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NO OASIS:
the Egyptian ivory
trade in 2005

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Front cover photograph: Ivory craftsman at work in Egypt, 2005.

Photograph credit: Esmond Martin.

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Credit: Esmond Martin.

Cairo's Khan al-Khalili market attracts many foreign tourists every day who come to buy souvenirs, including ivory.

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EXECUTIVE SUMMARY

A comprehensive survey of the ivory trade in Egypt, focused upon the cities of Cairo, Luxor, Aswan, Hurghada and Sharm el-Sheikh, was undertaken in March and April 2005. The principal findings of that effort can be summarized as follows:

- Raw elephant ivory tusks are still being imported illegally into Egypt, albeit in very limited quantities. Such shipments reportedly originate in the Democratic Republic of Congo and southern Sudan and are moved overland from Sudan into Egypt. Other reports suggested that a few tusks also may come from India, but such information could not be substantiated. Compared with the late 1990s, however, the quantity imported has declined markedly.
- The price paid by craftsmen and owners of the ivory workshops in Cairo for a 2-5 kg raw ivory tusk averaged about USD190/kg, while larger tusks weighing 10-19 kg cost around USD345/kg. When adjusted for inflation in 1998 USD terms, these prices are 200-250% of those documented for comparable tusks noted in surveys in 1998 and 1999. This price increase may be credibly attributed to three factors: increased law enforcement, a reduction in supply in Egypt and the increasing cost of elephant ivory at its source in neighbouring African countries.
- Somewhere between 25 and 50 ivory craftsmen, some located in and around Khan al-Khalili, the main market in Cairo, are estimated still to be carving ivory today, but their numbers have fallen to somewhere between one-quarter and one-half of the 100 carvers identified in 1998 and most only carve ivory on a part-time basis. This continues the significant decline in the number of ivory carvers in Egypt, documented with comparable data for the years 1989 and 1998 (Martin and Stiles, 2000).
- A total of 130 retail outlets were found selling ivory products in the five cities and towns surveyed. Cairo, Luxor and Aswan collectively had 142 shops in 1998 but, by 2005, the number of retail outlets selling ivory had apparently fallen to 119 in these three cities, indicating an overall reduction of about 15-20%.
- The number of ivory items seen for sale at the retail level numbered 10 709 in 2005, less than half the number observed in 1998 (21 460). While the scale of the trade has apparently fallen in all cities surveyed, the greatest decline in the number of ivory products on the retail market was noted in Aswan and Luxor, where only 373 and 1308, respectively, were found in 2005 compared to 3388 and 6445 ivory products observed in 1998.
- Cairo, with 83% of the ivory items seen for sale, continues to be the major outlet for ivory products in Egypt. Luxor accounted for 12% of the ivory products observed and Aswan had only three per cent. In sharp contrast, the huge tourist resorts of Hurghada and Sharm el-Sheikh displayed only negligible amounts of ivory.



Credit: Esmond Martin.

A small ivory tusk crafted in a workshop in the Khan al-Khalili area of Cairo.

- The most common items found for sale were figurines of Egyptian gods and humans - 34%; animal figurines, such as scarabs, camels and elephants - 30%; pendants - 9%; necklaces - 6%; and bangles - 4%. It is worth noting that there were almost no ivory name seals or chopsticks, key ivory products for the Asian market, found during the survey.
- The main buyers of ivory products were reportedly tourists from Italy and Spain, followed by those from France and unspecified Latin American countries. This largely mirrored the findings of the 1998 survey. Local Egyptians apparently consume virtually no ivory themselves.
- Retail prices for worked ivory items sold in Egypt in 2005, adjusted for inflation in US dollars (USD) terms, appear to be anywhere from twice to over four times those of late 1998. In 2005, a typical 10-cm human figurine cost about USD185, a medium-sized bead necklace was USD51, a 2.5-cm bangle was USD35, a 5-cm pendant was USD14 and a small ring was USD7.
- There were very few antique ivory pieces observed for sale (less than one per cent of the total number of ivory products surveyed). Equally, only a very small number of ivory items that had been manufactured in other countries were found for sale on the Egyptian market. Thus, virtually all of Egypt's ivory trade comprises products that were locally produced in recent times.
- The Egyptian Government has made significant efforts, particularly from 1999 through to 2003, to seize elephant tusks and illegal worked ivory items in several parts of the country. Altogether, over 3.5 t of ivory has been seized during this period. Improved law enforcement has been partly responsible for the decline of the Egyptian ivory industry and various shopkeepers indicated awareness concerning the illegality of the trade or had experienced government pressure to curtail sales directly.
- Although ivory trade in the country is under pressure and has declined considerably since 1999, the scale of the current trade at retail level is still significant and of conservation concern. In this regard, Egypt has not conformed with the CITES requirements for controls on the internal trade in ivory contained in *Resolution Conf. 10.10 (Rev. CoP12)*.
- To reduce the availability of elephant ivory products in key markets throughout the country and to ensure compliance with all CITES requirements, it is recommended that Egypt:
 - review and improve policy, legislation and regulatory measures so that they fulfil the requirements of CITES *Resolution Conf. 10.10 (Rev. 12)*;
 - address implementation and enforcement deficiencies;
 - raise awareness and publicity on wildlife trade controls; and
 - be reviewed as part of the CITES Standing Committee process for assessing domestic ivory markets worldwide, with a view to including Egypt as a priority country for attention within the context of the *Action plan for the control of trade in African elephant ivory*.

Figure 1

Map of part of Egypt, showing the places visited during the 2005 survey of Egypt's ivory trade.



INTRODUCTION

Egypt's ivory trade is ancient. Aristotle recorded that Egyptian Pharaohs had hunted or captured elephants in the Nile Valley from early times and Egyptian artifacts of ivory date back 8000 years (Kingdon, 1979). Three thousand five hundred years ago, Pharaonic texts from the reign of Queen Hatshepsut describe a major exploratory naval expedition to the Land of Punt (present-day Eritrea and Somalia in the Horn of Africa) returning with important raw materials, including "pure ivory" (Siliotti, 2004). By that time, the African Elephant *Loxodonta africana* was probably extinct in the lower Nile Valley of present-day Egypt, but throughout the intervening millennia, the great cities of the Nile certainly remained a destination for ivory from sub-Saharan Africa. Paintings on the walls of the chapel in the tomb of Rekhmire, which is found amongst the Tombs of the Nobles near the Valley of the Kings in Luxor, feature a long procession of bearers from foreign countries, including men carrying elephant ivory tusks, for the Pharaoh Amenophis II in 1400 B.C. (Siliotti, 2004). Indeed, the ivory trade still plies a long route from Africa's interior to modern-day Egypt, but today open processions have given way to clandestine trafficking.

A comprehensive assessment of Africa's ivory trade published in 2000, in the report *The Ivory Markets of Africa*, identified Egypt as one of the largest domestic ivory markets in Africa (Martin and Stiles, 2000). This conclusion was based upon a survey of the availability of ivory in the markets of Cairo, Luxor, Aswan and Alexandria in November and December 1998. The results of this survey were published in *Oryx* (Martin, 2000a), *BBC Wildlife* (Martin, 1999) and *Pachyderm* (Martin and Stiles, 2001). Indeed, in the late 1990s, only Abidjan (Côte d'Ivoire) and Harare (Zimbabwe) offered more ivory products (Martin and Stiles, 2000).

Since 2002, two comprehensive analyses of global ivory seizure records held in the Elephant Trade Information System (ETIS), one of the two monitoring systems for elephants under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), have also identified Egypt as a country of concern in the illegal trade in ivory (Milliken *et al.*, 2002; Milliken *et al.*, 2004). These studies have demonstrated that illicit trade in ivory is most directly correlated to countries having large-scale domestic markets that are poorly regulated. At the 12th meeting of the Conference of the Parties to CITES (CoP12), held in Santiago (Chile) in November 2002, *Decision 12.39* was approved, giving rise to an intersessional oversight process to assess domestic ivory markets in key countries. Under the direction of the CITES Standing Committee, this Decision obliges targeted countries to demonstrate compliance with CITES requirements for internal ivory markets outlined in *Resolution Conf. 10.10 (Rev. CoP12)* or face possible sanctions. In a subsequent development at CoP13, held in Bangkok (Thailand) in October 2004, *Decision 13.26* was approved, establishing an action plan to assess the domestic trade in ivory in all African Elephant range States. Because Egypt had previously been identified as having a major domestic ivory market, but was not an elephant range State, there was some concern that this important country might be overlooked if the CITES focus remained strictly on elephant range States. Further, in the past, Egypt's ivory trade had been clearly linked with neighbouring Sudan (Martin, 1999). In February 2005, a trade study in that country identified an escalating trade in the capital city of Khartoum and adjacent Omdurman (Martin, 2005). This development also raised the spectre that a similar increase in trade may be occurring in Egypt. As a result, TRAFFIC felt it was time to do another survey of Egypt's ivory trade.

The purpose of this study was to assess contemporary ivory trade dynamics in Egypt and to establish whether or not the ivory trade there continued to be a significant conservation concern. The report documents and analyses the ivory market of Egypt as it existed in early 2005. It is hoped that this study will make a useful contribution towards resolving serious issues that allow the ivory market in Egypt to operate beyond the requirements of CITES. There is little doubt that, with the complete closure or even reduction in scale of the Egyptian ivory market, elephant conservation will benefit throughout Africa.

METHODOLOGY

In the previous study of Egypt's ivory market in 1998, large numbers of ivory products were found for sale at the retail level in Cairo, Luxor and Aswan (Martin, 2000a). But in Alexandria, the second-largest city in the country, almost no ivory was observed on the retail market, probably because European tourists, the main ivory buyers, rarely visit in large numbers (Wahby, 2005). For the current survey, instead of Alexandria, it was decided to add two new Red Sea resorts, Hurghada and Sharm el-Sheikh, the first on the African mainland and the other on the Sinai Peninsula, both of which are extremely popular destinations for European tourists. In fact, the number of visitors to these locations is expanding more rapidly than anywhere else in Egypt.



Credit: Tom Milliken.

Elephant tusks with inlay work including religious motifs, seized in Egypt, and photographed in 2005.

Field work in Egypt took place between 20 March to 14 April 2005. Most of the souvenir shops surveyed in 1998 were visited again in 2005 during comprehensive market surveys in Cairo, Luxor and Aswan. The number of ivory items on display were counted in each shop and classified by product type to the extent possible. Data on prices were also obtained for many items. In this regard, it should be noted that many Egyptian sales personnel are very savvy operators on the

international tourist scene and would often quote prices for ivory products in US dollars (USD) or euros once they ascertained the nationality of prospective buyers. Consequently, if prices were only quoted in US dollars, the equivalent value in Egyptian pounds (EGP) is not presented in this report. The owners, managers or salespersons present were generally questioned about the origin of their ivory products, the nationality of their customers, and the state of their ivory business from past, present and future perspectives.

If possible, workshops were visited to ascertain how many ivory carvers were still in operation, or whether they were now using other raw materials, such as camel bone and wood. The type of products being crafted at these locations was documented. The carvers and workshop owners were also questioned on the origin of their ivory stocks, how they had been transported to Cairo, as well as asked for information on prices.

Government offices in Cairo, including the Ministry of Agriculture & Land Reclamation, were visited to obtain an overview of the country's policy and legislation for endangered wildlife in Egypt and the implementation of CITES. Officials were interviewed on their efforts to enforce the country's wildlife laws and on law enforcement efforts against the illegal ivory trade. Statistics were collected on ivory seizures and an inspection was made (April 2005) of the seized ivory in the government store by the second author of this report.

Literature dealing with Egypt's wildlife trade, especially ivory, was examined to compare past findings with those of the current survey. Over 200 interviews made in 1998 were compared with about the same number in 2005 to ascertain contemporary ivory trade dynamics and trends.

RESULTS

Legislation and policy

Legal framework

Egypt has been a Party to CITES for nearly three decades. Egypt's accession to the Convention took place on 4 January 1978 and its membership entered into force on 4 April the same year, making Egypt the 41st Party to CITES. Article VIII, Paragraph 1 of the Convention obliges Parties to “*take appropriate measures to enforce the provisions of the...Convention and to prohibit trade in specimens in violation thereof.*” Regardless of the timeliness of Egypt's accession to CITES, over the next 20 years, the authorities failed to meet this obligation and buttress membership with the enactment of effective national legislation. During this period, Egypt was recognised as a country in which significant wildlife trade occurred and was frequently implicated in wildlife trade infractions in violation of CITES. As was the case in many other longstanding Parties to the Convention, Egypt's lack of national legislation and regulatory measures for implementing CITES was a festering problem that allowed illegal trade in wildlife, including elephant ivory, to continue unabated.

To address regulatory weaknesses on a global level, in 1992, at the eighth meeting of the Conference of the Parties to CITES (CoP8), the Parties adopted *Resolution Conf. 8.4 (National Laws for Implementation of the Convention)*. This Resolution was developed in response to a comprehensive review of alleged infractions and other problems concerning enforcement of the Convention, which concluded that the widespread lack of national legislation was a serious impediment to effective law enforcement for CITES worldwide. The implementation of *Resolution Conf. 8.4* gave rise to what has subsequently become known as the “CITES national legislation initiative”, which continues to this day. At CoP9, in 1994, a report was tabled that assessed and ranked the legislation of 81 Parties, including Egypt, on a scale of 1 to 3. Egypt was ranked with 28 other countries in category 3, reserved for the most problematic countries, meaning those in which “*Legislation is believed generally not to meet the requirements for the implementation of CITES*”. Thus began a five-year process under CITES to encourage the development of new wildlife trade legislation in Egypt in order to meet the country's most fundamental obligations under the Convention.

At CoP10, in 1997, the Parties adopted *Decision 10.18*, which specifically singled out Egypt, Guyana, Indonesia, Malaysia-Sabah, Nicaragua, Senegal and Zaire (now the Democratic Republic of the Congo), as countries involved in significant trade in wildlife but generally lacking effective national legislation with which to implement CITES. These countries were given deadlines by which they needed to rectify the situation or face suspension of all trade in wildlife under the Convention. As the process for this Decision unfolded under the direction of the CITES Standing Committee, various deadlines for action were set and, later, various extensions given without imposing sanctions. Some two years later, however, things came to a head at the 41st meeting of the Standing Committee (8-12 February 1999). At that meeting, a decision was taken to recommend that all trade in CITES specimens with Egypt be suspended from 30 September 1999, unless the CITES Secretariat could verify that Egypt had enacted legislation that generally met the requirements of the Convention.

Following this decision, staff from the CITES Secretariat visited Egypt and provided guidance on the drafting of new legislation. *Ministerial Decree No. 1150 of 1999* was subsequently issued by the Ministry of Agriculture & Land Reclamation, on 2 September 1999, to provide a legal framework for CITES implementation in Egypt. This Decree, which became law following its subsequent publication in Arabic in the official government journal *Wake Al Mysrya*, establishes the conditions and criteria that govern wildlife trade. Of particular note is Article 1, paragraph j), which establishes a comprehensive and overarching definition of “violations”:

It is a violation to possess, to offer or display for sale, to import, export, re-export or introduce from the sea any specimen of a species listed in Appendices I, II and III of CITES without complying with the requirements of this Decree. All specimens that are the subject of a violation shall be confiscated and disposed of in accordance with recommendations of the Resolutions of the Conference of the Parties to CITES.

This definition clearly encompasses any and all trade in ivory as all African and Asian Elephant populations were listed in either Appendix I or II of the Convention at the time the Decree was adopted. Further, there are no specific provisions for exemptions in *Ministerial Decree No. 1150*, for example, to allow the disposal of pre-Convention or pre-Decree stocks of raw ivory or worked ivory products. To qualify for any exemption in this regard, Egyptian authorities require proof of ownership or legal importation (Prof. Dr. Samy El-Fellaly, pers. comm., April 2005).

To buttress this move and enhance the law enforcement capabilities of Customs at Egypt's ports of entry and exit, on 26 September 1999, the Ministry of Finance's Customs Department issued *Procedures Circular No. 17 of 1999*. This document further outlined procedures and conditions for Customs officers handling the import, re-export and export of CITES specimens. Other measures designated scientific and management committees for the Convention in Egypt and established a wildlife office at the airport in Cairo to assist with law enforcement at that import location.

These developments transpired just prior to the Standing Committee deadline given for Egypt to 'put its house in order'. In recognition of these improvements, the 42nd meeting of the Standing Committee (28 September – 1 October 1999) commended Egypt for enacting new legislation and stepped back from the imposition of sanctions in the form of a suspension of trade in all CITES specimens to the country.

Implementation and enforcement

The adoption of *Ministerial Decree No. 1150* and other supporting measures led to a rapid and immediate improvement in the policing of Egypt's wildlife trade under CITES. Ivory was no exception and, within one week of the Decree's promulgation, Customs officers at the Cairo International Airport seized two raw ivory tusks illegally leaving the country for Malta, the first reported ivory seizure in the country's history under CITES. Two weeks later, an even larger consignment of 29 elephant tusks on their way to Libya was confiscated at the airport and this was followed by the seizure of six pieces of raw ivory coming into Egypt from Nigeria a month later. Not just elephant ivory, but various other wildlife products being traded in contravention of CITES were also seized.

With this promising start, Egypt successfully turned a new page in its relationship with the Convention and began a concerted effort to ensure that its wildlife trade, including that in elephant ivory, proceeded in accordance with the rigorous enforcement of CITES provisions. Although since late 2002, enforcement efforts with respect to sales of ivory products on the retail market appear to have waned, from September 1999 to April 2000, there were nine separate seizures of 162 raw and worked ivory pieces, weighing 327 kg, according to the Egyptian CITES Management Authority (Martin, 2000b). Similar seizures continued to take place between May 2000 and December 2002; Egyptian authorities, including Customs, police and wildlife officers affiliated with the Ministry of Agriculture & Land Reclamation, seized 2564 pieces of raw and semi-worked ivory and 278 worked ivory products in various locations throughout the country. Collectively, these seizures represented over 3.5 t of raw ivory and included some rather sensational, large-scale confiscations of raw ivory destined for Egypt's carving industry. In August 2000, 1441 raw tusks, weighing 1525 kg, were seized in Kom Ombo District of the upper Nile near the border with Sudan. Other significant raw ivory seizures occurred in Aswan, the largest Egyptian

city near the Sudanese border and a major tourist destination. These included 79 tusks, weighing 139 kg, in 2000 and 230 pieces of raw ivory, weighing 850 kg, in 2001 (**Table 1**). All of these stocks reportedly came to Egypt from Sudan. The link between Egypt's trade in ivory and neighbouring Sudan becomes abundantly clear through an examination of ivory seizure records. **Table 1** shows that, from 2000 to 2003, 97% of the raw ivory seized in Egypt was believed to have entered the country from Sudan. Similarly, Sudan accounted for some 81% of the worked ivory products seized in Egypt.

Table 1

Ivory seizures in Egypt (2000-2002) where Sudan is identified as the country of origin, export or re-export

Date	Location of seizure	Raw/semi-worked ivory (pieces)	Raw/semi-worked ivory (kg)	Worked ivory (pieces)	Worked ivory (kg)
1/2000	Cairo Airport	2	12		
3/2000	Aswan	79	139		
8/2000	Kom Ombo	1441	1525		
9/2000	Cairo Airport	2	6		
4/2001	Cairo Airport			2	5
6/2001	Aswan			4	43
9/2001	Aswan			2	2
9/2001	Aswan			2	2
11/2001	Aswan	230	850		
2/2002	Cairo Airport			3	3
5/2002	Cairo			42	63
5/2002	Cairo	66	53		
5/2002	Cairo			21	13
5/2002	Cairo			125	108
10/2002	Cairo	665	550		
12/2002	Cairo Airport			11	6
12/2002	Cairo Airport			3	1
12/2002	Cairo Airport			7	2
12/2002	Cairo Airport	4	3		
12/2002	Cairo Airport			4	3
TOTAL		2489	3138	226	251
TOTAL: All ivory seizures		2564	3244	278	310
PERCENTAGE SUDAN TRADE		97.1%	96.7%	81.3%	80.9%

Source: Egypt Ministry of Agriculture & Land Reclamation

Ivory stockpiles

All types of ivory seized in Egypt are ultimately taken into custody by the Ministry of Agriculture & Land Reclamation and end up being stored on the premises of the Agricultural Museum in the Dokki District of Cairo.

The locked storage rooms hold not only ivory, but a wide range of other seized wildlife products, including stuffed birds and animals, sea turtle shells, mammal and reptile skins and hides, corals, shells and other dried marine specimens. An attempt has been made to consolidate all ivory in one part of the store, but space has become an issue because of the large volume of ivory and other products. To the extent possible, the ivory from each individual seizure is kept together and identified with a series of labels in Arabic.

While it was not possible to quantify the volume of ivory in the store at the time it was visited (April 2005), it was apparent that all of the major ivory seizures noted above were held in the store. It is estimated that some 3.5 t of ivory are currently represented by the stocks held at the Agricultural Museum. These stocks are reportedly subject to standard audit procedures by the government from time to time.

Participation in ETIS

In recent years, Egypt has been one of the few countries in the Middle East that has regularly provided ivory seizure data to ETIS. Further, the quality of information in terms of completeness reported by Egypt is very good. As of 6 September 2004, a total of 37 seizures have been made in Egypt and reported to ETIS through the CITES Secretariat. These seizures, all of which occurred between September 1999 and May 2004, included 2909 raw, semi-worked or worked ivory pieces, weighing a total of 3697 kg. Although the ETIS data cover the period 1989 to the present, there are no records documenting whether Egypt made any elephant product seizures between 1989 and late 1999.

During the period from 1990 to 2005, 14 countries reported seizing ivory products that originated in, or were exported or re-exported from, Egypt on 55 different occasions. These seizures totalled 165 kg and were principally worked ivory products confiscated from tourists. European countries, especially the UK, Spain, Germany and France, made 60% of these seizures, while another 30% occurred in the USA.

In both of the comprehensive analyses of the ETIS data presented to the Conferences of the Parties to CITES, Egypt has figured as a country of secondary importance when a cluster analysis technique is employed to highlight those countries most involved in the illicit trade in ivory (Milliken *et al.*, 2002; 2004). In the ETIS report for CoP12, in November 2002, cluster analysis was used to reduce the 150 countries identified in the ETIS data as being implicated in the illicit trade in ivory to the 31 most important players. These countries were then sorted into 13 different clusters or groups, which resulted in Egypt being included in an eight-country grouping together with Angola, Burundi, Côte d'Ivoire, India, the Republic of Korea, the Philippines and Sudan (Milliken *et al.*, 2002). This cluster was described as a 'catch-all' group with the various countries exhibiting a wide range of roles and variables in the ivory trade. As such, it included some elephant range States, transit countries and major ivory markets, of which Egypt was one, and overall the group as a whole exhibited poor law enforcement and a high perception of corruption. Egypt's major source of ivory, Sudan, fell within the same cluster.

In the ETIS analysis for CoP13, in October 2004, data reduction techniques reduced the number of countries under consideration from 154 to 35. Once again, Egypt was found in a 'catch-all' cluster together with Belgium, Botswana, Canada, India, Portugal and Zambia (Milliken *et al.*, 2004). Like in the earlier analysis, this cluster featured both elephant range States, transit countries and end-use markets, but in contrast it exhibited a much better law enforcement effort ratio and a lower value concerning the perception of corruption. Accordingly, the cluster for Egypt in this analysis marked an improvement over the earlier ETIS report, but it was nonetheless noted that Egypt's internal ivory market was reasoned to be the largest of all countries in the grouping.

These analyses have served to keep a low-grade focus on Egypt's ivory trade within the CITES arena. Egypt, however, is not explicitly part of the current CITES oversight process focused upon domestic ivory markets in African Elephant range States. At CoP13, *Decision 12.39* established an intersessional oversight process under the direction of the Standing Committee to assess compliance with CITES requirements for internal trade in ivory as outlined in *Resolution Conf. 10.10 (Rev. CoP12)*, which recommends that:

Those Parties in whose jurisdiction there is an ivory carving industry that is not yet structured, organized or controlled:

- a) register or license all importers, manufacturers, wholesalers and retailers dealing in raw, semi-worked or worked ivory products;*
- b) establish a nationwide procedure, particularly in retail outlets, informing tourists and other non-nationals that they should not purchase ivory in cases where it is illegal for them to import it into their own home countries; and*
- c) introduce recording and inspection procedures to enable the Management Authority and other appropriate government agencies to monitor the flow of ivory within the State, particularly by means of:*
 - i) compulsory trade controls over raw ivory; and*
 - ii) a comprehensive and demonstrably effective reporting and enforcement system for worked ivory.*

Decision 12.39 was originally directed at selected countries noted in the ETIS analyses, but the 50th meeting of the Standing Committee moved to extend the mandate of the Decision to cover all African Elephant range States. CoP13 formally endorsed this development by approving, in *Decision 13.26*, an *Action plan for the control of trade in African elephant ivory* that had been drafted by the CITES Secretariat. This action plan calls for all African Elephant range States:

- *to prohibit unregulated domestic sale of ivory, whether raw, semi-worked, or worked;*
- *to instruct all law enforcement and border control agencies to enforce such laws; and*
- *to engage in public awareness campaigns to publicise these prohibitions.*

In this regard, the first assessment of Africa's response to this plan of action will be at the 53rd meeting of the Standing Committee in June 2005. Each subsequent meeting of the Standing Committee and the 14th meeting of the Conference of the Parties to CITES (CoP14) will also review progress on this matter as a formal part of their business. Through this iterative process, countries which fail to address unregulated domestic ivory markets within a reasonable period of time face possible sanctions under CITES, including the suspension of all wildlife trade options under the Convention in the near future. Egypt, however, is currently not targeted as part of this process, although there remains scope for non-range States to be included by a decision of the Standing Committee.

Sources and prices of raw ivory

Egypt's main source for elephant tusks for the past 2000 years has been Sudan and the ivory has characteristically been transported overland across the border between the two countries. This trade route in recent years has been well documented (Martin, 2000a). Most tusks destined for Egypt seem to be initially smuggled into Sudan from

the Democratic Republic of the Congo or Central African Republic, while some possibly originate in Kenya and Chad. In fact, the origin of most tusks reaching Egypt since the late 1990s has probably been the Democratic Republic of the Congo, instead of Sudan, according to information from ivory traders in Egypt and Sudan (Martin, 2005). Owing to prolonged civil war in the southern half of the country, no quantitative elephant survey work has been undertaken in Sudan since the early 1980s, and the extent of elephant range and the status of the species remains essentially unknown today. Regardless, many elephant populations are believed to have suffered losses and currently, based on anecdotal information from local people and aid workers, the African Elephant Database records only some 300 elephants as an ‘informed guess’; the possibility of far greater numbers, however, certainly exists (Blanc *et al.*, 2003). The elephant population of the Democratic Republic of the Congo is believed to be far more substantial, but is also poorly surveyed owing to continuing conflict and war in the eastern and northern parts of the country, including all border areas with Sudan. The African Elephant Database reports a total of 7667 elephants in the ‘definite’ category, another 2631 are listed as ‘probable’, 34 996 as ‘possible’ and 17 554 as ‘speculative’; poaching, however, remains a significant problem and certain populations are believed to be in serious decline, including those found in Garamba National Park on the Sudanese border (Blanc *et al.*, 2003).

Ivory traders in Cairo interviewed in 2005 indicated that some quantities of raw ivory were still occasionally obtained from Sudan, a view that had also been expressed by traders in Khartoum and Omdurman a couple of months earlier. There is little doubt that ivory trade volumes between Sudan and Egypt have dropped significantly relative to the past. With 75% of Sudan’s current production of worked ivory products reportedly being sold to Chinese buyers (Martin, 2005), although not quantified in the same manner, there are strong indications that raw ivory is going from Sudan to China as well. Still, there is evidence of lingering trade with Egypt. In a press release dated 11 May 2005, the Sudanese Government stated “There is ivory which had been seized through Notice number 11/2004 in the volume of 46 pieces, carried on a lorry with an intention of smuggling to the Arab Republic of Egypt” (Anon., 2005a). Although this ivory was intercepted, it shows that the trade route from Sudan to Egypt is still active to some extent. Further, Sudanese authorities have also expressed a desire to set up an inspection station at Wadi Halfa, near the Egyptian border, to prevent elephant tusks from being exported illegally into Egypt (Anon., 2005a).

At least two Egyptian traders mentioned one other source of elephant tusks: India. In fact, India was previously mentioned as a source for ivory in Egypt on one occasion in 1998 (Martin, 2000a). During the course of this survey, one trader, an owner of an ivory workshop, showed the principal researcher a 28-kg tusk reportedly from

Table 2
Prices paid for tusks by ivory craftsmen and owners of ivory workshops in Egypt in March 2005 and comparable data for 1998 and 1999

Weight in kg	Price in EGP/kg 2005	Price in USD/kg 2005	Price in USD/kg 1998-1999*
1	800-1000	138-173	34 (< 1 kg)
2-5	1000-1200	173-207	62-80 (1-5 kg)
6-9	1500-1800	259-311	98-137 (> 5 kg)
10-19	2000	345	
20-30	2000-2600	345-449	

* Source: Martin and Stiles, 2000 (which includes raw ivory prices from a visit to Cairo in 1999, as well as data from the 1998 survey).

India. He claimed he could sell it wholesale for EGP2000 (USD345)/kg. There are privately-owned ivory stockpiles in India and there is trade in a huge number of commodities (including tusks) from the west coast and south of India to the Gulf States (Menon and Kumar, 1998); it is possible that such tusks are flown from the Gulf States to Cairo, as Egyptian traders indicated that the tusks were transported by air into the country. Occasionally, elephant tusks may also be flown into Egypt directly from India concealed in personal luggage. Overall, however, this type of trade is very small and opportunistic in nature.

Raw ivory prices remain contingent upon the size and the quality of the ivory tusk in question, with higher prices paid for larger tusks. In early 2005, ivory craftsmen and workshop owners reportedly paid about EGP1000 (USD173)/kg for tusks weighing 2-3 kg and about EGP2000 (USD345) a kilogramme for larger tusks of 10 kg (**Table 2**). Larger tusks that weighed more than 10 kg were reportedly even more costly. In comparison to price data from surveys of the Egyptian ivory trade in 1998 and 1999, current US dollar prices at face value have nearly tripled (**Table 2**). When these values are adjusted for inflation using the Gross Domestic Product (GDP) Deflator Inflation Index, raw ivory prices in Egypt in US dollar terms in 2005 are believed to have increased to 200-250% of 1998 levels.

Ivory carving and manufacturing

Egyptians have been carving ivory for some 8000 years (Kingdon, 1979). Almost all ivory production today takes place in and around Cairo. In addition, a few ivory workshop owners mentioned that some ivory items are also produced in Fayoum City. There was no evidence of ivory carving industries in Luxor, Aswan, Hurghada or Sharm el-Sheikh, but the first two cities may have occasional artisans who could carry out repair work if needed.

Most ivory craftsmen active today work in and around the famous 16th century market, the Khan al-Khalili in Cairo, which features over 930 shops selling a vast array of Middle Eastern products (Seif, 1993). Most craftsmen work out of sight, either in their homes or in tiny rooms hidden away from the pedestrian traffic; this is mainly to avoid paying rent on workshop space and also because of increased law enforcement efforts to suppress the trade in recent years. Generally speaking, throughout the course of this study, retail sellers were extremely reluctant to provide introductions and allow access to ivory carving workshops. Because of the secretive nature of Egypt's ivory carving enterprises today, it was not possible to count the number of craftsmen



Credit: Esmond Martin.

Craftsmen skilled in ivory carving increasingly work with camel bone, the most popular substitute for ivory. After camels are slaughtered for meat, craftsmen buy the bones (inset) for carving. Far more camel bone carvings than ivory carvings were seen for sale in Egypt in 2005.



Credit: Esmond Martin.

Beaded necklaces are one of the most common ivory items made in Egypt in 2005.

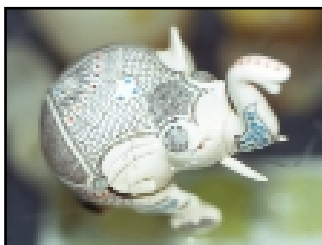
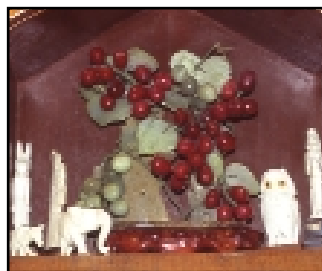
drills. They usually work a six-day week for up to 12 hours a day and most are paid according to what they produce. They reportedly earn between EGP300 (USD52) and EGP3000 (USD519) a month in wages, but skilled craftsmen generally earn about USD200 a month on average. Ivory carvers can earn more by producing small trinkets than by carving quality items that take longer to make, as most buyers seem to want inexpensive ivory items. Overall, ivory craftsmanship in Egypt is comparatively poor and the emphasis on cheap products clearly contributes to this state of affairs. The most common items made are various types of jewellery, especially beaded necklaces, and small human and animal figurines.

In the not too distant past, master ivory craftsmen in Egypt used some rare carving techniques and motifs, producing, for example, a range of ivory pieces enhanced with delicate inlays of turquoise, coral, agate and silver. Such items found in the

working in ivory accurately and only an estimate of their numbers is possible at this time.

It appears that many only work part time in ivory, concentrating nowadays on camel bone and wood as the most common materials for making figurines and other products. In 1998, Cairo had an estimated 100 craftsmen working in ivory, mostly on a part-time basis. In 2005, there were considerably fewer ivory craftsmen at work, perhaps numbering between 25 and 50 individuals at most, representing somewhere between one-quarter and one-half of the previous number. It is believed that very few of these individuals actually work in ivory on a full-time basis. This downward trend in the number of ivory carvers in Egypt has been evident since 1989 (Martin and Stiles, 2000).

A total of six ivory workshops were visited in and around the Khan al-Khalili, where eight people, all men, were observed crafting ivory products of some description. At these locations, an additional 15 craftsmen had work benches, but they were not present at the time of the visit. Egyptian carvers use both hand implements and electric tools, especially



Credit: Esmond Martin.

Human and animal ivory figures are common in Egypt's souvenir shops (top left); Egyptian craftsmen sometimes inlay with silver (bottom left); Christian carvings, such as figures of St George and characters from the nativity scene, appeal to some European buyers (right).

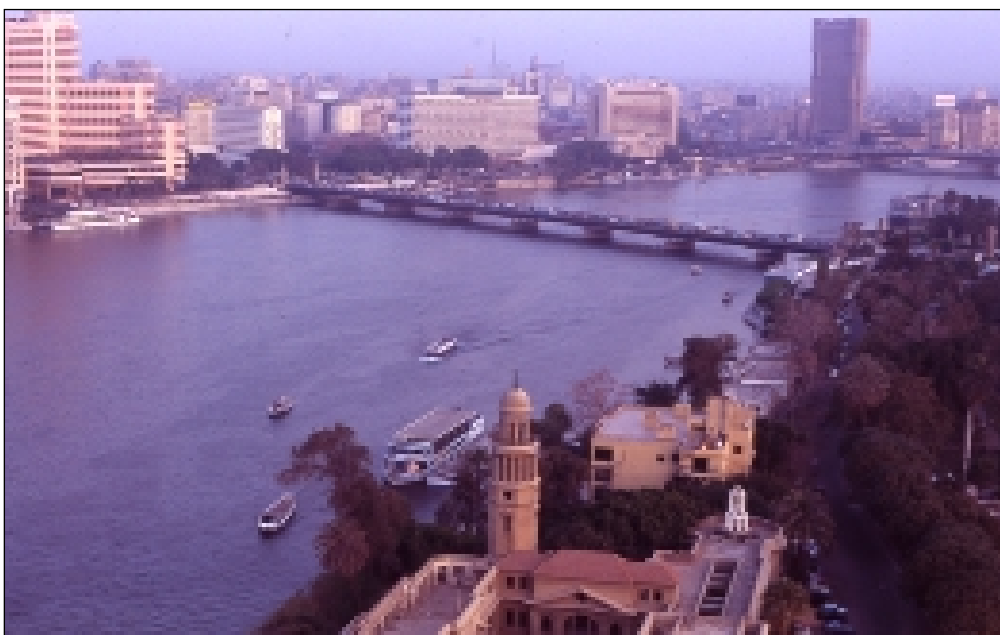
retail market in Egypt in 2005 included whole polished and mounted tusks featuring elaborate inlays of Islamic words of praise to God, or tusks inlaid with Christian symbols in stone and silver. Several shops featured elephant figurines inlaid with dazzling stone and silver ceremonial trappings. Some carvers showed adeptness in copying styles of ivory carving that are more commonly associated with the Chinese industry. For example, local reproductions of Chinese figures fishing or the so-called ‘Happy Buddha’ sculpture were occasionally observed. Shop attendants were usually quick to point out that such wares were locally produced by carvers skilled in copying the designs of others.

It is believed that most of the ivory products observed for sale in Egypt were made in the country between 1990 and 1999. There is some evidence of ivory products on sale which were made in Egypt before 1990, most likely in the 1970s or 1980s when foreign tourism started to increase. In 1974, for example, there were only 676 000 foreign tourists, but by 1990 the number of foreign visitors had jumped to some 2 600 000 (Ibrahim and Ibrahim, 2003). Some products are still being made today, too - for example, cheap and unsophisticated jewellery and small figurines - but the scale of local manufacturing is certainly much diminished from the situation found in the late 1990s. The ‘days of glory’ for Egypt’s ivory carvers are apparently fading and probably fading fast. In many retail shops, it was reported that the carvers of exceptionally fine ivory sculptures were no longer alive or had retired, or that most carvers still in business were elderly. Many retail dealers indicated that ivory carving was a “dying art” and referred to their stock of ivory products as irreplaceable because fewer and fewer carvers remained active in Egypt. Moreover, some dealers indicated that they were under increasing pressure to end the trade in ivory and that, for this reason, young people were no longer being trained to carve ivory. There was little evidence to suggest that high-quality ivory carving continues to any significant degree in Egypt today.

Retail outlets in Egypt

Cairo

Cairo, being the largest city in Egypt and a major destination for foreign visitors, had the most retail outlets selling the greatest number of ivory items. During the course of this survey, a total of 79 retail outlets were documented displaying some 8930 ivory products (**Table 3**).



Credit: Esmond Martin.

Cairo

Table 3**Number of shops and ivory items seen for sale in cities surveyed in Egypt, March/April 2005**

City	No. shops with ivory items	No. items	% of total items
<i>Cairo</i>			
Khan al-Khalili	34	3977	45% for Cairo
Hotels	17	732	8% for Cairo
Zamalak's antique shops	8	46	1% for Cairo
Elsewhere	20	4175	47% for Cairo
<i>Total</i>	79	8930	83% for Egypt
<i>Luxor</i>			
Markets: touristic and old	7	295	23% for Luxor
Hotels	2	4	1% for Luxor
Elsewhere (near hotels)	16	1009	77% for Luxor
<i>Total</i>	25	1308	12% for Egypt
<i>Aswan</i>			
Old market and corniche	12	330	88% for Aswan
Hotels	2	34	9% for Aswan
Elsewhere	1	9	2% for Aswan
<i>Total</i>	15	373	3% for Egypt
<i>Hurghada</i>			
Hotels	2	11	14% for Hurghada
Ad Dahar	3	56	69% for Hurghada
Town centre	3	14	17% for Hurghada
<i>Total</i>	8	81	1% for Egypt
<i>Sharm el-Sheikh/ Na'ama Bay</i>			
Na'ama Centre	3	17	100% for Sharm el-Sheikh/ Na'ama Bay
<i>Total</i>	3	17	
Grand total	130	10 709	

The Khan al-Khalili market had 45% of the ivory products seen in Cairo, with 34 shops displaying anywhere from one to 1021 items, the latter figure being the largest number of ivory products seen in any single retail outlet in all of Egypt. It is not surprising that the Khan al-Khalili has the greatest number of retail outlets selling ivory, as most of the remaining ivory workshops are located within its precincts. Moreover, the Khan al-Khalili is possibly the largest and certainly one of the most fascinating markets in the Middle East, attracting thousands of foreign visitors each day.



Credit: Esmond Martin

The Khan al-Khalili market in Cairo has the greatest number of ivory items - about 4000 - of any market in Egypt. Hardly any of these are bought by Egyptians.

A total of 17 shops within the premises of the main luxury hotels in Cairo, including some belonging to international chains such as the Hilton and the Sheraton, were found selling 732 ivory items. Comparatively, shops in the cheaper hotels almost never offered ivory items.

Most of the antique stores in Cairo are concentrated in one area of the city, Zamalak. There, eight out of some 40 stores visited were found selling a total of 46 ivory items, including some which were clearly antiques, but also some newer objects that were from other countries, especially

China, Japan and France. All of the ivory antiques and the majority of the newer, foreign-made, ivory items in Egypt were found in this part of Cairo.

Another 20 retail outlets were scattered throughout Cairo, offering some 4175 ivory items between them. The shops with the most items were large handicraft shops, called bazaars, most of which were located in Giza near the Pyramids (where some of the luxury hotels are also situated) and one large outlet in the Coptic section of town called Old Cairo.

Of the 8930 ivory items counted in Cairo, 6930 were classified by product type. Of these, 36% were human figurines, 32% animal figurines, including scarab beetles, and 24% jewellery, especially pendants, bangles and rings (Table 4).

Table 4
Types of ivory items seen for retail sale
in Cairo, March/April 2005

Item	% of total
Human or Egyptian god figurines	36
Animal figurines	32
Pendants	10
Bangles	4
Rings	4
Necklaces	3
Miscellaneous jewellery	3
Walking sticks (full or handle)	2
Obelisks	1
Miscellaneous	5
Total	100



Credit: Esmond Martin

A craftsman making ivory bangles in Egypt in 2005.

Credit: Esmond Martin.



Luxor, especially popular for tourists on cruise boats, has the second-largest amount of ivory items seen for sale in Egypt, after Cairo.

two shops in Luxor's hotels displayed a mere four ivory items. Elsewhere, however, 16 other shops featured a total of 1009 ivory products at various locations scattered throughout the city, mainly near hotels and along the main street, Khalid ibn al-Walid.

The most common items found for sale were human or Egyptian god figurines (33%), necklaces (29%) and animal figurines (12%), based on a sample of 858 items out of the 1308 products that were catalogued (**Table 5**).

Luxor

With the legendary Valley of the Kings, world-class Pharaonic monuments and the Nile River on offer, Luxor is one of Egypt's major tourist destinations. It is not surprising that Luxor was the second-most important location selling ivory, with 25 retail outlets collectively displaying 1308 ivory items. The two main tourist markets near the Nile River had seven shops with 295 ivory products, while only

Table 5
Types of ivory items seen for retail sale in Luxor, April 2005

Item	% of total
Human or Egyptian god figurines	33
Necklaces	29
Animal figurines	12
Paper knives	7
Cartouches	5
Pendants	2
Bangles	2
Rings	2
Fly whisks	2
Miscellaneous	6
Total	100

Aswan

Aswan is another important tourist destination and is the nearest major Egyptian city to the Sudanese border. During this survey, a total of 15 retail shops were found offering 373 ivory items in total. Most shops were

located on the Corniche el-Nil and the Sharia as-Souk that is parallel to the Nile River. There were 12 souvenir shops with 330 ivory products along these two roads. One hotel had two shops with 34 ivory items and one other shop – a bazaar on the outskirts of Aswan - had nine ivory items.

Credit: Esmond Martin.



Aswan, in southern Egypt.

A total of 326 items out of the 373 counted were classifiable under certain category headings. Of these, 42% were animal figurines (mainly camels, crocodiles, elephants and scarabs), 28% were

jewellery items and 18% were human or Egyptian god figurines (Table 6).

Hurghada and Sharm el-Sheikh/Na'ama Bay

Hurghada is a relatively new resort on the Red Sea. In the early 1980s, there were only a couple of hotels in the area, but by 2003 more than 100 hotels with over 35 300 beds were to be found in Hurghada, while another 12 hotels with over 4200 rooms existed in a suburb to the north called Al-Gouna (Anon., 2004). In spite of the large number of tourists, very few ivory items were found for sale. In total, only eight shops were found, collectively selling 81 ivory objects, two-thirds of which were located in three shops in the souk in the older (ca. 1975) part of Hurghada, called Ad Dahar. Sixty-nine items fell into certain categories of product - 41% were animal figurines, 22% bangles, 14% necklaces and 10% human or god figurines (Table 7).

Sharm el-Sheikh/Na'ama Bay is another modern large resort on the Red Sea which has expanded phenomenally over the past 20 years. By 2003, this resort had 110 hotels with over 42 400 beds (Anon., 2004). Although catering to a predominantly European tourist market, almost no ivory was found for sale during this survey. Altogether, only 17 ivory items were observed, including seven animal figurines, five necklaces and five bangles, in three shops all located in Na'ama Centre in Na'ama Bay.

Purchasers of ivory products in Egypt

Reportedly, Egyptians do not buy ivory objects. Since at least 2004, the main buyers of ivory in Egypt have been Europeans, especially Italians and Spanish. Italians prefer smaller items it seems, while Spanish buyers have a preference for larger pieces. Other frequent buyers identified by retail merchants included French and Latin American customers and a few Gulf State nationals. These results essentially mirror the findings of the 1998 survey (Martin, 1999).

Prices for worked ivory

Recently made ivory items

Prices for ivory products varied considerably in Egypt, depending on the quality of the craftsmanship, size, age and condition of the item in question, as well as on the type of shop and the amount of bargaining

Table 6

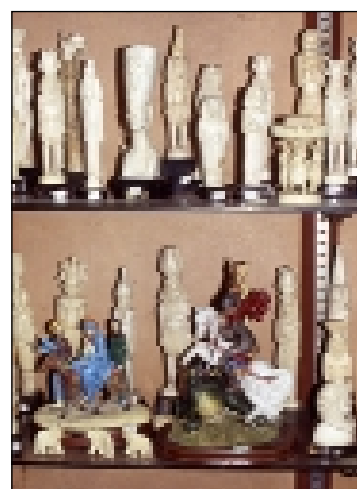
Types of ivory items seen for retail sale in Aswan, April 2005

Item	% of total
Animal figurines	42
Human or Egyptian god figurines	18
Pendants	16
Bangles	5
Necklaces	4
Walking sticks (full or handle)	4
Ear-rings, pair	3
Miscellaneous	8
Total	100

Table 7

Types of ivory items seen for retail sale in Hurghada, April 2005

Item	% of total
Animal figurines	41
Bangles	22
Necklaces	14
Human/Egyptian god figurines	10
Miscellaneous	13
Total	100



Credit: Esmond Martin.

Painted ivory figurines, as seen here, are rarely produced in Egypt.

Table 8**Retail prices for ivory items made after 1990 in Egypt, March/April 2005**

Item	Size in cm	Price range USD	Average price USD
Human/Egyptian god figurines	10	26-1002	185
Animal figurines	5	22-35	29
	7.5	35-173	105
	10	21-550	233
Pendants	5	11-17	14
Necklaces, beaded		22-104	51
Bangles	2.5	9-86	35
	3.3	60-121	81
Rings	2.5	5-8	7
Walking sticks	100	553-1800	1128
Walking sticks with ivory handle		35-164	107
Paper knives	15	43-52	48
Chess set, all pieces and board	40 x 40	2418	2418
Tusks, carved	40	518-950	734
	45	518-1036	777
	60		1183
	105		5000
	120		7000

Exchange rate: USD1 = EGP5.79

skill put into play by the consumer. Few shops had fixed prices and in most outlets prices could be reduced usually by 10-30% without hard bargaining. Prices recorded in this survey were those first given by the salesman, without extensive bargaining, but included a discount if offered. Prices excluded commissions that are commonly paid to taxi drivers and tour guides.



Credit: Esmond Martin.

Ancient Egyptians regarded scarabs as sacred and scarab objects are a feature of Egypt's souvenir shops

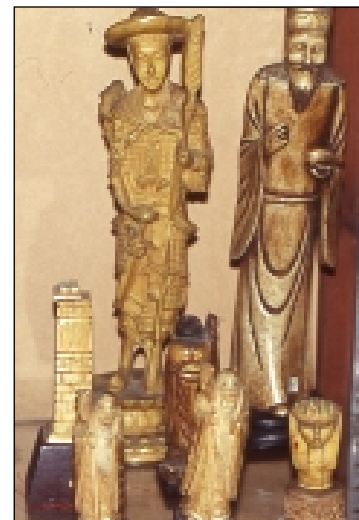
Rings were the cheapest items, some as low as EGP30 (USD5), followed by 2.5-cm scarabs for around EGP50 (USD9) each. Animal, human and Egyptian god figurines varied widely in price. A 10-cm Pharaoh could cost as little as EGP250 (USD43) or as much as EGP5800 (USD1002). A 10-cm animal, such as an elephant, varied in price from EGP120 (USD21) to EGP3185 (USD550). Jewellery prices were more constant, probably as the quality is fairly

standard. A medium-length necklace with beads of about one centimetre in diameter sold for about EGP342 (USD59). Carved tusks were the most expensive items, especially large ones, averaging USD7000 (**Table 8**).

As with the price of raw ivory in Egypt between 1998/99 and 2005, prices for finished ivory products on the Egyptian market in 2005 appear to have risen during the six-and-a-half-year period. While it is important to note that this judgement is not based on price comparisons for identical articles, prices collected in 1998 for a number of items comparable to those noted in 2005 were consistently lower. For example, in 1998, a simple ring retailed at USD2, but by 2005 a similar ring was typically about USD7. A 91-cm ivory walking stick cost USD203 in 1998, but similar articles in 2005 had an average price of over USD1000, while a full ivory chess set was priced at USD1020 in 1998 but USD2418 in 2005. In both 1998 and 2005, prices collected were those given without serious bargaining on the part of the investigators. The rise in price of raw ivory noted since 1998-99 (see **Table 2**) would undoubtedly have contributed to a rise in price for worked ivory articles.

Antiques

A total of 13 ivory antiques were seen for sale in Cairo (defined here as ivory items made over 100 years ago), but none were found anywhere else in Egypt. Amongst these products were six Chinese items: a carved tusk (USD2073), a card case (USD777), a fan and three human figurines, including a 20-cm man for USD3000 and another man of 22 cm for USD2500, both of which reportedly came from King Farouk's personal collection. There were also three French items: a 22-cm box (USD2591), a fan (USD1123) and a glasses case (USD864). Finally, there were two Japanese figurines of men (USD2000 and USD691) and one German portrait on ivory with an ivory frame (USD207). No identifiable Egyptian ivory antiques were found during this survey.



Credit: Esmond Martin.

Ivory is occasionally stained on purpose to resemble antique ivory

Foreign-made items carved since the 1970s

Only a handful of ivory items that had been carved abroad were found for sale in Egypt, nearly all in Cairo. From tropical Africa, there were two carved tusks (one being 60 cm on sale for USD1209), three combs and a few busts. From China, a 30-cm boat (USD2073), a Chinese magic ball (USD691) and a landscape piece were identified. Two Indian Rama figurines were also found selling for USD1500 and USD1000 each.

DISCUSSION

Using the 1998 survey results for comparison (Martin 2000a), there is little doubt that Egypt's domestic ivory trade has undergone considerable change in the intervening years to 2005. Following changes in Egypt's legislation for implementing CITES in late 1999, the government actively moved against the trade and seized raw tusks and worked ivory products on a number of occasions between September 1999 and December 2002. The two biggest were a seizure of 1525 kg of raw/semi-worked ivory in the town of Kom Ombo in southern Egypt, in August 2000, and one of 850 kg in Aswan, in November 2001 (**Table 1**). The tusks from these two large seizures had been transported overland from Sudan to Egypt and were destined for Cairo's workshops.

As a result of increased law enforcement on the part of the Egyptian authorities, it became more difficult for traders to obtain tusks from Sudan. At the same time, ivory prices in Sudan increased; three-kilogramme tusks in the Khartoum/Omdurman market increased from USD44/kg, in 1997, to USD105/kg in 2005 (Martin 1998; 2005). These three factors - increased law enforcement, a reduction in supply, and an increased cost at source - meant that the price of tusks in Cairo more than doubled in 1998 US dollar terms when adjusted for inflation,

and increased more than five-fold in the face-value of Egyptian pounds from 1998 to early 2005. This has undoubtedly had a knock-on effect on prices for finished ivory products on the local market. In 2005, when adjusted to account for inflation using the GDP Deflator Inflation Index, these appeared to be anywhere from twice to over four times those of late 1998, in US dollar terms, for comparable items.



Credit: Esmond Martin

Most ivory in Egypt is sold in souvenir shops, this being one of the largest; there are no shops selling only ivory in Egypt.

Government attempts to suppress the trade, coupled with the major increase in the price of raw ivory, as well as a price increase in carved objects, has caused retail sales to decrease substantially. Further, it is worth noting that craftsmanship has certainly not improved to justify the much higher prices for Egyptian ivory products currently on the market. Almost every shopkeeper admitted that sales had fallen in the past few years, although foreign tourists (who buy nearly all the ivory) rose from 3 453 900 in 1998 to 8 103 609 in 2004 (Anon., 2005b). Some of the main ivory buyers - the Italians,

Spanish and French in particular - increased in numbers and 1 631 400 tourists to Egypt came from these three countries in 2004 (Anon., 2005b).

By 2005, more shopkeepers were warning customers against buying ivory, having become increasingly aware that it was illegal to sell raw and worked ivory in Egypt (except for *bona fide* antiques with proper documentation). In fact, some observers have interpreted Egyptian law to suggest that ivory trade has been illegal since 1994 (Martin, 2000a) but, if so, this fact was not adequately publicized until after the 1998 survey. By 2005, it was noted that shopkeepers who did *not* sell ivory on their premises were usually the ones warning customers against such trade. On the other hand, those with ivory products for sale sometimes tried to propose ways of evading the law by offering to put in writing that the ivory items were camel bone or that they were antiques. Others incorrectly stated that it was not against the law to take out small quantities of ivory items for personal use. In general, however, all vendors had little hope for the future of the ivory trade and most appeared to be trying to sell their existing stock off as soon as possible in order to get out of the business completely.

Owing to fears of the illegality of the ivory business in Egypt, and because of the high prices for most ivory items and the generally poor state of sales, some of the larger shops have already moved away from ivory completely to sell other merchandise. One of the biggest and oldest retail ivory shops in the Khan al-Khalili, which also had an adjoining ivory workshop in 1998, apparently closed down in 2000, when government officials were actively tightening up on law enforcement. The shop owner in question reportedly moved all his ivory items to his home and replaced them with camel bone articles. The last craftsman left attached to the shop, still there in 2005, carved only camel bone in the shop. Craftsmen throughout Cairo are progressively giving up ivory to carve camel bone and wood as substitutes.

Compared with the situation in 1998, the number of shops selling ivory in Cairo, Luxor and Aswan in early 2005 had declined - from 142 to 119 - and the number of ivory products found on the retail market had decreased, from

21 460 to 10 611. The retail ivory trades in Aswan and in Luxor have been reduced by 89% and 78%, respectively, while in Cairo the trade has apparently dropped by about 25%. One reason for the higher rate of availability of ivory in Cairo is that inspections are reportedly more difficult in the sprawling metropolis than in the much smaller-scale markets of either Aswan or Luxor. Inspectors have said that the Khan al-Khalili is so convoluted, with many twisting alleyways, that it is particularly difficult to police effectively. Still, some retail outlets offering hundreds of ivory products are found on the major thoroughfares of the market.

There has also been some change in the type of ivory products found for sale in early 2005 as opposed to the situation observed in 1998. During the earlier study, jewellery made up only 10% of the ivory items on display in Egypt but, by 2005, jewellery items accounted for 22% of all of the products observed (**Table 9**). This is possibly because jewellery is generally small and easy to hide in luggage and, with the official crack-down, tourists have become more concerned about being caught. Also, ivory jewellery is far cheaper than most figurines and, with the steep increase in ivory prices since 1998, such products have the best chance of appealing to an increasing number of package tourists on low budgets.

Concerning the prospect of future ivory sales in Egypt, it is important to note that the trade could possibly increase if Japanese and Chinese visitors were to grow in number. In neighbouring Sudan, most demand for ivory products comes from Chinese people, notably expatriates working in Sudan's petroleum, construction and mining sectors (Martin, 2005).

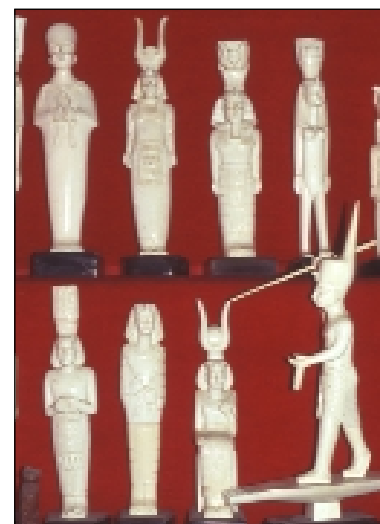
In 2004, Japanese and Chinese visitors to Egypt made up less than 1% and less than 0.5%, respectively, of the total number of foreign tourists to Egypt (Anon., 2005b) and consequently, hardly any name seals or chopsticks were found for sale during this survey. It is reasoned, however, that more Asian tourists might lead to greater levels of production of these products if retail level prices were considered reasonable by such consumers. Conversely, the generally poor quality of ivory craftsmanship in Egypt is probably an important factor inhibiting the sale of ivory products to discerning Asian buyers.

Despite the present drop in sales, a few craftsmen were still seen making new ivory items, sometimes on special order, such as beads by the bag-full. It is hard to understand how the craftsmen sell more new items when turnover in the shops is reportedly so slow. In some cases, it was noted that certain shops still displayed in 2005 the same ivory figurines that were observed in 1998! It is likely that such figurines, once sold, will not be replaced, if the government crack-down to curtail the ivory market in Egypt continues, as has noticeably been the case for other wildlife products. Skins from gazelles, leopards and zebras, for example, were openly displayed for sale in the Khan al-Khalili in 1998, but this no longer occurs.

Table 9

Types of ivory items seen for retail sale in Egypt, March/April 2005

Item	% of total
Human/Egyptian god figurines	34
Animal figurines	29
Pendants	9
Necklaces	5
Bangles	4
Rings	4
Walking sticks (full or handle)	2
Cartouches	1
Obelisks	1
Paper knives	1
Tusks, carved	1
Miscellaneous	9
Total	100



Credit: Esmond Martin.

Some of these exact ivory figurines were photographed by one of the authors in 1998, illustrating their slow turnover.

CONCLUSIONS

The Egyptian ivory trade has clearly decreased since 1998. The number of ivory products on display for sale has declined to about half of the volume found some six years ago. This development is in contrast to the current situation in neighbouring Sudan, where the Khartoum/Omdurman market has seen a sharp increase in the volume of worked ivory offered for sale at the retail level since 1997. In fact, remarkably, Sudan, with virtually no tourist industry whatsoever, now has more ivory items for sale than all of Egypt. The principal reason for the decline in Egypt's ivory market is that the government has been taking severe measures against the ivory trade at least since 2000, while the Sudanese Government has done very little to inhibit the expansion of its domestic ivory market during the same period (Martin, 2005). It is imperative that Egyptian law enforcement authorities keep up the pressure on local ivory markets or, with the possible increase in Asian visitors, especially Chinese – as has happened in Khartoum – demand for ivory trinkets might increase.

Altogether 10 709 ivory products were found during the course of this survey. Using the conversion formulas contained in the ETIS analysis to CoP13 to derive an estimated weight from the number of worked ivory pieces observed (Milliken *et al.*, 2004), and assuming that each elephant yields 1.88 tusks (Parker and Martin, 1982), it is possible to estimate the number of elephants represented by this trade. Accordingly, the volume of ivory products found on the Egyptian market in March/April 2005 would represent a minimum of 582 tusks or 310 elephants. In fact, the true figure could be considerably (possibly 2.8 times) more as the average tusk weight of the ivory seized in Egypt presented in **Table 1** is only 1.2652 kg, compared to an average tusk weight of 3.5701 kg derived from the global seizure data in ETIS (Milliken *et al.*, 2004). Thus, Egypt's retail ivory market in early 2005 could have represented as many as 873 elephants, if the lower average tusk weight of **Table 1** is accurate and were used in the calculation. Whether 310 or 873 elephants, or somewhere in between, these values are simply a static snapshot of Egypt's ivory trade at a particular point in time and do not take into account any turnover in the trade, ivory sold in other locations that were not visited, or any ivory stocks that were not openly displayed in the retail outlets surveyed. With that in mind, the overarching conclusion is that scale of Egypt's current trade in ivory is a serious conservation concern.

Despite the highly commendable effort by the Egyptian Government since 1998 to inhibit local production and ivory sales, it must be noted that Egypt currently does not comply with the CITES requirements for internal trade for ivory contained in *Resolution Conf. 10.10 (Rev. CoP12)*. In this regard, firstly, it appears that there has been an inadequate attempt to register all importers, manufacturers, wholesalers and retailers dealing in raw, semi-worked or worked ivory. It appears that the retail merchants observed selling ivory products during this survey, do so outside of the bounds of government regulation and oversight. Secondly, there is no nationwide procedure for formally informing visitors about CITES restrictions on trade in ivory. During this study, none of the 130 retail outlets selling ivory displayed signs or had literature informing prospective buyers that it is illegal to purchase ivory products and import them to their home countries without government permits. Thirdly, the government apparently has not introduced recording and inspection procedures to enable the CITES Management Authority or other appropriate government agencies to monitor the domestic ivory trade within Egypt. These inspection procedures should be implemented with compulsory trade controls for raw ivory, and with a comprehensive and demonstrably effective reporting and enforcement system for worked ivory.

The seizures of ivory carried out by Customs, police and officials from the Ministry of Agriculture & Land Reclamation from 1999 to 2002 have been partly successful in reducing the ivory trade in Egypt. Since late 2002, however, oversight efforts by the government appear to have waned with respect to sales of ivory products on the retail market. Some shops frequented by tourists openly display hundreds of ivory products, a situation

indicating little fear of detection or punitive law enforcement action. What is now needed is a concerted plan of action to implement fully the CITES requirements for internal trade controls on ivory. In other African countries, for example Ethiopia, officials have recently managed to implement CITES restrictions relating to ivory very effectively, perhaps as they have the added incentive to save their country's elephants, which is not the case in Egypt. However, without Egypt's full support to stop ivory trading, negative international publicity and criticism in CITES fora could ensue. It is believed that another concerted effort to crack down on the domestic ivory market, especially that which is found in Cairo, is warranted and that such a move would reduce Egypt's ivory trade considerably. By the same token, moves to curtail ivory trading in Egypt would certainly generate favourable international publicity for the country and pre-empt any punitive oversight action on the part of the CITES authorities.

RECOMMENDATIONS

The following actions are recommended to improve ivory trade controls in Egypt and ensure implementation of *Resolution Conf. 10.10 (Rev. CoP12)*.

Improving policy, legislation and regulatory measures

Egypt should be commended for the considerable progress it has made to provide a sound legal footing for the implementation of CITES since late 1999. There is little doubt that the Egyptian Government now strives to implement the Convention responsibly and with dedicated commitment. Still, the scale of the current domestic trade in ivory indicates that the requirements of *Resolution Conf. 10.10 (Rev. CoP12)* concerning the internal trade in ivory have been overlooked and are not being implemented effectively. In this regard:

- there is a need to review *Ministerial Decree No. 1150 of 1999* to ensure that it provides a strong legal basis from which to move against the continued display and sale of elephant ivory products in Egypt's retail markets; and
- if the scope of *Ministerial Decree No. 1150 of 1999* is insufficient to support decisive law enforcement action at the retail level, then appropriate amendments and regulatory measures need to be promulgated in order to fulfill all CITES requirements with respect to internal trade in ivory.

Addressing implementation and enforcement deficiencies

Judging by the lengthy list of wildlife trade seizures in recent years, Egypt has established a good record of effective law enforcement for implementing CITES. These actions are most directly associated with import and export trade moving through the country's ports of entry and exit. With this seizure record, it appears that good collaboration exists between Egyptian Customs, wildlife law enforcement authorities and other law enforcement authorities. With respect to the internal marketplace and the retail sector, however, there is a need to review present strategies and improve law enforcement oversight. In this regard:

- Consideration should be given to developing a mobile, investigative wildlife trade enforcement unit that regularly monitors key retail markets - for example the Khan al-Khalili, Old Cairo and Giza in Cairo, and tourist markets in Luxor and Aswan - for wildlife trade infractions, especially relating to elephant ivory. This body should be empowered to make seizures and arrests as appropriate.

- Law enforcement actions to seize ivory products that are being illegally sold on the retail market should be undertaken. TRAFFIC is committed to assisting the government in identifying retail shops and hotels that are currently selling ivory products in Egypt.
- In view of the large number of shops found selling ivory products during this study, despite the success of earlier enforcement activity, it is advised that a focused law enforcement campaign should be undertaken at the earliest possible moment and, thereafter, appropriate follow-up actions should occur to ensure that ivory products do not “creep back” into the retail market.

Raising awareness and publicity on wildlife trade controls

There is an apparent lack of information for tourists and other visitors to Egypt about CITES and wildlife trade restrictions, in general, and elephants and ivory trade, in particular. In this regard:

- Appropriate publicity materials need to be produced and disseminated through Egypt’s tourist networks and into key tourist markets in the country.

Being reviewed as part of the CITES Standing Committee process for assessing domestic ivory markets worldwide

While *Decision 12.39*, followed by *Decision 13.26*, has resulted in an intersessional process under the direction of the CITES Standing Committee to assess compliance of various countries with CITES ivory trade requirements for internal markets, Egypt is currently not part of this process. In this regard:

- The Standing Committee should recommend, at its 53rd meeting, that CITES Parties consider including Egypt as one of the countries to be assessed pursuant to *Decision 13.26*, within the context of the *Action plan for the control of trade in African elephant ivory*.

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TRAFFIC, the wildlife trade monitoring network, works to ensure that trade in wild plants and animals is not a threat to the conservation of nature. It has offices covering most parts of the world and works in close co-operation with the Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

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