

BEFORE THE SECRETARY OF THE INTERIOR

Petition to List the Javan Slit-Faced Bat (*Nycteris javanica*) as
Endangered Under the Endangered Species Act

Center for Biological Diversity

October 29, 2026

NOTICE OF PETITION

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PETITIONER

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The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats. The Center works through science, law, and creative media to secure a future for all species, great or small, hovering on the brink of extinction. The Center is supported by more than 1.8 million members and activists throughout the United States and around the globe. The Center and its members are concerned with the conservation of imperiled species and the effective implementation of the Endangered Species Act. The Center's International Program works to protect global biodiversity by using U.S. and international law to hold governments accountable for threatening imperiled species wherever they are found.

Submitted this 29 Day of October, 2026

Pursuant to Section 4(b) of the Endangered Species Act (ESA), 16 U.S.C. § 1533(b), Section 553(e) of the Administrative Procedure Act, 5 U.S.C. § 553(e), and 50 C.F.R. § 424.14(a), Petitioner, the Center for Biological Diversity, hereby Petitions the Secretary of the Interior and the U.S. Fish and Wildlife Service (FWS or the Service) to protect the Javan slit-faced bat (*Nycteris javanica*), as an endangered species under the Endangered Species Act, 16 U.S.C. §§ 1531–1544.

As described in this petition, Javan slit-faced bats are endemic to parts of Indonesia including Java, Nusa Penida, the Kangean Islands, Bali, Madura Island, and West Timor. They are forest-dependent and are sensitive to habitat changes. They roost in caves and tree hollows and live in small groups between five and 30 individuals. They are insectivores and specialize in hunting in areas with dense vegetation.

The Javan slit-faced bat was assessed as Vulnerable by the International Union for Conservation of Nature (IUCN) in 2021. Threatened by habitat loss and collection for the international décor trade, Javan slit-faced bats are declining in the wild. Sold as taxidermy specimens and in demand for their rabbit like ears, these bats are sold on-line in the United States. IUCN estimates that Javan slit-faced bats will experience a population decline of more than 30% over the next 15 years, and researchers in East Java have noted their absence from several caves within their range. The Javan slit-faced bat is at risk of extinction and warrants listing under the ESA.

This Petition presents substantial scientific and commercial information demonstrating that the Javan slit-faced bat is in danger of extinction throughout all of its range. *See* 50 C.F.R. § 424.14(h)(1)(i) (“substantial scientific or commercial information” refers to credible scientific or commercial information in support of the Petition’s claims such that a reasonable person conducting an impartial scientific review would conclude that the action proposed in the Petition may be warranted). Therefore, the Secretary of the Interior, through the Service, must make an initial finding “that the petitioned action may be warranted” within 90 days of receiving this Petition and make a subsequent finding that listing is warranted within 12 months receiving this Petition. 16 U.S.C. § 1533(b)(3)(A), (B).

Listing the Javan slit-faced bat under the Endangered Species Act would meaningfully contribute to the species’ conservation by strictly regulating the import, export, and interstate commerce of the species. *See* 16 U.S.C. § 1538(a)(1) (prohibiting the import, transport, and sale of endangered species). Listing will also raise awareness of the species and its threats within the United States and within its range countries and open potential funding for conservation and research.

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I. Executive Summary

Javan slit-faced bats are endemic to parts of Indonesia including Java, Nusa Penida, the Kangean Islands, Bali, Madura Island, and West Timor. They are forest-dependent and are sensitive to habitat changes. They roost in caves and tree hollows and live in small groups of between five and 30 individuals. They are insectivores and specialize in hunting in areas with dense vegetation.

The Javan slit-faced bat was assessed as Vulnerable by the International Union for Conservation of Nature (IUCN) in 2021. Threatened by habitat loss and collection for the international décor trade, Javan slit-faced bats are declining in the wild. IUCN estimates that Javan slit-faced bats will experience a population decline of more than 30% over the next 15 years, and researchers in East Java have noted their absence from several caves within their range. The Javan slit-faced bat is at risk of extinction and warrants listing under the ESA.

Javan slit-faced bats are threatened by collection for the international décor trade. Researchers have been raising concerns about the hunting and sale of taxidermy bats as souvenirs and decorations for over a decade, noting that bats are long-lived, slow to reproduce, and many species are already threatened by habitat loss. The United States is a major driver of the trade. According to the most recent available data from the U.S. Law Enforcement Management Information System (LEMIS) database, 1,198 Javan slit-faced bats were imported to the United States from 2016-2024 for commercial trade, and almost all of the specimens (99%) were labeled wild-caught.

Javan slit-faced bats are sensitive to habitat changes and are threatened by habitat disturbance and loss. Extensive habitat loss has been documented in several parts of the species' range. In the Gunungsewu Karst in southern central Java, natural tropical forests can no longer be found due to impacts from mining, farming, residential development, and tourism. In East Java, the Lawa Belik cave, which Javan slit-faced bats inhabit, has been impacted by phosphate mining and intermittent visitation from high volumes of tourists.

Under the Endangered Species Act, the Service is required to list a species as “endangered” if it “is in danger of extinction throughout all or a significant portion of its range.” 16 U.S.C. § 1532(6). There are five statutory listing factors that the Service must analyze for the species: (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; and (E) other natural or manmade factors affecting its continued existence. 16 U.S.C. § 1533(a)(1). Based upon the following analysis of these factors, we petition the Service to list the Javan slit-faced bat under the Endangered Species Act.

II. Introduction

The world is currently facing a global biodiversity crisis with wildlife extinctions accelerating at an alarming rate (IPBES, 2019 p. XVI). Bats are declining globally (Jones et al., 2009 p. 98). Over a third of the world's bat species that have been assessed by IUCN are either

threatened with extinction or data deficient (Frick et al., 2020 p. 19). Many species, including common ones, are experiencing contracting ranges and declining populations, some with only remnant populations remaining (Jones et al., 2009 p.98).

Bats are facing several threats in the wild including habitat loss, disease, climate change, hunting, pesticides, and invasive species (Frick et al., 2020 p. 9; Adams et al., 2024 p. 119). Over the past decade, researchers have been raising concerns about the hunting and sale of taxidermy bats as souvenirs, noting that bats are long-lived, slow to reproduce, and many species are already threatened by habitat loss (Lee et al., 2015 p. 204; Hunter et al., 2024 p. 8; Nguyen et al., 2026 p. 8). The United States is a major demand country in the bat trade, importing more than 100,000 bats each year for commercial trade (Tarango et al., 2025 p. 3).

Bats are particularly sensitive to threats, making them key bioindicators of the health of their environment (Bandara et al., 2022 p. 1; Jones et al., 2009 p. 94). Bats also provide important ecosystem services through pollination, seed dispersal, and control of insect populations (Jones et al., 2009 p. 94). With their essential roles in many of the world's ecosystems and their declining populations and conservation statuses, bats should be of high conservation priority generally.

The Javan slit-faced bat (*Nycteris javanica*) is one of many species imported to the United States for commercial trade. It is an insectivorous species endemic to Indonesia that primarily utilizes cave habitats (Waldien and Wiantoro, 2021 p. 1). The species was assessed as Vulnerable by the International Union for Conservation of Natures (IUCN) in 2021 (Waldien and Wiantoro, 2021 p. 1). Bats are one of the least studied mammal groups in Asia (Molur et al., 2002 p. 5), and there are no comprehensive population surveys of Javan slit-faced bats. However, the best available science indicates that populations are declining (Waldien and Wiantoro, 2021 p. 1). IUCN estimates that Javan slit-faced bats will experience a population decline of more than 30% over the next 15 years (Waldien and Wiantoro, 2021 p. 2), and researchers in East Java have noted their absence from several caves within their range (Prakarsa et al., 2024 p. 2; Prakarsa et al. 2025 p. 5044). Endangered Species Act protections are needed to prevent this species from experiencing future declines to supply the U.S. market.

III. Natural History

A. Taxonomy

The genus *Nycteris* currently contains 13 species from Africa and the Arabian Peninsula, one species from Madagascar, and two species from Southeast Asia which are limited to Malaysia and Indonesia (Demos et al., 2019 p. 1020). *N. javanica* was first described in 1813 (Waldien and Wiantoro, 2021 p. 1). Its closest relative is *N. tragata*, the Malayan slit-faced bat (Griffiths, 1997 p. 111-112; Demos et al., 2019 p. 1024).

Table 1. Taxonomy of *Nycteris javanica*.

Kingdom	Animalia
Phylum	Chordata
Class	Mammalia
Order	Chiroptera
Family	Nycteridae
Genus	Nycteris
Species	javanica

B. Description

Javan slit-faced bats have short, wide legs and long, webbed tails which support hunting in areas with heavy vegetation (Prakarsa et al., 2024 p. 5). Their forearms have been measured between 43.6-50.4mm (Prakarsa et al., 2024 p. 4). Colonies range from less than five individuals to more than 30 individuals (Krisanti et al., 2017 p. 1192; Waldien and Wiantoro, 2021 p. 2; Prakarsa et al., 2024 p. 4).

C. Life Cycle

There is no information published on the life cycle of Javan slit-faced bats. Their life cycle might be similar to the closely related Malayan slit-faced bat, which breeds year-round and has a litter size of one (Biodiversity Literature Repository, 2019 not paginated).

D. Behavior

Javan slit-faced bats roost in caves, tree hollows, and other similar structures (Waldien and Wiantoro, 2021 p. 2). They live in small groups of less than five individuals to more than 30 individuals (Krisanti et al., 2017 p. 1192; Waldien and Wiantoro, 2021 p. 2; Prakarsa et al., 2024 p.4). They are narrow space bats and foliage gleaners, and specialize in hunting in dense vegetation (Prakarsa et al., 2024 p. 5).

Javan slit-faced bats are insectivores, and they help control populations of pest insects that are destructive to agricultural crops (Prakarsa et al., 2024 p. 5). Prakarsa et al. (2024 p. 4) recorded prey from several arthropods in the orders Araneae, Hemiptera, Orthoptera, Coleoptera, Lepidoptera, Blattaria, and Homoptera, with most prey being in the order Lepidoptera. The average body weight before hunting was 9.15 grams and increased to 13.55 grams after hunting, suggesting that the species can consume 48% of its total body weight on average in one night of hunting (Prakarsa et al., 2024 p. 4-5).

E. Habitat

The Javan slit-faced bat is a forest-dependent species (Waldien and Wiantoro, 2021 p. 1). They have low adaptability and are sensitive to habitat disturbance (Hutson et al., 2008, as cited in Krisanti et al., 2017 p. 1192). As mentioned above, they utilize caves, tree hollows, and other similar structures for roosting (Waldien and Wiantoro, 2021 p. 2) and hunt in areas with dense vegetation (Prakarsa et al., 2024 p. 5).

IV. Distribution

Javan slit-faced bats are endemic to Indonesia (Waldien and Wiantoro, 2021 p. 1). They have been recorded from Java, Nusa Penida, the Kangean Islands, Bali, Madura Island, and West Timor (Koopman, 1989 p. 5; Suyanto et al., 2002 p. 13; Atmaja, 2011 p. 254; Mustari et al., 2014 p. 120; Krisanti et al., 2017 p. 1191; Waldien and Wiantoro, 2021 p. 1; Kedang et al., 2023 p. 366-367; Astirin et al., 2025 p. 1610).

Javan slit-faced bats are relatively common in some areas, but populations are declining (Waldien and Wiantoro, 2021 p. 2). The species is projected to experience a population decline of more than 30% over the next 15 years (Waldien and Wiantoro, 2021 p. 2).

In 2024 and 2025, Prakarsa et al. (2025 p. 5041) surveyed five caves in the Tuban Karst area of East Java, within the range of the Javan slit-faced bat. The researchers only found the species in one of the five caves with a population of 235 bats and noted a decreasing trend in the population (Prakarsa et al., 2025 p. 5044). They also noted that the Lawa Belik cave, where the species was found, has been impacted by phosphate mining and intermittent visitation from high volumes of tourists (Prakarsa et al., 2025 p. 5045). Previously, during surveys conducted in 2019, Prakarsa et al. (2024 p. 2) noted only finding Javan slit-faced bats in two caves, Nguwik and Anjani, in the Jonggrangan karst area, though it was unclear how many caves were surveyed in total.



Figure 1. Range of the Javan slit-faced bat. Extracted from Waldien and Wiantoro (2021 p. 2).

V. Conservation Status and Warranted Endangered Species Act Protection

The Endangered Species Act (ESA) is a “comprehensive scheme with the ‘broad purpose’ of protecting endangered and threatened species.” *Ctr. for Biological Diversity v. U.S. Bureau of Land Mgmt.*, 698 F.3d 1101, 1106 (9th Cir. 2012) (quoting *Babbitt v. Sweet Home*, 515 U.S. 687, 698 (1995)). Congress’ plain intent in enacting the ESA was “to halt and reverse

the trend toward species extinction” *Tenn. Valley Auth. v. Hill*, 437 U.S. 153, 184 (1978). In doing so, the ESA requires that “all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of [these] purposes.” 16 U.S.C. § 1531(c)(1). Endangered and threatened species are “afforded the highest of priorities.” *Tenn. Valley Auth.*, 437 U.S. at 174. Endangered species are species that are “in danger of extinction throughout all or a significant portion of its range,” and threatened species are species that are “likely to become endangered species within the foreseeable future” throughout all or a significant portion of range and are listed for protection pursuant to section 4 of the ESA 16 U.S.C. §§ 1532(6), (20), 1533.

As demonstrated by the best available information on the species, the Javan slit-faced bat meets the definition of endangered. The best available science indicates that populations are declining (Waldien and Wiantoro, 2021 p. 1). IUCN estimates that Javan slit-faced bats will experience a population decline of more than 30% over the next 15 years (Waldien and Wiantoro, 2021 p. 2), and researchers in East Java have noted their absence from several caves within their range (Prakarsa et al., 2024 p. 2; Prakarsa et al. 2025 p. 5044). As described below, the species continues to be threatened by habitat loss and collection for international trade.

VI. Current Threats

Under the ESA, the Service is required to list a species as endangered or threatened based upon one or more threats or factors that the Service must analyze for the species: (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; and (E) other natural or manmade factors affecting its continued existence. 16 U.S.C. § 1533(a)(1). Based upon an analysis of these factors, the Javan slit-faced bat should be listed under the ESA.

A. The Present or Threatened Destruction, Modification, or Curtailment of its Habitat or Range

Habitat loss, primarily due to logging and agriculture, is a threat to Javan slit-faced bats (Waldien and Wiantoro, 2021 p. 1). The species is losing the forests, caves, and tree-hollow roosts it depends on (Waldien and Wiantoro, 2021 p. 2). Javan slit-faced bats are particularly sensitive to habitat disturbance (Hutson et al., 2008, as cited in Krisanti et al., 2017 p. 1192). They are primarily found in karst caves that have experienced less human disturbance (Wilson and Reeder, 2005 as cited in Prakarsa et al., 2024 p. 1).

Habitat loss has been documented in several parts of the Javan slit-faced bat’s range. Java has the smallest percentage of natural forest among Indonesian islands with about 6% remaining (Saiful et al., 2021 p. 186). In the Gunungsewu Karst in southern central Java, natural tropical forest can no longer be found due to impacts from mining, farming, residential development, and tourism (Atmaja, 2011 p. 251). As mentioned above, Prakarsa et al. (2025 p. 5045) noted that the Lawa Belik cave, which Javan slit-faced bats inhabit, has been impacted by phosphate mining and intermittent visitation from high volumes of tourists.

Given that land conversion for agriculture is one of the main drivers of habitat loss for Javan slit-faced bats (Waldien and Wiantoro, 2021 p. 1), the use of insecticides is likely also impacting the species. Heavy insecticide use has been documented within the species' range (Prihandiani et al., 2021 p. 283). This may have direct lethal and nonlethal impacts to the bats themselves (Bayat et al., 2014 p. 49) in addition to diminishing prey populations.

Southeast Asia has experienced the highest rates of deforestation of humid tropical forests globally (Achard et al., 2002 p. 999; Sodhi et al., 2004 p. 320; Estoque et al., 2019 p. 2). From 2005-2015, the region lost about 80 million ha of forest, with an annual rate of about 8 million ha lost per year (Estoque et al., 2019 p. 2). Indonesia alone made up about two-thirds of the forest lost (Estoque et al., 2019 p. 2). Logging not only eliminates critical habitat for forest-dependent species but also increases the vulnerability of these ecosystems to secondary disasters including wildfires, landslides, and floods (Newman and Valentinus, 2005, p. 2). The loss and degradation of tropical forests, particularly in Southeast Asia, is a severe threat to bat populations (Frick et al., 2020 p.8).

B. Overutilization for Commercial, Recreational, Scientific, or Educational Purposes

1. Javan Slit-Faced Bats in Trade

Javan slit-faced bats are among several bat species threatened by collection from the wild to supply the décor trade. The species' rabbit-like ears are used as a selling point for taxidermy specimens in the United States. According to the U.S. Law Enforcement Management Information System (LEMIS) database, 1,198 Javan slit-faced bats were imported into the United States from 2016-2024 (Appendix 1). Most were exported from Indonesia (1,161 specimens), while 37 specimens were exported from Taiwan (Appendix 1). Almost all of the specimens (99%) were labeled wild-caught. Of the specimens that were not labeled wild-caught, 10 specimens were labeled "commercially bred" and five were labeled born in captivity (Appendix 1). However, these were likely mislabeled as we have been unable to find evidence of captive breeding of this species.

A survey of online advertisements for Javan slit-faced bats confirms the species is available for purchase in the United States (Appendix 2). Our search for Javan slit-faced bats for sale showed seven advertisements for a taxidermy specimen (Appendix 2). Chaber et al. (2021 p. 6) found four eBay advertisements for Javan slit-faced bats in May of 2020. As mentioned below, given that eBay and Etsy have banned bat sales, we expect that advertisements have shifted to other online platforms including social media groups and physical oddities stores. Additionally, Amazon and many other online sellers often do not identify bats available for sale to the species-level (Chaber et al., 2021 p. 3). As such, additional Javan slit-faced bats may be offered to sale in the United States.

2. The Bat Taxidermy Trade is a Conservation Concern

Dead bats are widely available for sale online. Chaber et al. (2021 p. 2) found 237 advertisements on eBay over a two-week period in 2020 for 32 different species of bats.

According to a National Geographic article, there were more than 500 listings of dead bats on Etsy and 71 on eBay in October 2022 (Maron, 2023 p. 2). From October to December 2022, Coleman et al. (2024 p. 5) found 856 unique online listings for bats on Amazon, eBay, and Etsy. Tarango et al. (2025 p. 3) found 230 advertisements of 28 total bat species for sale on U.S.-based e-commerce platforms over a five-week period. Hunter et al. (2024 p. 102) estimated that 10,454 bat specimens were sold on Etsy during an 18-month period. Sellers also appear to utilize social media to sell taxidermy bats (Coleman et al., 2024 p. 7), but advertisements on those platforms have not been quantified. While many dead bats are mounted and framed, some are sold on hats, hair barrettes, and garter belts (Maron, 2023 p. 2). They are particularly popular for Halloween or as Christmas gifts (Maron, 2023 p. 2).

Researchers have been raising concerns about the hunting and sale of taxidermy bats as souvenirs for over a decade, noting that bats are long-lived, slow to reproduce, and many species are already threatened by habitat loss (Lee et al., 2015 p. 204; Hunter et al., 2024 p. 8; Nguyen et al., 2026 p. 8). The United States is a major driver of the trade (Coleman et al., 2024 p. 6; Tarango et al., 2025 p. 2). Tarango et al. (2025 p. 2) found that from 2015-2023, the United States imported at least 284 bat species, including 37 species that are threatened with extinction according to IUCN, in 1,340 shipments. Most of the shipments (58.7%) were for commercial trade (Tarango et al., 2025 p. 2). While Indonesia was the main country of origin, shipments originated from more than 106 countries (Tarango et al., 2025 p. 3).

There is a concerning lack of understanding of the trade chain that supplies taxidermy bats. Online advertisements tend to have very little information about the bat specimen for sale, including where and how it was harvested. Some online advertisements do not identify bats to the species level, making it difficult for scientists to track the trade and for consumers to determine the conservation statuses of species offered for sale (Chaber et al., 2021 p. 3). Coleman et al. (2024 p. 9) notes that even when source locations were named in advertisements, it was not clear where the bat was harvested. The most commonly mentioned location was East Java, Indonesia. However, they concluded that this was likely reflective of Indonesia's second busiest port being in East Java rather than an indication that the specimens had actually been collected there.

In August 2024, following the increasing body of literature highlighting conservation concerns about the bat décor trade and resulting media attention, Etsy and eBay removed advertisements for bats on their platforms and implemented policies prohibiting bat sales (Coleman et al., 2025 p. 1). These two platforms hosted most of the online advertisements for bats. However, imports for commercial sales continued after August 2024, indicating that sales may have shifted to other online platforms including social media or physical stores, but the collection of bats for commercial trade continues. For example, the LEMIS database indicates that 600 painted woolly bats (*Kerivoula picta*), the most popular bat in the taxidermy trade, were imported to the United States for commercial sale after August 2024.

C. Disease

It is unclear to what extent disease may be a threat to Javan slit-faced bats. However, researchers have expressed concerns about disease spread through the supply chain that serves the dead bat trade, both to healthy bat populations and to humans (Chaber et al., 2021 p. 5).

D. Other Natural or Manmade Factors

1. Climate Change

Bats are important bioindicators for climate change due to their sensitivity to many impacts of climate change including extreme heat, cold, drought, and rainfall (Jones et al., 2009 p. 94; Ransome & McOwat, 1994 p. 343). Global surface temperature is projected to continue increasing until at least mid-century under all IPCC Climate Change 2021 report scenarios (IPCC 2021). In Southeast Asia there is an expected median warming of 2.5°C by the end of the 21st century (Christensen et al., 2007 p. 883). Changes in temperature can cause changes in bat populations and activity levels (Ransome & McOwat, 1994 p. 343; Russ et al., 2003 p. 294; Wang et al., 2010 p. 319), with some temperature extremes causing drops in population abundance (Ransome & McOwat, 1994 p. 343). In addition to population size, climate change can impact the distribution of bat populations (Jones et al., 2009 p. 99). Bats are also impacted by extreme weather events which are predicted to continue increasing due to climate change (Jones et al., 2009 p. 94).

Changes in precipitation due to climate change may impact Javan slit-faced bat populations. Summer precipitation is expected to increase in South and Southeast Asia during this century, and intense precipitation events are expected to occur more frequently (Christensen et al., 2007 p. 879). High levels of precipitation have been found to delay and even prevent bat reproduction (Grindal et al., 1992 p. 341). Changes in precipitation can also impact insect populations that bats depend on (Grindal et al., 1992 p. 342). Changes in activity levels based on insect abundance have been observed in insectivorous bat species (Wang et al., 2010 p. 319).

E. The Inadequacy of Existing Regulatory Mechanisms

As discussed below, despite regulatory measures that are in place, Javan slit-faced bats are being harvested from the wild at an unsustainable rate. Endangered Species Act protections, including a ban on imports of Javan slit-faced bats to the United States, are necessary to protect this species from extinction given the inadequacy of the regulatory mechanisms discussed below.

1. Indonesia's Protected Species Law

As explained below, Indonesia does not appear to allow any capture or export of Javan slit-faced bat. While the species is not a “protected” species in Indonesia, Indonesia has not issued a necessary quota for the species’ take and export, and thus export is illegal. Despite this, these bats are still being exported from Indonesia.

First, under Indonesia's Law Concerning Conservation of the Living Natural Resources and Its Ecosystem (No. 5/1990), animals may be listed as “protected,” and the law prohibits the catching, killing, transporting, and trade of any protected species.¹ Government Regulation of the Republic of Indonesia No. 7/1999 on Preserving Flora and Fauna Species recognizes that “flora and fauna are parts of invaluable natural resources” and that their conservation must be ensured through species protection efforts.² Government Regulation of the Republic of Indonesia No. 8/1999 states that only non-protected fauna species or captive-bred specimens of protected species of F2 or subsequent generations “can be commercialized.”³ Finally, Government Regulation of the Minister of Environment and Forestry Number 20/2018 provides the list of protected species.⁴ The Javan slit-faced bat is not listed and therefore is not a protected species in Indonesia.

However, trade in non-protected species in Indonesia is also regulated. For all species not listed as “protected,” Regulation of the Minister of Forestry No. 447/Kpts–11/2003 Concerning Administration Directive of Harvest or Capture and Distribution of the Specimens of Wild Plant and Animal Species sets requirements for take and trade.⁵ The Regulation requires hunters and wildlife traders to register with regional offices of the Indonesian natural resources conservation agency and obtain permits for capturing, transporting, selling, and exporting wildlife (Natusch & Lyons, 2012 p. 2902).⁶ If requested (Nijman et al., 2022 p. 4), authorities set a harvest or capture quota, and regional authorities distribute that quota through permits.⁷ Accordingly, non-protected species like Javan slit-faced bat can only be traded if a quota has been issued (Nijman et al., 2022

¹ Law of the Republic of Indonesia, No. 5/1990 Concerning Conservation of the Living Natural Resources and Its Ecosystem, at Art. 21(2), available at:

<http://www.flevin.com/id/lgsso/translations/JICA%20Mirror/english/4.05.1990.eng.qc.html>. This law was amended in 2024, but the relevant provisions banning capture and trade remain applicable. See Law of the Republic of Indonesia, No. 32/2024 about amendment to law No. 5/1990 concerning conservation of natural resources and their ecosystems. Available at: <https://peraturan.bpk.go.id/Details/295135/uu-no-32-tahun-2024>

² Government Regulation of the Republic of Indonesia No. 7/1999 on Preserving Flora and Fauna. Available at: https://www.flevin.com/id/lgsso/translations/JICA%20Mirror/english/27.PP_NUMBER%207%20OF%201999.eng.html

³ Government Regulation of the Republic of Indonesia No. 8/1999 on Wild Flora and Fauna Exploitation, Art. 18. Available at https://www.unodc.org/cld/uploads/res/document/regulation-8-of-1999_html/Regulation_8_of_1999.pdf; Natusch & Lyons, “Exploited for Pets”; Nijman, et al., “Disentangling the Legal and Illegal Wildlife Trade.”; Shepherd, C. R., Gomez, L., & Nijman, V. (2020). Illegal wildlife trade, seizures and prosecutions: A 7.5-year analysis of trade in pig-nosed turtles *Carettochelys insculpta* in and from Indonesia. *Global Ecology and Conservation*, 24, e01249; CITES (2015) (under Indonesian regulation “trade in Earless Monitor Lizards is not permitted).

⁴ Regulation of the Minister of Environment and Forestry Number 20/2018. Available at:

<https://jdih.kemenkoinfra.go.id/cfind/source/files/permen-lhk/permenlhk-nomor-p.106-tahun-2018.pdf>.

⁵ Decree of the Ministry of Forestry 447 of 2003, Tata Usaha Atau Penangkapan Dan Peredaran Tumbuhan Dan Satwa Liar. Available at:

http://www.flevin.com/id/lgsso/translations/JICA%20Mirror/english/54.FORESTRY_%20447.2003_final.Eng.QC.html.

⁶ Decree of the Ministry of Forestry 447 of 2003, Tata Usaha Atau Penangkapan Dan Peredaran Tumbuhan Dan Satwa Liar, Article 26(1).

⁷ Decree of the Ministry of Forestry 447 of 2003, Tata Usaha Atau Penangkapan Dan Peredaran Tumbuhan Dan Satwa Liar, Article 13(1), (2), (3).

p. 4), and trade in species without a quota is illegal (Nijman et al., 2022 p. 4; Latinne et al., 2020 p. 10).⁸

Based on a review of Indonesia's wildlife quotas from 2019-2026, Indonesia has not issued a quota for exporting Javan slit-faced bats ([quotas available here](#)). Therefore, all exports of Javan slit-faced bats are likely illegal.

a. Enforcement Concerns and Illegal Activity in Indonesia

Although Indonesia has enacted legislation to regulate wildlife trade, widespread non-enforcement severely undermines its effectiveness in managing trade and protecting endangered species (Freund et al., 2016, p. 8; Maulany et al., 2021, p. 284; Natusch and Lyons, 2012, p. 2902; Nijman, 2019, p. 203; Nijman et al., 2012, p. 88; Shepherd et al., 2020, p. 8). Indonesia's illegal wildlife trade is sustained by well-established and deeply entrenched criminal networks that enable the unlawful harvesting, transportation, and export of wildlife species, including many that are protected under both national and international law. These illicit activities are routinely facilitated by corruption at key points along the trade chain, undermining enforcement efforts and regulatory oversight.

Key barriers to enforcing existing regulations include a lack of awareness of existing conservation laws and inadequate species identification skills among law enforcement personnel (Lee et al., 2005, p. 478; Natusch and Lyons, 2012, p. 2906). For example, Natusch and Lyons (2012, p. 2906) documented instances in which protected reptiles were included in legal shipments, but BKSDA officers lacked the ability to identify them. In some cases, protected species were misclassified and exported as color variants of non-protected species to avoid detection. Similarly, Nijman et al. (2012, p. 88) found that despite existing regulations, most collectors, middlemen, and small-scale traders routinely ignored legal requirements, often blatantly conducting illegal trade openly and with impunity.

While Indonesian Customs is frequently identified as a high-risk institution, corruption vulnerabilities span a wide range of public agencies. These include airport security, quarantine services, forestry, and environmental authorities, and various branches of law enforcement. Corrupt officials may issue fraudulent permits, overlook illegal shipments, or even directly participate in trafficking operations (OECD, 2019, p. 30).

A 2018 case documented by the Indonesian National Police illustrates the gravity of the issue: an airport security officer was arrested and convicted for assisting in the illegal export of live reptiles and snakes to Japan. Although the individual was prosecuted for wildlife smuggling, the case was not heard in a corruption court, exposing a gap in how corruption-related offenses are legally addressed (Indonesia National Police, 2018, In: OECD, 2019, p. 79).

More concerning still, involvement in wildlife trafficking is not confined to low-level personnel. High-ranking government officials have also been implicated in facilitating the illegal

⁸ Decree of the Ministry of Forestry 447 of 2003, Tata Usaha Atau Penangkapan Dan Peredaran Tumbuhan Dan Satwa Liar, Article 32(1); 54(a).

movement of wildlife across borders (OECD, 2019, p. 30, 79). Such cases reflect broader, systemic weaknesses in governance and lack of accountability.

Corruption is one of the most significant enablers of wildlife crime in Indonesia (OECD, 2019, p. 30). Corruption risks are particularly acute at major transit points, especially at airports. Multiple schemes have exposed the involvement of customs officers, environmental officials, and police in bribery and smuggling operations (OECD, 2019, p. 30). Private sector actors in sensitive roles, such as airline staff and baggage handlers, are also frequently complicit (OECD, 2019, p. 79). Overall, corruption within customs and other regulatory agencies poses a significant threat to the integrity of the trade chain and facilitates the illegal trade in species such as the Javan slit-faced bat.

Despite the existence of formal regulations, compliance is alarmingly low. Natusch and Lyons (2012, p. 2905) noted that “few actors abide by these laws.” Reflecting this broader pattern, Eaton et al. (2015, p. 8) concluded bluntly that “most wildlife trade in Indonesia is illegal, yet enforcement is almost non-existent.” In light of these systemic enforcement failures and continued exports of Javan slit-faced bats to the United States, it is clear the existing system within Indonesia does not offer effective protection for Javan slit-faced bats, leaving the species highly vulnerable to continued overexploitation. Therefore, additional protections from trade are needed in the United States.

2. U.S. Lacey Act

The Lacey Act prohibits any person from importing or selling any wildlife “taken . . . in violation of any foreign law.” 16 U.S.C. § 3372(a)(2)(A). As described above, commercial collection and sale of Javan slit-faced bats are not permitted under Indonesian law. Yet wild-caught Javan slit-faced bats have been imported into the United States since at least 2016, including in the most recent available trade data from 2024. The Lacey Act, therefore, has not adequately protected Javan slit-faced bats because illegal specimens have entered the United States.

3. Protected Areas

Javan slit-faced bats have been recorded in protected areas in Java, including Pangandaran, Gunung Pangrango, Bogor Botanical Garden, and Purwodadi Botanical Garden (Waldien and Wiantoro, 2021 p. 3). However, Prakarsa et al. (2025 p. 5047) discuss the limitations of Indonesian regulations in protecting cave ecosystems, including that karst formations are typically treated as landscapes rather than ecosystems. They conclude “very few regions have established strong legal frameworks for the protection of karst and cave ecosystems” (Prakarsa et al., 2025 p. 5047). Given these limitations and the continued decline of Javan slit-faced bats in the wild, protected areas are not sufficiently protecting the species.

VII. Conclusion

The Javan slit-faced bat is at risk of extinction and warrants listing under the ESA. It is declining due to habitat loss and collection for the international décor trade. Researchers have

been raising concerns about the hunting and sale of taxidermy bats as souvenirs and decorations for over a decade, particularly given that bats are long-lived, slow to reproduce, and many species are already threatened by habitat loss.

We are in a global extinction crisis with one million species headed toward extinction and millions more declining (IPBES, 2019 p. XVI). Southeast Asia is estimated to lose 23% of bat species by 2100 (Lane et al., 2006 p. 592). Aside from their own intrinsic value, Javan slit-faced bats play an important role within their ecosystem, including helping to control insect populations. Bats are important bioindicators given their sensitivity to anthropogenic threats, and their declines should raise a flag that immediate conservation action is needed. We urgently call on the U.S. Fish and Wildlife Service to designate the Javan slit-faced bat as Endangered under the Endangered Species Act. Delaying action risks irreversible harm to the species and undermines U.S. commitments to global biodiversity conservation.

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Please note that all references will be provided via Box.com.

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APPENDIX I

Table 3. Trade in Javan slit-faced bats for commercial purposes in the Service's Law Enforcement Management Information System (LEMIS) from 2016–2024.

Year	Quantity	Wildlife Description	Exporting Country	Country of Origin	Source
2016	10	Dead animal (whole animal)	TW	ID	Specimens taken from the wild
2016	10	Specimen	TW	ID	Specimens taken from the wild
2017	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2017	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2017	5	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2017	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2017	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2017	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2017	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2017	10	Specimen	ID	ID	Specimens taken from the wild
2017	20	Specimen	ID	ID	Specimens taken from the wild
2018	10	Dead animal (whole animal)	ID	TW	Commercially bred

2018	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2018	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2018	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2018	8	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2018	17	Dead animal (whole animal)	TW	ID	Specimens taken from the wild
2019	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2019	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2019	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2019	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2019	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2019	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2019	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2019	29	Specimen	ID	ID	Specimens taken from the wild
2020	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2020	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild

2020	8	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2020	9	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2020	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2020	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2020	10	Specimen	ID	ID	Specimens taken from the wild
2021	30	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	1	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	30	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	30	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	30	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild

2021	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	1	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	30	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2021	20	Specimen	ID	ID	Specimens taken from the wild
2021	10	Specimen	ID	ID	Specimens taken from the wild
2021	20	Specimen	ID	ID	Specimens taken from the wild
2021	30	Specimen	ID	ID	Specimens taken from the wild
2021	20	Specimen	ID	ID	Specimens taken from the wild
2021	10	Specimen	ID	ID	Specimens taken from the wild
2021	20	Specimen	ID	ID	Specimens taken from the wild
2021	30	Specimen	ID	ID	Specimens taken from the wild
2022	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2022	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild

2022	50	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2022	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2022	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2022	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2022	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2022	20	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2022	50	Skull	ID	ID	Specimens taken from the wild
2023	5	Dead animal (whole animal)	ID	ID	Born in captivity
2023	3	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2023	60	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2023	30	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2023	30	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2023	10	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2023	6	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2024	15	Dead animal (whole animal)	ID	ID	Specimens taken from the wild

2024	7	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2024	15	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2024	7	Dead animal (whole animal)	ID	ID	Specimens taken from the wild
2024	1	Skeleton (substantially whole)	ID	ID	Specimens taken from the wild
2024	1	Skeleton	ID	ID	Specimens taken from the wild

APPENDIX 2

Table 4. Examples of online advertisements for Javan slit-faced bats in the United States in September and October 2026.

[BicBugs](#)

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Nycteris javanica rabbit ears hanging bat Indonesia

Home > Oddities, Taxidermy, & Aquatica > Nycteris javanica rabbit ears hanging bat Indonesia



Nycteris javanica rabbit ears hanging bat Indonesia

\$60.00 – \$70.00

Order Value	Discount
\$100 - \$149	Free shipping
\$150 - \$499	10% + Free shipping
\$500 - \$2499	20% + Free shipping
\$2500+	25% + Free shipping

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Packaged or Framed:

Choose an option

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1

+

+ Add to Cart

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Tags: [rabbit](#), [ears](#), [framed](#), [nycteris](#), [indonesia](#), [black](#), [bat](#), [hanging](#), [javanica](#)

Click on a tag to view more.

25



[Apparel & Accessories](#)

[Animals & Pet Supplies](#)

[Health & Beauty](#)

[Home & Garden](#)

[Electronics](#)



Javan Slit-Faced Bat *Nycteris javanica* Hanging Real Preserved Taxidermy

SKU: BAT-Njavanica-1-Hang

★★★★★ 12 reviews

\$32.00 USD

[View Product in Store](#)

Shipped from by [Bizarre Bugs LLC](#)

Product details



Customer photos & videos



Cranfield's Curiosity Cabinet's Post



Genuine preserved hanging bats. Each mounted to a bar of wood with string, ready to hang up anywhere! They look great hanging from curiosity cabinet shelves; antlers; picture frames; even your rear view mirror!

From left to right -

1. Rousette Fruit Bat (Rousettus leschenaultii)
£60

2. Lesser Short-nosed Fruit Bat
(Cynopterus brachyotis)
£55

3. Javan Slit-faced Bat
(Nycteris javanica)
£50

4. Minute Fruit Bat
(Cynopterus minutus)
£50

UK postage £5

Worldwide postage £15/£25

Send a DM to buy.

Please note, none of these species are protected and have come from pest-control in Indonesia.





HOME ABOUT US WORKSHOP NEW JEWELERY BUTTERFLIES INSECTS MOUNTING MATERIALS
FRAMES & GLASS DOMES SKULLS & SKELETONS SKINS MOUNTED ANIMALS SHELLS WOOD DECORATION
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Nycteris Javanica (bat) hanging

HOME / NYCTERIS JAVANICA (BAT) HANGING



€26,00

Information

Availability: *Out of stock*

Delivery time: 1-5 weeks

Nycteris Javanica (bat) hanging

Approximately 12cm

This is a product from nature, the product delivered may differ from the picture.





EL MEJOR PRECIO!!!



Real bat - New! Nycteris javanica +-23cm!- Taxidermy

37,00 €

Producto Descatalogado - (Imp. Incluidos)

Costes de envío Ver descripción

1

No Disponible

Categoría: TAXIDERMIA | Tags: mecnorrhina torquata poggei, mecnorrhina, taxidermy, insectos-coleccion, entomology | Comentarios

Venta al por mayor / Otros Artrópodos

M : Macho F : Hembra P : Pareja



Bat & Skeleton

Favor inserte cantidad. ↓

Code	Latin-Name
Bat011	Cynopterus brachyotis (Hanging)
Bat012	Cynopterus minutus (Hanging)
Bat013	Eonycteris spelaea (Hanging)
Bat025	Hipposideros bicolor (Hanging)
Bat009	Hipposideros diadema (Hanging)
Bat008	Hipposideros larvatus (Hanging)
Bat066	Hipposideros madurae (Hanging)
Bat063	Kerivoula pellucida (Spread,Wingspan 17~19cm)
Bat070	Kerivoula pellucida (Hanging)
Bat041	Kerivoula picta (Hanging) (Painted bat)
Bat004	Kerivoula picta (Painted bat) (Spread)
Bat128	Macroglossus minimus (Folded)
Bat037	Macroglossus minimus (Hanging)
Bat032	Megaderma spasma (Spread,Wingspan 27cm)
Bat038	Megaderma spasma (Hanging)
Bat030	Miniopterus medius (Hanging)
Bat024	Nycteris javanica (Hanging)
Bat031	Otomops formosus (Hanging) (A2)
Bat047	Otomops formosus (Skull)
Bat129	Pipistrellus imbricatus (Spread,Wingspan ~18cm)
Bat133	Pipistrellus imbricatus (Hanging) (A2)
Bat019	Pipistrellus javanicus (Spread,Wingspan ~18cm)

Insect-Sale.com - Nycteris javanica (Hanging) - Nycteris-javanica-han...

insect-sale.com/es/photo.asp?photo=Nycteris-javanica-hanging

Bat024 Nycteris javanica (Hanging)



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ABA-110a	Kerivoula picta	OFFER Bestseller! Folded, half-open wings - excellent quality	INDO-ASIA	F.	10	pc	9,50 €
ABA-111	Kerivoula picta	OFFER Bestseller! Half-folded, 3/4-open wings - excellent quality	INDO-ASIA	H.F.	5	pc	10,00 €
ABA-111a	Kerivoula picta	OFFER Bestseller! Half-folded, 3/4-open wings - excellent quality	INDO-ASIA	H.F.	10	pc	9,50 €
ABA-112	Kerivoula picta	Hanging, small-medium	INDO-ASIA	H.		pc	sold
ABA-113	Roussetus leschnaulti	OFFER Bestseller! Hanging, super large, just a few -	INDO-ASIA	H.	5	pc	9,00 €
ABA-113a	Roussetus leschnaulti	OFFER Bestseller! Hanging, super large, just a few -	INDO-ASIA	H.	10	pc	8,00 €
ABA-114	Roussetus leschnaulti	OFFER "Folded" - clearance price, won't restock once sold!	INDO-ASIA	F.	2	pc	12,00 €
ABA-115	Scotophilus kuhlii	OFFER SPREAD, A2 - moldy but disinfected/dried, some powder/mold residue, fine for art use. Clearance price!	INDO-ASIA	S.	10	pc	1,50 €
ABA-116	Scotophilus kuhlii	OFFER Hanging, excellent quality	INDO-ASIA	H.	5	pc	4,00 €
ABA-117	Macroglossus minimus	OFFER SPREAD, excellent quality	INDO-ASIA	S.	5	pc	7,00 €
ABA-118	Macroglossus minimus	OFFER Hanging, excellent quality	INDO-ASIA	H.	5	pc	5,00 €
ABA-119	Nycteris javanica	OFFER Hanging, excellent quality giant ear bat	INDO-ASIA	H.	5	pc	7,00 €
ABA-120	Eonycteris spelaea	OFFER Hanging, excellent quality	INDO-ASIA	H.	5	pc	7,00 €
ABA-120a	Eonycteris spelaea	OFFER Hanging, excellent quality	INDO-ASIA	H.	10	pc	6,50 €
SPREAD & FOLDED BAT SKELETONS							
ASK-101	Pipistrellus imbricatus / javanicus	Bestseller! FOLDED bat skeleton	INDO-ASIA	F SK	2	pc	9,75 €
ASK-105	Pipistrellus imbricatus / javanicus	Bestseller! SPREAD bat skeleton	INDO-ASIA	S SK	2	pc	9,75 €
ASK-102	Scotophilus kuhlii	Bestseller! FOLDED bat skeleton	INDO-ASIA	F SK	2	pc	11,00 €
ASK-103	Cynopterus brachyotis	Bestseller! FOLDED bat skeleton	INDO-ASIA	F SK	2	pc	12,00 €
ASK-104	Miniopterus medius	Bestseller! FOLDED bat skeleton	INDO-ASIA	F SK	2	pc	9,75 €
SPREAD HALF BAT SKELETONS		Taxidermy masterpieces!					
ASK-194	Macroglossus minimus	Half bat/half skeleton SPREAD	INDO-ASIA	S HALF	1	pc	22,50 €
ASK-194a	Macroglossus minimus	OFFER Half bat/half skeleton SPREAD	INDO-ASIA	S HALF	5	pc	20,00 €
		NEW!! OFFER Half bat/half skeleton SPREAD, A2 (ex infected with Dermestids, needs					