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# THE CAIRO CONNECTION

## PART II

– APE TRAFFICKING –



Enforcement missions by CITES

Part of the solution or part of the problem?

Karl Ammann & Pax Animalis

August 2011

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In 2001 the CITES Secretariat got for the first time involved in the ape trafficking issue in and out of Egypt when a deplorable case came to light. The Secretary-General took the unusual step to respond with two press releases (below).

Today 10 years later we would like to evaluate what progress has been made in the context of Egypt and CITES compliance and enforcement.

This is what this report is all about.

#### Statement on the Cairo seizure of primates<sup>1</sup>

The Convention is an agreement between nations on how to regulate trade in certain wild animals and plants in ways that do not threaten the survival of these species. These ways involve common procedures and safeguards, and these are supported by advice and instructions from the member countries (known as CITES Parties). CITES Parties can, and do, develop the many measures, provisions, instructions and advice that are needed to ensure that trade in wild species listed in CITES Appendices occurs in a manner that will not result in harm to live animals, in cases where trade is allowed.

The provisions and procedures of CITES do protect thousands of live animals from cruel and inhumane treatment during transport every day. For instance, the Convention requires that any live specimens in trade be prepared and shipped so as to minimize the risk of injury, damage to health or cruel treatment. Detailed guidelines have been adopted for the humane transport of animal specimens, and the disposal of confiscated animals. However, the Convention and its many provisions, including those concerning safe and humane handling of live animals, can only be implemented and enforced through national laws.

I should like to thank everyone who wrote to the Secretariat to express their concern over events involving the seizure of a chimpanzee and a gorilla at Cairo airport last September.

Upon hearing the news report, I have contacted the Egyptian authorities for information. They have confirmed the drowning of animals that were in the possession of a known wildlife smuggler of Nigerian-Egyptian origin. The Egyptian Minister of Agriculture has ordered a thorough investigation of the case and of how the decision to drown the animals was reached. The CITES Secretariat will be informed of the outcome of this investigation. The Secretariat is requesting that the Nigerian CITES authorities investigate the matter and contact the Egyptian authorities in order to ensure a coordinated approach to avoid such illegal trade, and to inform the Secretariat of the outcome.

Many of the letters and e-mails the Secretariat has received call on the Secretariat to ensure that the persons involved in this action are held accountable. CITES of course has no power to prosecute, bring people to justice or hold people to account for their actions. I am therefore pleased with the investigation started by the Egyptian authorities.

Willem Wijnstekers Secretary-General

#### Further statement on the Cairo seizure of primates<sup>2</sup>

In September 2001, the Egyptian Customs seized a gorilla and a chimpanzee following their arrival at Cairo without the necessary CITES permits. The Egyptian veterinary service decided to dispose of the animals by drowning for fear of health risks.

A large number of individuals and organizations understandably expressed concern regarding the manner in which the incident was dealt with. I contacted the authorities in Egypt and the Minister of Agriculture ordered an investigation of the case.

I have now been advised by Egyptian authorities of the outcome of this investigation.

The woman who was in possession of the animals was handed over to the Police and the case is subject to legal proceedings by the District Attorney Office. A formal letter was sent by the CITES Management Authority of Egypt to the airline on which the woman and animals travelled from Nigeria to Egypt. The airline has been made aware of the provisions of the Convention and of the Ministerial Decrees of Egypt relating to illegal trade and importation of endangered species. The airline has been requested to distribute the information to its offices worldwide.

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<sup>1</sup> Statement of October 11<sup>th</sup>, 2001. Source: [http://www.cites.org/eng/news/press/2001/011011\\_cairo\\_statement.shtml](http://www.cites.org/eng/news/press/2001/011011_cairo_statement.shtml).

<sup>2</sup> Statement of February 21<sup>st</sup>, 2002. Source: [http://www.cites.org/eng/news/press/2002/020221\\_statement\\_cairo.shtml](http://www.cites.org/eng/news/press/2002/020221_statement_cairo.shtml).

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Egypt has passed information on the case to the authorities in Nigeria, who have also started an investigation.

Lastly, the authorities in Egypt have collated information relating to institutions and rescue centres that may be appropriate places to transfer seized and confiscated live animals to in future.

I am grateful to Egypt for its response and to those persons who expressed an interest in this matter. I am also pleased that the involvement of the CITES Secretariat appears to have helped in resolving some of the aspects that were causing concern.

An interesting idea put forward by a number of animal welfare organizations has been for them to develop guidelines for the humane disposal of confiscated animals and to collect and make available data on rescue centres and their ability to house animals. Obviously the CITES Secretariat would fully cooperate in making this kind of information available to the Parties to the Convention.

Willem Wijnstekers Secretary-General



Young chimpanzee who was drowned – together with a baby gorilla – in a vat of chemicals at Cairo Airport in September 2001.

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## Abbreviations

|       |   |
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| CITES | Convention on International Trade in Endangered Species |
| CoP   | CITES Conference of the Parties                         |
| ESCC  | Egyptian Standing Committee for CITES                   |
| GRASP | Great Apes Survival Partnership                         |
| K.A.  | Karl Ammann   |
| PASA  | Pan African Sanctuary Alliance                          |
| SC    | Standing Committee                                      |
| SSN   | Species Survival Network                                |
| UAE   | United Arab Emirates                                    |

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Illegally imported baby chimps available for play sessions at the African Safari drive through park on the Cairo-to-Alexandria Highway.





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## EXECUTIVE SUMMARY

"In September 2001, the Egyptian Customs seized a gorilla and a chimpanzee following their arrival at Cairo without the necessary CITES permits. The Egyptian veterinary service decided to dispose of the animals by drowning for fear of health risks. ... I have contacted the Egyptian authorities for information. They have confirmed the drowning of animals that were in the possession of a known wildlife smuggler of Nigerian-Egyptian origin. The Egyptian Minister of Agriculture has ordered a thorough investigation of the case and of how the decision to drown the animals was reached. ... I have now been advised by Egyptian authorities of the outcome of this investigation. The woman who was in possession of the animals was handed over to the Police and the case is subject to legal proceedings by the District Attorney Office. Egypt has passed information on the case to the authorities in Nigeria, who have also started an investigation. ... A formal letter was sent by the CITES Management Authority of Egypt to the airline on which the woman and animals travelled from Nigeria to Egypt. The airline has been made aware of the provisions of the Convention and of the Ministerial Decrees of Egypt relating to illegal trade and importation of endangered species. The airline has been requested to distribute the information to its offices worldwide..."

These are excerpts of the comments made by Willem Wijnstekers, CITES Secretary-General until 2010, to the drowning of a young chimpanzee and gorilla at Cairo Airport in September 2001 (see page II).

Despite all the enforcement actions that are so proudly announced in these statements nothing has changed in the illegal wildlife trade in and through Egypt until this day. To the contrary and despite two enforcement-needs assessment mission by CITES officials to Egypt in 2007 (John Sellar) and 2010 (Laurent Gauthier) things have even gotten worse:

- The well-known wildlife smuggler of Nigerian-Egyptian origin is still active today and together with her daughters continues to smuggle primates from Cameroon and Nigeria to Egypt.
- Most of the trade goes to the Middle East where the animals (chimpanzees, gorillas, lions, ligars) end up in private collections.
- Still in February 2011 one of our investigators was offered to have his pictures taken with chimpanzees, lions, or bears at Giza Zoo in Cairo, despite a CITES recommendation of 2007 demanding the immediate ban of such activities, where it involved illegally imported species (such as chimpanzees).
- Cairo-based pet shop owners offer puppies, chimpanzee and gorilla babies for sale, one of the dealers even openly advertises ligers on his website.
- Various hotel owners and a drive-through safari park set-up on the Cairo-to-Alexandria Highway have illegally-imported chimpanzees and gorillas as well as other wildlife species on display for paying tourists.
- The Tower Hotel in Sharm el-Sheikh proudly presents itself as the only wildlife rescue centre in Egypt providing homes for illegally traded and confiscated wildlife species, while at the same time claiming that they have made enormous progress in the effort to breed chimpanzees.
- No Court records have ever been presented by Egyptian officials to substantiate their claims that well established law enforcement procedures against the illegal wildlife trade are now in place in Egypt.
- Still in May of this year (2011) one of our investigators received an email from a pet shop in Cairo offering him among others chimpanzees, gorillas, zebras, giraffes, black and white rhino, elephants and cervel cats for sale.
- The same trader also sent our investigator what appear to be fake CITES export permits from Syria for two chimpanzees he had expressed interest in. The trader was then willing and able to change the permits several times according to our requests.

- Egypt still is adamant that they will not repatriate any of the “confiscated” chimpanzees or other illegally traded or kept wildlife to the countries of origin or to well-established primate sanctuaries in respective animal range states.
- The illegal ivory trade, mainly based in Cairo’s Khan el-Khalili market still flourishes as openly as ever.
- Just after the 2007 enforcement mission by the Secretariat at least two more baby gorillas appeared at the *Tower Hotel Breeding Centre*. There were never any indications as to where they came from or who had imported them, since they were clearly not captive borne.
- Various chimps have disappeared (from Hauza Hotel and African Safari Park) and new chimps have appeared at various facilities without any explanations or records of enforcement or confiscations or necropsy reports.

This report provides evidence of various ongoing infractions of national laws as well as CITES stipulations in the context of Egypt and Ape trafficking.

It would be extremely helpful, if the data provided here could be compared with the findings made during the CITES assessment mission by Laurent Gauthier in early 2010, for example in the form of a report on the individual apes inspected by him at the various facilities, their sexes and ages, etc.

**We therefore ask the CITES Secretariat:**

1. **to comply with CITES regulations and provide to persons and organizations, who made available respective information, the full Laurent Gauthier report on his visit to Egypt in 2010,**
2. **to re-open the case on Egypt again in order to put an end to the crimes committed by a well-established illegal wildlife trade mafia that has been active in the country for decades now, and**
3. **to implement the GRASP stipulations of September 2009:**
  - **Law enforcement measured through records of confiscations, arrests and successful prosecutions for ape trafficking**
  - **Management and welfare of the apes held in Egypt:**
    - **Egypt identify and place a microchip (as referred to in the Annex of Soc 58 Doc 23) on all great apes held in Egypt.**
    - **Egypt should DNA test all great apes for subspecies identification (also as referred to in the Annex of Soc 58 Doc 23).**
    - **Egypt should submit all great ape facilities to unannounced inspections by CITES and outside agencies.**
    - **Egypt should publicly identify the facilities designated as CITES rescue centers, and open these centers to international experts.**

Karl Ammann & Pax Animalis  
Nanyuki, Kenya – Gerzensee, Switzerland

August 2011



Invalid chimpanzee at the Fayoum Government Zoo. He was sent to this former lion cage from Giza Zoo, when three orang utans arrived in Cairo from Al Ain Zoo (UAE) and space had to be created for them (one died in the meantime).

## BACKGROUND

In 2005 we completed a film – The Cairo Connection<sup>3</sup> – on the trafficking of six chimpanzees from Nigeria to Egypt (Landais 2008). This documentary was based on investigating the story behind a crate containing six chimpanzees which was intercepted in Nairobi on the way back from Cairo to Lagos after the shipment was rejected at Cairo Airport. We provided conclusive evidence of the involvement of an Egyptian / Nigerian family which had been – and still is – concentrating on trafficking Central African chimpanzees, gorillas, parrots and other wildlife on to the Middle East (figure 1). A trafficking pattern, which officials informed us had been going on for many years (CITES 2007, SSN 2008a-c, PASA 2009).



Figure 1: Map of Africa (left) with the purple arrow showing the origin of the illegally traded wildlife from Kano, Nigeria to Cairo, Egypt, with possible transit routes through Libya or Sudan. The green arrows indicate the main destination of the trade as Turkey (top), Kuwait (middle), and the United Arab Emirates (bottom). Map of Egypt (right) showing the location of Alexandria, Cairo & Asyut, as well as Sinai, which play a major role as centres for the illegal wildlife trade in Egypt. © <http://www.worldatlas.com/webimage/countrys/africa/eg.htm>.

<sup>3</sup> Source: <http://www.karlamann.ch/assets/files/movies1/KairoConnection.mov>, or <http://www.karlamann.ch/assets/podcast/podcast.xml>.

The Secretariat's reaction to hearing about the investigation by a third party resulted in the fax below addressed to all member states involved in the 2005 trafficking case (CITES 2005 – Annex 1):

"...The CITES Secretariat understood that this matter was being investigated by the relevant national law enforcement agencies. However, we have recently learned that an individual associated with a non-governmental organization is also conducting 'investigations' into the incident and that he, or his colleagues, may already be in possession of documents (or copies of documents) that could be evidence for any subsequent prosecution.

Whilst the CITES Secretariat acknowledges that non-governmental organizations can play a useful role in supporting wildlife law enforcement, it is firmly of the opinion that investigations of violations of the Convention are solely a matter for national, regional or international law enforcement organizations. Consequently, the Secretariat urges Egypt, Kenya and Nigeria to conduct joint and cooperative investigations into this incident and that all relevant information should be exchanged between their relevant law enforcement agencies..."

(Telefax transmission of March 31st, 2005, by John Sellar, Senior Enforcement Officer, Law and Compliance Unit, to The CITES Management Authorities of Egypt, Kenya and Nigeria – Annex 1).

Asking actors in member countries with poor governance quality to investigate and enforce such high profile trafficking scenarios as the one documented in "The Cairo Connection" amounts, in our opinion, to '**asking he fox to watch the hen house**'. This was clearly the case with the officials involved at the Egypt and Nigeria end (Ammann 2008, SSN 2008a-c, Landais 2008).

Finally, in November 2007, did John Sellar, Head of the CITES Legislation and Compliance Unit, visit Egypt to verify some of the claims made in the film or during follow up investigations. His attached report, even then, threw up more questions than it answered (CITES 2007 – Annex 2).

## CITES – Appendix I

The '**Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)**' states in Article III the regulations of trade applicable to these species (CITES 1973). **In summary, any permit for the international transport of these species may only be issued if such movements are not detrimental to the survival of the species.** The species listed in Appendix I entail – among many other species – all members of the *Pan species* and of the species *Gorilla beringei* and *G. gorilla* (figure 2 + 3; CITES 2011):

### Article III<sup>4</sup>

#### Regulation of Trade in Specimens of Species Included in Appendix I

1. All trade in specimens of species included in Appendix I shall be in accordance with the provisions of this Article.
2. The export of any specimen of a species included in Appendix I shall require the prior grant and presentation of an export permit. An export permit shall only be granted when the following conditions have been met:
  - (a) a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species;
  - (b) a Management Authority of the State of export is satisfied that the specimen was not obtained in contravention of the laws of that State for the protection of fauna and flora;
  - (c) a Management Authority of the State of export is satisfied that any living specimen will be so prepared and shipped as to minimize the risk of injury, damage to health or cruel treatment; and

<sup>4</sup> Source: <http://www.cites.org/eng/disc/text.shtml#III>.

- 
- (d) a Management Authority of the State of export is satisfied that an import permit has been granted for the specimen.
3. The import of any specimen of a species included in Appendix I shall require the prior grant and presentation of an import permit and either an export permit or a re-export certificate. An import permit shall only be granted when the following conditions have been met:
- (a) a Scientific Authority of the State of import has advised that the import will be for purposes which are not detrimental to the survival of the species involved;
  - (b) a Scientific Authority of the State of import is satisfied that the proposed recipient of a living specimen is suitably equipped to house and care for it; and
  - (c) a Management Authority of the State of import is satisfied that the specimen is not to be used for primarily commercial purposes.
4. The re-export of any specimen of a species included in Appendix I shall require the prior grant and presentation of a re-export certificate. A re-export certificate shall only be granted when the following conditions have been met:
- (a) a Management Authority of the State of re-export is satisfied that the specimen was imported into that State in accordance with the provisions of the present Convention;
  - (b) a Management Authority of the State of re-export is satisfied that any living specimen will be so prepared and shipped as to minimize the risk of injury, damage to health or cruel treatment; and
  - (c) a Management Authority of the State of re-export is satisfied that an import permit has been granted for any living specimen.
5. The introduction from the sea of any specimen of a species included in Appendix I shall require the prior grant of a certificate from a Management Authority of the State of introduction. A certificate shall only be granted when the following conditions have been met:
- (a) a Scientific Authority of the State of introduction advises that the introduction will not be detrimental to the survival of the species involved;
  - (b) a Management Authority of the State of introduction is satisfied that the proposed recipient of a living specimen is suitably equipped to house and care for it; and
  - (c) a Management Authority of the State of introduction is satisfied that the specimen is not to be used for primarily commercial purposes.

## **CITES – Strategic Vision 2008 - 2013<sup>5</sup>**

### **CITES vision statement**

Conserve biodiversity and contribute to its sustainable use by ensuring that no species of wild fauna or flora becomes or remains subject to unsustainable exploitation through international trade, thereby contributing to the significant reduction of the rate of biodiversity loss.

### **THE STRATEGIC GOALS**

**GOAL 1 ENSURE COMPLIANCE WITH AND IMPLEMENTATION AND ENFORCEMENT OF THE CONVENTION**

**GOAL 2 SECURE THE NECESSARY FINANCIAL RESOURCES AND MEANS FOR THE OPERATION AND IMPLEMENTATION OF THE CONVENTION**

**GOAL 3 CONTRIBUTE TO SIGNIFICANTLY REDUCING THE RATE OF BIODIVERSITY LOSS BY ENSURING THAT CITES AND OTHER MULTILATERAL INSTRUMENTS AND PROCESSES ARE COHERENT AND MUTUALLY SUPPORTIVE**

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<sup>5</sup> Source: <http://www.cites.org/eng/res/14/14-02.shtml#vision>.





Figure 2: Young gorilla at the Tower Hotel Breeding Centre in 2006.

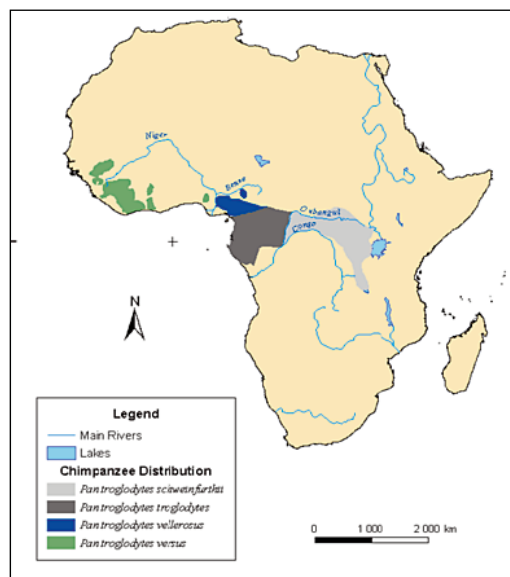


Figure 3: Distribution ranges of chimpanzee subspecies (Gagneux et al. 2001) – redrawn with kind permission from Pascal Gagneux in Schoene 2003, p. 75.

## THE 2007 CITES MISSION REPORT – COMMENTS & QUESTIONS ARISING

In this chapter we refer to various statements from the 2007 CITES mission report (hereafter **“the report”**), comment on them and ask the questions arising when comparing the report with the real situation on the ground as we established it during our own investigations.

### Legal Background – The Ministerial Decree No. 1150

Taking us back prior to the 2001 drowning case, the following citation from the Eleventh meeting of the Conference of the Parties (CoP) in Gigiri (Kenya), April 10<sup>th</sup> – 20<sup>th</sup>, 2000, states:

#### “Egypt

8. According to Ministerial Decree N° 843/1999 a new structure of the Ministry of Agriculture is now in place. The decree establishes four committees to implement CITES, namely, the National Committee, the Scientific Committee, the Management Committee and a special unit under the name of the Egyptian Standing Committee for CITES (E.S.S.C.).
9. A mission of the Secretariat took place on 1 and 2 September 1999, on an invitation from the E.S.S.C to consult on the implementation of CITES and to assist national authorities in the process of preparing legislation that would fulfil Egypt’s obligations under the Convention. After two days of intense work, the Egyptian authorities, with the assistance of the Secretariat, had drafted and submitted to the Minister of Agriculture a Ministerial decree for his signature.
10. On 18 September 1999, Ministerial Decree No. 1150 was published in the Official Journal of Egypt. The Secretariat received a copy on 20 September 1999 and reported at the 42nd meeting of the Standing Committee that Egypt had fully met the requirements established by the Conference of the Parties.” (CITES 2000 – bold letters are ours).

Referring to this Ministerial Decree the report clarifies:

“It is a violation of the Decree to possess, offer or display for sale, export or re-export or introduce from the sea any specimen of a CITES-linked species con-



trary to the provision 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.**" (CITES 2007 – page 3 + 4 – bold letters are ours).

## The Egyptian Frame Work

With the respective legal framework to enforce the CITES Convention and stipulations since 2000, the 2007 enforcement mission dealing with the ape trafficking issue had the basis in place to effect real change.

Prior to the mission's arrival in November 2007 the authorities did decide to take some token enforcement measures. They confiscated three small chimpanzees illegally held and imported by individuals and based on a range of reliable accounts they killed two more in the process of confiscation (CITES 2007, Ammann 2008 – Annex 3, Personal communication<sup>6</sup>).

The three surviving chimps are today still held at very inadequate facilities at Giza Zoo. They are daily used for commercial photography sessions (figure 4), which the CITES Secretariat in various communications with the authorities pointed out was unacceptable (CITES 2007, PASA 2009).

"Egypt has recently introduced specialized courts to deal with environmental crime cases and it is expected that this move will increase awareness." (CITES 2007 – page 5).

**It would be really interesting to know if these courts in the meantime have prosecuted a single player, especially any wildlife dealers?**

**There were no indications that these courts were used to prosecute a single party, who held any of these confiscated chimpanzees illegally or that any of the well known importers / dealers were subjected to hearings in front of these specialized courts.**

There is also no reference to any such action having been taken in the follow up report of early 2010 (CITES 2010a).

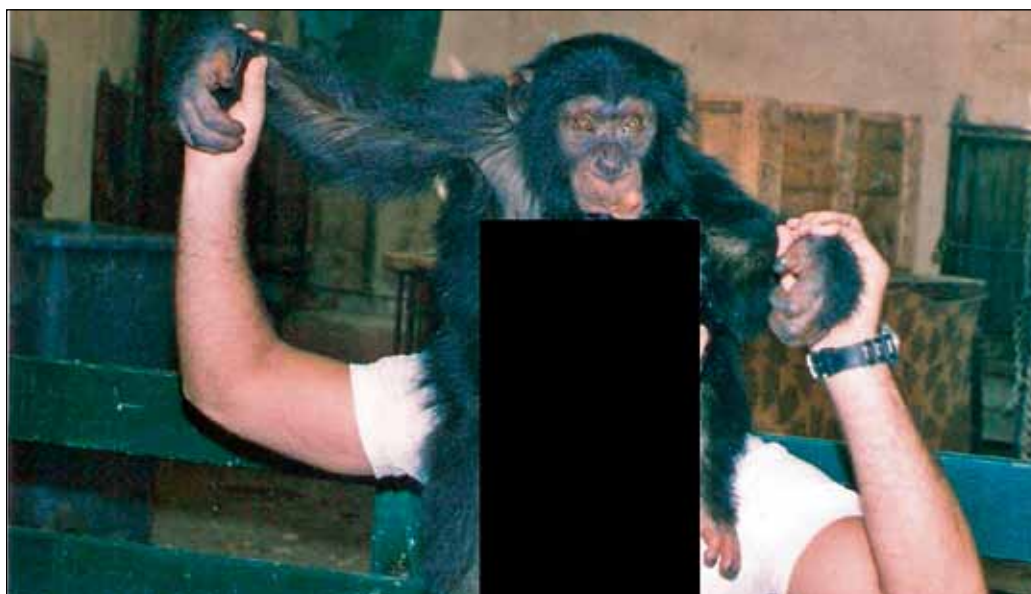


Figure 4: Illegally imported chimpanzee at Giza Zoo in early 2010, who is used daily for commercial photography sessions despite instructions to the contrary from the CITES Secretariat.

<sup>6</sup> Information received from representatives of various Egyptian NGOs.

## Sharm el-Sheikh

"One person spoken to in Sharm el-Sheikh was adamant that there is no demand in Egypt but this is simply a transit country and that the true customers can be found in the Gulf States. The person who said this to the Secretariat possesses several chimpanzees, his version seemed somewhat questionable" (CITES 2007 – page 6).

Even if Egypt were just a transit country the illegal trafficking of wild animals is also a violation of CITES regulations (Article III – CITES 1973).

It should be pointed out here that John Sellar from the CITES Secretariat later confirmed that he saw only two teenage gorillas at the respective facility, which he did not mention in his report (CITES 2007, Personal communication<sup>7</sup>).



Figure 5: Sinai with Al-Arish (north) and Sharm el-Sheikh (south). Sharm el-Sheikh is home of the *Tower Hotel Breeding Centre*, where Egyptian officials claim that chimpanzees have been breed successfully. © <http://www.touregypt.net/sinai5.htm>.

We are not aware of any activities by the CITES officials, neither by John Sellar nor from the local Egyptian CITES office, as far as following up the origin and fate of these two gorillas (or supposedly the increased number having been inspected during the 2010 visit by a representative of the Secretariat) are concerned. We have no information, if they have been identified and microchipped, nor any information regarding their sex and age, and if any of this information has been stored in any CITES database.

There is solid evidence though that the "one person spoken to in Sharm el-Sheikh" (figure 5) is in close contact with various CITES officials and the quarantine / customs officials at the airport (they set up our original contact with him). One of the CITES officers seems to be officially on his payroll as a veterinary advisor.

This person, who is the owner of the Tower Hotel in Sharm el-Sheikh, is also known to be in contact with the key ape dealers: images taken at his facility show that his gorilla collection keeps increasing and then shrinking in size (figure 6), meaning he looses apes and then replenishes his collection with new babies he imports via the above mentioned dealers (PASA 2009).

Within days of John Sellar's visit two, or possibly three, new baby gorillas appeared at this facility. They were either hidden during the CITES mission or were brought in after the mission had left. No investigation was ever done to establish their origin (Ammann 2008).

We know about them since within weeks of the 2007 visit we heard of a zoo keeper who managed to get into the Sharm el-Sheikh facility and documented that at least two more baby gorillas had arrived at the private collection in question (figure 6).

While his facility has been declared a 'national rescue centre', there is no evidence of any kind that he was ever handed a **confiscated** ape.

<sup>7</sup> Source: Email of June 5<sup>th</sup>, 2008, from John Sellar to Karl Ammann.

All indications are that all the apes at this facility were ordered, illegally imported, and he paid for upon delivery (CITES 2007, Personal communication<sup>8</sup>). Figure 7 shows an official document from the Egyptian CITES Office declaring this facility a National Wildlife Rescue Centre and laundering one gorilla into it without any indication that the ape was ever confiscated.

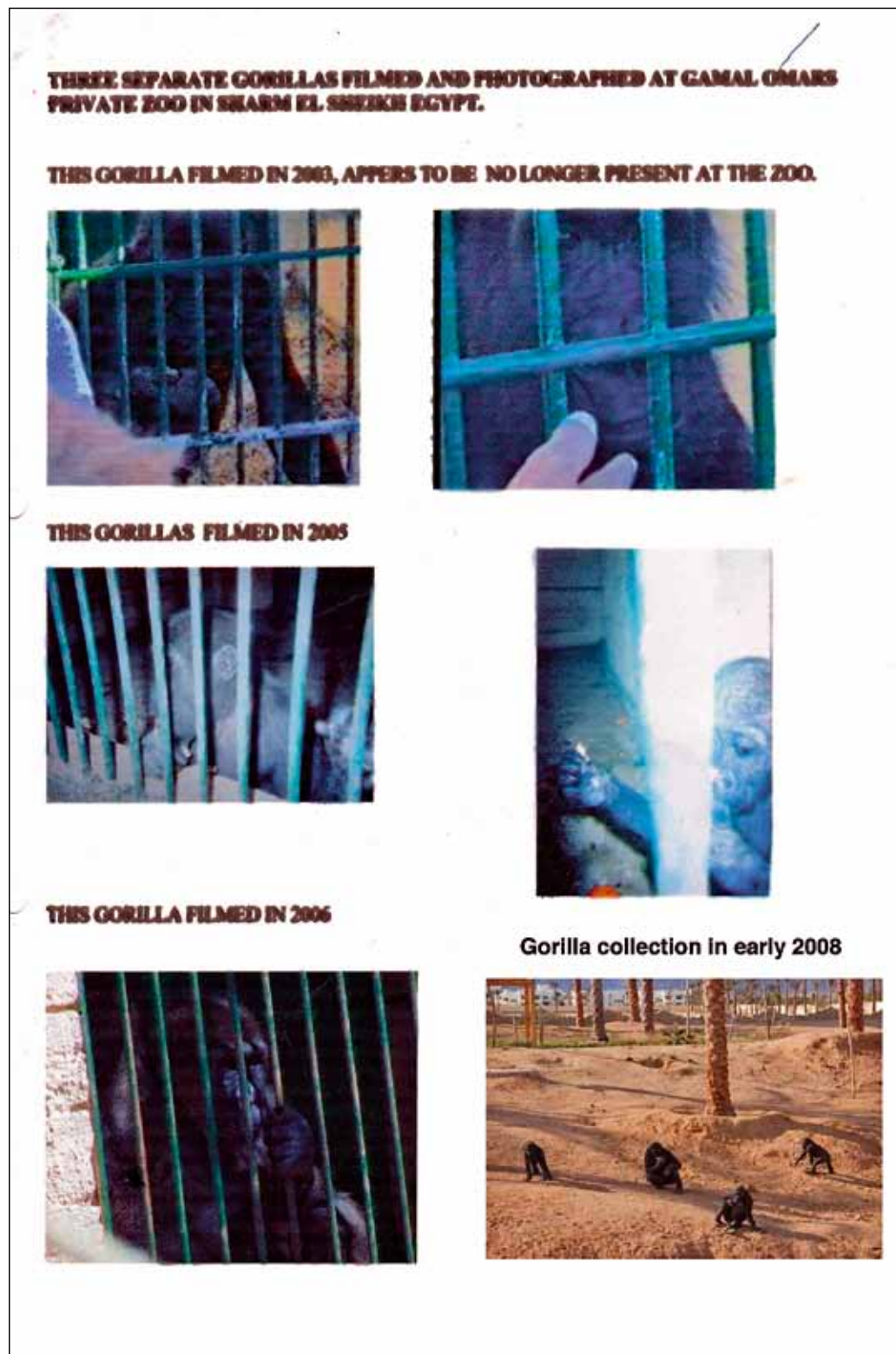


Figure 6: Images of gorillas at the *Tower Hotel Breeding Centre* in Sharm el-Sheikh showing different age gorillas over 6 years illustrating the 'shrinking' of earlier recorded apes or - as has to be assumed - replacement of older animals with new arrivals (bottom right the image of baby chimps which arrived within weeks of a CITES enforcement mission of November 2007).

<sup>8</sup> Source: Minutes of meeting with his Excellency Dr Abu Hadid, Egyptian Minister of Agriculture, 16 April 2011 – page 3.





Figure 7: CITES document declaring what today is known as the *Tower Hotel Breeding Centre* a National Wildlife Rescue Centre for (confiscated) wildlife in Egypt.

When the official, who had issued this permit, was questioned on the number of apes held and the three-monthly reports that the document states have to be provided by the rescue centre on the health of their animals, he could neither find any of these reports nor did he know how many apes were at the time being held at this facility<sup>9</sup>.

## PASA's Comments on the Egyptian CITES Procedures

A report by the Pan African Sanctuary Alliance (PASA) on their Egypt Mission from 2009 points out:

"One of the major problems with the CITES Management Authority of Egypt seems to be its historical method of paper works and permits. Rather than assign individual CITES import / confiscation permits to each chimpanzee in the country, for instance, CITES instead issues permits to each facility that indicate the **total number of each species** it is permitted to hold. As a result, the total number of chimpanzees at a given facility may never exceed the assigned quota at any time, but there is no way to confirm whether the chimpanzees in question are the same chimpanzees as two years ago or 10 years ago" (PASA 2009 – page 3).

<sup>9</sup> Interview by Karl Ammann during a private investigation.

Our evidence therefore corresponds with the findings regarding the practice of issuing CITES permits in Egypt as cited by the Pan African Sanctuary Alliance (PASA 2009).

Except when it comes to the **number of apes** the 2007 / 2008 evidence (figure 6) clearly suggests that apes are easily hidden for the purpose of an inspection, if the number present exceeds supposedly agreed totals.

There was never any feedback of any kind from the Egyptian authorities or the Secretariat on our attached follow up report of July 2008 when we included the image of the new baby gorillas, who had arrived after the CITES enforcement mission of 2007 or had been hidden during it (figure 6; Ammann 2008 – Annex 3).

## Breeding Centres & What Happened to “Moza”

The “one person spoken to in Sharm el-Sheikh” was breeding chimps and the Head of the Egypt Delegation at the 15th meeting of the Conference of the Parties in Doha (Qatar) in 2010 (CoP 15: 13<sup>th</sup> – 25<sup>th</sup> March<sup>10</sup>) showed photos of an incubator holding a very baby chimp (see “The Doha Meeting” – figure 26).

He showed this to interested parties to illustrate how successful this private collection owner now was at breeding chimps (it has to be assumed that in some of these cases the baby is pulled from the mother at birth to make her receptive again as soon as possible).

There are indications that now baby chimps are offered out of Sharm el-Sheikh by a prominent animal dealer<sup>11</sup>. These might involve captive borne chimps from this facility. These babies could be offspring of the illegally imported parents.

It has now become impossible for a third party to get into the facility to establish new population levels or ages and sex of the apes he is holding.

The subsequent CITES inspection report in 2010 stayed away from mentioning any of these details which would have made it possible to compare their findings with our prior or later ones (CITES 2010a – Annex 4).

This same ‘owner’ also recently dumped a sick chimp – “Moza” – at Giza Zoo, stating: “she was no longer suitable for breeding” (figure 8; Personal communication<sup>12</sup>).

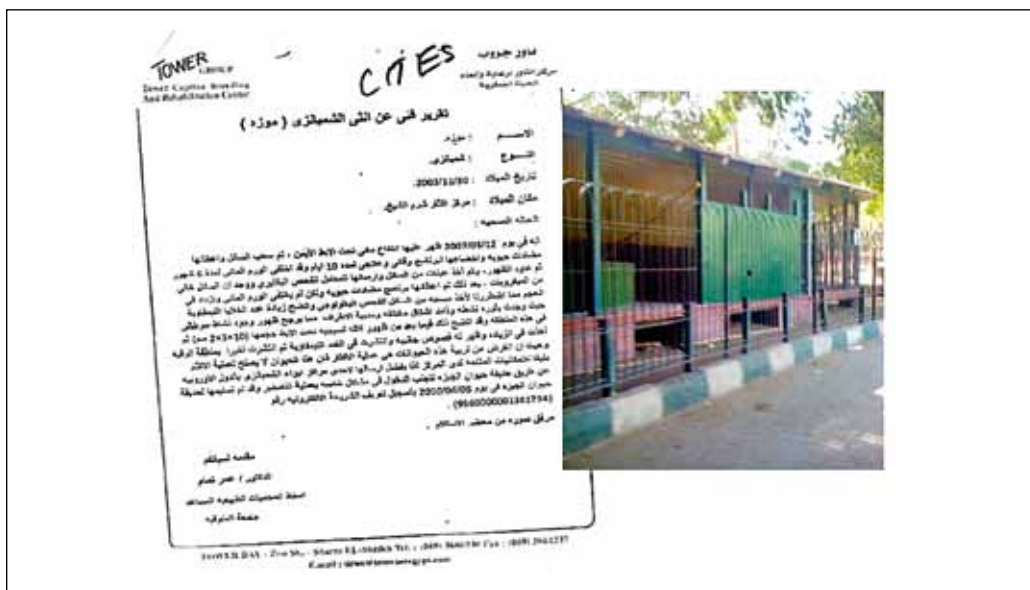


Figure 8: Moza's vet report and her new enclosure at Giza Zoo, where she is kept in a green metal cage, which is blocked up.

10 Source: <http://www.cites.org/eng/cop/index.shtml>.

11 Hidden camera footage.

12 Information received from representatives of various Egyptian NGOs.

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The veterinary report that accompanied her states the following:

Technical report on the female chimpanzee.

Name: Moza  
Species: Chimpanzee  
Date of birth: 30.11.2003  
Place of birth: Akthar Centre, Sharm el Sheikh [what do they mean with “Akthar Centre”?]

On 12.05.2007 she had a swelling below her right arm. We opened and drained it and gave her antibiotics. Afterwards we watched her for ten days. We took a sample and sent it off to the laboratory. After six months the swelling re-appeared. The laboratory culture did not show any result (microbes) since we had administered antibiotics [and presumably took the sample for the laboratory only afterwards, a second possible translation here is: the laboratory test did not show any microbial growth. Afterwards we started an antibiotic treatment].

To no avail. The fluid has returned and the swelling is even larger now than before.

We decided to do a second laboratory test [it is again not stated which one exactly].

At the same time the [regional?] lymph nodes started growing and showing various kinds of growth forms. We had [originally only] assumed that her swelling would be an active malignant tumour. Due to the growth and the related hypnoses (2x3x10) [this is most likely the size of the growth from the lymph node; presumably measured in cm], we are now convinced of it.

Since our objective is the breeding of animals and since this animal is no more available / suitable for such purpose, we thought it might be better to send her to a European Centre which is specialised in keeping chimpanzees. We therefore sent her via / to Giza Zoo on 08.04.2010 [that was nearly three years after her swelling was treated for the first time?!].

Her micro chip ID number is as follows: 9560000001381794

Dr. Omar Tamam

Attachment / Copy of the protocol of acceptance [that might indicate a letter of acceptance or something similar by Giza Zoo, when they received Moza?]

This is a summary translation, the comments and questions in [ ] are ours.

## Xenotransplantation?!

Going back to the Secretariat's inspection report of 2007:

“Some researchers claim that the demand is partly due to a particular medical practitioner who wishes the animals for experimentation or organ transplants. There is certainly evidence that demonstrates this doctor's involvement in the trade but **there is no evidence to illustrate that animals he has been associated with remain alive with their organs intact**”.  
(CITES 2007 – page 6 – bold letters are ours).

This refers clearly to the above collection of chimpanzees inspected by the CITES official at the *Tower Hotel Breeding Centre* and him pointing out that these apes were imported illegally by this individual, namely the owner of the hotel (figure 9; CITES 2007 – page 6).

**We find it very strange that this would not have led to further investigations and an analysis of how many apes this collector has gone through and where they came from (like some DNA work on the ones still alive).**

**There was certainly no recommendation to shut down this private collection and maybe repatriate the corresponding apes to the countries of origin.**

**The doctor could also have been interviewed.**



The report concludes:

“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”.

(CITES 2007 – page 6).

The information that he was importing chimps to ‘help humans’ was presented by customs officials as a justification why it was OK for him to effect these imports. The same was repeated to us by the Head of the CITES Management authority, who also called the doctor in question (see “The Nigeria Connection” – figure 12) and had his number on speed dial<sup>13</sup>.

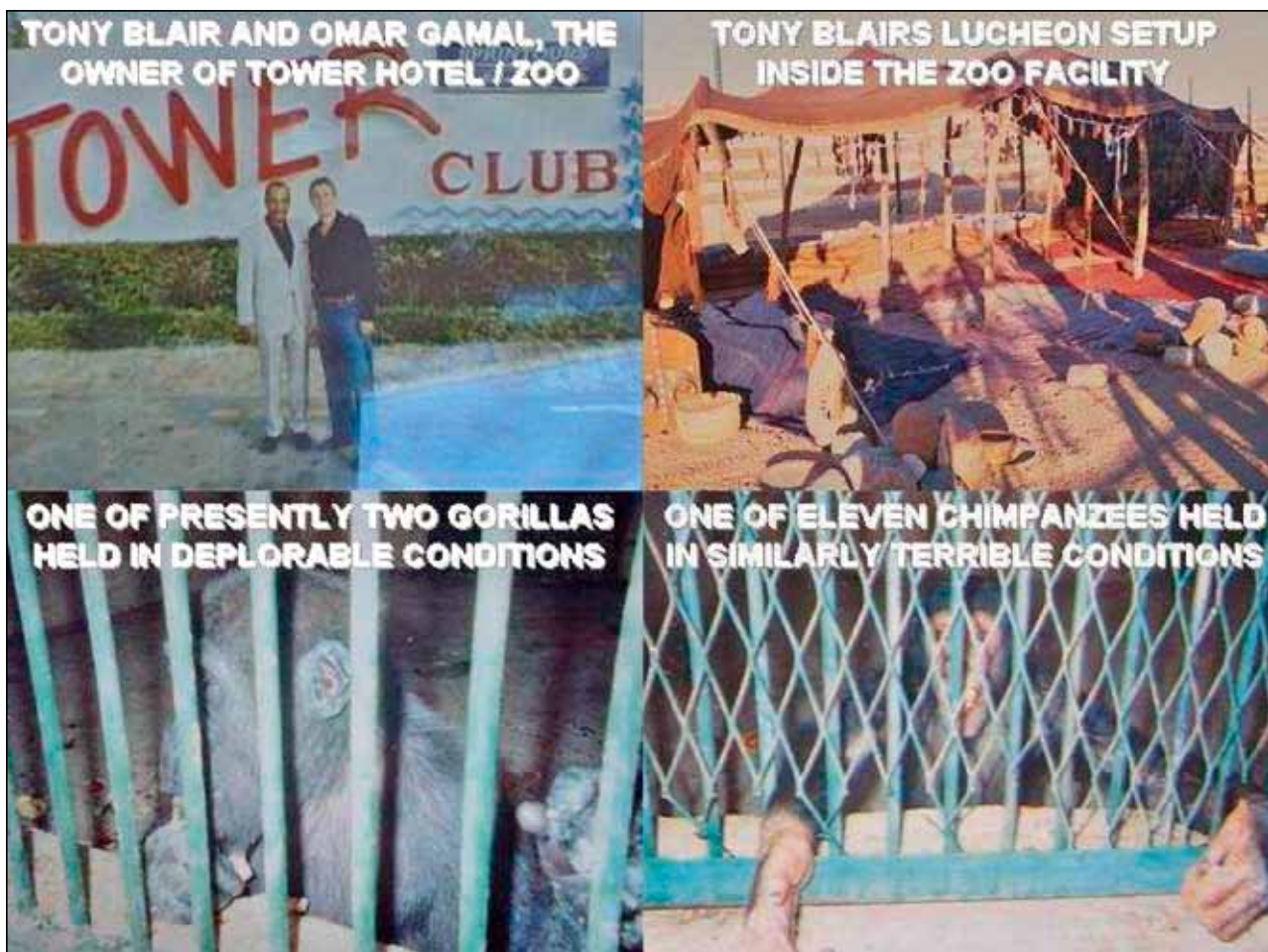


Figure 9: The owner of the *Tower Hotel Breeding Centre* welcomes VIPs for specifically catered luncheons in his private Zoo in keeping with the ‘private collection’ mentality prevailing in the Middle East. Tony Blair and family were allowed to visit the illegally imported apes at his facility.

The report mentions some of the well known dealers and importers which have been active **“over many years”** trading apes and other wildlife, despite the CITES Secretary-General, after one of the gruesome smuggling incidents, demanding arrests from the Egyptian authorities (page II + III; CITES 2007 – page 6).

Figure 10 shows the official – handwritten – document written by a Commission obviously established to deal with the incident of the chimpanzee and gorilla illegally imported in 2001.

13

Information received by Karl Ammann during his investigation for the documentary “The Cairo Connection”.



The report continues:

“With regards 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” (CITES 2007 – page 7).

Clearly they did not present any of the cases having been prosecuted by the earlier mentioned **specialized courts** or there would be public records of “these measures”.

When discussing the Sharm el-Sheikh private collection again the author of the report states:

“There has been no commercial trade in specimens from this facility” (CITES 2007 – page 8).

As pointed out earlier the owner of this facility seem to exclusively deal with wild stock they are trying to breed. They appear to have succeeded with chimpanzees but not with gorillas (who they do not seem to be able to keep alive to a sexually mature age). However, they seem to go full steam with the attempts at breeding, to the extend of pulling babies and using incubators and clearly getting rid of chimpanzees, who they no longer consider “breeding stock” (figure 8; Personal communication<sup>14</sup>).

**What do they plan to do with these baby chimps? If they have not already started trading them commercially, when will this step be taken?**

We have a filmed conversation with a prominent animal dealer offering two baby chimps from Sharm el-Sheikh. He provides photographs which show a sterile looking facility and cages which might well be part of the above collection. He offers a male and a female for U\$ 40 000 as captive bred with CITES permits (figure 11).

**What about looking at all the records of this facility and establish, if one is dealing with a large scale end consumer of a large number of smuggled primates with an agenda to creating a commercial breeding facility???**



Figure 11: Chimps offered by a well known animal dealer in Cairo implying that they were captive born and would come from Sharm el-Sheikh.

14 Information received from the Head of the Egyptian CITES delegation at Doha.



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## The Nigeria Connection

“The persons mentioned above” as referred to on page 7 of the report is a Nigerian/ Egyptian lady (and her daughters), holding both passports, who has been illegally trafficking wildlife for the past forty years (figure 12<sup>15</sup>). There is little doubt that she and her daughters, who now all live in Nigeria and who have been involved in past trafficking cases, are still active and there are indications that they now use a route via Libya where one of their brothers is a border guard<sup>16</sup>. These shipments usually end up in Alexandria (figure 1; Ammann 2008, CITES 2007, SSN 2208a+b).

“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” (CITES 2007 – page 6).



Figure 12: Heba and her daughters in their car in Cairo (left). Dr Al Shafy (right), one of Heba’s main ‘collaborators’, who is using the apes supplied to him “for experimentation or organ transplants” (CITES 2007 – page 6).

## Visit July 2008

During a visit in 2008 while asking about the whereabouts of the lady in question we were told by the CITES management authority that she had fled the country and now lived in Nigeria. We drove from the meeting to her apartment building and found her having lunch!!! (Ammann 2008).

On the same visit we reported to the **Head of the Environment Police** the arrival of the new baby gorillas (see: “Sharm el-Sheikh”), but also that we had driven up to the gate of one farm, which again is well known for holding apes in numbers and potentially other illegally imported wildlife (figure 13) and that we were chased away and shots were fired over our heads from a semi-automatic weapon. Our exit route was blocked by some young men who threatened our driver and banged on the car.

The General and Head of the Environment Police told us on the phone, that **as foreigners we had no right to drive off the main road into the desert** (the road to the gate of the farm was some 200 metres from the main road and there were no signs or any indications that foreigners could not get off the main Cairo-to-Alexandria Highway – figure 14).

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15 Photographs taken from “The Cairo Connection” documentary.

16 Comment made by the former Head of the Egyptian CITES management authority.



Figure 13: Farm gate with high wall surrounding a property along the Cairo-to-Alexandria Highway and suspected to hold a wide range of apes and other illegally imported wildlife. It is owned by the same party as the Hauza Hotel in Sharm el-Sheikh.

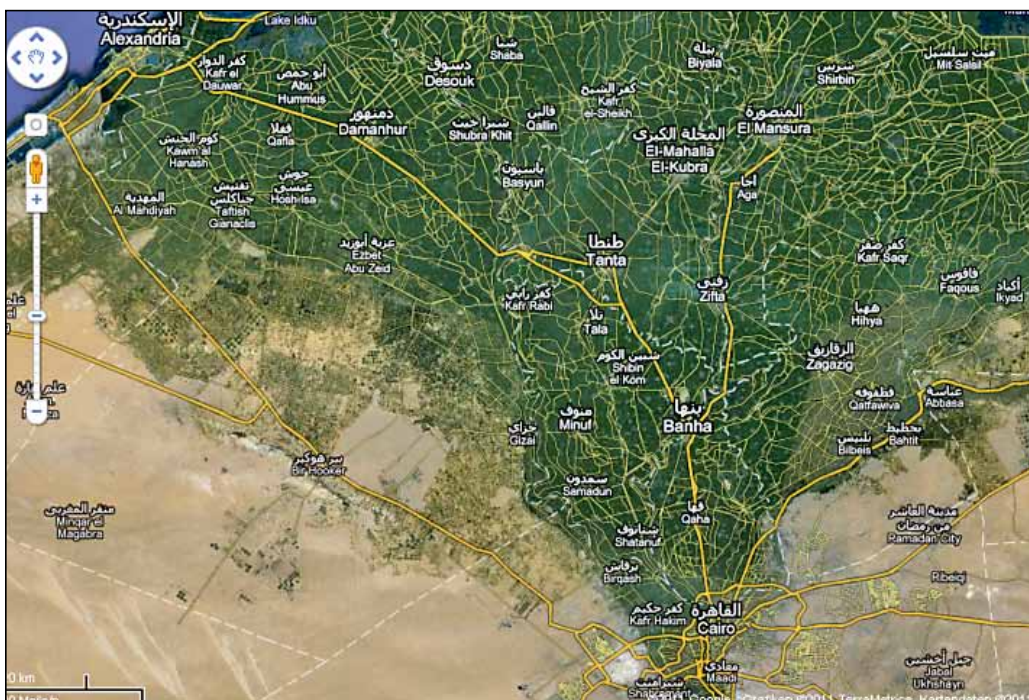


Figure 14: Cairo-to-Alexandria Highway.

The taxi driver who took us to the facility was, on later occasions called in several times by the Environment Police, threatened and detained for hours and asked about us and our excursions and what information we had first provided to find the place. He will no longer drive around any party wanting to inspect known private collections (Ammann 2008).

At another of the private collections (a drive through safari set up) we found three new adult chimpanzees, who had not been there prior to the Secretariat's mission of November 2007 – **again no indication where they had come from. Two have died since:** one drowned and the other one died while he was fitted with a microchip<sup>17</sup>.

17 Information received from representatives of various Egyptian NGOs.



This, the African Safari Park, is another facility where chimps come and go (figure 15; Ammann 2008, PASA 2009).

This place also has a rock island with chimps on it, where they have to face temperatures of up to 50°C in summer and as low as 9°C in winter.



Figure 15: Chimpanzees at the “African Safari Park”, a drive-through set-up for tourists.

## Law enforcement? – An Example

Going back to the John Sellar report:

“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” (CITES 2007 – page 7).



Figure 16: The Gaza strip as further destination and transit country for illegally trafficked wildlife species from Egypt.  
© [http://en.wikipedia.org/wiki/File:Gaza\\_Strip\\_map2.svg](http://en.wikipedia.org/wiki/File:Gaza_Strip_map2.svg)

No young chimp arrived at Giza Zoo after the John Sellar visit. As mentioned earlier and stated in the report, several chimps – some on prominent up market gated housing estates – were confiscated just prior to the CITES mission (Ammann 2008, CITES 2007, PASA 2009).

During our visit in 2008, we did however hear from the director of the Zoo in Al Arish (figure 5) that authorities had recently confiscated a chimp from **Bedouin smugglers en route to Gaza** (figure 16).

However, again this chimpanzee did not re-appear anywhere at any of the known and accessible facilities<sup>18</sup>. **There is a good chance that, if such confiscations do take place, the apes in question are then sold on.**

**It would be good to have any evidence of any confiscations since the visit by the Secretariat in 2007 and the whereabouts of these confiscated animals.**

<sup>18</sup> Information received from representatives of various Egyptian NGOs.



## The Pet Shop Issue & Rescue Centres vs. Primate Sanctuaries

Most recently (March 2011) a drug addicted chimp was offered by a pet shop in the centre of Cairo (via video footage made available by the shop owner – figure 17 is a photograph taken from this footage). The addicted chimpanzee's name is "Said" and during the film clip one can hear the 'owners' mocking and teasing the chimpanzee, calling him a drug addict and asking him to stop drinking the cough syrup – which clearly they provide in quantities.

This was reported to the Environment Police. Several weeks later they got back to the informant once again asking for the address of this very prominent pet shop in Zamalek (figure 18).



Figure 17: Photograph taken from a DVD that was given to a potential customer at a pet shop in Zamalek district, Cairo, offering a young chimpanzee addicted to cough syrup.



Figure 18: Zamalek in the centre of Cairo. At least one of the pet shops also dealing with illegal wildlife is located here. © www.lonelyplanet.com

On page 7 the 2007 report by the Secretariat talks about the lack of government run rescue centres and the problems with Giza Zoo (which in the meantime have again resulted in detailed press reports of shortcomings at this facility and the illegal use in commercial photography sessions of the chimp babies confiscated for the above visit by the Secretariat – Ammann 2008+2009, CITES 2007, PASA 2009).

" The Secretariat, previously and during this 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 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 provision of the Convention, as the State of confiscation, to determine disposal" (CITES 2007 – page 7). " The Secretariat, previously and during this 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 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 provision of the Convention, as the State of confiscation, to determine disposal" (CITES 2007 – page 7).

The same position is reflected by the Egyptian authorities in the document declaring the *Tower Hotel Breeding Centre* a National Wildlife Rescue Centre:

[It is stated furthermore in the text that the Egyptian Standing Committee for CITES (ESCC ) does not want confiscated animals to go to rescue centres in Europe, but rather that they shall stay in Egypt since the country is able to provide the necessary care and husbandry for these animals on its own.

The *Tower Hotel Breeding Centre* is given the right to keep any kind of wild / confiscated animal, not only chimpanzees. This is, since they possess the veterinary expertise to care for these animals.]

[The information is dated August 2003]

As has been documented in detail above, it is no secret that most of the chimpanzees and gorillas in question came from Cameroon via Nigeria to Egypt (figure 1; CITES 2007, Ammann 2008, Landais 2008, SSN 2008a+b).

This could be proven with **DNA work** (figure 3), which clearly the Secretariat is not pushing for and the Egyptian authorities have no interest to pursue, since there would then be no choice but to deal with the well connected individuals, who hold a range of illegally imported animals at their private collections and maybe the authorities would have to confiscate some of these. This would be awkward considering that some of these officials helped laundering some of these apes into these 'rescue centres' to start off with.

The 2007 mission report goes on stating that there are no proper facilities to deal with confiscated animals and as such private 'rescue centres' and collections have to be considered as an option for placement. However it acknowledges that no standards or regulations exist governing such facilities. They also acknowledge that this subject needs to be addressed (CITES 2007 – page 7 + 8).

**What has been done to address this issue in the last four years?**

**Declaring those animals as government property and leaving them exactly where they are does not really represent a real deterrent measure but one of more laundering.**

**Is the documentation available, where these facilities were informed that they no longer owned these apes – as per the 2010 mission report (CITES 2010a – page 1 Nr 5 b))?**

Exactly the opposite is what happened and what happens:

Clearly the owners of those private rescue centres still take all the decisions to breed those animals and to breed who with whom and they go to the extent of shipping a chimpanzee to Giza Zoo on the basis "that she was no longer fit for breeding" (see "Moza" above).

"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... 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**" (CITES 2007 – page 7).

This is exactly what happened:

- Most of the private collection owners have their specific suppliers (some chimps at some of these private collections have the facial characteristics of West African chimpanzees).
- There is no evidence that any ape was ever confiscated except for the three prior to the Secretariat's visit (and the two, who were destroyed at the airport).
- As such no animals could or should have been handed to these private collection owners (the Head of the CITES management authority had no up to date records of how many apes existed at each facility<sup>19</sup>).

19

This information was given by the Head of the CITES management authority during an interview in 2006.

- The party in charge of doing some kind of census work was, at the same time, on the payroll, as a veterinarian, of at least one of the above mentioned private collection owners.
- His brother was also arrested while transporting illegal wildlife in an official vehicle of the Ministry of the Environment (Personal communication<sup>20</sup>).

## Local Investigations at Pet Shops

Visits to pet shops in Alexandria and Cairo by local investigators resulted in offers of chimpanzees and in one case a gorilla for sale. The same investigators were also told, by Giza Zoo keepers, of a facility on the Suez road where there were always chimpanzees for sale.

We equipped them with a hidden camera and they went to try to visit, having made an appointment via the zookeeper from Giza Zoo. The camera footage shows that they were expected by two cars parked on the desert track where they were first interrogated.

When they asked about the availability of chimpanzees and prices and pointed out that they were not interested in baboons the response was: "Who do you think we are?" and they were then shown a finger of a chimpanzee which the dealers had in the glove compartment and which they used as evidence to illustrate they had chimps (figure 19 – 21). They then asked: "Why are you not going to Al-Arish (figure 5) where chimps are cheaper?"

Next the two investigators are walked at gun point (the guards in question were armed with automatic weapons) into the desert. They are threatened and thrown to the ground and they are searched for money they might have with them to buy chimps. Eventually they are let go (figure 22).



Figure 19: Desert hide away with sign on Suez road.



Figure 20: Two cars parked on the desert track are awaiting the potential 'clients'.

<sup>20</sup> Information received from representatives of various Egyptian NGOs.



Figure 21: One of the dealers is holding an ape finger to prove that they have chimps 'available'.



Figure 22: The youngest of the road side scouts was armed with an automatic weapon, which he used to walk the investigators into the desert, where his 'colleague' was throwing them in the sand, threatening and robbing them before they were let go.

**This DVD was provided to the CITES secretariat with the corresponding transcript and an interview in English with the investigators. We offered to provide the exact location of the farm, if the Secretariat would confirm that they could arrange a raid and this location information was to only be handed over the moment the corresponding team was ready to proceed to the location in question. Our offer was declined.**



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## Finding Evidence

John Sellar in his report then goes on:

“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” (CITES 2007 – page 8).

For an individual or journalist it can indeed be extremely difficult to get such evidence. Besides the earlier mentioned shooting incident, the harassing of drivers, there was also a case of a break in into a hotel room (reported to the police) with all film stolen and all relevant computer files having been deleted.

This incidence took place after a visit to the Hauza Hotel in Sharm el-Sheik. The hotel had at that time baby chimps on display (figure 23) and tourists could get their photographs taken with those chimps. This illegal activity was even advertised on the Hauza Hotel website (figure 24 - this photograph was taken directly from the hotel's website in 2006).

The owner of the Hauza Hotel is also the owner of the Utopia Ostrich farm where we had the problems outlined earlier (see “Visit July 2008”).



Figure 23: Young chimp on display at Hauza Hotel.



Figure 24: On its website the Hauza Hotel used to advertise a private zoo with people being able to take their pictures with baby chimps. After it was closed the five baby chimps having been recorded over a period of time disappeared and are assumed to be part of the breeding set up at the farm next to the Cairo-to-Alexandria Highway (see figure 14).

**However, all a CITES official on mission would need to do is ask for the confiscation records and which ape ended up where.**

**Clearly the Environment Police going out and confiscating any ape would lead to some kind of record; at least the address where the ape came from. That in turn would have allowed asking the former ‘owners’ to tell their side of the story.**

**Clearly such cases should then also have been presented to the newly (in 2007) set up specialized courts.**

**If this kind of cooperation and verifying of what must be existing records is not possible then we would like to suggest that the CITES secretariat is wasting time and resources going on such missions.**

The relevant national authority would automatically conclude that the arrival of a CITES mission requires some token gestures and it will never be a question of anybody demanding to inspect records or check court files.

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**“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” (CITES 2007 – page 8).**

This makes it abundantly clear that none of these chimps or gorillas were ever confiscated and handed to a private collection, which the authorities then decided to classify as a ‘rescue centre’. Instead those private owners bought the illegally imported animals and then only reported their existence once they were at their facility. That only leaves the question open if the animals were ordered in advance via the well known network or if they were bought up when they had already arrived in Egypt.

The above individual has close contacts to the major traffickers and the officers at the airport and based on his ‘standing in society’ the traffickers would most likely have taken advantage of his connections to arrange safe transfer through the airport. (According to an Egyptian CITES official, the one shipment which went wrong in 2005 and which we documented in **The Cairo Connection** was a case of a competing animal dealer having heard about it and then using his contacts to arrange for ‘problems’ at the airport.)

**“The Secretariat also understands that prosecution has been started against an individual who acted as a ‘middle man’ in the domestic great ape trade in Egypt but that this case has been ongoing for over two years” (CITES 2007 – page 8).**

We never heard of any kind of prosecution having been carried out nor being ongoing.

**Did the Secretariat ask for any kind of documentary evidence to illustrate that indeed this was happening?**

**Can we get the outcome of this prosecution now four years later?**

## Prices

Every animal dealer and pet shop approached by a local investigator asking for baby chimps was offered one based on a certain ‘order period’. Everybody seems to operate as a middle man and to know of a source where chimps are available. Generally even the prices quoted were uniform:

US\$ 5 000 if the ape is picked up in Cairo  
US\$ 10 000 if it is exported without documents  
US\$ 20 000 if it is to be exported with CITES permits  
(via Syria or other neighbouring countries if necessary)

Though, before the Secretariat goes on to its recommendations, the 2007 report states:

**“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” (CITES 2007 – page 9).**

**We are here dealing with traders who have illegally trafficked apes for decades.**

**We are talking of hundreds of chimps and dozens of gorillas which have been laundered through Egypt, which have died in Egypt or still suffer in totally inadequate conditions in a range of private collections.**

**Does the Secretariat have the authority to ‘declare a general amnesty’ in the hope that things will change in future?**

**Can we now be told what specifically has changed in the last four years?**



## Ivory Trading

The 2007 report then goes on to ivory:

“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” (CITES 2007 – page 6).

Has the author seen the confiscated ivory at the Environment Police? What is the chance the officers in question told the shop owners (figure 25) to better hide the ivory for a few days until the officer from the CITES headquarters had departed?

Based on a personal comment<sup>21</sup> in April 2011 another inspection of ivory on sale in Egypt was done and all indicators are that nothing has changed and the same amount of ivory is for sale as was at the end of 2007.



Figure 25: Khan el-Khalili bazaar in Cairo close to the Egyptian museum (see Figure 18) – a centre of illegal ivory trade.

## Other Dealings in Wildlife

Another wildlife dealer advertising his ware on Facebook has pictures of chimpanzees and other primates. He is however a specialized dog trader and also holds lions and tigers and via his website offers ligers (hybrid tigers / lions) into Kuwait and the rest of the Middle East.

He features images on his web page (Tamer in Animal Kingdom<sup>22</sup>) of him with these ligers.

This would appear to be a new CITES dilemma: How should a liger be listed within the CITES context?

## The 2007 CITES Recommendations in the Light of Recent Investigations

The report lists 17 recommendations on pages 9 – 11 (CITES 2007). One example of compliance with these recommendations by the Egyptian authorities is given below.

### Recommendation 12:

“...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...” (CITES 2007 – page 10).

At the beginning of 2011 we sent back another investigator from Switzerland (a senior zoo keeper with experience in looking after great apes – see “The Story Continues – A Private Investigator’s Report”). He tried to check on “**Moza**”, the chimpanzee who was ‘dumped’ in Giza Zoo since ‘she was no longer suitable for breeding’. This investigator established again that the younger chimpanzees are still used on a daily basis in photography session despite the CITES Secretariat’s stipulation (figure 4):

As far as the definition of “zoo” versus “private animal collection” is concerned, the Secretariat notes:

„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” (CITES 2007 – page 7).

<sup>21</sup> Information received from representatives of various Egyptian NGOs.

<sup>22</sup> Source: <http://www.facebook.com/pages/-Tamer-Box-in-animal-kingdom-/152286674828128?sk=photos>.

“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 recommendations” (CITES 2007 – page 11).

#### Could we be told if this subject has in the meantime been addressed?

During the Meeting 57<sup>th</sup> meeting of the Standing Committee (SC) from July 14<sup>th</sup> – 18<sup>th</sup>, 2008, in Geneva (Switzerland) the Secretariat reported on its enforcement mission to Egypt and provided the report referred to throughout this document (CITES 2007 – Annex 2). The agenda of the SC meeting though does not show any item reporting on any kind of implementations of the 2007 CITES recommendations by Egypt until this meeting<sup>23</sup>.

## THE 2010 CITES FOLLOW-UP MISSION REPORT

The Secretariat decided to send a second mission to Egypt prior to the Doha meeting of the Parties in February 2010, to check on progress made by Egypt as far as any kind of implementation contained in the 2007 mission (CITES 2010a – Annex 4).

This mission was conducted as “an **assessment mission** to examine the implementation of the Convention” (CITES 2010a).

This would have been an announced visit, as seem to be all inspections by the CITES Secretariat. This clearly does not allow for any surprise spot checks of any holding facilities.

In addition we learned that officials from the CITES Secretariat are not to get directly in touch with national law enforcement agencies, but are meant to always go through the national CITES officials, who in turn are meant to set up meetings with the relevant law enforcement authorities (CITES 2005 – Annex 1).

The 2010 mission was undertaken by Laurent Gauthier, the CITES Programme and Documentation Officer, who does not seem to have a record of ever having conducted a field mission prior to this one. It would be interesting to see his qualifications as far following up on specific tasks, which would have required an investigative component. This especially since the Head of the Enforcement division of CITES continues to stress the fact that “only accredited members of an established enforcement authority should carry out any kind of investigative work” (CITES 2005).

Mr. Gauthier in his report tells us:

“The Secretariat found that Egypt has made great progress in implementing the Convention” (CITES 2010a – page 1 Nr 5).

He gives a list of examples none of them with really measurable criteria and as such they might as well amount to just more window-dressing by the authorities (CITES 2010a – Nr 5 a) – e)).

This is with the exception of him stating that:

“The Secretariat visited **all operations keeping apes** to verify their microchip tagging. The reader used to scan microchips required direct contact with the animals, which meant that scanning was not always possible, particularly where the apes were held in open enclosures. Nevertheless the Secretariat was able to verify the tagging of the majority of apes and is satisfied that the tagging and registration have been carried out comprehensively” (CITES 2010a – page 1 Nr 5 d)).

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Source : <http://www.cites.org/eng/com/sc/57/index.shtml>.

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How did Mr Gauthier know that he visited ALL the facilities, which hold apes? Did he go to Asyut, which has another farm holding apes?

How many of the apes could he approach to touching distance to read his microchip reader. For example all the apes now at African Safari are out on islands and out of range of any such reading device)?

Mr Gauthier suggests in this context that “Egypt acquire a long-range scanner to facilitate the identification of its apes” (CITES 2010a – page 1 Nr 5 d)).

Even if all animals were microchipped we know from the bear farms in South-east Asia that shady operators have learnt to take chips from dead animals and implant them in new and illegal arrivals (Personal communication<sup>24</sup>). How will this be controlled in the Egypt context?

Besides him not giving any explanations regarding the facilities he did visit, none of the other specifics expected to come with such a mission report are being provided:

- which facilities he visited?
- how many chimps and gorillas he saw?
- what sex ratio they were?
- what age classes they represented?
- what else he observed about the welfare and husbandry of these apes?

Therefore, absolutely no measurable information is given that would allow to evaluate in detail the ‘great progress’ Mr Gauthier claims that Egypt has made (CITES 2010a).

The only exception to the tale of success is the comment on the public display of chimpanzees at Giza Zoo:

“...The Secretariat found that some apes were still on public display at Giza Zoo, which is a public zoo, and in one private operation it visited. As the Egyptian Government does not operate any non-public rescue centre that could house confiscated apes, it has no other option but to keep them at Giza Zoo.

However, the Secretariat recommended to the Management Authority of Egypt that apes kept on display at the private zoo be removed from the areas to which visitors have access” (CITES 2010a – page 1 + 2 Nr 5e)).

These instructions were once again ignored as our investigator illustrated later in 2010 and then again in 2011.

The African Safari Park in question has three islands with illegally imported chimpanzees (figure 15). As mentioned above, it has lost two adult ones last year; one during the microchipping exercise ordered by the CITES Secretariat. The last island with three baby chimps was only set up in 2010. These illegally imported chimps are also used in a commercial setting on a daily basis (Ammann 2008, PASA 2009, Personal communication<sup>25</sup>).

The report concludes that:

“[The Standing Committee]...believes that the Management Authority of Egypt has developed all the necessary tools to monitor and keep trade in Appendix-I specimens under control, and it congratulates it for its work...

In conclusion the Secretariat sees no reason to reopen the issue **unless new and reliable information showing resumption in illegal trade or in violations of the Convention** were to emerge” (CITES 2010a – page 2).

We asked John Sellar about the specifics of the report on facilities visited and apes seen. He confirmed that a more detailed report existed. He suggested we discuss it with Mr. Gauthier directly, during the Doha meeting of the Parties.

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24 Information received from a private investigator in the region.

25 Information received from representatives of various Egyptian NGOs.

Once again from this inspection it becomes clear that there are no set guidelines as to what such inspection visits involve and what information is made available to the Parties. Such missions seem to consist of going on pre-announced guided tours, which involve some casual conversations with owners of illegal wildlife collections and officials who help them with window-dressing.

## The Doha Meeting

The Fifteenth meeting of the Conference of the Parties (CoP 15) took place in Doha (Qatar) from March 13<sup>th</sup> – 15<sup>th</sup>, 2010<sup>26</sup>. The NGO Pro Wildlife during a Committee session on Enforcement (here five officers from the Secretariat attended but not Mr. Gauthier, who was however present in Doha) asked the following question:

“We miss some relevant information in the CITES Secretariat recent mission report, for example any numbers of great apes kept in Egyptian facilities. How many gorillas, how many chimpanzees have been observed – and in which facilities?

We especially miss information on four gorillas, who have been observed at the Tower Hotel in 2008 and whose young age did not fit with the CITES permits given 13 and five years ago. As these animals are not mentioned in the Secretariat’s reports we fear that they just have disappeared” (Pro Wildlife 2010).

There is no recorded response to this question and all the minutes state:

“Pro Wildlife drew attention to the document Cop 15 info 20 [sic] regarding Egypt (CITES 2010a) and the smuggling of great apes and that whilst they appreciated Egypt’s progress, they considered that certain aspects of enforcement, such as the repatriation of confiscated great apes, remained lacking. They urged Parties to retain the item on the agenda for future meetings and to prepare appropriate proposals for Cop 16” (CITES 2010b – page 5).

The minutes on Enforcement matters state:

“The Secretariat ... drew attention to a report provided by Egypt in Annex 3 following a Secretariat mission to the country, and confirmed that, as there were no outstanding Standing Committee recommendations, the matter had now been closed” (CITES 2010b – page 3).

Regarding the personal meeting with Laurent Gauthier at Doha, as suggested by Mr Sellar, he first agreed to join a meeting with a group of range country representatives as well as Egypt and GRASP and then sent a note saying he would not be able to attend (figure 26):

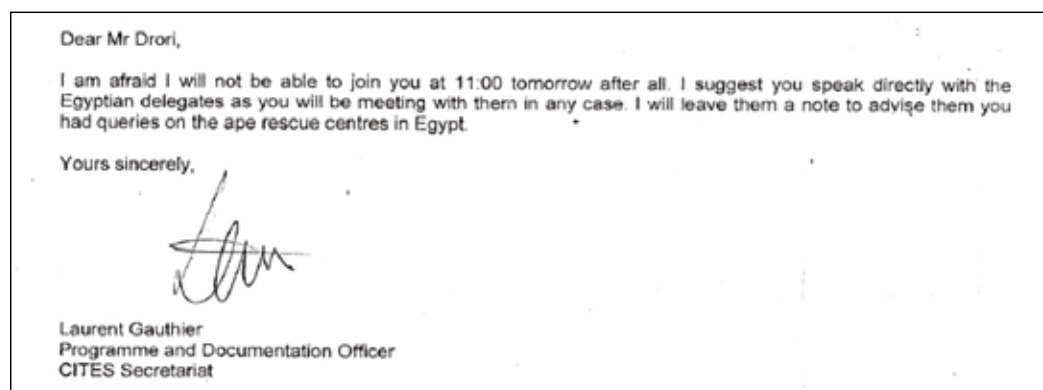


Figure 26: Note sent by Laurent Gauthier informing that he will not be able to attend a meeting with interested parties at CoP 15 in Doha (Qatar).



As stated earlier, during this meeting the Head of the Egyptian Management authority illustrated to the groupe "how successful" they now were at the Sharm el-Sheikh breeding facility by showing photographs on his mobile phone with a very small chimp in an incubator (figure 27).

He did then sign a short agreement that the Egyptians would provide **DNA evidence of all the chimpanzees and gorillas** they were holding, which would allow the other range countries to establish, if they might have been the source for these ape shipments (figure 28).

**This to the best of our knowledge was once again not complied with.**



Figure 27: Head of the Egyptian Management Authority (left) showing a chimpanzee in an incubator on his mobile phone.

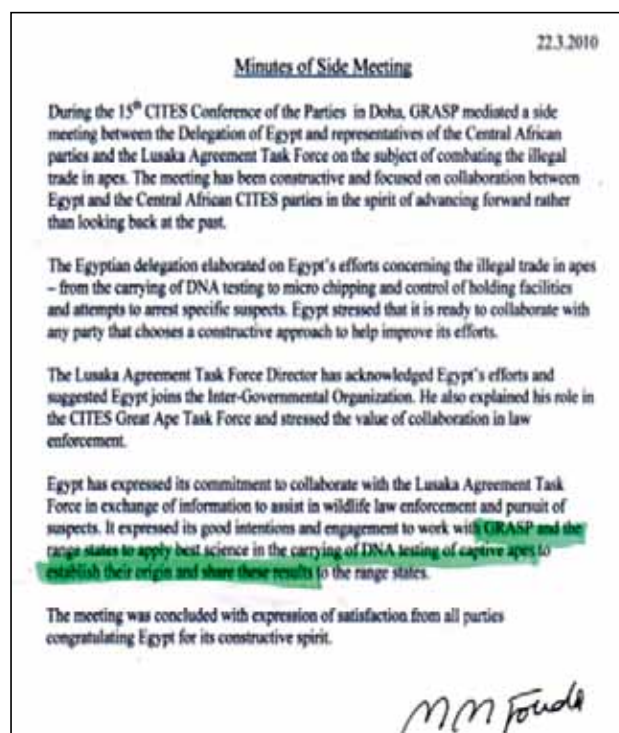


Figure 28: Copy of a statement signed by the Head of the Egyptian Management Authority and stating that they will support "carrying out DNA testing of captive apes to establish their origin".

## THE STORY CONTINUES – A PRIVATE INVESTIGATOR'S REPORT

A qualified third party recruited by Pax Animalis undertook two return visits to Egypt in 2010 and 2011 in order to investigate, if anything had changed as far as the apes on offer and the wildlife trade in general after the two CITES missions.

This investigator approached some of the prominent animal dealers about the availability of apes. It seems some of them got together and checked out his approach and tale and then called him back to warn him that they did not believe his story and he should stop playing a prospective buyer. However one dealer offered him a five year old gorilla and several chimpanzees. Figures 29 shows two examples of the respective email exchange.

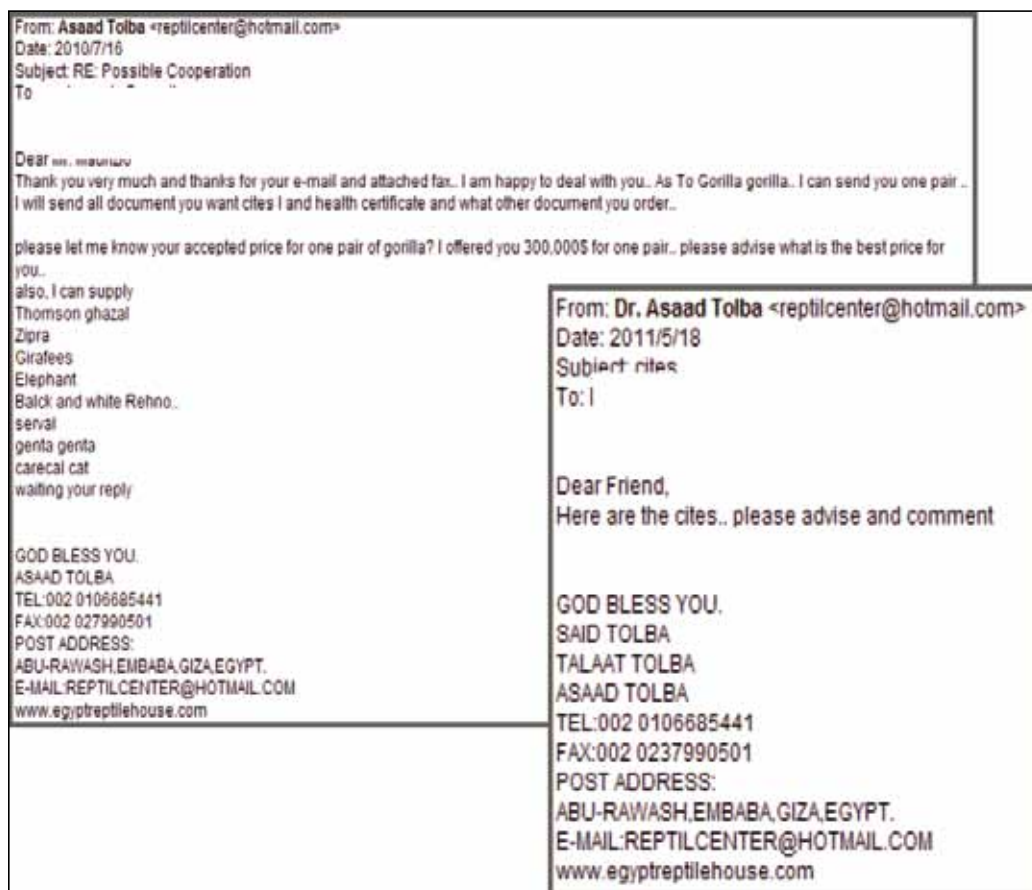


Figure 29: Two examples of the email correspondence between a private investigator and an illegal wildlife trader from Egypt.

In early 2011 the same investigator (he was there the day President Mubarak resigned and left town) met with the same dealer again in the hope to see the chimpanzees, who had been offered to him. He was told they were in Sharm el-Sheikh and due to the tense political situation could not be brought to Cairo.

However, the dealer (figure 30) provided some images of these babies. The background against which these chimpanzees are photographed might be that of a breeding facility (figure 11). So there is a good chance that the *Tower Hotel Breeding Centre* (figure 31) is now very actively and very commercially breeding chimps (pulling the babies from the mother as soon as



Figure 30: Dr Asaad Tolba – one of the prominent Egyptian wildlife dealers illegally trading apes.



Figure 31: The *Tower Hotel Breeding Centre* photographed in 2007 from the next door motel (a wall has now been built to avoid anybody taking these kind of pictures, but it would appear that some black bears have arrived which somebody photographed from the top floor of the motel).

they are borne) or alternatively there is another holding facility at Sharm el-Sheikh which holds illegally imported chimpanzees – there are indicators that trafficking from Egypt into Saudi Arabia and the Emirates takes place also via a Quarantine station at Aqaba in Jordan (figure 32; Personal communication<sup>27</sup>).

Later this dealer informed the investigator that he had problems getting CITES export permits in Egypt but Syrian permits would be possible. Presumably the chimps would be illegally shipped to Syria and then supposedly exported legally from there – these negotiations are still ongoing and recently resulted in us receiving CITES export permits from Syria (figure 33 + 34), which however do not bear the obligatory CITES stamp and as such looks like a forgery. There are also missing signatures and the re-export box is being ticked (presumably originating in Egypt).

Other shortcomings and discrepancies were addressed by sending us new and updated permits.



Figure 32: Aqaba in Jordan is another transit route through which chimps are illegally trafficked from Egypt to the Middle East.

© [http://www.websters-online-dictionary.org/images/wiki/wikipedia/commons/thumb/b/bc/Aqaba\\_location.png/300px-Aqaba\\_location.png](http://www.websters-online-dictionary.org/images/wiki/wikipedia/commons/thumb/b/bc/Aqaba_location.png/300px-Aqaba_location.png)

Figure 33: The first permit (left) contained a wrong import address, but was corrected (right).

27 Information received from representatives of various Egyptian NGOs.




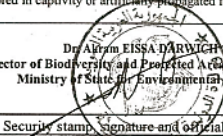
|   |          |  |      |   |                          |
|---|----------|--|------|---|--------------------------|
|  <b>CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA</b>  |          | <b>PERMIT/CERTIFICATE NO.</b><br><input type="checkbox"/> EXPORT<br><input checked="" type="checkbox"/> RE-EXPORT<br><input type="checkbox"/> IMPORT<br><input type="checkbox"/> OTHER   |      | <b>Original</b><br>11/SY/000310/AN<br><br>2. Valid until<br>November 17, 2011 |                          |
| <b>3. Import (name and address)</b><br>Zoo Lagundo Bruno Tenger<br>Steinachstrasse<br>39022 Algund BZ<br>Italien (Sudtirol)   |          | <b>4. Export / re-export (name and address and country)</b><br>Mohammad Faisal ALmanini<br>Forest Zoo – Damascus<br>Syria<br><br>_____<br>Signature of the applicant   |      |   |                          |
| <b>3a. Country of import</b><br>ITALY   |          | <b>6. Name, address, national seal/stamp and country of Management Authority</b><br>Syrian Arab Republic<br>Ministry of State for Environmental Affairs<br>Directory of Biodiversity and Protected Areas<br>Tel: 00963 11 2320884<br>Fax: 00963 11 2320884 |      |   |                          |
| <b>5. Special condition</b><br>For animals, this permit or certificate is only valid if the transport conditions conform to the CITES Guidelines for transport or, in the case of air transport, to the IATA Live Animals Regulations   |          |  |      |   |                          |
| <b>5a. Purpose of the transaction: Z</b>  |          |  |      |   |                          |
| <b>7/8. Scientific name (genus and species) and common name of animal or plant</b>  |          | <b>9. Description of specimens, including identifying marks or number (ages/sex if live)</b>   |      | <b>10. Appendix no. and source</b>  |                          |
| 7/8 <i>Pan troglodytes</i>  |          | 9. Live<br>Age: one and half year  |      | 10. I – C   |                          |
| <b>12. country of origin*</b><br>Syria  |          | permit no. _____ Date _____  |      | <b>11. Quantity (including unit)</b><br>11. – 2 –                             |                          |
| <b>12a. country of last re-export</b>   |          | Certificate _____ Date _____   |      | <b>11a. Total exported/ quota</b><br>11a. –                                   |                          |
| <b>12b. No of the operation** or date of acquisition***</b>   |          | _____  |      | _____   |                          |
| <b>7/8</b>  |          | <b>9.</b>  |      | <b>10.</b>  |                          |
| <b>12. country of origin*</b>   |          | permit no. _____ Date _____  |      | <b>11.</b>  |                          |
| <b>12a. country of last re-export</b>   |          | Certificate _____ Date _____   |      | <b>11a.</b>   |                          |
| <b>12b. No of the operation** or date of acquisition***</b>   |          | _____  |      | _____   |                          |
| <b>7/8</b>  |          | <b>9.</b>  |      | <b>10.</b>  |                          |
| <b>12. country of origin*</b>   |          | permit no. _____ Date _____  |      | <b>11.</b>  |                          |
| <b>12a. country of last re-export</b>   |          | Certificate _____ Date _____   |      | <b>11a.</b>   |                          |
| <b>12b. No of the operation** or date of acquisition***</b>   |          | _____  |      | _____   |                          |
| <b>7/8</b>  |          | <b>9.</b>  |      | <b>10.</b>  |                          |
| <b>12. country of origin*</b>   |          | permit no. _____ Date _____  |      | <b>11.</b>  |                          |
| <b>12a. country of last re-export</b>   |          | Certificate _____ Date _____   |      | <b>11a.</b>   |                          |
| <b>12b. No of the operation** or date of acquisition***</b>   |          | _____  |      | _____   |                          |
| *Country in which the specimens were taken from the wild, bred in captivity or artificially (only in case of re-export)<br>** Only for specimens of Appendix- I species bred in captivity or artificially propagated for commercial purposes<br>*** For pre-Convention specimens  |          |  |      |   |                          |
| <b>13. This permit/ certificate is issued by:</b><br><div style="text-align: center;"> <br/> <b>Dr. Akram EISSA DARWICH</b><br/>         Director of Biodiversity and Protected Areas Department<br/>         Ministry of State for Environmental Affairs       </div> |          |  |      |   |                          |
| <b>Damascus</b><br>Place  |          | Security stamp, signature and official seal  |      | May 18, 2011<br>Date  |                          |
| <b>14. Export endorsement</b>   |          |  |      |   |                          |
| <b>15. Bill of lading/ Air waybill:</b>   |          |  |      |   |                          |
| Block   | Quantity |  |      |   |                          |
| A   |          |  |      |   |                          |
| B   |          |  |      |   |                          |
| C   |          |  |      |   |                          |
| D   |          |  |      |   |                          |
|   |          | Port of export   | Date | Signature   | Official stamp and title |

Figure 34: This is the final CITES permit as it stands now, which was sent on May 22<sup>nd</sup>, 2011.

During his visit in February 2011 our private investigator also briefly visited Giza Zoo and reported back as follows:

"In the morning my driver and I return to Giza Zoo for the intended undercover investigations. I want to have another look round the area to develop my own feeling for the situation.

Just as during my last visit I am immediately approached by a photographer who asks if I want to get my picture taken together with lions, elephants, hippos, bears or chimpanzees. I book the photo session.

Again I am taken into a back room where the lions are kept. First they take me to see the adult animals, who all seem very subdued to me as if they have been severely drugged (what I assume is the case). Then, they show their baby lions to me; the three youngsters are in very poor condition; they have various skin lesions, are malnourished and kept under appalling conditions. The animals have no access to water; no sunlight gets into the rooms. We take the usual photographs and then continue our tour.



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The photographer offers me to get additional pictures taken with bears, etc. I tell him that I would rather get my picture taken together with some chimpanzees. So he takes me to see the baby chimps. He knocks at a door and a keeper opens from the inside. He welcomes me. I count altogether four chimpanzees; one of them (about two years old) seems to be a new addition. Three of the young chimps are used for the photo session. One of the animals is kept in a separate confinement. I manage to collect some hair samples for analysis.

After I have paid ten pounds he is going to take the chimpanzees out of their cage, but discovers the camera at my belt. Immediately, the photo session is interrupted, because, as the keeper says, the animals have to be checked by the veterinarian first. I am asked to leave.

What follows can only be described as an absolute insolence: a gang of five to seven people pushes me into a vehicle. One of these people introduces himself as the Zoo's manager. He informs me that it is forbidden to film and take pictures. Then my luggage is searched, my passport confiscated and I am taken to an office at the Zoo. Here, I am treated rather unfriendly and put under observation.

I am told that my actions were illegal and therefore they would have to hand me over to the army. A short while later I am indeed picked up by some soldiers. At the army post I have to wait for the chief for about one-and-a-half hours. When he arrives I have to recount my whole story once more. The army personnel treats me very kindly, hands my camera back to me, which had been confiscated by the Zoo people, and eventually lets me go without imposing any sanctions.

What might be the reason for a Zoo to make it illegal to take pictures or film its animals? Is it not one of a Zoo's rights to exist that people can take pictures of its animal collection? What is Giza concerned about, if everything is supposedly in order?

Clearly the Giza Zoo management is aware of the fact that it is illegal to ask visitors to pay money for getting their picture taken with a baby chimp or a lion."

**Both the visits from the secretariat (in 2007 and 2010) dealt with the continued and illegal use of confiscated and illegally held animals in a commercial setting and asked for respective measures to be taken. As with all other such stipulations (except maybe for some microchipping) Egypt seems to also have ignored all these instructions.**

## SUMMING UP THE MOST RECENT DEVELOPMENTS

Our report on conversations (some also filmed with hidden camera) of **pet shop owner's offering chimpanzees** was classified by CITES officials as a counterproductive approach on the basis that such sting operations, pretending to be potential buyers, were counter productive and might encourage the trade (Personal communication<sup>28</sup>).

This irrespective of the fact that pretty much all organized law enforcement authorities on this planet use such sting operations to get to traders of contraband. It seems to be one of the only effective ways to get any first hand information of what is really going on – in contrast to the fairy tales presented by some of the local CITES officials – like the main trafficker has fled the country.

In the end we provided the DVD of the **Suez Road incident** to the Egyptian Permanent Mission in Geneva prior to the 2008 Standing Committee meeting. They confirmed that they received it and would investigate and provide feedback. We never heard anything thereafter.

In 2010 when our private investigator managed to again find the location on the Suez Road shown in the photographs (figure 18 – 21) and which was supposedly where the animals were kept, he found the forest patch deserted.

The assumption has to be that the Geneva mission did take some action and the place was raided but there was never any sign of any confiscated chimps or other wildlife.

In mid 2010 a female chimp – **Moza** – appeared in a small miserable monkey cage at Giza Zoo. Local activists investigating found that she had been sent unsolicited by the *Tower Hotel Breeding Centre* in Sharm el-Sheikh. The letter which accompanied her, tells us she is captive

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28 Email of October 24th, 2008, from John Sellar to Karl Ammann.

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borne (very unlikely and another reason to do some real DNA testing), that she had an incurable tumour and 'was no longer suitable for breeding' (figure 8).

The **Giza Zoo** despite considerable outside pressure took months to arrange a biopsy (with the chimp now having been locked away from the public and her cage boarded up on all sides so nobody would get upset by seeing the big tumour on her chest – figure 8). Finally she got some proper treatment and the tumour was not cancerous and she has recovered.

Although she is still in solitary confinement since nobody at Giza Zoo seems capable of integrating her with the other three teenage chimps. If it illustrates anything it is the fact that this private collection at Sharm el-Sheikh also does not have adequate veterinary facilities and expertise to deal with great ape husbandry issues.

Certainly there has been **no independent third party inspection** of such facilities as the *Tower Hotel Breeding Centre*, or the Utopia Ostrich farm or another one at Asyut as well as of the holding facilities of animal dealers and circus owners, some of which are also holding great apes. Most of these private farms are guarded by armed Bedouins which seem to have no problem using their arms if they feel necessary to keep away outside parties (figure 18 – 21).

Also in **2009**, during the **Standing Committee meeting in Geneva**, the Cameroon delegation asked for Egypt to be sanctioned for the continued violation of the Convention. The Egyptian delegation called their ambassador at the permanent mission in Geneva. He in turn called his Cameroonian counterpart.

The Cameroonian ambassador then showed up at the venue and declared that his delegation had no authority to ask for any kind of sanction as far as Egypt was concerned. It was pointed out to him that he was not accredited to the Standing Committee meeting but his delegation, which put in the request, was. **It then all descended into a farce...**

Among the range of recommendations of the CITES 2007 mission there is item 15 on page 11, stating:

**"Recommendation 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" (CITES 2007 – page 11).

**The big question is: was all this information supplied to the CITES secretariat during their follow up mission in 2010?**

**If it was not then on what basis would the Secretariat have suggested, during the Doha meeting, that Egypt is now in full compliance with the Convention?**

**If it was supplied why is this information not being made public in a report which could be inspected?**

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## NECESSARY CONSEQUENCES & URGENT REQUIREMENTS

Having provided a lot of the above information to the Secretariat in one form or the other, being given a copy of the full report of Laurent Gauthier's mission to Egypt in February 2010 would indeed have helped to establish if any real progress had been made or if the Secretariat had joined the Egyptian authorities in another cover up and window-dressing exercise.

As the CITES regulations state:

**«Wherever practical, the Secretariat will, unless requested not to do so, advise persons and organizations supplying information how it has made use of the information and the results of any investigations conducted. The detail relating to the results of investigations may, of course, have to be restricted owing to it being subject to court proceedings or confidential for other reasons, and these will be explained by the Secretariat.»**  
**(CITES 2004 – Guidance 9.).**

An investigation is "...a careful search or examination in order to discover facts...<sup>29</sup>".

What the two CITES missions to Egypt have demonstrated is that they were pre-arranged guided tours with the 'tour guides' interested that many facts would not get discovered ("**the foxes watching the hen house**").

Should CITES as a first step decide what to call its enforcement missions?

To compare present data available with what Mr. Gauthier found in February 2010, can we now ask once more for a copy of this report in line with the Conventions rules and regulations?

A range of requests by ourselves, various NGOs and the Great Apes Survival Partnership (GRASP), a UN body, have yielded no response.

Furthermore, considering the information provided in this report, we would like to ask CITES to decide if it amounts to 'new evidence' and if therefore the Egypt case can be re-opened and if once and for all CITES will at least follow the guidelines of its UN sister organization (GRASP; CITES 2010c), which in 2009 provided the basic framework, which should be put to the Egyptian authorities to avoid sanctions?!

Great Apes Survival Partnership stipulations of September 2009 (GRASP 2009):

- **Law enforcement** measured through records of confiscations, arrests and successful prosecutions for ape trafficking
- **Management and welfare** of the apes held in Egypt:
  - Egypt identify and place a microchip (as referred to in the Annex of Soc 58 Doc 23) on all great apes held in Egypt.
  - Egypt should DNA test all great apes for subspecies identification (also as referred to in the Annex of Soc 58 Doc 23).
  - Egypt should submit all great ape facilities to unannounced inspections by CITES and outside agencies.
  - Egypt should publicly identify the facilities designated as CITES rescue centers, and open these centers to international experts.

The Annex of "Soc 58 Doc 23" can be found in the reference cited as "CITES 2009".

**Without the Secretariats willingness to sign on to this very basic level of transparency and accountability the question does arise if enforcement missions carried out by Geneva officers are part of the problem rather than any solution.**

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29 Source: <http://www.thefreedictionary.com/investigation>.

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These references entail emails, faxes and letters as well as interviews, most of which can be made available on request.

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CITES. 2005. Telefax transmission 31.03.2005. Subject: Illicit trade in primates. To "The CITES Management Authorities of Egypt, Kenya and Nigeria". From: John M. Sellar, Senior Enforcement Officer, Legislation and Compliance Unit. CITES, Geneva: 2 pp.



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## ACKNOWLEDGEMENTS

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## Contact

Karl Ammann: [karl@karlammann.ch](mailto:karl@karlammann.ch)  
Pax Animalis: [www.pax-animalis.org](http://www.pax-animalis.org)  
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*Code Report*

*OECD Transparency Int'l.  
Human Rights Commission  
Amnesty Int'l.*

*Head Intelligence Investigation*

04/01/05 15:23 FAX ++4122 797 34 17 CITES

*Kenya*

*Can you brief on this?*

*to guide us re: info.*

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

**KENYA WILDLIFE SERVICE  
RECEIVED  
- 6 APR 2005  
ASSISTANT DIRECTOR INVESTIGATION  
P.O. Box 40241, NAIROBI**

**TELEFAX TRANSMISSION**

**KENYA WILDLIFE SERVICE  
RECEIVED  
- 4 APR 2005  
E.P.C.  
P.O. Box 40241 - NAIROBI**

Our ref.: JMS/CIT011736  
Your ref.:

|          |  |          |               |
|----------|--|----------|---------------|
| To:      | The CITES Management Authorities of Egypt, Kenya and Nigeria<br>cc: Lusaka Agreement Task Force, Interpol General Secretariat and UNEP/GRASP | Date:    | 31 March 2005 |
| From:    | John M. Sellar<br>Senior Enforcement Officer<br>Legislation and Compliance Unit  | Page(s): | 2             |
| Subject: | Illicit trade in primates  |          |               |

The CITES Secretariat was advised in early February 2005 of a seizure of primates that took place in Kenya on 31 January 2005. This apparently involved six chimpanzees and four guenon monkeys that were in transit, having been refused entry to Egypt when it was found that no CITES documents accompanied the movement. It is not clear why the primates and a female suspect were not detained in Egypt.

It is believed that a female Nigerian national had been responsible for this movement and accompanied the animals, but she subsequently left Kenya, apparently before the authorities could deal with her. We understand that the woman and primates may also have transited through Sudan at some stage.

The CITES Secretariat understood that this matter was being investigated by the relevant national law enforcement agencies. However, we have recently learned that an individual associated with a non-governmental organization is also conducting 'investigations' into the incident and that he, or his colleagues, may already be in possession of documents (or copies of documents) that could be evidence necessary for any subsequent prosecution.

Whilst the CITES Secretariat acknowledges that non-governmental organizations can play a useful role in supporting wildlife law enforcement, it is firmly of the opinion that investigations of violations of the Convention are solely a matter for national, regional or international law enforcement organizations. Consequently, the Secretariat urges Egypt, Kenya and Nigeria to conduct a joint and cooperative investigation into this incident and that all relevant information should be exchanged between their relevant law enforcement agencies to enable the responsible woman, and whoever else may have been associated with this crime, to be brought to justice. Where appropriate, it encourages the use of Interpol channels to exchange information or make requests for assistance. If appropriate and desired, we will also readily assist in such exchanges or requests and we know that the Lusaka Agreement Task Force is also ready to provide support, albeit some of the affected countries are not signatories to the Agreement.

04/01/05 15:24 FAX ++4122 797 34 17 CITES

*Kenya*

002/002 102

To: CITES Management Authorities of Egypt, Kenya and Nigeria 31 March 2005  
From: John M. Sellar, Senior Enforcement Officer, CITES Secretariat page 2

This incident suggests that illegal trade of primates from Nigeria continues to be a problem. We also note that Egypt has previously been a destination for such trade. Because of this, and the urgent need to eliminate illicit trade in primates, we believe that this incident requires to be pursued vigorously and we will provide whatever assistance we can.

The CITES Secretariat would welcome being advised of progress of the investigations by national law enforcement agencies, since we have an obligation to report to the Standing Committee and Conference of the Parties on significant enforcement matters.

Your assistance is greatly appreciated.

Yours sincerely,

*[Signature]*

Annex 1: Copy of a telefax transmission of March 31st, 2005, by John Sellar, Senior Enforcement Officer, Law and Compliance Unit, to The CITES Management Authorities of Egypt, Kenya and Nigeria.



SC57 Doc. 20 Annex / Anexo / Annexe  
(English only / únicamente en inglés / seulement en anglais)



**CITES SECRETARIAT**  
**Enforcement-needs assessment mission**  
**EGYPT**



17–23 November 2007



SC57 Doc. 20 Annex / Anexo / Annexe – p. 1

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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.

## **Report on visit to Egypt and the United Arab Emirates, June 28th to July 7th**

Att.: General Maher, Head of the Environmental Police  
From: K. Ammann  
CC: Dr Sherbiny The Egyptian Society of Animal Friends  
Dina Zulficar Animal Welfare Awareness Research Group  
John Sellar CITES Geneva

As per our telephone conversation and the meeting with a number of your officers, I am providing below the additional comments regarding some of the findings and events which occurred during my visit and which I feel require the attention of the corresponding law enforcement authorities.

### **1. The five chimpanzees originally held at the Hauza Hotel in Sharm el Sheikh**

Last year in October I asked an individual to visit the Hauza Hotel to establish how many chimpanzees were in residence. Not unexpectedly, he reported that the cages were empty and no chimpanzees were in sight (we know from various reports that a few months earlier there were five young chimpanzees at this facility). I asked Dr. Ragi of the CITES Management authority if he knew where the five chimpanzees had been moved to – just prior to the arrival of the CITES fact finding mission. He first indicated that he thought some of the chimps which were confiscated and were now at the Giza Zoo originally came from the Hauza Hotel. After some deliberation with representatives of NGOs it became clear that this could not possibly be the case and that the confiscated chimps came from other well-known locations. Dr Ragi also mentioned that the CITES inspection team visited the Hauza Hotel and did not find any chimpanzees (unfortunately this does not appear to have been mentioned in the official CITES report). It would be interesting to receive some information as to where these 5 chimpanzees are housed today? What condition are they in? Are they in any kind of approved facility? One with "rescue center" status? And if indeed these are the only chimps present at this new location and how these apes first arrived in Egypt?

### **2. The attempt which was made to establish the possible new location where these chimpanzees are being housed**

On a past visit to the Hauza Hotel at Sharm el Sheikh the chimp keeper informed us that the owner of the hotel kept various apes at his house and farm in or near Cairo. Mr. Ashraf Enab provided me with his business card which lists his Ostrich farm venture. Going into the corresponding website one finds the farm is located at kilometer 68 on the Alexandria road and it offers such services as "providing feasibility studies for new investors" – in ostrich farming. After interviewing Mr. Tarik of African Safari, together with a team from the Associated Press, I asked our drivers to stop at the above ostrich farm on our way back to

Cairo. We asked at some other farm gates and were directed to a gate and walled in property some 3 kilometers from the main road. Our driver asked at the gate if we could visit the ostrich farm. We were told to wait why some phone calls were being made. Then the gate which had been opened was closed. The driver then looked through the viewing hole in the gate and suggested that we leave since a man in a blue gallabiah was approaching with a semi-automatic weapon. We turned the cars around ready to leave when the person in charge, "the engineer," arrived and there were some heated discussions with the drivers in Arabic which I did not understand. Eventually they got back in the cars and we started driving of when two shots were fired. We did not see the shooter at the time and assumed they were fired over the wall as some kind of a warning. About a kilometer down the road a car came driving at us at high speed in the opposite direction. It came to a screeching halt in front of us blocking our way. It carried four or five young men (the AP car behind us drove up on to the bank on the left side and managed to pass us and the road-blocking vehicle). Another heated exchange ensued in Arabic between our driver and two occupants which got out of the car. After about five minutes of this they jumped back in, swerved past us and took off. Our driver concluded that the level of threats uttered in Arabic, the display of a semi-automatic weapon and the actual shooting of it could not possibly be all because of some ostriches or chimpanzees and that there had to be other reasons. We reported the incident to Dr. Ragi and Dr. George of the CITES Management authority and the driver made a corresponding report in Arabic. We were told to file the same report with the Environmental police. I would also like to respectfully add:

- we never entered any kind of privat property on this side road
- there are no signs on the Cairo-Alexandria road which state that foreigners are not allowed to leave the road and enter the desert.

### **3. Mrs. Heba's whereabouts**

During the same meeting with the CITES authorities we were told that Mrs. Heba had now been officially listed by Interpol and that she had fled the country supposedly back to Nigeria and that the Environmental Police had visited her premises several times and there was no sign of her. I sent two contacts, who had in the past helped me to offer Mrs Heba "the right to respond" to allegations made in the film *The Cairo Connection*, to visit her premises and find out her present whereabouts. The door man confirmed that she was in residence. They went upstairs while the luncheon meal was delivered and saw her two daughters (both implicated in various ape trafficking incidents) and although they did not see Mrs. Heba they had absolutely no doubt that she was in residence. They provided the corresponding report in Arabic to your officials. In our conversation you stated again that the Egyptian law did not provide for any arrest or prosecution of any traffickers, certainly not for being in possession of protected species. This is also backed up by an E-mail from Dr. Fellali, the former head of

the CITES management authority, who stated in 2006: "Before proposed amendments of the Law of Environment (No 4 for the year 1994) come to force here in Egypt these individuals can not be tried by a court of Law in Egypt." This however contradicts some of the statements contained in the recent CITES secretariat report concerning its Enforcement-needs assessment mission.

I quoted to you article 28 of the 1994 law which makes it illegal "to possess, transport, export, import or trade in these species, alive or dead." Article 84 then stipulates a minimum fine of Pounds 5000 and a max of Pounds 50,000 and imprisonment with hard labour (the law seems to specifically state AND, not OR) for offenders. The 1999 Ministerial decree then updates and refers to the 1994 law and takes into consideration all of the specific CITES compliance requirements. The assumption has to be that this law was then ratified. I would welcome some clarification on this issue and any information concerning any legal proceedings against Mrs. Heba.

#### **4. New chimpanzee arrivals at Africa Safari Park on the Cairo-Alexandria road**

This Safari Park is open to the public and, as on previous visits, we stopped by to establish any change in the status of their chimpanzee population. We telephoned the owner prior to our arrival and requested an interview which he granted. We first visited the two adult chimps on the rock island. Then next door to the restaurant we were allowed to play with three babies. It would appear the oldest one is from the previous grouping we filmed in 2006 but based on size the smaller two are new additions (I will have to compare the photographs). We then were shown three new adults on a relatively large island. There were two males and one female in good condition. AP then interviewed Mr. Tarik, the owner, who confirmed that he bought four of them 7 months ago (probably just after the visit of the CITES team). He stated that they had been held in very small cages within Egypt (he also had 23 new baboons crammed in cages which had just arrived from a facility within Egypt) and that they were a lot better off where they were now. He would not divulge any details as to where these three fully adult animals had been kept previously and how many were possibly still there, or if indeed the owner had replaced the ones he sold by buying new baby arrivals. I do feel strongly that if the Environmental Police Department is to make any real progress in shutting down the trade of apes and other endangered wildlife into and out of Egypt not only will the traders need to be prosecuted and hopefully sentenced but the buyers will also need to be made to understand that the internal trade of illegally imported apes will not be tolerated. The proposed micro-chipping would of course go a long way in establishing which animals are being exchanged within Egypt and which animals are new arrivals, replacing apes which clearly perish regularly.

(We only saw one tiger this time at Lion Village, while past video footage shows at least a dozen).



## **5. Four more baby gorillas at Sharm el Sheikh**

On June 5th I was copied on an E-mail of a Zoo director (Frank Rietkerk from Appenheul Zoo in Holland) in which he made the following statement:

"I met Dana Holeckova of Dvur Kralove in Frankfurt. She had pictures on her laptop of the 'zoo' in Sharm el Sheikh, on the Sinai Peninsula. Strange place. There is a whole bunch (4 or 5?) young gorillas there in a sandy exhibit with palm trees. They looked OK and the exhibit wasn't too bad, but might be a bit hot during the summer! Obviously this is not a good place for them to stay in the longer term. Dana said they were all confiscated but one wonders. Sharm el Sheikh is a huge tourist development."

I informed Mr Rietkerk that he seems to have good reason to wonder. I had asked Mr. Sellar of the CITES secretariat how many gorillas he had seen during his visit to the Tower Hotel Zoo. He confirmed that he had seen two teenage apes. He did not mention any kind of new confiscations and Dr. Ragi and Dr. George denied any knowledge of any new gorillas having arrived or having been confiscated. This morning I received from Mr. Rietkerk the picture in question which is attached and which seems to show four new small gorillas and possibly one of the two Mr. Sellar had seen. Mr. Rietkerk also confirms that the picture was taken by Dana Holeckova in January 2008.

Clearly these gorillas arrived after the Nov 2007 CITES mission visited this facility (or they were hidden from view the time they were there). This means more gorillas were ordered, delivered, and paid for and then declared as rescued in this "official rescue center." The word which comes to mind in analyzing this interpretation of the stipulations of the convention is: Absurd....

Yesterday I also received further evidence that a range of parties might be aware of the existence of these new gorillas and that the recent visit by the CITES assessment mission is being used to pretend that all these apes had been discussed and dealt with. The corresponding e-mail is from Nick Lindsay of the Zoological Society of London who was recently in Egypt to assist with the Giza Zoo. He writes to a colleague in Czech Republic who informed him of the existence of the photographs and the 4 or 5 small gorillas featured in it: "I was at the Cairo Zoo recently and heard that the director had been there some weeks ago," referring to the Czech Zoo director who had taken the picture of these gorillas. He continues, "I did hear about the gorillas at Sharm el Sheikh which are there legally, apparently. They were confiscated when they passed through Egypt. This was discussed with the CITES authorities."

In an earlier exchange with Prof Fellali, the former head of the CITES management authority in 2008 I pointed out that we had video footage of the gorillas held near the Tower Hotel dating back to 2003 and that the photographs taken of gorillas at this facility in 2006 could not possibly be the same apes or they would have shrunk in the three years. I also had

comments from competing private collection owners stating that some colleagues kept importing gorillas although it was clear they could not keep them alive (the problem seems to be less the summer heat than the winter cold which can be very extreme in these desert settings).

While walking around the Giza Zoo with Ms. Zulficar we identified a large and very tall cage facility which is about five times the size of the outdoor cage the chimps have at their disposition. The cage has some very large tree trunks and is by far the best primate facility on the premises. At the moment it is home to some 12 small vervets. In my assessment it would not be suitable for any fully grown chimp or gorilla but any grouping of small apes would be perfectly fine in this cage with the corresponding night housing and as such there is no reason why these gorillas could not be housed at an official government-owned "rescue center." The confiscation of these apes would also, once and for all, send a clear cut message to the traffickers and buyers of illegal wildlife.

## **6. Ivory**

Dr. Ragi and Dr George suggested that we investigate markets concerning the continued sale of ivory. While my wife did some shopping at Khan el Khalili I decided to visit one shop called "Ivory and Ebony," owned by a Mr. Lamai Abdel Malek. I was offered a wide range of ivory items which were clearly ivory and not camel bones. When asking for plain bangles the owner opened two drawers behind the desk which held a wide variety of these items. Many other pieces were openly on display.

As promised to your officers I will edit down the video material shot on this trip (none with hidden cameras) and present it for their inspection. The objective of this trip was to update the film The Cairo Connection based on the request of various TV networks which have already broadcasted it. I conducted this follow up mission once again with my own resources as an independent journalist and film maker. I strongly feel that the new findings do belong in the public domain and I would very much welcome an invitation to come back to Cairo in a few months to provide your department the right to respond. In the meantime I plan to circulate this report to other interested parties besides the ones on the above CC list.

Dubai, July 3rd 2008

Karl Ammann

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



Fifteenth meeting of the Conference of the Parties  
Doha (Qatar), 13-25 March 2010

IMPLEMENTATION OF THE CONVENTION IN EGYPT

1. This document has been prepared by the Secretariat.
2. Following ongoing concerns regarding illegal trade involving Egypt, especially with regard to great apes and ivory, Egypt invited the Secretariat at the 14th meeting of the Conference of the Parties (The Hague, 2007) to conduct an assessment mission to examine implementation of the Convention. That mission was conducted in November 2007 and the Secretariat's report was made available to the Standing Committee at its 57th meeting (SC57, Geneva, July 2008, see document SC57 Doc. 20). The Committee endorsed the recommendations it contained.
3. At SC58 (Geneva, July 2009), Egypt and the Secretariat reported on progress with the implementation of the recommendations mentioned above (see document SC58 Doc. 23) and the Standing Committee requested Egypt to report at the present meeting on its implementation of the recommendations contained in the Annex to document SC57 Doc. 20. It also directed the Secretariat to monitor progress and provide support to Egypt.
4. Consequently, the Secretariat conducted a second mission to Egypt in February 2010, focussing particularly on apes. The present document summarizes the findings of the Secretariat.
5. The Secretariat found that Egypt had made great progress in implementing the Convention. In particular:
  - a) All operations keeping apes and other wild animals must operate under a one-year renewable licence. Renewal of this licence requires the implementation of any recommendation the Management Authority may make to those operations during verification visits.
  - b) The ownership of all apes previously kept by private individuals and imported into the country illegally has now been transferred to the Egyptian Government.
  - c) The apes have been tagged with a microchip and registered by the Management Authority. Furthermore, at the time of writing (February 2010), the Management Authority was expecting the results of DNA analysis to complete this register. These results will allow it to verify the origin of any offspring held by the operations.
  - d) The Secretariat visited all operations keeping apes to verify their microchip tagging. The reader used to scan the microchips required direct contact with the animals, which meant that scanning was not always possible, particularly where the apes were held in open enclosures. Nevertheless, the Secretariat was able to verify the tagging of the majority of apes and is satisfied that the tagging and registration have been carried out comprehensively. The Secretariat simply recommends to the Management Authority of Egypt that it acquire a long-range scanner to facilitate the identification of apes. This seems all the more important as Egypt plans to microchip all Appendix-I specimens held in captivity on its territory.
  - e) In its report contained in the Annex to document SC57 Doc. 20, the Secretariat had recommended that "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." The Secretariat found that some apes were still on public display at Giza Zoo, which is a public zoo, and in one private operation it visited. As

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the Egyptian Government does not operate any non-public rescue centre that could house confiscated apes, it has no other option but to keep them at Giza Zoo.

However, the Secretariat recommended to the Management Authority of Egypt that the apes kept on display at the private zoo be removed from the areas to which visitors have access.

6. The Secretariat believes that Egypt has made significant efforts to implement the recommendations of the Standing Committee. It also believes that the Management Authority of Egypt has developed all the necessary tools to monitor and keep trade in Appendix-I specimens under control, and it congratulates it for its work. This is very commendable given that the Egyptian CITES Authorities seem to have very limited resources. The Secretariat therefore urges the Government of Egypt to provide all the necessary financial support to its Management Authority to allow it to implement the Convention successfully (increasing the very low price of the entrance ticket to Giza Zoo or the fee for issuing CITES documents to a level similar to other countries in the region might be options worth exploring in this regard). In conclusion, the Secretariat sees no reason to reopen this issue unless new and reliable information showing resumption in illegal trade or in violations of the Convention were to emerge.