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

Seventy-eighth meeting of the Standing Committee
Geneva (Switzerland), 3 - 8 February 2025

Additional information from Egypt concerning trade in *Testudo kleinmanni* in regard to Resolution Conf 17.7 on *Review of animal specimens reported as produced in captivity*

1. This document has been submitted by Egypt in relation to agenda item 35.1.*

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

Dear Colleagues

Greetings from the Egyptian management authority

We thank you for the Animals Committee has reviewed trade in *Testudo kleinmanni* from Egypt,

We have reviewed SC78 Doc. 35.1 and are pleased to provide you with the clarifications contained in the document

1-Parts of the NDF seem copy-paste of various sources without a clear structure and seem heavily based on a review of the literature, including European hobbyist literature, rather than the biology of the species in nature, or the realities of captive production in-country.

- It is natural to rely on different sources and multiple examples and to make use of Egyptian research on the biology of species in nature and the results of what is available in the markets, its source and import, and the attached references for that(.2019-2021) Knowing that there is a shortage of financial resources for this research recently

2- The pictures provided by Egypt show husbandry conditions that are not considered most appropriate for the species. Information in the text is in direct contradiction with the evidence in the pictures (example: "Do not feed the tortoises too much or too little and always feed the tortoises a varied high-fiber, low protein vegetable diet."; photo: food dishes of peas and carrots, which are low fiber, high sugar, high protein). Due to the water basin visible in one enclosure, there is a risk of drowning for the animals; there are usually no open water areas in the species' natural habitat. Egypt presented an individual marking with epoxy, which has been found suitable in other turtle species if combined with logbook keeping/ a database, noting that these markings can be scraped off. However, it is an important first step to address illegal trade that is apparently still taking place nationally and internationally and should be endorsed.

-These dishes of peas and carrots, which contain low fiber, high sugars and high proteins, are only special additions to the main meal rich in fiber, especially during the breeding season, knowing that this type of turtle is raised in homes., the water basins are not deep It is for drinking Egypt has introduced epoxy marks which are registered in farm records and approved by inspection committees.

3- Besides anecdotal records from the 80s, 90s and 2000, recent distribution records are lacking. Egypt states that "The only "evidence" obtained that some population or small individuals may still exist is based entirely on oral contacts with local Bedouins." By the end of 1990, the Egyptian tortoise appeared to be ecologically and physically extinct in Egypt, but in 2000 a small population of the Egyptian tortoise was found in northern Sinai (in the Zaranik Protected Area) at a density of about four to five tortoises per square kilometre. Due to the species being still offered in commercial and pet markets, it is assumed to be still present, or being largely illegally imported from Libya by Bedouins. Egypt also noted that the Libyan population might likely also vanish. Maintenance and control on legislation in these countries is very poor according to Egypt. Egypt concluded that trade from the wild should be stopped, also the trade flow from Libya to Egypt, awareness should be raised, the species should be at forefront of Egyptian natural history conservation agenda and captive-breeding under supervision of the administrative body and scientific committees should be promoted.

- There are official records from the Ministry of Environment in the eighties, nineties and 2000, as well as a 2019 study from EAZA Reptile Taxon Advisory Group on distribution. These records were relied upon in addition to relying on oral communications with local Bedouins, displays in commercial markets, pet markets and confiscations, with the promotion of breeding in captivity under the supervision of the administrative body and scientific committee.

We have conducted training courses on the Egyptian borders for workers in this field to raise awareness, in cooperation with the IFAW organization

4- The link between the farm's parental stock establishment and the sustainable extraction from the wild is lacking, nor the origin of parental stock in each farm.

Facility 1 September 2009

Numbers of initial stock, and sexes

Total source	Total male	Total female
40	16	24

Facility 2 September 2007

Numbers of initial stock, and sexes,

Total source	Total male	Total female
50	22	28

Executive Regulations of Environmental Law No. 9 of 2009, in Clause Two, Reptiles, the numbers specified for breeding and propagation are determined, provided that the numbers do not exceed 25 pairs at the beginning of the propagation programs.

5- In terms of the establishment of breeding operations, Egypt stated that it is prohibited to remove Egyptian tortoise specimens from the wild, but that the authority to establish a breeding operation for Egyptian tortoises and to catch the initial breeding stock is issued by the Management Authority. Information on how it was determined that the breeding stock used for the facilities was established in a manner nonde trimental to the survival of the species in the wild was not provided (as requested per C5).

- Egypt is prohibited to remove Egyptian tortoise specimens from the wild except for breeding and propagation Samples were obtained in accordance with Egyptian Environmental Law No. 4 of 1994 and Executive Regulations of Environmental Law No. 9 of 2009, in Clause Two, Reptiles, the numbers specified for breeding and propagation are determined, provided that the numbers do not exceed 25 pairs at the beginning of the propagation programs. and this does not harm the survival of the species, as after the success of the propagation programs, it is possible to return twice what was taken from the wild.

6- Some concerns about the inspection process include the following: o 'Facility Staff accompanying the inspection' are the same two names for both facilities; the facilities are stated to have a single location, so they must be separate. Are they nevertheless sharing staff, or is this a mis-interpretation and are these two persons wildlife inspectors/advisors to the inspector? In either case, it's interesting that the named veterinarian accompanying the inspection is also the veterinarian named as supervising both facilities.

These people work as supervisors on the farm on behalf of the farm owner and do not work for the government or as part of any inspection team. They supervise the two farms as private doctors on two separate farms, each farm in a different place.

7- Most recent exports from both facilities were reportedly using source code' C', without clearly documenting F2 production.

.Wild-caught: CITES source code W

F1 generation (CITES source code F): Produced in a controlled environment: one or both parents conceived in or taken from the wild. Does not meet CITES' definition of "bred in captivity".

F2 generation (CITES source code C): Both parents produced in a controlled environment. Meets CITES' definition of "bred in captivity".

- There are certified records for the first and second generations, as well as a record of the aforementioned marks indicating birth and whether it is the first or second generation .

8- Legal acquisition of founder stock in 2007 and 2009 is not documented with collecting permits, invoices or other Legal Acquisition documentation.

-Samples were obtained in accordance with Egyptian Environmental Law No. 4 of 1994 and Executive Regulations of Environmental Law No. 9 of 2009, in Clause Two, Reptiles, the numbers specified for breeding and propagation are determined, provided that the numbers do not exceed 25 pairs at the beginning of the propagation programs

9- It is indicated that extractions from the wild are allowed only to form parental stock, but it is not indicated if in the 2 farms these were taken from the wild or acquired from other centres, or, according to the information in AC33 doc. 15.2, if they were seized. It is important to clarify

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10-One facility: Based on known reproductive capacity, a founder stock of 24 adult females should, under optimal conditions, have been able to reproduce to a current holding of 212 females over 15 years, though the past year's production of 109 hatchlings from 212 mature

females (potential 4 eggs/female/year) suggests the animals are producing far below maximum capacity

--The founding stock of 24 adult females, capable of breeding to a current holding of 212 females over 15 years. though the past year's production of 109 hatchlings from 212 mature females This quantity is the production of the first and second generations after deducting the mortality rate and export. It is worth noting that the Egyptian tortoise matures at an age of 5-7 year and the female lays between 1-5 eggs per year.

11- One facility: the number of adult females (295) is larger than the total reported adult breeding stock (213). 421 juveniles from 295 females.

--ADULT BREEDING STOCK 213 xxx This is a typo in front of the title.

Number of adults present? 569

Number of males present? 274

Number of females? 295

What % of females breed each year
51%

---- REARING STOCK (CAPTIVE BRED)

Number of juveniles present? 421

Age at sexual maturity (years)? 6-8 years

Size or mass at sexual maturity (cm or g)? 10 : 12 cm

Size at sale (cm or g) 3-5

the number of adult females (295) from the total reported adult breeding stock (569).

12- Egypt did not provide the age of animals exported as requested by the AC but the size of animals sold is provided (3-5 cm).

Age at export does not exceed one year--

We hope that the Scientific Committee and the Standing Committee will take into account the additional information that addresses the concerns of the Animals Committee, and we hope that the Standing Committee will consider removing *Testudo kleinmanni* / Egypt from review in SC78.

Kindest regards,

Egyptian Management Authority