

Reforming Songbird Trapping Permits in Iran: A Policy Brief

Prepared by

Iman Ebrahimi & Fateme Kazemi
Avayeboom Bird Conservation Society, Isfahan, Iran

Published

May 2026

Correspondence

Iman Ebrahimi
i.ebrahimi@avayeboom.com

How to cite

Ebrahimi, I., & Kazemi, F. (2026). *Reforming songbird trapping permits in Iran: A policy brief*. Avayeboom Bird Conservation Society.

<https://www.avayeboom.com/en/reforming-songbird-trapping-permits-in-iran>



Photo: Tasnim News Agency

Executive Summary

Iran has a long-standing legal framework for regulating hunting, trapping, possession, transport, and trade of huntable wildlife. Publicly accessible legal material shows that the broader permit architecture predates the recent songbird permit system, while public evidence for province-level live-capture permits for songbirds is clear from the early 2010s and was nationally reported by 2016.

Although the permit system was intended to regulate limited live capture under administrative conditions, field evidence, enforcement accounts, media reports, and stakeholder engagement indicate that it created significant compliance-verification challenges. In practice, valid permits could provide documentary cover for possession, transport, transfer, or sale of wild-caught songbirds, making it difficult for enforcement authorities to distinguish compliant activity from illegal trade pathways.

The system also created a complex enforcement dynamic. Some licensed actors reportedly helped identify unlicensed trappers, while the same permit framework could also complicate prosecution by allowing offenders to present formal documentation. This created a policy paradox: a regulatory system intended to control live capture could simultaneously constrain and weaken enforcement.

Following a structured process involving field-based evidence, multi-level stakeholder engagement, and formal policy communication, the Department of Environment suspended the issuance of songbird trapping permits for a five-year period. The policy decision is supported by official Persian-language correspondence, including AvayeBoom's formal submission, the Wildlife Office response, and the subsequent directive to provincial offices.

This case illustrates a broader governance challenge: legal regulatory systems, when weakly monitored and difficult to verify in practice, may unintentionally create opportunities for abuse. The five-year suspension provides an opportunity to monitor outcomes, evaluate unintended consequences, and inform a long-term decision on whether to permanently eliminate, reform, or replace the permit system.

Key Policy Messages

- The core problem was not only illegal trapping, but the difficulty of verifying compliance within a legal permit system.
- Valid permits could function as documentary cover for possession, transport, transfer, or sale of wild-caught songbirds.
- Repeated enforcement cases across multiple provinces indicate a recurring governance and enforcement problem, not an isolated local issue.
- The five-year suspension should be treated as an adaptive policy intervention requiring systematic monitoring, evaluation, and a clear decision pathway.

Background and Policy Context

Iran's broader legal framework for hunting, trapping, possession, transport, and trade permits is long-standing. The 1967 Executive Bylaw of the Hunting and Fishing Law established a permit architecture that included ordinary, special, and commercial permits. Under this framework, commercial permits could be issued for hunting or fishing with a professional or trade character, as well as for breeding, purchase, sale, and export of huntable species and their parts. The same legal framework prohibited purchase, sale, offering, keeping, transport, and export of huntable animals without a permit (Government of Iran, 1967).

Publicly accessible evidence for province-level live-capture permits for songbirds is clear from the early 2010s. Media and administrative reports show that permits for species such as goldfinch were issued or publicly discussed in several provinces, often under specific instructions and quotas. A nationally reported instruction in 2016 referred to live-capture permits for goldfinches in multiple provinces, reportedly justified partly on livelihood grounds (Islamic Republic News Agency, 2016).

This legal and administrative background is important because the issue is not limited to field trapping. Once permits relate to capture, possession, transport, transfer, or sale, enforcement officers must verify whether birds found in cages, vehicles, markets, or private residences were obtained within permit conditions. In practice, this creates a compliance-verification challenge.

The available public evidence does not show a transparent national dataset on the number of permits issued, the number of birds captured, compliance rates, or ecological outcomes. This limits the ability to evaluate whether the permit system achieved its regulatory purpose or instead created opportunities for misuse.

Problem Definition

The permit system was designed to regulate limited live capture under administrative conditions. However, field observations, enforcement accounts, and stakeholder feedback suggest a divergence between policy intent and actual practice. The central problem was not only illegal trapping, but the limited capacity to verify compliance once birds entered possession, transport, exchange, or sale pathways.

Permits may specify trapping days, quantities, and conditions, but enforcement officers often face practical difficulty verifying whether birds found in cages, shops, vehicles, checkpoints, or private residences were captured legally and within permit conditions. This creates a compliance-verification gap between written regulation and field enforcement.



Figure 1. Multiple individuals captured simultaneously, reflecting the cumulative impact of small-scale trapping practices

In practice, valid permits could function as documentary cover for possession, transport, transfer, or sale of wild-caught songbirds. This does not mean that all permit holders acted illegally. Rather, it means that the permit system created opportunities for abuse when monitoring and verification mechanisms were weak.

Live-capture activities often occur outside protected areas and away from regular enforcement presence. Detection probability is low, and once birds are moved away from capture sites, it becomes increasingly difficult to distinguish legally captured birds from illegally captured ones. This weakens the capacity of rangers and enforcement authorities to act effectively.

The system appears to have been implemented unevenly across provinces, with limited public data on permits issued, birds captured, compliance outcomes, or ecological impacts. Without a systematic monitoring system, the permit framework could not be evaluated or adaptively managed.



Figure 2. A captured European goldfinch held by a trapper before confiscation

Evidence from Field and Media

Persian-language enforcement reports indicate repeated cases of illegal live-capture, possession, transport, attempted sale, and residential holding of goldfinches and other songbirds across multiple provinces. Reported cases include birds intercepted during vehicle transport, live-capture cases in mountain and rural areas, seizure of cages, nets, ropes, and trapping equipment, and confiscation of birds from private residences. These records do not provide a national estimate of trapping scale, but they demonstrate that enforcement challenges occur across different stages of the chain, from capture and holding to transport and sale (Etemad Newspaper, 2020; Fars News Agency, 2026; Islamic Republic of Iran Broadcasting News Agency, 2026; Moj Rasa News Agency, 2025; Saheb News, 2021; Tasnim News Agency, 2025).

Table 1. Sample of enforcement cases related to live capture, transport and sale of songbirds across Iranian provinces.

Province / locality	Reported issue	Evidence type	Policy relevance
Shirvan, North Khorasan	Arrest of an offender involved in live-capturing goldfinches	Arrest and judicial referral	Shows live-capture enforcement beyond the initially identified provinces
Astara, Gilan	18 goldfinches intercepted during vehicle transport	Checkpoint seizure, police-environment cooperation	Shows that the issue extends beyond capture sites into transport pathways
Abhar, Zanjan	Illegal live-capture of goldfinches by non-local offenders	Judicial fine and administrative damages	Challenges a purely local-livelihood framing of trapping
Fereydunshahr, Isfahan	26 goldfinches seized; cages, ropes, nets, and other tools confiscated	Equipment seizure and judicial referral	Shows practical field enforcement challenges and use of trapping equipment
Choram, Kohgiluyeh and Boyer-Ahmad	13 goldfinches seized from illegal trappers and released	Seizure and release after veterinary assessment	Links live-capture to sale and market demand
Boyer-Ahmad, Kohgiluyeh and Boyer-Ahmad	18 goldfinches seized from a private residence	Residential holding case	Shows that enforcement challenges continue after capture
Isfahan / national media	Public objection by AvayeBoom to official goldfinch trapping permits	Policy controversy and civil-society intervention	Shows that concerns about permits, net-based capture, and monitoring existed before the 2026 suspension

These cases should not be interpreted as a quantified national estimate. Rather, they indicate a recurring pattern of enforcement problems across multiple stages: capture, holding, transport, attempted sale, and prosecution. This pattern supports the need to evaluate the permit system not only as a harvesting mechanism, but as a governance system with practical verification limits.

Geographic Pattern of the Issue

The available evidence suggests that songbird live-capture and related enforcement cases are geographically dispersed rather than confined to a single locality. Reports reviewed for this brief include cases from northern, northwestern, northeastern, central, and southwestern Iran. Some cases involve vehicle transport, non-local offenders, residential holding, or attempted sale, suggesting that trapping dynamics may extend beyond local capture sites.

However, the available public evidence is not sufficient to define or quantify a national trafficking corridor. A more cautious interpretation is that enforcement records are consistent with a multi-province pattern involving capture, holding, transport, and market demand. Further systematic data collection is needed to map routes, source areas, market nodes, and enforcement hotspots.

Intervention Process

Concerns regarding the effectiveness of the permit system emerged through long-term field observations, enforcement experiences, and engagement with local stakeholders, including environmental experts and rangers.

Structured discussions were conducted with provincial offices, including Isfahan, Fars, and Mazandaran, as well as experts and officials within the Department of Environment. These discussions provided insight into how the permit system functioned in practice and how it affected enforcement.

AvayeBoom consolidated the findings in January 2026, integrating field observations, institutional perspectives, enforcement accounts, media evidence, and policy concerns related to monitoring and compliance verification.

Based on this evidence, AvayeBoom submitted a formal policy request to the Department of Environment, outlining the need for structural reassessment of the permit system and a temporary suspension of permit issuance.

Following internal review and consultation, the Department of Environment approved a five-year suspension of songbird trapping permit issuance. This decision is documented through the Wildlife Office response and the subsequent official communication to provincial offices instructing implementation of the suspension.

Key Insight: The Enforcement Paradox

The permit system generated a complex and contradictory enforcement dynamic. On one hand, valid permits could function as documentary cover for possession, transport, transfer, or sale of wild-caught birds, making it difficult for enforcement officers to verify whether birds were captured within legal conditions. On the other hand, field-based accounts suggest that some licensed actors occasionally helped identify unlicensed trappers, creating an informal enforcement role. This created a policy paradox: the same system that was intended to regulate live capture could also complicate enforcement and prosecution.

Field-based practitioner accounts illustrate this dynamic:

“The season of issuing permits becomes the most difficult time of the year for us. Many applicants appear more interested in avoiding enforcement than in regulated trapping.”

– Provincial wildlife expert

“We identify individuals as offenders, but once they present a permit, proving illegal intent becomes very difficult in court.”

– Ranger

These accounts should be interpreted as practitioner-based evidence rather than a quantified empirical estimate. They highlight the need to consider informal governance dynamics when designing wildlife policy interventions.

Policy Outcome

According to official Persian-language correspondence reviewed for this brief, the Department of Environment suspended the issuance of songbird trapping permits for a defined period of five years. The policy decision is documented through AvayeBoom’s formal request, the Wildlife Office response, and the subsequent official directive to provincial offices.

This time-bound suspension creates an opportunity to monitor ecological and enforcement outcomes before a permanent decision is made. Depending on the results, the policy may be extended, allowed to expire, transformed into a permanent ban, or replaced with a reformed permit system supported by strict monitoring and compliance mechanisms.

This should be treated as an adaptive policy intervention, not simply as a temporary administrative pause.

Administrative Documentation

The policy process described in this brief is supported by official Persian-language correspondence, including AvayeBoom’s formal request to the Department of Environment, the Wildlife Office response, and the subsequent directive to provincial offices regarding the suspension of songbird trapping permits. Copies of these documents are held by AvayeBoom Bird Conservation Society and can be made available upon request where appropriate.

Policy Options

Given the current lack of a publicly accessible national dataset on permit issuance, compliance, and ecological outcomes, continuation of the suspension appears to be the most defensible short-term option. Any future return to permitting should be conditional on a demonstrably stronger monitoring and verification system.

Table 2. Policy options for managing songbird trapping permits: advantages, risks and conditions for implementation.

Policy option	Advantages	Risks / limitations	Conditions for use
Maintain the five-year suspension	Allows time for monitoring, reduces immediate legal cover for trapping, creates a learning period	Illegal activity may shift underground; enforcement still needed	Requires monitoring of trapping, trade, enforcement, and unintended effects
Introduce a permanent ban on songbird trapping permits	Removes the legal loophole and simplifies enforcement	May face resistance from previous permit holders; may not eliminate illegal demand	Requires strong enforcement, public communication, and market monitoring
Reform the permit system with strict monitoring	Allows controlled use if evidence supports sustainability and compliance	High administrative burden; risk of loophole persistence	Only feasible if there is reliable population monitoring, permit database, tagging or traceability, inspection capacity, and clear penalties

Policy Implications and Lessons Learned

This case provides several lessons for wildlife policy and governance.

First, legal permit systems can create enforcement vulnerabilities when monitoring and compliance verification are weak. In such cases, permits may not function as effective control mechanisms and may instead provide documentary cover that complicates enforcement and may facilitate illegal trade pathways.

Second, enforcement is not only a technical issue. It is shaped by social dynamics, informal networks, institutional constraints, and the practical conditions under which rangers and officials must make decisions.

Third, governance systems require reliable data. Without systematic information on permits issued, birds captured, compliance levels, enforcement outcomes, and population trends, it is difficult to determine whether a permit system is sustainable or enforceable.

Fourth, adaptive policy design is essential when uncertainty is high. Time-bound interventions such as a five-year suspension can be useful only if they are linked to clear monitoring indicators, periodic evaluation, and a decision pathway (Cooney, 2004; Williams et al., 2009).

Finally, this case has relevance beyond Iran. Many countries face similar challenges where legal and illegal wildlife systems overlap and where weak verification creates opportunities for laundering, misuse, or enforcement failure (Lyons & Natusch, 2011; TRAFFIC, 2019; United Nations Office on Drugs and Crime, n.d.-b).

Next Steps and Recommendations

The Department of Environment has decided that monitoring will continue. The recommendations below are the same proposals AvayeBoom submitted to the Department, and their implementation will be calibrated to the evolving conditions in Iran over the coming years.

1. Establish a national permit and enforcement database: The Department of Environment should establish a centralized database covering previous permit holders, permit conditions, enforcement cases, confiscated birds, species involved, locations, penalties, and judicial outcomes.
2. Monitor ecological and enforcement outcomes during the suspension period: Monitoring should assess whether the suspension reduces live capture, possession, transport, and sale of songbirds, or whether activity shifts into less visible illegal pathways.
3. Track unintended consequences: The suspension may reduce legal cover for illegal activity, but it may also push some actors into fully informal markets. This possibility should be monitored through market surveillance, enforcement reports, and local stakeholder feedback.
4. Strengthen inter-provincial coordination: Because enforcement cases occur across multiple provinces, coordination should be strengthened between provincial DoE offices, police, judiciary, and local informants.
5. Develop a five-year evaluation framework: Before the suspension period ends, the DoE should define indicators for evaluating the policy. Suggested indicators include number of enforcement cases, number of birds confiscated, market availability, repeat offenses, geographical distribution of cases, and evidence of population recovery or continued pressure.
6. Define a decision pathway before the suspension expires: The policy should not automatically return to the previous system after five years. A decision should be made based on evidence: permanent ban, continued suspension, or a reformed permit system with strict monitoring.
7. Avoid reinstating permits without verification mechanisms: Any future permit system should require clear traceability, transparent quotas, population monitoring, inspection capacity, and penalties for misuse. Without these safeguards, reinstating permits may recreate the same governance problem.

Conclusion

The reform of songbird trapping permits in Iran demonstrates that addressing illegal wildlife use requires more than enforcement alone. It requires examining how legal systems function in practice and whether they can be monitored, verified, and adapted.

The evidence reviewed in this brief suggests that the permit system created a compliance-verification problem across capture, possession, transport, transfer, and sale of songbirds. The five-year suspension provides an important opportunity to evaluate whether removing this legal cover reduces enforcement vulnerability and improves conservation outcomes.

This case also offers a broader lesson for wildlife governance: regulatory systems must be judged not only by their legal design, but by their performance under real enforcement conditions.

References

BirdLife Cyprus. (2025). *Update on illegal bird trapping activity in Cyprus: Autumn 2024 trapping report*. BirdLife Cyprus. https://birdlifecyprus.org/wp-content/uploads/sites/3/2025/02/BirdLife-Cyprus_Autumn_2024_Trapping_report_Final_for-publication.pdf

Brochet, A.-L., Van den Bossche, W., Jbour, S., Ndang'ang'a, P. K., Jones, V. R., Abdou, W. A. L. I., Al-Hmoud, A.-R., Asswad, N. G., Atienza, J. C., Atrash, I., Barbara, N., Bensusan, K., Bino, T., Celada, C., Cherkaoui, S. I., Costa, J., Deceuninck, B., Etayeb, K. S., Feltrup-Azafzaf, C., ... Butchart, S. H. M. (2016). *Preliminary assessment of the scope and scale of illegal killing and taking of birds in the Mediterranean*. *Bird Conservation International*, 26(1), 1–28. <https://doi.org/10.1017/S0959270915000416>

Cantú, J. C., Sánchez, M. E., Grosselet, M., & Silva, J. (2007). *The illegal parrot trade in Mexico: A comprehensive assessment*. Defenders of Wildlife. https://defenders.org/sites/default/files/publications/the_illegal_parrot_trade_in_mexico.pdf

Center for International Environmental Law, & Forest Trends. (2022). *Legal acquisition findings: A handbook*. Forest Trends. <https://www.forest-trends.org/publications/legal-acquisition-findings-a-handbook/>

Convention on International Trade in Endangered Species of Wild Fauna and Flora. (n.d.). *Legal acquisition findings*. https://cites.org/eng/imp/legal_acquisition_findings

Cooney, R. (2004). *The precautionary principle in biodiversity conservation and natural resource management: An issues paper for policy-makers, researchers and practitioners*. IUCN. <https://portals.iucn.org/library/node/8528>

Eaton, J. A., Shepherd, C. R., Rheindt, F. E., Harris, J. B. C., van Balen, S., Wilcove, D. S., & Collar, N. J. (2015). *Trade-driven extinctions and near-extinctions of avian taxa in Sundaic Indonesia*. *Forktail*, 31, 1–12. <https://www.orientalbirdclub.org/s/Trade-driven-extinctions-z5y9.pdf>

- Etemad Newspaper. (2020, August 15). *Objection to the issuance of goldfinch hunting permits* [In Persian]. <https://etemadnewspaper.ir/fa/main/detail/153008/>
- Fars News Agency. (2026). *Rescue of 18 goldfinches in Astara* [In Persian]. <https://farsnews.ir/HamidrezaDonyadide/1775453449744245995/>
- Government of Iran. (1967). *Executive bylaw of the Hunting and Fishing Law* [In Persian]. National Laws and Regulations Portal. <https://qavanin.ir/Law/TreeText/?IDS=1784763570147088152>
- Islamic Republic News Agency. (2016, August 2). *Goldfinch hunting permits create grounds for the destruction of this bird's population* [In Persian]. <https://www.irna.ir/news/82172369>
- Islamic Republic of Iran Broadcasting News Agency. (2026, May 2). *Arrest of an offender for live-capturing goldfinches in Shirvan* [In Persian]. <https://www.iribnews.ir/000Fn1>
- Leupen, B. T. C., Gomez, L., Shepherd, C. R., Nekariss, K. A. I., Imron, M. A., & Nijman, V. (2020). *Thirty years of trade data suggests population declines in a once common songbird in Indonesia*. *European Journal of Wildlife Research*, 66, Article 98. <https://doi.org/10.1007/s10344-020-01436-4>
- Lyons, J. A., & Natusch, D. J. D. (2011). *Wildlife laundering through breeding farms: Illegal harvest, population declines and a means of regulating the trade of green pythons (Morelia viridis) from Indonesia*. *Biological Conservation*, 144(12), 3073–3081. <https://doi.org/10.1016/j.biocon.2011.10.002>
- Mehr News Agency. (2018). *Eighteen goldfinches seized from a house in Boyer-Ahmad* [In Persian]. <https://www.mehrnews.com/xMSDq>
- Moj Rasa News Agency. (2025, October 7). *Illegal goldfinch trappers fined millions* [In Persian]. <https://mojerasa.ir/khabar/48297/>
- Saheb News. (2021, August 17). *Arrest of offenders involved in live-capturing 26 goldfinches in Fereydunshahr* [In Persian]. <https://snai.ir/1059506>
- Tasnim News Agency. (2025). *Release of 13 goldfinches in their natural habitat in Choram* [In Persian]. <https://tasnimnews.ir/3517553>
- Tella, J. L., & Hiraldo, F. (2014). *Illegal and legal parrot trade shows a long-term, cross-cultural preference for the most attractive species, increasing their risk of extinction*. *PLOS ONE*, 9(9), Article e107546. <https://doi.org/10.1371/journal.pone.0107546>
- TRAFFIC. (2019). *Addressing corruption in CITES documentation processes*. <https://www.traffic.org/site/assets/files/12675/topic-brief-addressing-corruption-in-cites-documentation-processes.pdf>
- United Nations Office on Drugs and Crime. (n.d.-a). *Criminalization of wildlife trafficking. Education for Justice, Wildlife Crime Module*. <https://www.unodc.org/e4j/en/wildlife-crime/module-3/key-issues/criminalization-of-wildlife-trafficking.html>

United Nations Office on Drugs and Crime. (n.d.-b). Legal and illegal markets. *Education for Justice, Wildlife Crime Module*. <https://www.unodc.org/e4j/en/wildlife-crime/module-1/key-issues/legal-and-illegal-markets.html>

Williams, B. K., Szaro, R. C., & Shapiro, C. D. (2009). *Adaptive management: The U.S. Department of the Interior technical guide*. U.S. Department of the Interior. <https://www.usgs.gov/publications/adaptive-management-us-department-interior-technical-guide>

Young Journalists Club. (2020, March 23). *What are the conditions for issuance of hunting permits?* [In Persian]. <https://www.yjc.ir/fa/news/7268132>