



CITES SECRETARIAT

Enforcement-needs assessment mission

EGYPT



17–23 November 2007



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Background to the mission

Owing to its geographical location, Egypt has a centuries-long history of being an important trading nation. This tradition has encompassed the processing of its own natural materials but also those from elsewhere. Egypt's seaports (and in modern times airports) have also been important transit locations.

Thus, over the centuries, Egypt's (and particularly Cairo's) craftsmen have become skilled in processing material such as ivory and raw and worked ivory have been readily available in several trading centres in the country. Given this long history and significant trade levels, it is probably not surprising that some traders maintained their activities after the Appendix-I listing of elephants took effect in 1990. Thus, Egypt continued to be a significant trading point for ivory specimens. ETIS (Elephant Trade Information System) reports, together with surveys conducted by individuals and non-governmental organizations, show this to be the case.

In the early 2000s, the authorities in Egypt made a number of highly significant seizures of ivory. These included both raw ivory being smuggled into the country from the Sudan and also raw and worked ivory at manufacturing and retail outlets around the country (especially in Cairo). Several of these enforcement actions received considerable publicity and undoubtedly helped to reduce illegal trade by acting as a deterrent.

However, as is often the case, some determined individuals continued to trade illegally and it seems that others, initially deterred, subsequently re-entered the trade. Consequently, ETIS reports for the 13th and 14th meetings of the Conference of the Parties (Bangkok, 2004 and The Hague, 2007 respectively), as well as another detailed survey in 2005, showed that Egypt continued to be a country of importance with regard to illicit trade in ivory.

Egypt appears to have been also, for many years, both a destination and transit point for illicit trade in great apes, mainly gorillas and chimpanzees. There have been several significant incidents and certain individuals have been identified as being involved in such activities. However, none of them has been prosecuted or sentenced.

Egypt's response to such trade has come into question. Two incidents attracted considerable attention. In the first, a number of primates were seized and the authorities decided that the appropriate means of disposal of the animals was euthanasia. However the means adopted to achieve this was to drown the primates in a vat of chemicals. In the second incident, an illegal shipment of primates was detected but, rather than seize the animals, they were ordered to be returned to the country from which they had come (although it was questionable whether it was truly their country of origin) but it appeared that no effort was made to alert the authorities in that country that Egypt had refused import. As it happened, the animals were discovered by chance en route in a subsequent transit country, where they were then confiscated.

The Secretariat had considerable communication with the CITES Management Authority of Egypt regarding illicit trade matters during the early 2000s but many issues remained unclear or unresolved. The Standing Committee had also been made aware of the Secretariat's concerns, as had the Permanent Mission of Egypt to the United Nations and other international organizations in Geneva. Egypt's implementation of the Convention was discussed at the 53rd and 54th meetings of the Standing Committee (Geneva, June-July 2005 and Geneva, October 2006), when it was agreed that the Secretariat should report further at the 14th meeting of the Conference of the Parties (The Hague, 2007) (CoP14).

During CoP14 the Secretariat had discussions with diplomatic and CITES officials of Egypt and the Secretariat was invited to conduct an enforcement-needs assessment mission. The Conference of the Parties noted that this would be undertaken.

Conduct of the mission

A mission to Egypt was undertaken between 17 and 23 November 2007. During its visit, the Secretariat met with many officials engaged in the implementation of the Convention and a half-day seminar was held in Cairo where the Secretariat made presentations regarding CITES and illicit trade in wildlife. Representatives of a wide range of agencies attended this event.

The Secretariat visited the animal health office at Cairo International Airport that is the designated port of Egypt for CITES-related trade and the neighbouring quarantine offices. It also visited Giza Zoo.

Surveys were conducted of markets and other outlets where it was thought illicit trade might be taking place. Some of this work was conducted in the presence of local officials but unaccompanied visits were also made by the Secretariat.

The wildlife museum of Cairo was visited, where a number of confiscated wildlife specimens are on display as part of efforts to raise awareness of the Convention and Egypt's wildlife legislation. The Secretariat was shown the extensive quantities of confiscated specimens, particularly ivory, that are stored away from public view.

A journey was also made to the resort town of Sharm El Sheikh on the Red Sea, as it had been alleged that primates of illegal origin were on display to the public at different locations there. Whilst there, the Secretariat met with individuals who were alleged to have engaged in illegal trade or to have taken possession of illegal-origin specimens in questionable circumstances.

It is of particular significance that, during the mission the Secretariat was able to interact directly for the first time with the primary agency responsible for domestic law enforcement, the Environment Police, and its chief officer who is a General of the Police of Egypt.

The Secretariat wishes to express its appreciation to the many government officials who assisted in the logistics of the mission and for the frank exchanges that were held with those persons but also to the private individuals with whom it met.

The Secretariat also wishes to record its thanks to the Government of Hong Kong S.A.R., China, which regularly provides funds for enforcement-related activities by the Secretariat, and it was part of such funds that paid for this mission.

Introductory remarks

Egypt has been a Party to the Convention since 1978. In 1999, it introduced, with the drafting assistance of the CITES Secretariat, legislation to implement the Convention. This takes the form of a Ministerial Decree.

It is a violation of the Decree to possess, offer or display for sale, import, export or re-export or introduce from the sea any specimen of a CITES-listed species contrary to the provisions of the Decree. In practical terms, the Secretariat understands that persons in possession of a specimen would be expected to demonstrate either:

- a) legal ownership (which would relate primarily to pre-Convention specimens); or
- b) proof of legal importation (which might again involve pre-Convention specimens but which would primarily mean showing compliance with CITES via relevant permits or certificates).

The Decree also makes clear that confiscation is expected in the case of violations.

Egypt has, consequently, a firm legal basis upon which to control trade in and possession of CITES-listed species. Indeed, its ability to deal with possession of specimens is much clearer than many other countries. The legislation of many countries does not address personal possession or, if it does, tends to restrict any controls to Appendix-I specimens only. Egypt's controls apply to all three Appendices of the Convention.

The Government of Egypt, at present, authorizes very little trade in wildlife. Whilst this seems to be mainly a matter of policy, it also seems to result partly from a lack of clarity as to how such trade could be sustainably managed. It became clear during the mission that extensive capacity-building and awareness-raising are required in a range of agencies and at all levels.

For example, it appears that some agencies might wish to sanction trade in some of Egypt's natural resources but are unsure of how to make non-detriment findings and it is not clear whether such capacity exists in the two Scientific Authorities designated by Egypt. Some officials acknowledged that the present situation, where almost no trade in specimens from wild populations is allowed, may result in persons resorting to illicit trade. They also believe that some of Egypt's wildlife, such as reptiles, are smuggled to nearby countries from which they enter into international trade accompanied by CITES documents that have been obtained either corruptly or through fraudulent applications.

There are wildlife traders based in Egypt and their activities are authorized by the CITES authorities but these are restricted to re-exports. It is suspected by some officials that some of this trade may also involve false declarations as to the origin of specimens.

Several officials expressed concern regarding conflict cases between crocodiles and humans in Egypt and said that there were large numbers of such animals in some locations. Some officials expressed a desire to explore ways in which crocodiles might be treated as a sustainably exploitable resource. Reference was also made to ranching crocodiles, breeding them in captivity or transferring Egypt's crocodile populations to Appendix II.

It struck the Secretariat that decision-making processes in Egypt are currently seriously hampered by a lack of knowledge of the provisions of the Convention and the many Resolutions that would be relevant when considering wildlife trade policies. Egypt, however, is certainly not alone in this.

The Secretariat learned that the last CITES-related training to have been conducted in Egypt took place in the late 1990s and was sponsored by the British Council. Relatively few of the persons trained at that time remain active in CITES implementation.

General implementation and enforcement issues

Administration and implementation of the Convention lie primarily in the hands of officials of the Ministry of Agriculture and Land Reclamation. In practice, the majority of those engaged in day-to-day CITES issues are veterinary surgeons.

At the policy and strategy level, Egypt has formed a 'CITES Standing Committee', which brings together officials from the Ministry referred to above and other relevant bodies, such as the Ministry of State for Environmental Affairs, the national parks authority, Customs and police.

Practical implementation of the Convention is very much centred on the animal health office at Cairo International Airport, where veterinary officers are available on a 24-hour basis. Any specimens of CITES-listed species to be imported, exported or re-exported from Egypt are meant to be presented to this office for clearance. Consequently, it is officials based there that have tended to be trained in CITES matters. Although other border control officials, such as Customs officers, may have some awareness of the Convention, it seems that no direct role in its implementation has been given to them.

Given the importance of some of Egypt's other ports, such as the seaport of Alexandria, the Secretariat found it surprising that one single airport had been designated as the sole entry and exit point for wildlife trade. Additionally, whilst veterinary officers may very well be the type of officials whose training and background would equip them to administer CITES, it must be questionable whether they are best suited for combating, detecting or responding to illegal trade.

For example, when a case of smuggling of a live animal is detected, the involvement of a veterinary surgeon or quarantine officer is unquestionably important. So too, however, is an experienced law enforcement officer who is suitably trained and experienced in the gathering of evidence, questioning of witnesses and suspects, who has the authority to make arrests and who knows, if the need arises, how to speedily arrange actions by other relevant agencies (in-country and abroad).

It seems, according to the accounts of some previous incidents, that inter-agency liaison appears to have been absent in Egypt on occasions. Instead, veterinary and quarantine officials would seem to have found themselves called upon to make quickly law enforcement-related decisions for which they must have had little training or experience. The administrative structure is such that they would also have found themselves referring to a chain of command where senior officials had no more law enforcement experience than they did.

To a lesser extent, the same seems to have been true of domestic trade controls. Although there appears to be a good working relationship between officials of the CITES Management Authority and the Environment Police, it is unclear whether this has been as well coordinated as it might have been. For instance, it seems that CITES officials have not always passed relevant information to the Police, such as CITES Alerts or details of previous surveys of the ivory trade. Additionally, it appears that CITES officials have, on occasions, determined the response to illicit trade matters that were probably more properly issues for the Police. Although Egypt has participated in meetings of the Interpol Wildlife Crime Working Group for several years, it has been represented by a CITES official and not a police officer. Further, the Environment Police had apparently not been advised of the participation.

As a result, the Environment Police appears not to have been adequately briefed or equipped to play its full role in combating illegal trade. Yet, the Secretariat found the Environment Police to be ready and willing to engage in wildlife law enforcement activities and it provided many examples of work that it has conducted. None of this had previously been communicated to the Secretariat. If it is provided with additional information regarding the Convention and supplied with appropriate intelligence, the Environment Police is well-placed to have a significant impact upon illicit trade. Officers of the Environment Police are based throughout the country and its criminal investigation staff can travel anywhere in Egypt in response to environmental and wildlife crime.

The Police mentioned to the Secretariat one difficulty they have faced in relation to their work and that is the reluctance on the part of some judges to issue warrants to enable searches of premises (commercial and domestic) where specimens of illegal origin are suspected to be. This does not seem to result from any lack of a legislative basis for issuing such warrants but rather from a lack of appreciation among some parts of the judiciary of the seriousness of wildlife crime. Egypt has recently introduced specialized courts to deal with environmental crime cases and it is expected that this move will increase awareness. The Chief of the Environment Police has also raised this issue with the Minister of the Interior.

Illicit trade in ivory

The trading in and carving of ivory in Egypt has historically been centred around the market called the Khan el Khalili souk in Cairo. This souk was visited by the Secretariat and a relatively brief tour of the area quickly revealed many carved ivory objects on sale. In none of the shops where carved ivory was seen did this appear to be a significant part of the business, however. It was also noted that there were even more ivory-like objects that were in fact made from bone, plastic or other materials. Some merchants were fraudulently declaring camel bone products as ivory.

Six high-quality hotels were surveyed in Cairo. In four of these no ivory was found. In one of the four, a shop owner told the Secretariat that selling ivory was illegal. In the fifth shop, many ivory carvings were on display in a glass case behind the shop counter. Consequently, they were not readily accessible and, upon inspection, it seemed they were seldom removed from the case and, thus, it appeared that little trade was taking place.

In the sixth shop, genuine ivory carvings, individually wrapped, were kept in a cupboard behind the shop counter and were only produced after considerable conversation between the Secretariat and the shop owner (who spent considerably more time and effort trying to convince the staff member to buy what he falsely claimed were ivory products).

The Secretariat was able to survey a very few tourist souvenir shops in Sharm El Sheikh and also some airport shops. Ivory was not found in any of these.

Within twenty-four hours of the Secretariat's visit to Khan el Khalili, the Environment Police had seized much of the ivory seen the previous day. Details of the sightings in the hotels were also passed to the Police and raids were subsequently conducted, which led to over 150 items being seized in total from the two hotels.

It was clear that illicit trade in ivory continues in Cairo. It also seems, however, that it could be substantially reduced, or even eradicated, with further enforcement actions. Such activities have had considerable impact in the past and presumably could do so again. The Secretariat noted, however, that there seems to be little experience among officials (CITES or Police) in relation to distinguishing elephant ivory from other ivory-like materials. Indeed, it was seen that a camel-bone carving had been inadvertently seized by the Police during their raids in Khan el Khalili. It would perhaps be prudent, therefore, for training to be provided on this issue before further work takes place. The Secretariat provided the CITES officials in Cairo with ivory identification training materials.

Distinguishing elephant ivory from substitutes or look-alikes can be difficult. Indeed, identification (especially of small objects) can sometimes be next to impossible in a shop and yet it is in shops or the dark alleyways and stalls of markets that most enforcement work has to be undertaken. It is, therefore, understandable why relatively few enforcement agencies engage in self-initiated work against illicit ivory trade and few officers in consumer countries have ready access to the training needed to equip them for such work.

Illicit trade in primates

The Secretariat heard, both prior to and during its mission, various explanations as to why Egypt has come to be so closely linked to illicit trade in primates. One person spoken to in Sharm El Sheikh was adamant that there is no demand in Egypt but that it is simply a transit country and the true customers can be found in the Gulf States. Given that the person who said this to the Secretariat possesses several chimpanzees, his version seemed somewhat questionable.

Some researchers claim that the demand is partly due to a particular medical practitioner who wishes the animals for experimentation or for organ transplants. There is certainly evidence that demonstrates this doctor's involvement in the trade but there is also evidence to illustrate that animals he has been associated with remain alive and with their organs intact.

The basic reason for illicit trade is that there are persons living in Egypt who wish to possess specimens of great ape species, especially chimpanzees and, to a lesser extent, gorillas. There is evidence and intelligence showing that the medical practitioner referred to above, together with female members of a family with homes in Egypt and Nigeria (and passports issued by both countries), have engaged, over many years, in illicit trade in primates. Such trade appears to have involved customers in Egypt but also elsewhere.

Considerable concern has been expressed by the NGO community over an apparent lack of action against these individuals, who appeared to be determined smugglers and illegal traders. The CITES Secretariat has previously expressed to the authorities in Egypt its view that there appear to have been missed opportunities with regard to bringing these persons before the courts. Many of the illicit shipments destined for Egypt began in Nigeria, although the country of origin of most of the primates seems likely to have been a neighbouring country. Nigeria's ability to implement the Convention has been very limited in recent years and the country is currently subject to a trade suspension recommendation by the Standing Committee.

With regard to action in Egypt, the Secretariat discussed this matter with the Environment Police and was reassured by the measures taken with a view to preventing or intercepting any repeated smuggling or illegal trade by the persons mentioned above. It would not be appropriate to make these measures public.

The Environment Police now appears to be taking the lead in relation to combating illicit trade in primates and has engaged in recent months in at least one 'sting' operation, which led to the seizure of a young chimpanzee.

Alongside concerns regarding the levels of illicit trade, and as mentioned in the background section of this report, several organizations and individuals have expressed disquiet regarding how seized and confiscated primates are dealt with. This matter was given particular attention during the mission.

Rescue centres

Egypt, like most CITES Parties, has no purpose-built government-owned rescue centre for confiscated live specimens. Neither does it have a specific budget to pay other bodies for the housing and care of such animals. Consequently, it has to seek the cooperation of suitable facilities in voluntarily accepting animals on a long-term (and probably mostly permanent) basis.

The main facility to which the CITES authorities in Egypt have historically turned for support has been the government-owned Giza Zoo, situated in a suburb of Cairo. This institution has existed for over 100 years and has very extensive grounds. It is, however, old-fashioned in concept as a zoo, with most species being housed in cages with adjoining 'exercise' areas. Relatively few species have compounds that replicate their natural environments and it seems likely that the zoo might be criticized for failing to provide adequate behavioural enrichment for its specimens.

It is not the role of the Secretariat to assess rescue centres and it made no attempt to assess Giza Zoo. It is aware, however, that Giza Zoo was expelled from membership of the World Association of Zoos and Aquariums several years ago. A new director of the zoo has since been appointed and the Secretariat noted his intent to improve the facilities. It also noted that several million people visit the zoo annually and, whilst the entry fees are very low, this nonetheless produces considerable revenue. However, this revenue apparently goes to central government coffers and very little is returned to the institution. The zoo clearly needs to retain more of its revenue if the facilities are to be improved. If the government is unwilling to release funds, then an alternative might be to raise entry fees and allow the zoo management to retain the additional income that would result. The entry fees are currently so low that any reasonable rise seems unlikely to deter visitors and the sheer number of visitors means that even a small rise would bring considerably more revenue.

The Secretariat saw two young chimpanzees in the zoo, including the one that had been confiscated in the recent Police operation. The zoo director, and his management colleagues, expressed regret at their limited ability to provide a better environment for these animals. The zoo director, CITES authorities and the Environment Police are apparently all calling for the creation of a suitable rescue and long-term care centre for confiscated animals.

The Secretariat, previously and during the mission, has suggested to the CITES Management Authority of Egypt that it might consider placing confiscated primates in the sanctuaries that exist for such animals elsewhere in the world, especially in great-ape range States in Africa. It is aware that non-governmental organizations have also encouraged Egypt to use this option and that offers of support, both technical and financial, have been made to Egypt.

It was clear throughout discussions during the mission that the authorities of Egypt do not wish to use such an option. If the true country of origin of an animal could be determined, the authorities would consider repatriation. Otherwise, they believe it is their right under the provisions of the Convention, as the State of confiscation, to determine disposal.

The ability of Giza Zoo to provide long-term care for confiscated animals being very restricted, the authorities in Egypt have turned elsewhere, to private zoos and to individuals with private collections of animals. The authorities acknowledge that there are currently no standard policy or regulations governing what type of facility can operate as a 'zoo' or 'private animal collection'. They also acknowledge that this subject needs to be addressed.

Consequently, the possession by individuals of exotic species and the placement of confiscated animals in rescue centres appears to have been decided on a case-by-case basis. This seems to have led, on occasions, to persons who were found in possession of animals of questionable legal origin being allowed to retain them and to the premises owned by such persons being designated as a rescue centre.

Whilst, on the face of it, this might seem a questionable action, the Secretariat was assured that, in such cases, this was only done where the authorities were satisfied that the person in question had not been involved in the illegal importation of the specimen, that he or she was a suitable person (in respect of animal welfare issues but also financial status) to provide long-term care for the animal or animals and that he or she had adequate facilities to house the specimens.

The Secretariat visited one particular set of premises in the Sharm El Sheikh area, which had been described by a documentary-maker journalist as a private animal collection located next to a tourist hotel. At the time of the Secretariat's visit, the animals (including chimpanzees and gorillas) were located in an extensive compound situated some distance from the hotels and resort complexes that the owner of the animals operates. The compound was not accessible to the public.

The facility, whilst certainly a private collection in some sense, is also being operated as a captive-breeding project for a number of species whose wild populations in Egypt have decreased in recent years. This included, for example, tortoises, some antelopes and several species of birds. Various government agencies appear to cooperate in the captive-breeding projects and government veterinary officers regularly visit the premises. There has been no commercial trade in specimens from the facility. Some captive-breeding has been so successful that it is apparently intended that re-introduction projects be started.

Although the great apes were being housed in relatively large compounds, there seemed to be a lack of stimulation for the animals. Similarly, it did not appear that any expert guidance had been sought in relation to their long-term care from persons or organizations experienced in such matters.

General observations – designation and management of rescue centres

Some individuals, whose facilities have been treated or designated as rescue centres, appear to have been in possession of a range of species, of varying numbers, over many years. As reported above, the circumstances leading to designation have varied greatly, as has the manner in which individuals first came to possess specimens. Some of the individuals concerned appear to be persons of considerable standing in society or are very wealthy (or both). This, together with a lack of transparency in relation to the designation of rescue centres, has created a situation where both the owners of centres and government officials are open to allegations of impropriety. It can be difficult to find evidence to prove such allegations but, equally, it can be just as difficult to find evidence to disprove them.

There seems to have been various levels of engagement with the authorities. Some persons made no effort to report their possession of animals of questionable legal origin (albeit perhaps not actively concealing it) but others did. One individual the Secretariat spoke to claimed to have kept the authorities informed but deliberately postponed doing so until he had taken possession of the animals. He said that when he became aware of chimpanzees that were available, he provided no advance notice of his intention to acquire them. He claimed to have done so, not in an effort to avoid being prevented from acquiring them, but to prevent the authorities having the chance to employ euthanasia on the animals.

Whether any of the owners of facilities that have been designated as rescue centres were actually involved in illegal imports, some paid for animals and, thus, albeit perhaps with good intentions, contributed to an illicit trade. They also helped fuel the impression that Egypt provided a ready market for great apes.

The Secretariat welcomes the recent investigations and confiscations by the Environment Police in relation to illicit trade in great apes. Such activities should make clear that such trade will not be tolerated by the authorities. The Secretariat also understands that a prosecution has started against an individual who acted as a 'middleman' in the domestic great ape trade in Egypt but that this case has been ongoing for over two years.

It remains, however, for a formal policy relating to rescue centres and the disposal of confiscated live specimens to be determined and the Secretariat had lengthy discussions with officials regarding this subject. It appears that repatriation, or re-exports to sanctuaries or rescue centres outside Egypt, are unlikely to become the disposal policies of the authorities. That being the case, it is essential that in-country provision of appropriate long-term care is made available and the recommendations section of this report addresses such matters.

General observations – implementation and enforcement

Whilst Egypt has established a committee to oversee implementation of the Convention, it appears that in recent years much of the decision-making has been left to a very few individuals and perhaps sometimes to only one. Knowledge of the Convention has also been restricted to relatively few individuals and their depth of knowledge has perhaps been limited. This is apparent to the Secretariat not only as a result of this mission but also through its interactions with the Management Authority of Egypt in recent years. This is a scenario that the Secretariat has encountered in several other Parties and it is one that, not surprisingly, can lead to difficulties.

It is all too easy for one, or just a few, individuals to: misinterpret, deliberately or innocently, the requirements of the Convention or Resolutions; to be pressured to act in a certain way; to be corrupted; or to quite simply make errors.

The Secretariat believes there is little to be accomplished by focusing on what happened previously in Egypt. It was impressed during the mission by the level of enthusiasm and apparent commitment and determination shown by officials that CITES should be implemented fully and effectively in future.

Recommendations

The Secretariat is conscious that some of the following recommendations may go further than what might usually be suggested or needed in relation to, for example, rescue centres. Similarly, the Secretariat does not commonly make specific recommendations with regard to the possession of specimens by individuals. However, given the particular circumstances and illicit trade history in Egypt, it believes it is appropriate to do this. Also, it is conscious that Egypt's national legislation appears very suited to cope with such matters.

1. Widespread capacity-building and awareness-raising requires to be undertaken throughout all agencies that have a role to play in implementing CITES in Egypt. This should particularly include Management and Scientific Authority staff, veterinary surgeons and quarantine officers stationed at ports, Customs and Environment Police. It is essential that there be sufficient personnel at every sea and air port of Egypt with knowledge of the Convention and at land borders too. Consideration should also be given to including (at least for part of any training) airport security personnel, airline staff and other relevant persons. A train-the-trainer module should be included, so that knowledge gained can be disseminated widely. Consideration should be given to holding part of the training at a Customs college or Police academy, to promote inter-agency cooperation and communication.
2. At the conclusion of initial capacity-building, which it is expected will be conducted by the CITES Secretariat, the committee responsible for overseeing CITES matters in Egypt should undertake a complete review of the implementation of the Convention and determine whether changes are necessary. Egypt should not hesitate to call upon the Secretariat or other relevant bodies for technical advice or assistance during such a review, which it is presumed will include wildlife trade policies.
3. The review referred to above should include consideration of whether it is appropriate, and practical, for Egypt to have only one designated port at which CITES trade can enter and leave the country.
4. Guidelines should be prepared on the action to be taken by staff at ports or land border crossings when illicit movements of specimens of CITES-listed species are detected. These should be distributed to all ports and border crossing points. The guidelines should incorporate such matters as advice relating to the detention or seizure of live specimens, the detention or arrest of suspects and the subsequent investigation. The three primary agencies, CITES Management Authority, Customs and Environment Police, should nominate persons of a supervisory level that can be contacted on a

24-hour basis for advice. In responding to the discovery of an attempted illegal export, import, re-export or transit, it is preferable that the discovering agency does not reach a decision solely on its own but that it should consult with at least one of its partner agencies.

5. Enforcement agencies in Egypt should consider the use of controlled deliveries as an investigative tool, both internationally and in-country. (Detailed advice on this subject will soon be published by the CITES Secretariat and Interpol.)
6. The CITES or enforcement authorities are encouraged to communicate with the judiciary of Egypt to raise their awareness of the instances of significant illicit trade that have affected the country and which deserve an appropriate response from prosecutors and courts.
7. Egypt should maintain its participation in the Interpol Wildlife Crime Working Group but its representative should preferably be a police officer.
8. Egypt's offer to translate into Arabic a presentation on the identification of ivory, supplied by the Secretariat, is welcomed. Following translation, printed versions of the guidance should be distributed to all relevant enforcement agencies.
9. A public education campaign (in Arabic and English) should be conducted to raise awareness of CITES and Egypt's domestic legislation. This might include leaflets to be distributed at hotels, tourist locations, tour operators, markets, etc. Posters could be used at markets, ports and land border crossings. Particular attention should be given to illicit trade in great apes and ivory. Egypt has already engaged in similar campaigns in relation to coral at Red Sea locations. A new campaign need not necessarily be at the government's expense, as the Secretariat believes it should be possible to attract sponsorship by local companies or organizations.
10. Shortly after the campaign referred to above has been conducted, surveys should be conducted of locations where illicit wildlife trade may occur and appropriate enforcement action should be taken in the case of non-compliance.
11. All seizures of ivory should be reported to the Elephant Trade Information System (ETIS). All illicit trade involving specimens of Appendix-I species should be reported on Ecomessages to the Secretariat and Interpol.
12. The relevant authorities of Egypt should establish a national policy in relation to zoos (whether formal institutions or private), private collections of exotic species and rescue centres. Such places should require to be licensed, subject to regular inspections and liable to confiscation of specimens should standards of husbandry, etc. not be appropriate. No rescue centre should be of a primarily commercial nature and no illegal-origin Appendix-I animals in a rescue centre or private collection should engage in any form of public performance or direct interaction with the public. In the case of any animal that is not indigenous to Egypt, advice should be sought from relevant experts as to long-term care, behavioural enrichment, etc. Placement of seized and confiscated specimens in rescue centres or private collections should only take place where the facility is demonstrably engaged in work of conservation benefit to wildlife generally or to specific species. There should be a presumption against placing animals in a private collection where this will simply add to the number or variety of the animals kept by an individual.
13. The authorities in Egypt are encouraged to continue their consideration of establishing a new government-controlled rescue centre or of renovating existing facilities at Giza Zoo.
14. In future, any confiscated Appendix-I animal placed in a rescue centre should remain the property of the government and this should be made clear in writing at the time of placement. The status of all illegal-origin, seized or confiscated Appendix-I animals currently held by zoos, rescue centres or private individuals in Egypt should be reviewed. Where no formal transfer of ownership has taken place, the holder should be notified in writing that the animal remains the property of the Government of Egypt.

15. All Appendix-I live animals in Egypt should be registered with the CITES Management Authority and records should indicate their origin, legal status, owner, possessor and their location. Any changes in ownership, possession or location should be notified to the authorities. Any deaths or births should be similarly notified. Such animals should be subject to regular inspections, preferably of an unannounced nature.
16. All Appendix-I live animals should be microchipped. Blood samples should also be taken from these animals, to enable DNA profiling if necessary. For example, profiling might become appropriate to verify claims of captive-breeding. To save costs, it may not be necessary to undertake DNA profiling of all animals immediately and blood or other suitable samples can simply be stored.
17. No Appendix-I animal should be exported or re-exported commercially from Egypt unless it is of a legal origin and was imported in compliance with CITES or was removed from the wild in Egypt in compliance with the Convention.

Final remarks

The Secretariat is aware that the authorities in Egypt had, before the end of its mission, already started to discuss how control of 'rescue centres' might be handled in future and that some form of a board of trustees for at least one facility was being considered. It has, therefore, avoided being too prescriptive in its recommendations on this issue. Instead, it believes the recommendations made should enable effective control and reduce the opportunities for the deliberate acquisition by individuals of specimens of illegal origin or the laundering of such specimens.

The Secretariat believes that most of the above recommendations can be implemented in the not-too-distant future. It will, therefore, report upon their implementation at the 57th meeting of the Standing Committee, scheduled for 14-18 July 2008. Capacity-building aside, there should not be major financial implications in most of the recommendations.

The Secretariat is very willing to help start the capacity-building process but it does not have the budget to employ interpreters or cover the travel and accommodation costs that it would need initially. Consequently, it will welcome donor support for this activity. The Secretariat has training materials available in Arabic but does not have staff that are sufficiently fluent to provide training without interpretation. Egypt has been asked to identify any additional costs that its Government would not be able to cover in relation to initial training and capacity-building matters.