin-Sedili Forest Complex.

#### 4.3 Population structure

Little to no information exists on its population structure. However, trappers focus on capturing adults by virtue of the methods they use—listening for its calls to find nesting groups, and also capturing roosting birds by rivers. It can be inferred that adults are captured more often, while also recognising that with the adults gone, many young are unlikely to reach maturity.

#### 4.4 Population trends

Population decline is rapid and likely ongoing, estimated to exceed 80% in the previous three generations (15 years) (Asian Songbird Trade Specialist Group in litt., 2018, cited in BirdLife International, 2021).

Range State	Population trend
Singapore	Largest subpopulation known globally, estimated at 200–500 mature individuals (Chiok et al., 2020; Yong et al., 2017). Believed to be the only stable or possibly increasing population trend. Since this population comprises a large and increasing percentage of the global population, future rates of decline in this species are believed to be slower than previous estimates.
Malaysia	Small remaining populations in parts of Peninsular Malaysia (including Taman Negara), Sarawak and Sabah.  Numerous inventories of potentially suitable sites undertaken within the species' range over the past decade have failed to find the species, including sites such as

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Gunung Mulu National Park with records up to 2010 (Burner et al., 2016). Comparing sites with pre- and post-2000 records in Borneo, Chiok et al. (2019) identified six sites in Peninsular Malaysia where the species has become extirpated.

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Indonesia	Java: Extirpated likely in the mid-20th century (van Balen, 1999)  Sumatra: Very few are believed to remain, having been considered likely extinct by Eaton et al. (2015). Comparing sites with pre- and post-2000 records in Borneo, Chiok et al. (2019) identified three sites on Sumatra where the species has become extirpated. Yong D. L. (in litt., 2018) reported its presence in locations that were not surveyed previously.  Kalimantan: Considered increasingly rare by the mid-1990s despite being 'so common' two decades previous (Holmes, 1997). Decline appears to have progressed to site level extinctions, e.g., at Bukit Batikap Protection Forest in 2014 (Fischer et al., 2016). Bickle et al. (2010) had suggested that any that remained must be in the most remote areas.
Brunei	Population status unknown.
Myanmar	Population status unknown, but probably extirpated (BirdLife International, 2021).
Thailand	Extirpated likely in the mid-20 <sup>th</sup> century (Wells, 2007; Fishpool et al., 2020).

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#### 4.5 Geographic trends

The straw-headed bulbul has faced widespread extirpations throughout its entire range within the last three decades, with a rapidly decreasing range. (See also 4.4.)

### 5. Threats

The species is assessed to be Critically Endangered on the IUCN Red List, as it is declining extremely rapidly across its range as a result of trapping of wild birds for the cage-bird trade as the main threat, compounded by habitat loss within its rather specific habitat type. Because of this, the straw-headed bulbul is listed on Tier 1 of the IUCN SSC Asian Songbird Trade Specialist Group's priority taxa list as a conservation priority (ASTSG, 2022). Tier 1 species are those considered to be the most threatened from trade, needing urgent action.

#### 5.1 *Trapping for Trade*

Trapping for the songbird trade is the primary cause of the species' rapid decline (Bergin et al., 2017; BirdLife International, 2001; Harris et al., 2016; Shepherd et al., 2013). The straw-headed bulbul is a popular songbird in the caged bird trade and is highly sought after across parts of Asia. Its warbling song makes it a target for trappers looking to sell live birds for significant profit. Its loud, distinctive

calls make it easy to locate them in the wild. Nests are usually constructed in accessible areas, making them relatively easy to spot and trap. While some extent of captive breeding is known, it has been reported that wild-caught straw-headed bulbuls are considered superior and can fetch higher prices than captive-bred birds (Bergin et al., 2017).

The number of birds available at market has dropped dramatically in the past few years, due to declining populations (Chng et al., 2018). Temporal analyses of market data have shown an increase in its monetary value (Bergin et al., 2017; Rentschlar et al., 2018), likely due to population decline and increased forest accessibility to humans, among other factors (Harris et al., 2015, 2016). Price data collected from trade observations shows its increased value in the three decades from USD20 in 1987 (Basuni & Setiyani, 1989) to USD902 in 2018 (Bergin et al., 2018). Prices are complicated by the value placed on champion songbirds, which compete for very large prizes at events across Java and Bali (Jepson, 2008). This commercial value adds to trapping pressure. Its commercial value is widely known even in remote areas, resulting in continued attempts to trap and sell the birds.

## 5.2 Habitat Loss

Decreases in the extent of lowland forests, especially near rivers and other watercourses, have contributed to the decline of the species (Birdlife International, 2021). See 4.1. While habitat loss is likely to be a contributing factor to the decline of the species, the bird is capable of tolerating some degree of habitat degradation in areas where it is not under significant hunting pressure. However, developments including roads in such areas also increases accessibility of trappers to straw-headed bulbuls (Birdlife International, 2021).

## 6. Use and Trade

### 6.1 National use

*P. zeylanicus* is traded as songbirds in the ornamental caged bird trade in parts of Asia. For example, bird keeping has long been a popular pastime in Indonesia and retains a central place in the culture for many, especially those of Javanese descent, with bird singing competitions of cultural significance (Jepson et al., 2008; Nash, 1993). Snapshot surveys of 11 markets in eight cities in North and West Kalimantan, and Central, West and East Java between July 2014 and June 2015 recorded a total of 71 straw-headed bulbuls (Bergin et al., 2018). This is far lower than numbers from previous decades. Between 1991 and 1993, 1,100 straw-headed bulbuls were counted in 37 out of 39 surveys carried out by TRAFFIC across Sumatra and Java (Nash, 1993), an average of 30 birds per market – over four times that of our average of 6.5 birds per market. Monthly surveys over a five-year period from January 1997 to December 2001 across three markets in Medan (Sumatra) indicated that, although trade fluctuated (lowest number seen = 2, highest = 86) and numbers rarely exceeded 45 individuals per survey, straw-headed bulbuls were a constant presence in the markets, with an average of 25 birds observed per survey during 59 surveys (Shepherd et al., 2004), significantly more than were observed in markets of a similar or larger size in Java in 2014 and 2015 (Bergin et al., 2018). Online trade surveys between April 2020 and January 2021 by TRAFFIC found 10 individuals for sale.

In Malaysia, only very small numbers of straw-headed bulbuls are occasionally observed for display in bird shops. It is suspected that clandestine trade is taking place (Shepherd et al., 2013). This is also substantiated by law enforcement seizures (See 6.4). Online trade surveys carried out by TRAFFIC for 256 hours between Oct 2019 to Oct 2020 on online trade platforms recorded six *P. zeylanicus*. In Peninsular Malaysia, the species is considered Totally Protected (see 7.1), however captive breeding is permitted through government regulation. The Department of Wildlife and National Parks Annual Report in 2010 showed a total of 874 straw-headed bulbuls were kept in captivity by individual licence-holders as permitted by the previous law (Protection of Wild Life Law 1972) (Shepherd et al., 2013).

In Singapore, market surveys by Eaton et al. (2017) found one straw-headed bulbul, compared to a historical market survey by Nash (1993) which found 500 of these birds. Its decline in popularity is substantiated by surveys among songbird owners in Singapore which found this species to be unpopular in recent years (Chiok et al., 2022).

## 6.2 Legal trade

Since the listing of *P. zeylanicus* in Appendix II in 1997 to 2020, the CITES Trade Database has recorded the international commercial trade in 704 live birds (exporter- and importer- reported; excluding 7 specimens exported for scientific purposes). All were declared as wild caught, except for three individuals declared by Kuwait (the importer) as captive-bred. All exported birds originated from Malaysia and were imported by Indonesia, Netherlands, Singapore, Kuwait and Taiwan. Majority or 93% of these took place prior to 2000. In the last two decades, only 46 live birds were recorded. In Peninsular Malaysia, the species is considered Totally Protected (see 7.1), however captive breeding is permitted through government regulation.

## 6.3 Parts and derivatives in trade

*P. zeylanicus* is primarily traded in the form of live specimens. There is no evidence of dead specimens, or parts/derivatives in trade.

## 6.4 Illegal trade

Poaching and illegal trade of the straw-headed bulbul trade has been reported over the past 20 years, evidenced from seizures, arrests, convictions and observations from markets (Chng et al., 2015; Chng & Eaton, 2016; Eaton et al., 2015; Shepherd et al., 2013). An 11-day survey by TRAFFIC in 2012 in two townships around the Belum-Temengor Forest Complex that borders Thailand recorded seven straw-headed bulbuls in one shop in Malaysia, and six straw-headed bulbuls in four shops in Thailand (TRAFFIC, unpublished data). Shepherd et al (2013) also noted that 10 straw-headed bulbuls were available in a shop in Betong, Thailand which borders Malaysia and traders claimed that all birds were sourced from Peninsular Malaysia. Since 2017, Thailand also observed 7 cases of domestic illegal trade with 11 specimens confiscated. Bird dealers in Medan, Indonesia claimed that birds were being sourced from Malaysia, specifically Peninsular Malaysia and Sabah (Shepherd et al., 2013). Sourcing



of birds from Malaysia due to population decline of species in Indonesia has been reported since the early 1990s, and is still ongoing, impacting the survival of several Asian songbird species (Nash, 1993; Leupen et al., 2018; Chng et al., 2021). Bird dealers in Singapore claimed to favour straw-headed bulbuls from Malaysia as they are thought to be larger and sing the loudest (Shepherd et al., 2013), despite a blanket ban for live import of birds from Malaysia into Singapore due to concern of the Avian influenza virus.

For known illegal trade, a minimum of 61 straw-headed bulbul were confiscated from 2006–2021 (Krishnasamy K., in litt., 2022). TRAFFIC’s Wildlife Trade Information System (WiTIS) hold records for a total of seven seizure incidents between 2014 – 2021. This involved the confiscation of 19 birds in Malaysia (4 incidents, 7 birds); Thailand (2 incidents, 8 birds); and Indonesia (1 incident, 4 birds) (Krishnasamy K., in litt., 2022). There was no indication if any of these involved international smuggling. No incidents involving the species were reported in 2022. Additionally, in Peninsular Malaysia, the Department of Wildlife and National Parks (DWNP) seized at least 42 straw-headed bulbuls between 2006 and 2011; none were reported from Sarawak and Sabah (Shepherd et al., 2013).

### 6.5 Actual or potential trade impacts

Trapping for trade is the primary threat to the species, classified by the latest IUCN Red List assessment as an ongoing threat, majority (50–90%) in scope, and rapid declines in severity (BirdLife International, 2021). Marked declines in almost all populations of its range (except Singapore) is attributed to trade impacts, compounded by habitat loss. The minimum 61 birds confiscated (see 6.4) from illegal trade from 2006–2021 may at surface level seem low. However, considering the species’ Critically Endangered status and its extreme rarity in the wild, this number is considered significant and any further illegal offtake from the wild will contribute to the species extinction in the wild.

## 7 Legal Instruments

### 7.1 National

Range State	Legal Instrument
Brunei	The species is not listed as Protected under the Wildlife Protection Act 1984.
Indonesia	The species was listed in June 2018 as protected in Indonesia (MLHK, 2018) but this was rescinded in September 2018, allowing for captive breeding and trading by private owners to be legal again for this species.
Malaysia	The species is listed in Appendix II of the International Trade in Endangered Species Act 2008 [Act 686]; Malaysia’s CITES Act. Any person convicted of an offense for illegal import or export is liable to a fine of up to MYR100,000 (USD24,740) per animal up to a maximum of MYR1,000,000 (USD247,404) or/and imprisonment of up to seven years whereas if the crime is committed by a body corporate, the fine can be up to MYR200,000 (USD49,480) per animal up to a maximum of MYR2,000,000 (USD495,049).

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Peninsular Malaysia: Since 2010, the straw-headed bulbul has been categorised as a Totally Protected species under the Wildlife Conservation Act 2010 [Act 716], prohibiting the illegal capture, trade and possession of the species, with legal protection and enforcement action. The government however allows the breeding of the species through permits. The Law has been updated in 2022 (Wildlife Conservation (Amendment) Act 2022), whereby higher fines than its 2010 predecessor have been passed:

- Anyone convicted of an offence for illegal hunting and possession is liable to a penalty of MYR30,000 (USD7,425) per bird, and up to 15 years imprisonment.
- Anyone convicted of an offense for the illegal import, export and re-export is liable to a penalty of MYR20,000 (USD4950) per bird and up to MYR1 million (USD247,404), and up to 15 years imprisonment.

Sabah: Protected under the Wildlife Conservation Enactment 1997 which means that it can only be collected or traded with a licence. Anyone convicted of an offense is liable to a penalty of minimum MYR50,000 (USD12,500) and maximum MYR 100,000 (USD25,000) fine, or a minimum of six months and maximum of five years imprisonment, or both.

Sarawak: Totally protected under the Wildlife Protection Ordinance 1998 which meant that any capture and trade in the species is illegal. Anyone convicted of an offense is liable to a penalty of maximum MYR25,000 (USD6182) fine and two years' imprisonment.

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Myanmar	The species is listed as Completely Protected under the Conservation of Biodiversity Protection Act 2018 (Notification No.690/2020). Anyone convicted of killing, wounding, collecting, selling, transferring and transporting, illegal possession, import, export, re-export, is liable to minimum 3 years imprisonment, up to 10 years, and / a fine of MMK1million (USD680).
Singapore	The species is listed as a protected species under the Wildlife Act (Chapter 351) prohibiting the killing, trapping or offering of sale or import or export of any wildlife without Director-General's approval. The trade of the species is regulated under the Singapore's Endangered Species (Import and Export) Act (Chapter 92A). Anyone convicted under the Endangered Species (Import and Export) Act is liable to a fine of up to SGD50,000 (USD36,855) fine and/or jail time of up to 2 years.
Thailand	The species is Protected under the Wildlife Reservation and Protection Act B.E. 2562 (2019). Trade is permitted only from licensed captive-bred individuals. Anyone violating this law, upon conviction, is liable to a penalty of THB1,000,000 (USD32,500) fine and / up to 10 years imprisonment.

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## 7.2 International

*P. zeylanicus* was included in Appendix II of CITES in 1997.

## 8 Species management

### 8.1 Management measures

See 7.1 for legal protection of *P. zeylanicus* by range states. Programmes to manage wild populations do not exist in any range State.

### 8.2 Population monitoring

In Singapore, a distance sampling survey was used to estimate the number of birds by Chiok et al. (2020), and the Nature Society (the BirdLife partner in Singapore) has gathered data for the Annual Bird Census (Yong et al., 2017). Beginning in 2021, there is also combined efforts by National Parks Board (Singapore) and other stakeholders to determine the population throughout the country more accurately using both visual surveys and a passive acoustic method. A national straw-headed bulbul Working Group was also established in 2020 to monitor and protect wild populations, following a dedicated workshop on the species that was held in May 2019. Beyond Singapore, there is no known population monitoring programmes established.

### 8.3 Control Measures

Beyond CITES measures, the import of live birds is strictly regulated in Singapore for biosecurity reasons. All import of live birds from countries/regions/zones affected by Avian Influenza is prohibited. For domestic measures, please refer to 7.1 for legal protection of *P. zeylanicus* by range states.

### 8.4 Captive breeding

*P. zeylanicus* has been bred in captivity with some success. The IUCN SSC Asian Songbird Trade Specialist Group reported conservation breeding success of the straw-headed bulbul by Jurong Bird Park in Singapore (Shukhova et al., 2021). However, the process is not yet deemed sustainable, with protocols being developed to improve breeding knowledge such as hand-rearing of chicks (Keita et al., 2019, cited in BirdLife International, 2021).

In Peninsular Malaysia, under the Wildlife Conservation Act 2010 [Act 716] and Wildlife Conservation (Commercial Captive Breeding) Regulations 2013, any person who operate a commercial captive breeding facility of the species shall require a permit and a special permit to use this species for a commercial captive breeding purpose. To date, there are eight captive breeders in Peninsular Malaysia actively conducting commercial captive breeding activity for this species.

### 8.5 Habitat conservation

Much of the secondary forest and woodlands where the straw-headed bulbuls occur do not fall within protected areas, and in many cases have been cleared (Yong et al., 2017).

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Range State	Habitat conservation
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Singapore Occurrences of *P. zeylanicus* in gazetted protected areas are restricted to Bukit Timah Nature Reserve (163-ha; primary lowland dipterocarp forest), Central Catchment Nature Reserve (2880-ha; primary and secondary lowland dipterocarp forests) and Sungei Buloh Wetland Reserve (202-ha; wetlands including mangroves, brackish and freshwater ponds, mudflats and marshes).

Visual surveys in 2021 found *P. zeylanicus* in 26 field sites across Singapore. Of these, two are gazetted protected areas, and eight are government-managed parks and nature parks with additional protection against poaching under the Parks and Trees Act, on top of the Wildlife Act (see section 7.1; NParks & NSS, 2021, unpublished data).

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Malaysia The Malaysian Important Bird Area (IBA) Directory released in 2007<sup>1</sup> noted that the species occurred in some 30 locations throughout the country, a small number of which are National Parks and Wildlife Sanctuaries; the remaining IBAs where *P. zeylanicus* occurred are largely managed forests where logging and conversion of forest for agriculture and other land uses takes place. Trapping pressure and habitat loss since then has caused a decline in its population. Today, the species' remaining stronghold is likely in the Taman Negara National Park, covering 4314km<sup>2</sup> spanning across three states in Peninsular Malaysia; as well as a couple of other protected areas.

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9. Information on Similar Species

N/A

10. Consultations with range States

All range States: Brunei, Indonesia, Malaysia, Myanmar, Thailand, Singapore were consulted through its CITES Management and Scientific authorities through a combination of emails, virtual meetings, phone calls, and at regional meeting etc.

Malaysia, Myanmar and Singapore are supportive and are co-proponents to the proposal. Myanmar provided additional comments that profound conservation efforts are essential owing to scarce information with limited habitat ranges for *P. zeylanicus*, amidst the rising threats to their population. Restrictions on trade and further enforcement may bring the conservation status of *P. zeylanicus* be more efficient and effective. Therefore, being a range state of *P. zeylanicus*, Myanmar fully support this proposal and welcome the attempt of transferring *P. zeylanicus* from Appendix II to Appendix I in accordance with the Resolution Conf. 9.24 (Rev. CoP17), Annex 1, Criteria A and C.

Thailand: By letters dated 15 June and 16 June 2022, the CITES Management Authority of Thailand support the proposal of transferring *P. zeylanicus* from Appendix II to I and provided additional population and illegal trade information on the species in Thailand.

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<sup>1</sup> <http://datazone.birdlife.org/userfiles/file/IBAs/AsiaCntryPDFs/Malaysia.pdf>

11. Additional Remarks

N/A

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