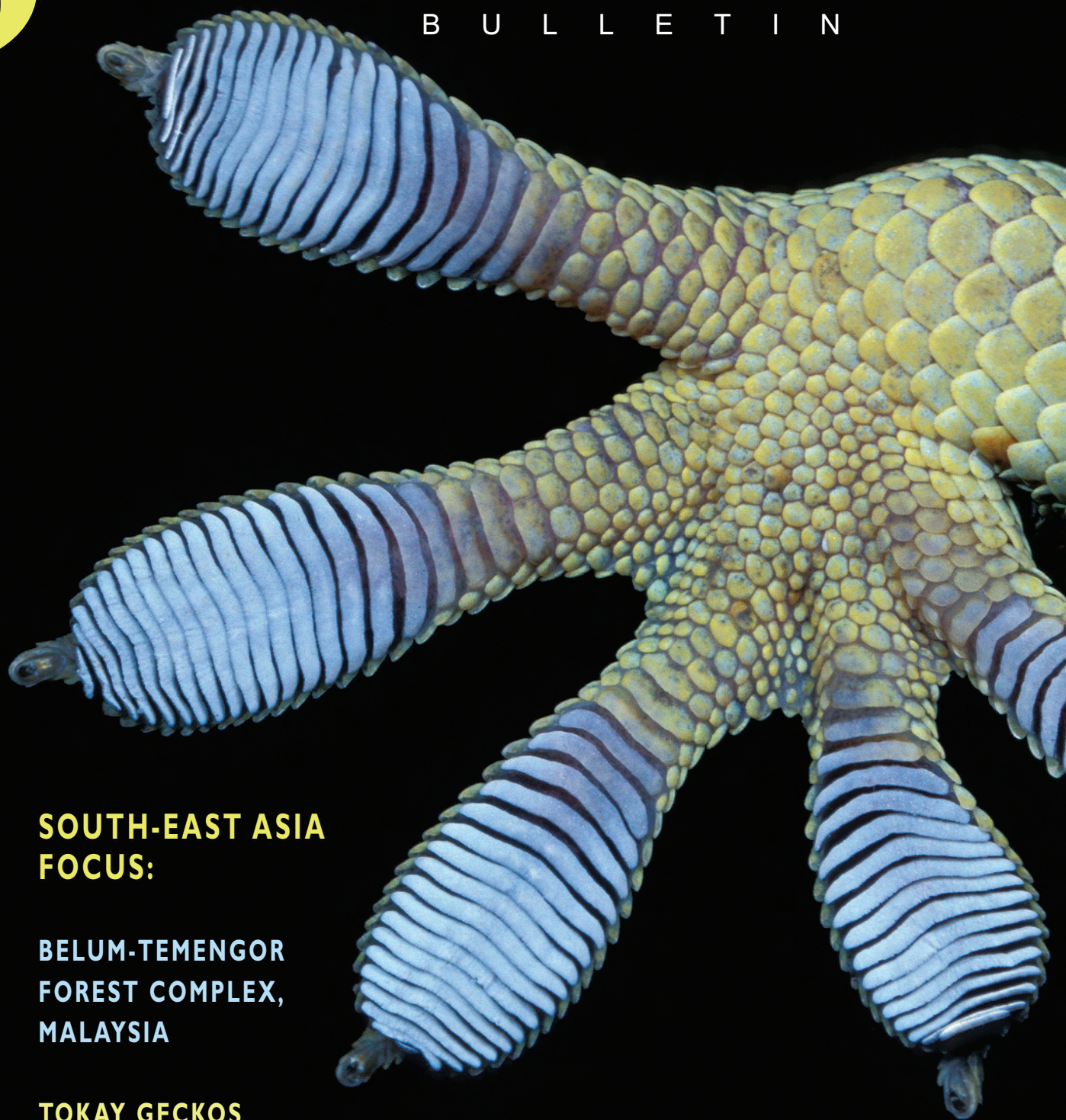


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3

TRAFFIC

B U L L E T I N



SOUTH-EAST ASIA FOCUS:

**BELUM-TEMENGOR
FOREST COMPLEX,
MALAYSIA**

TOKAY GECKOS

BIRDS-OF-PARADISE

OCTOBER 2011

The journal of the TRAFFIC network disseminates information
on the trade in wild animal and plant resources

TRAFFIC was established in 1976 to perform what remains a unique role as a global specialist leading and supporting efforts to identify and address conservation challenges and solutions linked to trade in wild animals and plants.

TRAFFIC's Vision is of a world in which trade in wild plants and animals is managed at sustainable levels without damaging the integrity of ecological systems and in such a manner that it makes a significant contribution to human needs, supports local and national economies and helps to motivate commitments to the conservation of wild species and their habitats.

Trade in wildlife is vital to meeting the needs of a significant proportion of the world's population. Products derived from tens of thousands of species of plants and animals are traded and used for the purposes of, among other things, medicine, food, fuel, building materials, clothing and ornamentation.

Most of the trade is legal and much of it sustainable, but a significant proportion is not. As well as threatening these resources, unsustainable trade can also lead to species declining in the wild to the point that they are threatened with extinction. Illegal trade undermines local, national and international efforts to manage wild natural resources sustainably and causes massive economic losses.

TRAFFIC is a joint programme of WWF and IUCN, the International Union for Conservation of Nature. The role of TRAFFIC is to seek and activate solutions

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TRAFFIC's reports and advice provide a technical basis for the establishment of effective conservation policies and programmes to ensure that wildlife is maintained within sustainable levels and conducted according to national and international laws and agreements. The journal of the TRAFFIC network, *TRAFFIC Bulletin*, is the only journal devoted exclusively to issues relating to international trade in wild plants and animals. Provided free of charge to over 4000 subscribers and freely available from the TRAFFIC website (www.traffic.org), it is a key tool for disseminating knowledge of wildlife trade and an important source of information for those in a position to affect change and improve awareness.



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Much of the content published in the *TRAFFIC Bulletin* arises from investigations carried out by TRAFFIC staff, whose wide-ranging expertise allows for a broad coverage of issues. TRAFFIC has also built up a global network of contacts with, for example, law enforcement agents, scientists, and wildlife experts, some of whom are regular contributors to the *TRAFFIC Bulletin*.

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JÜRGEN FREUND / WWF-CANON



MARTIN HARVEY / WWF-CANON

Illegal Ivory Sales in Egypt

Esmond Martin and Lucy Vigne

INTRODUCTION

Craftsmen in Egypt have worked ivory for thousands of years, perhaps longer than in any other country. Egypt is one of the largest illegal markets for elephant ivory in Africa. Tusks are smuggled in, mostly through Sudan, and sold to ivory workshops in Cairo. Since the CITES international ivory trade ban was introduced in 1990, Egyptian law has prohibited all imports and exports as well as the display and sales of all ivory, including antiques, but this is not enforced. The Egyptian Wildlife Service, which is the government agency that implements Egypt's wildlife laws, has not carried out a successful raid on retail outlets selling ivory for many years (R. Toma, Director, Egyptian Wildlife Service, pers. comm., March 2011).

In 1998, the first detailed survey of Egypt's ivory industry revealed that Cairo retailers were offering the third-largest number of ivory items for sale in Africa, surpassed only by Abidjan, Côte d'Ivoire, and Harare, Zimbabwe. Luxor and Aswan also had many ivory products, exceeding most other African cities (Martin, 1999; Martin, 2000a; Martin, 2000b; Martin and Stiles, 2000). In 2005, TRAFFIC carried out a second survey, which included the tourist resorts of Hurgada and Sharm el-Sheikh/Na'ma Bay, but encouragingly the number of ivory items found on display in Cairo, Luxor and Aswan had declined by about half, to 10 611, compared with 21 460 in 1998 (Martin and Milliken, 2005; Martin and Milliken, 2006).

Reports that large amounts of ivory continued to be offered for sale in Egypt—particularly in Cairo—led to TRAFFIC funding another ivory survey in March and April 2011 in Cairo and Luxor, the two most significant ivory centres. This was a critical period for the country as it followed the political uprising in January and February when the government was overthrown by the military. The number of foreign tourists dropped by around 75% in March, but all the hotels were open as were at least 90% of the tourist shops. The old market—called the Khan al-Khalili—remains Cairo's main centre for the manufacture and retail sale of ivory products and almost all outlets and workshops were open. Business was extremely poor, however, with many shops claiming that they had sold almost nothing since late January. This was advantageous for the purposes of the survey because craftsmen and vendors were happy to spend time talking with the authors, and with little fear of prosecution, allowed them to take photographs.

METHODS

The methodology used to count the ivory items followed that of earlier ivory surveys (Martin, 2000a; Martin and Stiles, 2000). One author would distract the

vendor by asking about prices and photographing items, while the other would count the pieces by type; only those items on display for sale were counted. If a shop drawer was open on arrival and ivory items could be seen, they were counted, but if drawers were opened especially for the authors or concealed ivory was shown to them, these items were not recorded, in line with the methodology used in previous surveys and thus allowing for comparison of the different data sets. The authors visited workshops and shops that had been investigated previously and surveyed any new establishments found to be selling ivory.

The craftsmen and shopkeepers were asked about origins and prices of tusks, number of workshops and ivory craftsmen, ages of ivory items, nationality of customers, turnover and stocks, and vendors' views on the ivory trade. The age of the ivory items—whether they were old (i.e. made before 1990), recent (i.e. made between 1990 and 2005), or were newer—was estimated based on style and appearance. The items were priced using the official rate of Egyptian pounds EGP6 to USD1, compared to EGP5.79 to USD1 in 2005 (there was no significant black market rate despite being a politically and economically unstable period).

A meeting was arranged in March with two senior government officials who were asked about recent ivory seizures and shop inspections, and for their ideas on how to improve law enforcement.

LEGISLATION AND ENFORCEMENT

Details have been given elsewhere on the history of wildlife legislation in Egypt (Martin and Milliken, 2005). In summary, Egypt's *Ministerial Decree No. 1150* of 1999 states that "it is a violation to possess, to offer or display for sale, to import, export, or introduce from the sea any specimen of a species listed in Appendix I, II and III of CITES" (Martin and Milliken, 2005). Thus, the display and offering for sale of all ivory (tusks and worked objects), old or new, is illegal without a special permit. No such permit has been issued (R. Toma, Director, Egyptian Wildlife Service, pers. comm., March 2011).

Implementation of Egypt's ivory trade ban has been very weak. According to ETIS, between 2000 and 2002 the Egyptian authorities carried out 37 ivory seizures, comprising a total of 2564 pieces of raw and semi-worked ivory and 278 ivory items in various locations in the country (Martin and Milliken, 2005). From 2003 to 2009, ETIS recorded only one ivory seizure (Milliken *et al.*, 2009). During the authors' meeting with the senior government officials, it was confirmed that since 2009, only two seizures had occurred, both at Cairo airport: one, in January 2010, involved a tusk weighing seven kilogrammes that an Egyptian was trying to export, and another tusk was seized from a Chinese national in January 2011. The officials further confirmed that there had been no confiscations of ivory items from retail outlets since 2003, a fact backed up by vendors in Cairo and Luxor. According to the government officials, the authorities inspected the Khan al-Khalili market only

once in 2010, although inspections are supposed to be carried out every three months. Only legal camel bone items were reportedly found and the government officials believe the ivory had been hidden, possibly suggesting that market surveillance is not spontaneous. One of the officials lamented the difficulty in inspecting for ivory as government officials must be accompanied by the police. Since the police have not been in full control since January 2011, no inspections had been carried out since the beginning of the year. Crime has also reportedly increased considerably since the revolution (Anon., 2011a). The authors noted that vendors in many jewellery shops had removed their gold items to prevent theft.

RESULTS

Origins and prices of elephant tusks: In 2010, most tusks came from Sudan, but Côte d'Ivoire, Kenya and Tanzania were also mentioned as sources of ivory by ivory vendors in Cairo. This does not mean all tusks originated from these countries as most of the ivory from Sudan would have originated in Central Africa. Traders, usually Sudanese, bring their ivory directly to workshops and retail outlets and sell according to the weight and quality of the tusks. Interviews with seven buyers of tusks—mostly small specimens—paid USD276/kg on average in 2010 for tusks of one–two kilogrammes, with a price range of USD200–416/kg. Larger tusks of around eight kilogrammes fetched USD367/kg, while damaged or tiny tusks, tusk pieces, or hollow parts were selling for USD150/kg on average.

Ivory workshops: Egyptian ivory carving, compared with that in Asia and southern Africa, is fairly poor. Many of the figurines are crude, with little attention to detail, although some of the newer items are being carved with greater care and skill, probably owing to the greater expense and rarity of the material. As well as figurines, craftsmen today are mainly producing utilitarian items such as rosaries, walking sticks, name seals and chopsticks that are made in bulk—when tusks are available—with electric drills. Jewellery, mostly beaded necklaces and bangles, continue to be popular items.

The authors visited five workshops and heard of two others in and around the Khan al-Khalili. These had a total of at least 23 craftsmen working ivory. It is unlikely there are many more. Several craftsmen were seen working ivory in the day, while others worked at night. They also carve camel bone, ebony and other wood, turquoise, amber, buffalo horn and cow horn. One carver was making complete ivory walking sticks, each taking about a week to produce; another was making walking stick handles, and others, name seals and beads. The authors were shown a tusk that had been cut in two which was to be quartered lengthways and sliced every two centimetres to make four cubes producing four large rosary beads. The craftsmen do not receive a salary but are paid for what they produce on a weekly basis. They earn EGP600–2000

(USD100–333) a month depending on their skill and output. The average pay is USD200 a month.

In Luxor almost no new ivory items are being made. Only one vendor at a recently opened hotel shop claimed his new ivory items were made by craftsmen in the Luxor area, and two others admitted ivory could be made or repaired in Luxor on special request.

Retail ivory outlets and ivory items seen: The number of retail outlets in Cairo seen selling ivory was 71 in early 2011, comprising 32 gift/souvenir shops, 13 jewellery shops, 12 antique shops, eight rosary shops, three ivory speciality shops, and three shops selling miscellaneous items (Table 1). These outlets were in the Khan al-Khalili (58%), near the pyramids and a few around Tahrir Square and the Coptic church (18%), in several luxury hotels (14%), and in the Zamalek area (10%). In total, 8343 ivory items were counted on display for sale (Table 1). The most common items seen in Cairo were animal figurines (20%), human figurines (16%), beads for necklaces and rosaries (11%), scarab beetles (10%), rosaries (8%), pendants (8%), necklaces (5%) and bangles (5%) (Table 2).

In Luxor, the number of retail outlets with ivory objects was 23, comprising 18 jewellery shops, four souvenir shops and one gold/silver outlet (Table 1). Most of these outlets—61%—were along the main streets of central Luxor, as well as 26% in the hotels and 13% in the tourist souks. Some 918 ivory items were recorded (Table 1). The majority were human figurines (34%), animal figurines (13%), pendants (9%) and obelisks (9%) (Table 2).

Only a few antique ivory items were found in some of the antique shops of Cairo, and a small number of outlets offered African-carved ivory human figurines which were generally considered less popular. Most objects had been carved in Egypt between 1990 and 2005, after which time increased security at the border with Sudan made it more difficult for items to be smuggled into the country. Many vendors claimed to be selling off their last stocks and not replacing them. Some, however, were doing well, selling new ivory objects, especially jewellery, rosaries and figurines. In Cairo, the authors counted an estimated 3000 (out of 8343) ivory items in 25 shops that were believed to be post-2005 (18 shops sold only newer items and seven had both old and newer objects for sale). In Luxor, 36 (out of 918) newer items were counted in two shops only. While some displays appeared almost identical to what was observed six years earlier (with certain items being regularly replaced and others not selling), other shops had got rid of their ivory entirely (or would bring it out only on request). Some shops had closed down, but others had opened, often selling the newest ivory. Vendors sometimes revealed examples from stock (new and old) concealed in drawers which, in keeping with the methodology of previous surveys, the authors did not record.

The number of outlets with ivory and the number of ivory items displayed overall had declined very little from 2005 to 2011, especially in Cairo.

CAIRO Location	No. of outlets with ivory	No. of ivory items	LUXOR Location	No. of outlets with ivory	No. of ivory items
Khan al-Khalili	41	4849	Hotels	6	145
Hotels	10	269	Souks	3	33
Zamalek	7	116	Main streets	14	740
Elsewhere	13	3109			
TOTAL	71	8343	TOTAL	23	918

Table 1. Number of retail outlets and ivory items seen on display for sale in Cairo and Luxor, March–April 2011.

CAIRO Item	Percentage	LUXOR Item	Percentage
Animal figurine	20	Human figurine	34
Human figurine	16	Animal figurine	13
Bead	11	Pendant	12
Scarab beetle	10	Obelisk	9
Rosary	8	Scarab beetle	8
Pendant	8	Necklace	7
Necklace	5	Bangle	3
Bangle	5	Cartouche	3
Ear-rings, pair	3	Bead	2
Ring	2	Misc.	9
Misc.	13		

Table 2. Ivory items seen for retail sale in Cairo and Luxor, March–April 2011.

Prices, sales and buyers of ivory items: Prices of items varied according to the quality of carving and the place of sale. Prices also apparently depended on what the vendors believed the customer would be willing to spend. Few pieces bore price tags, and nearly everything was negotiable. Vendors were desperate to sell due to the tourist slump, offering discounts of at least 20%. Tourists accompanied by a guide pay more in order to cover his commission. Ivory salesmen also said there was no problem in bringing ivory out of Egypt, with some offering to write a receipt indicating that a piece was an antique or made of camel bone.

Cairo: In Cairo, a 10-cm animal figurine cost from USD58–408 (Table 3). Prices were lowest in the Khan al-Khalili and highest in the luxury tourist hotels. The cheapest items—at USD21—were thin plain rings and small cartouche pendants (the latter bearing a person's hieroglyphic name). Large, heavy figures were over USD1000 as they require the biggest tusks and detailed carving, while the most expensive item was a one-metre barge for USD15 000.

Although many vendors were unwilling to discuss their turnover, some gave a sense of transactions, which varied considerably. Vendors at the shop with the most ivory for sale said that in a good month they sold up to 100 objects (out of about 1500 on display), with larger items taking over five years to sell, whilst jewellery and small figurines sold more quickly. They said that the items on display were the last of their stocks. Another shop selling off old 10-cm ivory obelisks (that the vendor claimed he had not replaced) had five left of 12 surveyed

six years earlier, still priced at USD29. A large bazaar that had between 60 and 80 figurines when visited 10 years earlier, had six on display during this survey. Some such outlets displayed dusty ivory figurines bought in the 1990s, but turnover was very slow and the items too expensive now to replace, vendors said. A few shops in the Khan al-Khalili were selling old tusk carvings and large figures. The vendors remembered traders from West and Central Africa carrying heavy tusks to their shops to sell to their grandfathers some 40 years' earlier. Items carved from these tusks were still on sale. Another vendor in a Cairo souvenir shop admitted that wooden figurines with ivory heads and hands had been brought to her shop by Sudanese traders about 10 years earlier, and some were still on display.

In 2011, the main ivory buyers were Chinese, Spanish, Italians and Americans, in that order. Shop vendors selling ivory rosaries and walking sticks said their main buyers were Egyptians, Gulf Arabs and other Muslims. In general, shopkeepers said that over half the ivory was now bought by the Chinese, both expatriates and tourists. In late March 2011, one vendor said that a Chinese couple had come into his shop the previous day and spent USD4167 on a few horse figurines and human busts. Another said a group of Chinese would sometimes spend USD50 000 on ivory in one session of bargaining. According to one hotel shop vendor, the Chinese come with packs of dollars and will easily spend USD25 000 at one time in his shop. In another outlet visited twice, Chinese individuals were seen on both occasions bargaining for fairly new thick ivory bangles and beaded necklaces from drawers behind the counter. Ivory

Item	Size (cm)	Price range (USD)	Average price (USD)
JEWELLERY			
Bangle	0.5	17–133	79
	1	33–417	123
	2–2.5	133–500	254
Ear-rings, pair		30–58	46
Necklaces, small/medium/ large beads	25–250/62–450/142–567		92/153/348
Pendant	4	10–58	28
Ring, plain	0.3	4–30	21
FIGURINES			
Animal	5	29–58	46
	10	58–408	160
	15	108–2000	558
Human	5	45–135	75
	10	33–850	299
	15	133–667	252
	20	150–1000	495
	30	333–1500	597
TUSKS, carved	20	117–2000	814
	30	183–2500	1220
MISC.			
Chess set	40 x 40	617–2500	1223
Chopsticks, pair	20	33–67	44
Cigarette holder	10	25–29	28
Fly whisk		333–367	350
Name seal	2 x 6	33–83	53
Obelisk	10	10–42	29
Paper knife	10–30	16–667	150
Rosary, small, medium, large		27–700	179
Scarab beetle	2.5	8–33	29
Walking stick, all ivory	100	500–2000	822
Walking stick, ivory handle		108–250	188

Table 3. Retail prices for ivory items seen in Cairo, March–April 2011.

Item	Size (cm)	Price range (USD)	Average price (USD)
JEWELLERY			
Necklace, small/medium beads		33–43/50–67	37/58
Ring, plain	0.3	5	5
FIGURINES			
Animal	10	58	58
Human	5	3–150	55
	10	33–417	108
	20	60–333	168
MISC.			
Obelisk	10	8–25	16
Paper knife	10–30	60–67	63
Scarab beetle	2.5	10–30	20

Table 4. Retail prices for ivory items seen in Luxor, March 2011.

Year	No. retail outlets displaying ivory	No. ivory items	Average no. ivory items per outlet
CAIRO			
1998	88	11 627	132
2005	79	8930	113
2011	71	8343	118
LUXOR			
1998	33	6445	195
2005	25	1308	52
2011	23	918	40

Table 5. Comparison of ivory surveys in Cairo and Luxor for 1998, 2005 and 2011.

vendors sometimes insert Chinese business cards from customers into their glass cabinets. A variety of ivory items are purchased by Chinese, but they prefer newer items and do not visit antique shops. At the Citadel, a young Chinese man was wearing a new ivory bead bracelet that he had just bought for EGP100 (USD17). No other nationalities were seen wishing to buy ivory objects.

One vendor with a large souvenir shop in the Khan al-Khalili which displayed about 200 ivory items, said that in January 2011, before the revolution, turnover (gross sales) of his produce on a good day was EGP3000–4000 (USD500–667), but never less than EGP1000 a day. In March, due to the collapse in tourism, he sold items worth USD167 for the entire month.

Luxor: In Luxor, prices for ivory items are lower than in Cairo as items sell less well. Nearly all vendors said they did not wish to replace their ivory. The cheapest items, as in Cairo, were rings and small cartouches but these sold for USD5 compared with USD21 in Cairo. Paper knives were selling for USD63 in Luxor compared with USD150 in Cairo (Tables 3/4). Some vendors were nervous about the authors' interest in ivory, pretending items were made of camel bone or were old items. Another vendor said there had been a police raid earlier in the decade and he had since cleared his ivory items away into drawers, displaying only a few samples for interested buyers (to whom he would then show some of the hidden items). The principal buyers in Luxor remain the Spanish, Italians and Americans who mainly purchase small items.

Ivory substitutes: The main substitute for ivory in Egypt is camel bone. Egyptians are a major consumer of camel meat so there are plenty of bones available from slaughterhouses. Tibia bones are the strongest and preferred. They are bleached and then carved into items such as figurines. The workmanship is generally poorer than that demonstrated for ivory carving. Camel bone can have tiny holes and feels less polished than ivory, is lighter, and has an odour, especially when burned (a practice used to assist in the identification of materials). Small items are harder to tell apart from ivory. One way to distinguish bone from ivory is by price. A camel bone paper knife can sell for only USD2. Generally bone and ivory objects are kept on separate shelves in a shop. Some dishonest vendors or those



ABOVE FROM TOP:
IVORY POMMELS FOR WALKING STICKS BEING CARVED IN CAIRO;
AN IVORY CARVER IN CAIRO MAKING IVORY WALKING STICKS;
A LARGE DISPLAY OF IVORY ITEMS IN CAIRO;
ROWS OF IVORY ELEPHANT FIGURINES ON SALE
TO TOURISTS IN CAIRO.

PHOTOGRAPHS: LUCY VIGNE

unable to distinguish between bone and ivory, mix the two, but this is unusual. Other less common animal substitute materials are cow and buffalo bones, antlers and horns, the latter two being easy to distinguish from ivory due to the shape and colour. No mammoth ivory items were seen. Some vendors were sometimes unable to distinguish between moonstone and ivory scarab beetles. A synthetic substitute, which vendors called either polyester-resin or ivory, is used for necklaces and rosaries, usually inlaid with stone and silver. This substance has fine lines running through it that can be mistaken for elephant ivory, but no cross-hatching that is unique to ivory. For comparison, in a shop with similar looking small inlaid rosaries, one of polyester-resin was USD35, one of camel bone was USD30, whilst the ivory rosary was priced at USD100.

Vendors' views on the ivory trade: Most Cairo vendors were confident that their ivory sales would continue, presumably as there is no pressure on them to stop the trade. Only a couple of ivory vendors in Cairo were wary of photographs being taken of their stock in case of any repercussions, they said. Luxor vendors were more nervous of questions and of their ivory items being photographed, and said they were gradually pulling out of ivory sales, citing the fact that it is illegal and that customers for ivory are few. Vendors in Cairo were optimistic that the Chinese, especially, would continue to buy new ivory items, such as bangles, pendants, necklaces, and heavier, newer figurines such as busts and hippopotamuses. Sales of older and cruder thin figurines of Egyptian pharaohs, gods and goddesses sell less well, and many vendors in souvenir shops said their sometimes dusty displays were the last of their stocks and that they would not be replacing them. Instead, artisans and vendors said they are producing larger numbers of name seals for Chinese buyers, and also walking sticks, walking stick handles and rosaries, especially for the Egyptians and Gulf Arabs, and were confident this market would continue. With foreign tourist numbers to Egypt increasing, numbers of wealthy Egyptians rising, and an increase in Chinese expatriates as well as tourists, there is a large and growing clientele for the ivory carvers.

Trends in the ivory trade since 2005: Raw tusks are still almost exclusively sold in Cairo, which is the ivory carving centre of the country. The wholesale price in 2005 was USD173/kg for a one- to two-kilogrammes piece, while in 2011 this price had risen to USD276/kg.

Comparing the 2005 survey results with those of 2011, the total number of ivory items seen in the Cairo retail outlets decreased by only 7% (Table 5), while the number of ivory items actually increased in the Khan al-Khalili from 3977 to 4849. Prices in Cairo rose two-and-a-half-fold between 2005 and 2011. Walking sticks and chess sets, however, remained roughly the same price compared with six years earlier.

In Luxor, a much larger decrease in the number of ivory objects on display for retail sale was noted—a drop of 31% from early 2005 to early 2011. The exception was hotels, where the number of shops rose from two with only four ivory items in 2005 to 10 with 269 items in 2011. This is partly due to the increase of new hotels.

While Spanish, Italians and Americans were the main buyers in 2005, more Egyptians and Gulf Arabs are now buying ivory rosaries and walking sticks, but the Chinese have become the principal buyers, reportedly purchasing over half of all worked ivory sold. In 2001 there were only 110 expatriate Chinese in Egypt, but in 2007 the number had increased to an estimated 6000–10 000 (Sautman and Hairong, 2007) and perhaps 60 000–100 000 in 2010 (Anon., 2010). In early 2011, there were 1022 Chinese companies in Egypt and the number continues to increase (Yang, 2011). The number of Chinese tourists also rose to 106 000 in 2010 (Anon., 2011b), a 37% increase from 2009, according to Egypt's Minister of Tourism, who told the Chinese Ambassador to Egypt in March 2011 that he hoped the figure would reach a million (Shawqi, 2011).

DISCUSSION AND CONCLUSIONS

No ivory items—old or new—can be sold legally in Egypt without a special permit, and none has ever been issued. Egypt remains one of Africa's largest markets for illegal ivory items. From 1998 to 2005 there was an overall reduction of 43% in the combined number of ivory objects surveyed for retail sale in Cairo and Luxor, the main markets. In comparison, from 2005 to 2011, this figure declined by just 10%. In this survey, the authors counted 8343 ivory items openly for sale in Cairo and 918 in Luxor. Of these, 3000 were estimated to be items that had been produced in the last five years, the rest mostly carved in Egypt in the 1990s and early 2000s. The relative strength of Egypt's ivory retail market is due to the almost total lack of law enforcement over the last six years, combined with the entrance into the market of a major new consumer, the Chinese buyer, due to a fast-growing number of Chinese residents and tourists to the country. Until the January 2011 political uprising, the Egyptian tourist industry had been expanding: in 2010, approximately 13 million foreign visitors came to Egypt, spending about USD13 billion, and the principal buyers of ivory were Chinese.

The Egyptian Wildlife Service is mandated to prevent illegal wildlife products from coming into and out of the country, and from being displayed in shops. There have been few ivory seizures at the borders since 2005, while inspections of retail outlets have failed to find ivory. In May 2010, the Egyptian Management Authority for CITES held seven training courses involving wildlife officers, Customs, police officers and tourist workers, to identify products from endangered species, and produced posters to help officials to identify elephant tusks. It is time these newly learned skills were employed to confiscate raw and worked ivory, in order to bring this flagrant trade to an end. Ivory continues to be openly carved and displayed without any prosecution ensuing. Raids and subsequent confiscations of ivory items have led to a significant decline in retail sales of ivory in Ethiopia and Ghana (Milledge and Abdi, 2005; Martin and Vigne, 2010; Martin, 2010). Similar action must be carried out in Egypt if the open sale of ivory in that country is to be stopped.

RECOMMENDATIONS

1. The Egyptian Government must urgently implement CITES Resolution Conf. 10.10 (Rev. CoP15), especially with regard to three main considerations:

- a) publicizing the illegal status of elephant ivory in Egypt by displaying official leaflets in souvenir shops, hotels and airports, explaining in Arabic, Chinese and English that it is illegal to import, export or buy raw or worked ivory, and stipulating the severe penalties imposed for such offences;
- b) carrying out effective raids on retail outlets selling ivory on a regular basis, especially in the Khan al-Khalili, and prosecuting and penalizing offenders; and

- c) improving efforts to seize both worked and raw ivory at international borders, especially at Cairo's international airport.

2. It is imperative that tour operators and embassies, along with Chinese companies, take responsibility for foreign tourists and expatriates in Egypt—especially Chinese nationals—by instructing them via public awareness materials that it is illegal to purchase ivory.

3. International tour operators must urgently exert pressure on the Egyptian Government to enforce the law banning the trade in ivory by discouraging tourists to the country until such time that ivory is no longer being offered for sale.

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