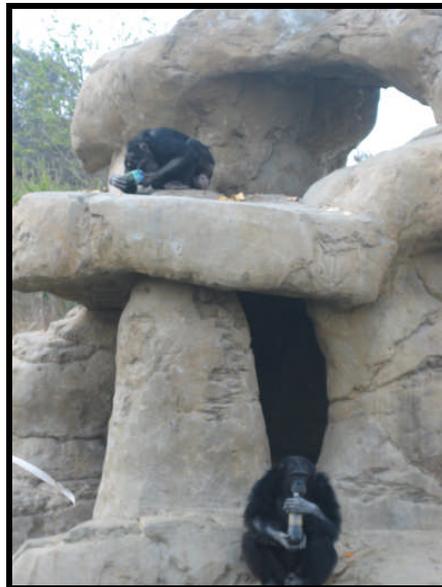




# **Pan African Sanctuary Alliance**

**Egypt Mission  
March 9-14, 2009**

**Final Report**



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## Summary

From March 9-14, Doug Cress, executive director of the Pan African Sanctuary Alliance (PASA), and Anne Olivecrona, a PASA consultant funded by the International Fund for Animal Welfare (IFAW), visited Egypt at the invitation of CITES Management Authority of Egypt to review protocols, procedures and designated rescue facilities for the enforcement of laws prohibiting the illegal trade in primates. It is believed that Egypt is the pivot for the illegal flow of primates – primarily chimpanzees and gorillas, both CITES Appendix I species – out of Africa into private zoos in the Middle East and Asia, and it is estimated that as many as 25 could leave the continent each year. Egyptian facilities, meanwhile, double as private farms and breeding centers, and evidence indicates that as many as 100 could be held there at any time.

The PASA trip was a follow-up to a formal CITES inspection that took place 15 months earlier. As a result of several independent investigations that clearly identified Egypt as a major part of the illegal trade, John Sellar, Senior Enforcement Officer of the CITES Secretariat, visited Egypt on an eight-day mission in November 2007 to investigate the black-market trade in both great apes and ivory. In the ensuing CITES report, Sellar indicated that serious problems exist, and extended a series of recommendations for enforcing CITES laws. Among the recommendations were:

- Registration of all Appendix I animals with the Egyptian CITES Management Authority, including origin, legal status, owner, possessor and location
- Regular inspections of facilities holding Appendix I animals, “preferably of an unannounced nature”

PASA accepted this most recent invitation from the CITES Management Authority of Egypt on the condition that all facilities *known or thought to be* holding primates be opened for inspection, and the Egyptian CITES authority agreed. PASA also asked for – and received – an agreement that DNA testing be permitted on captive great apes, and that micro-chips be used to establish a primate’s identity.

Unfortunately, the CITES Management Authority of Egypt proved either less willing or less able to cooperate than promised, and the visit failed to generate much new knowledge or data on the scale of the illegal trade. Only four facilities were made open for inspection – three of which are open to the public anyway – and Egyptian officials failed to provide any evidence that the flow of illegal primates has abated.



Still, what little evidence was gained in this trip is alarming: Of the 18 chimpanzees seen in total at the Giza Zoo, the Alexandria Zoo, and the African Safari Park, six were infants under three years of age (*two of which are pictured at left*) that authorities acknowledged to be illegal – although no

confiscation papers or data is said to exist -- and another two adult males could not be verified either. In addition, one of those infants was traded between the African Safari Park and the Giza Zoo without any paperwork or even discernible knowledge by CITES officials.

In addition, the lack of paperwork or proper CITES permits on any of the primates signals that almost no oversight exists whatsoever to control the movement of primates through Egypt.

## **Background**

As far back as the late 1980s, regular violations of Convention have been documented involving Egyptian circuses, which illegally transported chimpanzees through eastern and southern Africa, leading to high-profile confiscations in Uganda, Kenya and Zambia. Later, confiscations of illegally transported chimpanzees and gorillas occurred in Egypt, neither of which was handled in accordance with CITES protocol. And independent investigations by the NGO community identified well-established trading routes of great apes from Nigeria and Cameroon through eastern Africa and up to Egypt.

An investigation conducted by the World Society for the Protection of Animals (WSPA) in 1997 indicated that one illegal trade route alone – from Nigeria to Egypt – was responsible for an average of 40 chimpanzees and eight gorillas each year, based on information obtained from the carpenters who manufactured the trader's crates. Only sporadic confiscations occurred in the last 15 years, yet even those incidents are enough to confirm the illegal trade continues to flourish. In 2001, a confiscated infant chimpanzee and a confiscated infant gorilla were drowned in a vat of chemicals by customs officials rather than be processed in accordance with the Convention, and four years later, five infant chimpanzees and some monkeys were discovered in a crate in Nairobi after being identified in Egypt and sent back to their most recent point of origin – Kenya.

## **Trip**

PASA was first invited by the CITES Management Authority of Egypt to visit the country in November 2008. Once PASA's conditions were put forward and accepted, plans were made for the trip, but delays by Egyptian officials forced postponement of the trip on three occasions. Finally, a March 9-14 date was mutually agreed upon.

Nevertheless, the Egyptian CITES officials that extended the invitation seemed surprised by the timing once PASA officials arrived, and repeatedly said they lacked sufficient advance notice to prepare. Presented with a list of eight sites that PASA officials wanted to visit, they immediately indicated that some were private and could not be visited without prior permission of the owners, all of whom were said to be out of the country and unavailable.

(It is worth noting that PASA officials did not present the final list until their arrival in Egypt, primarily because it is believed that illegal traders can shift chimpanzees and gorillas fairly quickly when an inspection is announced. Nevertheless, none of the sites identified in the PASA list could have come as a surprise to Egyptian CITES officials).

Similar excuses were given for requests to visit sites in the tourist resort of Sharm al-Sheikh, ranging from a lack of airplane tickets to an international conference involving high-level security for Egyptian president Hosni Mubarak. While the latter was true, there was no shortage of airplane seats and / or hotel options in Sharm al-Sheikh.

The PASA list included:

- Giza Zoo
- National Circus
- Tower Hotel
- Hauza Hotel
- African Safari Park
- Alexandria Zoo
- Utopia / Egyptian Agricultural Development
- Al Arish Zoo

(There is also strong evidence to indicate that several private farms in Egypt serve as breeding centers for great apes and a wide range of protected wildlife, but these were not included in the PASA list. Regardless, CITES Management Authority of Egypt officials denied any knowledge of such facilities.)

The PASA team was able to visit the Giza Zoo, the Alexandria Zoo, the National Circus, and the African Safari Park. Visits to the other four did not materialize, despite daily assurances that details could be worked out.

Instead, an inordinate amount of time was spent in meetings with Egyptian CITES officials, few of whom seemed to be well-versed in CITES procedures or protocols. More alarming, none could accurately indicate which venues in Egypt were actually designated as "CITES Rescue Centers" for confiscated animals – at various points, the Giza Zoo, African Safari Park, Tower Hotel and Utopia / Egyptian Agricultural Development were each named as Rescue Centers, then retracted.

Egyptian CITES officials said they believe the Hauza Hotel was no longer caring for animals and that the private zoo there had closed, yet no evidence of this could be produced.

At one point, Egyptian CITES officials indicated that they were planning to build a *separate* CITES Rescue Center at the African Safari Park, but offered no timetable, designs, or budget to indicate this was a real possibility.

A meeting with Dr. Moustafa M. Fouda, director of the Nature Conservation Sector of the Ministry of State for Environmental Affairs, on March 12 produced the only real semblance of cooperation, as he promised to organize a complete review of the CITES rescue centers and visit each within four weeks. PASA asked for, and received, assurances that it could send a delegate along on the trip, and intended to include information regarding that trip in this report.

Unfortunately, Dr. Moustafa never made that trip or scheduled any inspection of CITES rescue centers, and attempts to contact him via telephone and e-mail for clarification were unsuccessful.

## **CITES Documents**

One of the major problems with the CITES Management Authority of Egypt seems to be its historical method of paperwork 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 one 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.

An example is the Tower Hotel facility in Sharm al-Sheikh: CITES stated that it issued the Tower a permit for three gorillas in 1995, and added a fourth gorilla to that list in 2003. As a result, it would seem clear that of the four gorillas CITES officials believe to be there, three would have to be at least 13 years of age and one would be at least five years of age.

Instead, the four gorillas currently at the Tower Hotel (*see below*) comprise a juvenile, an adolescent, and two infants,



according to a photo taken by a tourist in 2008. It is therefore reasonable to assume that dozens of chimpanzees and gorillas could have moved illegally through Egypt under this system over the past decade without detection.

Another obstacle to proper CITES enforcement in Egypt is the fact that the few documents that do exist regarding Appendix I

animals and CITES Rescue Centers are only in Arabic, which contravenes accepted CITES protocol. Although not formal CITES policy, most countries prepare all corresponding documents in English, French or Spanish, in addition to their native language.

## **CITES Enforcement**

A surprising lack of familiarity with CITES protocols or policies was obvious in meetings with the CITES Management Authority of Egypt. The assertion that no smuggling has occurred within the last three years was quickly disproven by the existence of infants under the age of three at both the Giza Zoo and the African Safari Park, yet none of the CITES officials seemed clear on the steps for confiscating, recording, and dealing with illegally obtained Appendix I species. At one point, it was made clear that the Egyptian CITES officials were committed to refusing any package that might be thought to contain

illegally trafficked animals – such as chimpanzees or gorillas – and that placing said package on the next return flight unopened was the best policy.

(A similar incident occurred in 2005, when a crate containing six chimpanzees and several monkeys was seized at the Cairo airport, but then placed on the next flight to Nairobi without any record of confiscation or procedure. One of the six chimpanzees died soon after reaching Nairobi, while the other five were placed in the Sweetwaters Chimpanzee Sanctuary in Kenya.)

None of the Egyptian CITES officials seemed to be aware of the CITES Great Ape Enforcement Task Force, which was created in 2006 to specifically combat the illegal trade in great apes. They also had not seen any of the posters or identification materials that were created for the Task Force, prompting PASA to commit to producing a new series in Arabic for distribution in the Middle East.

The role of PASA and its member sanctuaries also seemed to be a mystery to Egyptian CITES officials, particularly as regards confiscation and the return of illegally trafficked Appendix I animals. Most assumed that a chimpanzee or gorilla returned to the country of origin would be set loose in the forest as quickly as possible, which they likened to a death sentence, rather than placed in a sanctuary and allowed to rehabilitate over time. The case was made repeatedly that any confiscated ape was better off in an Egyptian zoo, where it could breed.

The fact that Egyptian CITES officials seem so unclear on the enforcement of international law and trade is particularly alarming given that not only did the CITES secretariat visit 15 months ago, the International Fund for Animal Welfare (IFAW) has committed to a series of workshops designed to train the customs officials, border guards, military and police in the proper Convention techniques. Two such workshops have already been held and a third is scheduled for March 2009, yet even the most basic steps of confiscation or prosecution seemed unfamiliar.

## **Chimpanzees**

Of the four sites PASA visited in Egypt, three held chimpanzees: the Giza Zoo (eight), the Alexandria Zoo (one), and the African Safari Park (seven).

The National Circus is known to have trafficked heavily in chimpanzees in the past, and its trips through Africa in previous years have resulted in confiscations of chimpanzees and other wildlife by CITES officials in Zambia and Uganda. Although PASA was permitted to visit the circus headquarters in downtown Cairo, it was only after a long wait on-site for “security clearance,” and then only lions, tigers, horses, and reptiles were produced. PASA was not taken into many rooms of the headquarters, despite requests to visit all animal holding areas.

At Giza Zoo, the eight chimpanzees include three infants that were identified as “confiscated” from the illegal trade, although no paperwork or information on that confiscation could be produced. Each was under three years of age. Two of the chimpanzees were delivered to the Giza Zoo after their “confiscation,” but the third arrived only after a trade (for a hippopotamus, according to zoo officials) with the African

Safari Park in 2008. Again, this trade included no paperwork or any indication that the chimpanzee was illegally brought into the country.



At the African Safari Park, three more infants were clearly the result of illegal trade, and again no information on their confiscations exists. Two adult males on a new island exhibit also have appeared in recent months, but no paperwork could be produced on them either. Egyptian CITES officials stated that they knew they must return the six illegal infants to their country(s) of origin, but no timetable was laid out for that plan.

The lone chimpanzee at the Alexandria Zoo is an adult male believed to be 25 years of age.

It is worth noting that none of the chimpanzees seen was on birth control or contraception of any sort (other than isolation), raising the possibility that any of them could be shifted into a breeding program with ease. Similarly, none of the chimpanzees has yet been micro-chipped for permanent identification, although the micro-chip scanner was on display in the CITES office in Cairo.

Egyptian CITES officials indicate that only 11 other chimpanzees reside in Egypt: Five at the Utopia facility and six at the Tower Hotel. But those numbers were impossible to verify without visual inspection, and cannot be considered reliable.

### **Gorillas**

As mentioned above, the only gorillas said to exist in Egypt are the four currently being held at the Tower Hotel in Sharm al-Sheikh. But the CITES documentation fails to correspond to recent photos, and cannot be considered reliable.

More troubling is the fact that other gorillas known to exist recently in Egypt – both at the Tower Hotel and in the private zoo of the Tower's owner, Omar Gamal – are no longer accounted for. At least three gorillas over various ages were photographed in 2003, 2005 and 2006, yet none can be found today.

### **Welfare**

PASA's visit to Egypt was not to judge the welfare or husbandry protocols found there, although PASA officials gave advice on socialization, diet, veterinary care, contraception, enclosure design and myriad other topics when asked. But it is safe to say that none of the primates seen in Egypt – and that includes chimpanzees, Vervet

monkeys, baboons, a gibbon, a spider monkey and a Patas monkey, among others – was properly cared for, and most did not even have access to shade or water. In addition, it is standard practice in Egypt to permit the public to pay for the opportunity to feed captive animals and / or pose for pictures, both of which raise serious health and safety issues.

### **Conclusion**

Egypt's role in the illegal flow of chimpanzees, gorillas, and other primates out of Africa is beyond dispute, and the scope can only be imagined. But following a series of high-profile visits by CITES officials and law enforcement experts and a steady stream of damaging press reports over the past four years, one would assume that Egypt might be dedicated to positive change. Instead, the entire culture of CITES Management Authority of Egypt was to obstruct any attempt to verify claims or make visual inspections, and to deny that any major problems currently exist. Given that PASA was invited to Egypt specifically to tour rescue centers, that is a troubling contradiction.

Egyptian CITES officials clearly lack the will or the authority to enact positive change, and the power held by private zoo owners remains dangerous. Much of the discussion revolved around Egypt's need for training in the enforcement of CITES laws and the protection of Egypt's borders against illegal trade from Libya, Kenya and Sudan, but it seems the greatest threat currently lies within. Unless CITES Management Authority of Egypt is able to control the zoos, parks, private zoos and facilities that currently hold and breed chimpanzees, gorillas and other primates inside Egypt, the country's borders are the least of the problem.



## Appendix I

### **PASA – Egypt Mission CITES Standing Committee Submission July 6-10 2009**

#### CITES

At CoP14 in 2007, the CITES Secretariat was invited by the CITES Management Authority of Egypt to visit that country and conduct an assessment mission to investigate concerns regarding the illegal trade in ivory and great apes and the implementation of the Convention. That mission was conducted in November 2007, and a report was prepared.

The CITES report included 17 recommendations to the CITES Management Authority of Egypt to strengthen the implementation of the Convention, particularly as regards enforcement and the disposal of confiscated live specimens.

In February 2008, the CITES Management Authority of Egypt advised that a committee had met twice to consider the report and that the recommendations had been accepted. The committee was prioritizing Egypt's implementation of the recommendations and two sub-committees had been established, one to deal with training and capacity-building and another with awareness-raising. Timetables and budgets were being developed to address the various matters raised by the Secretariat.

The CITES Management Authority of Egypt also agreed to advise the Secretariat of progress and requested the Secretariat's assistance in reviewing Egypt's policies and in providing training. It was also agreed by the Secretariat and the CITES Management Authority of Egypt that the NGO community and external funding would be necessary to implement the recommendations of the report.

The Pan African Sanctuary Alliance (PASA) conducted a five-day visit to Egypt in March 2009 at the invitation of the CITES Management Authority of Egypt to inspect CITES "rescue centers," and follow up on recommendations from a CITES report resulting from a CITES Secretariat mission in November 2007.

Using the CITES 2007 report as a template, PASA was alarmed to find that virtually none of the recommendations pertaining to the illegal trade in great apes had been followed, that CITES compliance and oversight is almost non-existent, and that the illegal trade in great apes remains unchecked.

Specifically:

### **CITES Recommendation 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.

### **PASA Finding**

Egyptian officials offered no evidence that this recommendation had been adopted. There is no national policy in place that coordinates the activities of the zoos, private collections or rescue centers. In fact, the CITES Management Authority of Egypt could not clearly indicate which venues in Egypt were actually designated as “CITES Rescue Centers” for confiscated animals – at various points, the Giza Zoo, African Safari Park, Tower Hotel and Utopia / Egyptian Agricultural Development were each named as Rescue Centers, then retracted.

Egyptian CITES officials said they believe the Hauza Resort was no longer caring for animals and that the private zoo there had closed, yet no evidence of this could be produced. To the contrary, a new website for the facility ([www.hauzaresort.com](http://www.hauzaresort.com)) not only advertizes the “mini-zoo” under Kids Activities, but includes four photographs of children holding and interacting with infant chimpanzees.

At one point, Egyptian CITES officials indicated that they were planning to build a *separate* CITES Rescue Center at the African Safari Park, but offered no timetable, designs, or budget to indicate this was a real possibility. The only chimpanzees known to be present as the result of illegal trade were held at either the Giza Zoo or the African Safari Park, but there does not appear to be any policy that supports those placements. And one CITES document on record indicates that a gorilla was allocated to the Tower Hotel in its capacity as a “rescue center,” although no further evidence exists as to how that gorilla came to be in Egypt.

Many of the facilities that hold great apes in Egypt are private and therefore not open to CITES officials for regular inspection without permission and a great deal of negotiation – thereby eliminating any possibility of oversight. Even a visit to the National Circus in Cairo required a half-day of phone calls, and then an extended delay at the circus entrance for “security clearance.” And all but one of the eight facilities that hold great apes – the Utopia / Egyptian Agricultural Development – is commercial in nature and open to the public, which clearly contradicts the nature of a “rescue” center.

Many of the facilities on the list permit direct contact with the great apes, including the Giza Zoo, the African Safari Park, and the Sharm al-Sheikh hotels, a situation that poses tremendous health risks for both people and great apes. Although not an official policy,



the “pay for play” scheme permits tourists to pay for the opportunity to either play with the chimpanzees or pose with them for pictures, and there exists a great deal of evidence to confirm this. In fact, two researchers for the PASA mission were able to “pay for play” with chimpanzees at the Giza Zoo (*pictured at left*) the week before the PASA mission arrived.

Although the invitation to have PASA visit facilities in each might be perceived as seeking advice from experts regarding animal not indigenous to Egypt, the fact that the visit was so restricted and unproductive stands in stark contrast. Most of the chimpanzees seen

in Egypt by PASA had no access to shade, fresh water, or enrichment of any sort, although officials at the Giza Zoo, in particular, did seem to take suggestions seriously. But there was no evidence whatsoever of a conservation program designed to raise awareness, action, or even concern regarding the plight of great apes in Africa.

#### **CITES Recommendation 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.

#### **PASA Finding**

PASA found no evidence whatsoever that great apes confiscated in Egypt are the property of the Government of Egypt, as per the Convention. In fact, the point was often made that visits could not be made to sites such as the Utopia / Egyptian Agricultural Development of the Sharm al-Sheik hotels because they were private property and CITES officials could not enter without permission of the owners. Of the few great apes that were generally agreed to have been confiscated, one, an infant originally at the African Safari Park, was transferred to the Giza Zoo (in exchange for a hippopotamus) despite a lack of CITES paperwork and any notification to the CITES Management Authority of Egypt.

#### **CITES 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. 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.

#### **PASA Finding**

The CITES Management Authority of Egypt maintains a very outdated and inefficient system of official documentation, which exists only on paper and cannot be readily accessed. In fact, the PASA mission was only able to look at the paperwork on the final day of a five-day mission because the CITES director was away and no one else had access to the documents. Those same documents are written solely in Arabic. Although CITES does not require official languages for its permits, it does suggest that French, Spanish or English copies of all documentation be maintained to facilitate communication and transparency.

The most serious problem with Egypt's CITES documentation, however, is the use of general permits issued to individual facilities indicating the total number of an Appendix I species it is permitted to hold, rather than a separate CITES import / export document for each chimpanzee or gorilla. As a result, the total number of chimpanzees at a given facility may never exceed the assigned quota at any one 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.

An example is the Tower Hotel facility in Sharm al-Sheikh: CITES officials stated that a permit for three gorillas was issued to the Tower in 1995, and a fourth gorilla was added to that list in 2003. As a result, it would seem clear that of the four gorillas CITES officials believe to be there, three would have to be at least 13 years of age and one would be at least five years of age. Instead, the four gorillas currently at the Tower Hotel comprise a juvenile, an adolescent, and two infants, according to a photo taken by a tourist in 2008 – and there is no indication that the four gorillas in the photo comprise the entire population at the hotel. It is therefore reasonable to assume that dozens of chimpanzees and gorillas could have moved illegally through Egypt under this system over the past decade without detection.

As noted above, the premise of unannounced inspections is impossible under the current system in Egypt, where CITES officials lack either the will, the authority, or the impetus to visit sites known to be holding chimpanzees or gorillas. The PASA mission requested on Day One of its visit to enter the Utopia / Egyptian Agricultural Development and the Sharm al-Sheikh hotels – and repeated that request every single day – but was offered only excuses and delays until it was finally deemed impossible. Egypt's director of the Nature Conservation Sector of the Ministry of State for Environmental Affairs, Dr. Moustafa M. Fouda, agreed to personally conduct a complete investigation of Egyptian wildlife facilities by mid-April – and promised to invite a PASA delegate to take part – but no invitation ever came and the trip presumably never occurred.

### **CITES Recommendation 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.

### **PASA Finding**

None of the chimpanzees or gorillas known to be in Egypt at this time have been microchipped. Although a microchip scanner is stored in the CITES Management Authority offices at the Giza Zoo, no workplan or system for actually tagging any of the

great apes in Egypt was produced. Similarly, no DNA tests have been conducted on any of the great apes, and no blood or hair samples have been collected. As for captive breeding, none of the great apes is on contraception, and CITES officials consistently argued that breeding was a sign of good health and positive captive management.

#### **CITES Recommendation 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.

#### **PASA Finding**

No chimpanzee or gorilla has been imported or exported from Egypt under proper CITES compliance since the CITES mission of 2007, and the only “confiscation” appears to have been the three infants currently at the Giza Zoo, although no documentation exists to indicate where they originated, how they were confiscated, and what became of the perpetrators. But that relative lack of activity should not be taken as an indication that the illegal trade has ceased, or even lessened. The clearest signs of the black market are the confiscations that occur on a semi-annual basis, and the lack of a high-profile confiscation in several years cannot be taken to mean that the flow of primates through Egypt has stopped.

Instead, the movement of chimpanzees and gorillas *inside* Egypt could be a signal that the trade is as active as ever. Two adult male chimpanzees at the African Safari Park could not be verified by Egyptian CITES officials, and might have been moved to the facility from a private collection, indicating that shifting of the great apes behind the scenes was underway. The fact that no paperwork could be produced to indicate where the chimpanzees came from – either originally in Africa or more recently within Egypt – underscored the magnitude of the problem.

## **Appendix II**

### **CITES SC58 Doc. 23: Enforcement Matters**

#### **Open letter to the CITES Standing Committee on illegal trade in great apes in Egypt**

The undersigned experts, organizations, and institutions are seriously concerned about the ongoing illegal trade in great apes in Egypt. **Numerous reports over the past 15 years have identified Egypt as a destination and transit point for the illegal trade in primates – mainly chimpanzees and gorillas – and there is ample evidence to indicate that this illegal trade continues to flourish.**

Egypt's lack of implementation of CITES has been discussed by the Standing Committee (SC) at its 53<sup>rd</sup>, 54<sup>th</sup> and 57<sup>th</sup> meeting (2005, 2006, 2008) as well as at CoP14 (2007) and is once again on the agenda for SC58 in July 2009. Despite a mission by the CITES Secretariat to Egypt in Nov. 2007 (SC 57 Doc. 20 Annex) and Egypt's reassurance that it would implement a long list of recommendations endorsed by SC57 (SC57 summary record) Egypt has made almost no progress with regard to halting illegal trade and possession of primates.

The *Pan African Sanctuary Alliance* (PASA) visited Egypt at the invitation of the CITES Management Authority of Egypt in March 2009 and concluded that few of the CITES recommendations (including capacity-building and awareness-raising, confiscation, a ban on the commercial use of illegally held great apes, proper registration or documentation, micro-chipping and DNA-testing) have been implemented. In addition, despite having been promised to be able to visit all facilities in Egypt known to keep gorillas and chimpanzees, PASA submitted a list of eight sites, but was only permitted to visit four of them, three of which are open to the public anyway. Nevertheless, PASA observed several young chimpanzees, for which no CITES permits or documentation on their confiscation was available, while at least three gorillas, which had been documented earlier, were believed to have disappeared.

**The undersigned experts, organisations and institutions call on the Standing Committee to take urgent measures against Egypt's non-compliance with CITES and to issue a suspension of trade in CITES listed specimens to and from Egypt, until the recommendations of SC57 are implemented.**

1. Lilly Ajarova, Ngamba Island Chimpanzee Sanctuary, Uganda
2. Dr. Sandra Altherr, Pro Wildlife, Germany
3. Bala Amarsekaran, Tacugama Chimpanzee Sanctuary, Sierra Leone
4. Claudine Andre, Lola ya Bonobo, DR Congo
5. Mimi Arandjelovic, Max Planck Institute for Evolutionary Anthropology, Germany
6. Rebeca Atencia, Tchimpounga Chimpanzee Rehabilitation Centre, Congo
7. Dr. Augustin K. Basabose, International Gorilla Conservation Program, Rwanda
8. Cornelia Bernhardt, Zoo Krefeld, Germany
9. Dominique Bikaba, Pole Pole Foundation (POPOF), Democratic Republic of Congo
10. Miroslav Bobek, The Revealed, Czech Republic
11. Dr. Kerry Bowman, Canadian Ape Alliance, Democratic Republic of Congo
12. Dr. Thomas Breuer, Wildlife Conservation Society, Republic of Congo
13. Mireille Breuer-Ndoundou Hockemba, Republic of Congo

14. Keith E. Brown, Jane Goodall Institute, USA
15. Dan Bucknell, The Gorilla Organisation, United Kingdom
16. Dr. Bryan Carroll, Director Bristol Zoo, United Kingdom
17. Janis Carter, Chimpanzee Rehabilitation Project, Gambia
18. Dr. Damian Chillaud, Max Planck Institute, Germany
19. Claire Coulson, CERCOPAN, Nigeria
20. Marianne Courouble, Ministry of Environment, France
21. Debby Cox, Jane Goodall Institute, Uganda
22. Doug Cress, Pan African Sanctuary Alliance(PASA), USA
23. Daniela Crone, Berlin Zoo and Friedrichsfelde Zoo, Germany
24. Eugene Cussons, JGI-Chimpanzee Eden, South Africa
25. Ingrid De Decker, Jane Goodall Institute, Belgium
26. Simone de Vries, Limbe Wildlife Centre, Cameroon
27. Dr. Gerald Dick, The World Association of Zoos and Aquaria, Switzerland
28. Andrew Dunn, Wildlife Conservation Society, Nigeria
29. Dave du Toit, Vervet Monkey Foundation, South Africa
30. Dr. Atanga Ekobo, WWF Central Africa Regional Programme Office, Cameroon
31. Christina Ellis, WWF, Cameroon
32. Gilles Eloga, WWF Central Africa Regional Programme Office, Cameroon
33. Maurice Etoga, WWF Central Africa Regional Programme Office, Cameroon
34. Heike Finke, Naturschutzbund, Germany
35. Marianne Fischer, Berlin Zoo and Friedrichsfelde Zoo, Germany
36. Dr. Roger Fotso, Wildlife Conservation Society, Cameroon
37. Liza Gadsby, Drill Ranch, Nigeria
38. Dr. Thomas Gillespie, Global Health Institute, Emory University, U.S.A.
39. Axel Goldau, Institut für angewandte Kulturforschung, Germany
40. David Greer, WWF Coordinator African Great Apes Programme, Cameroon
41. Prof. Colin Groves, School of Archaeology & Anthropology, National University, Australia
42. Daniel C. Hänni, Jane Goodall Institut, Switzerland.
43. Dr. Philipp Henschel, Panthera and Wildlife Conservation Society, Gabon
44. Rachel Hogan, Ape Action Africa, Cameroon
45. Volker Homes, WWF, Germany
46. Alette Jamart, Habitat Ecologique et Liberté des Primates, République du Congo
47. Sandra Junglen, Robert-Koch-Institute, Germany
48. Michaela Kitschke, WWF, Germany
49. Corinna Köhn, Berlin Zoo and Friedrichsfelde Zoo, Germany
50. Angela Krüger, Berlin Zoo and Friedrichsfelde Zoo, Germany
51. Annette Lanjouw, Arcus Foundation, United Kingdom
52. Dr. Fabian Leendertz, Robert-Koch-Institute, Germany
53. Klaus Lengefeld, GTZ, Germany
54. Innocent Liengola, Wildlife Conservation Society, Democratic Republic of Congo
55. Dr. Liz Macfie, Consultant in Great Ape conservation, Kenya
56. Fiona Maisels, Wildlife Conservation Society, Central Africa
57. Dr. Shelly Masi, Museum National d'Histoire Naturelle, Paris, France
58. Luc Mathot, Projet Protection des Gorilles, Congo
59. Dr. Guy Mbayma, Institut Congolaise pour la Conservation de la Nature, Democratic Republic of Congo
60. Shirley McGreal, International Primate Protection League, USA
61. Dr. Angela Meder, Berggorilla & Regenwald Direkthilfe, Germany

62. Praveen Moman, Volcanoes Safaris, Uganda and Ruanda
63. John Mshelbwala, UNEP CMS Scientific Council Chair, Nigeria
64. George Muamba-Tshbusu, Institut Congolaise pour la Conservation de la Nature, Democratic Republic of Congo
65. Martin Mulama, Sweetwaters Chimpanzee Sanctuary, Kenya
66. Chouaibou Nchoutpouen, Central African Forest Commission (COMIFAC), Cameroon
67. Aaron Nicholas, Wildlife Conservation Society, Cameroon
68. Prof. Dr. Manfred Niekisch, Director Zoo Frankfurt, Germany
69. Radar Nishuli, Institut Congolaise pour la Conservation de la Nature & Parque National Kahuzi Biega, Democratic Republic of Congo
70. Fidelis Omeni, Federal Ministry of Environment, Nigeria
71. Liz Pearson, Projet Protection des Gorilles, Gabon
72. Charles-Albert Petre, Royal Zoological Society Antwerp (KMDA), Belgium
73. Estelle Raballand, Centre de Conservation pour Chimpanzes, Guinea
74. Wolfgang Rades, Bird Park Herborn, Germany
75. Helga Rainer, London School of Economics and Political Science, United Kingdom
76. Chris Ransom, The Zoological Society of London, United Kingdom
77. OBE Ian Redmond, Chair of the Ape Alliance and Ambassador of the CMS Year of the Gorilla, United Kingdom
78. Dr. Patricia Reed, Wildlife Conservation Society, Republic of Congo
79. Julia Riedel, Max-Planck Institute for Evolutionary Anthropology, Germany
80. Dr. Martha Robbins, Max Planck Institute for Evolutionary Anthropology, Germany
81. Eugene Rutagarama, International Gorilla Conservation Programme, Ruanda
82. Brenda Santon, National Council of SPCAs, South Africa
83. Maik Schaffer, Borneo Orangutan Survival Foundation, Germany
84. Dr. Nicole Schauerte, Zoo Frankfurt, Germany
85. Sheila Siddle, Chimfunshi Wildlife Center, Zambia
86. Sheri Speede, Sanaga-Yong Chimpanzee Sanctuary, Cameroon
87. Boris Thiemig, Borneo Orangutan Survival Foundation, Germany
88. Dr. Jo Thompson, Lukuru Wildlife Research Project, Democratic Republic of Congo
89. Angelique Todd, WWF, Central African Republic
90. Sandra Tranquilli, Max Planck Institute, Germany
91. Will Travers, Species Survival Network (SSN), USA
92. Dr. Marina Vancatova, Charles University, Czech Republic
93. Claudia Rudolf von Rohr, University of Zurich, Switzerland
94. Deepak Rughani, Biofuelwatch, United Kingdom
95. Steve Unwin, Pan African Sanctuary Alliance (PASA) Veterinary Co-ordinator, United Kingdom
96. Dr. Iris Weiche, University of Tübingen, Germany
97. Liz Williamson, IUCN/SSC Primate Specialist Group, United Kingdom
98. Cosma Wilungula-Balongelwa, Institut Congolaise pour la Conservation de la Nature, Democratic Republic of Congo
99. Juichi Yamagiwa, International Primatological Society