



# Convention on the Conservation of Migratory Species of Wild Animals

*Secretariat provided by the United Nations Environment Programme*



## **1<sup>st</sup> Meeting of the Intergovernmental Task Force on Illegal Killing, Taking and Trade of Migratory Birds in the Mediterranean** *Cairo, Egypt, 12 – 15 July 2016*

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02 June 2016

### **Review of Egypt's National legislation and enforcement mechanisms related to birds hunting and trapping**

*Prepared by Nature Conservation Egypt and the Egyptian Environmental Affairs Agency*

The review of Egypt's national legislation and enforcement mechanisms related to bird hunting and trapping is one of the key actions included in the Action Plan to address Bird Trapping along the Mediterranean Coasts of Egypt and Libya. It provides a summary of existing laws and regulations related to bird hunting and trapping in Egypt and an assessment of their compliance with international conventions which the Egyptian government has signed. It assesses the gaps and weaknesses in the enforcement of these laws and regulations and proposes a series of recommendations to improve law enforcement to combat illegal bird killing in Egypt.

#### ***Action requested:***

The first meeting of the Intergovernmental Task Force on Illegal Killing, Taking and Trade of Migratory Birds in the Mediterranean is requested to:

- i. Review the report and make comments, if needed;
- ii. Provide advice on the future steps to be taken to implement the recommendations of the report and how these recommendations should be reflected in the Task Force's work plan.

*For reasons of economy, this document is printed in a limited number, and will not be distributed at the meeting. Delegates are kindly requested to bring their copy to the meeting and not to request additional copies.*

## Addressing Illegal Bird Killing in Egypt

# Review of Egypt's National legislation and enforcement mechanisms related to bird hunting and trapping



*Report to BirdLife International - completed by Nature Conservation Egypt and the Egyptian Environmental Affairs Agency –with generous support from the Nando Peretti Foundation*

August 2015

# **Contents**

## **Executive Summary**

### **Section 1: Introduction**

- 1.1. Background on the status of illegal bird killing in Egypt
- 1.2. Objectives of the legal review

### **Section 2: Local Legislation and Executive Regulations**

- 2.1. Egypt's legislative system
- 2.2. Laws
- 2.3. Executive Regulations
- 2.4. Enforcement of laws & regulations
- 2.5. Procedures to issue hunting & trapping permits

### **Section 3: International Conventions & Agreements**

- 3.1. Egypt's commitments under international conventions & agreements

### **Section 4: Assessment of Existing Legislation & Enforcement**

- 4.1. Assessing adequacy of existing laws and executive regulations
- 4.2. Assessing current enforcement of legislation

### **Section 5: Preliminary Recommendations**

- 5.1. Recommendations for improved legislation (laws & regulations)
- 5.2. Recommendations for improved enforcement of legislation

### **Section 6: Annexes**

## **Executive summary**

In 2015, Birdlife International undertook the first scientific review of illegal killing across the Mediterranean region (Brochet et al. in review). This study estimated that **between 490,000 and 9,000,000 birds are illegally killed in Egypt each year**. The results of the study also suggest that **Egypt may be the country in the Mediterranean region where the most birds are illegally killed per year**.

In November 2013, the Secretariat of the African Eurasian Migratory Waterbird Agreement (UNEP/AEWA Secretariat) convened an emergency meeting in Bonn, specifically to address the trapping of birds on the Mediterranean coast of Egypt and Libya. This was the first time a meeting of this type had been convened for this issue. The meeting was attended by representatives of governments (the Egyptian Environmental Affairs Agency, the Environmental General Authority of Libya and the German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety), Secretariats of Multilateral Environmental Agreements (the African Eurasian Migratory Waterbird Agreement (AEWA), the Convention on Migratory Species (CMS), the CMS Raptors MOU), the chairpersons of the AEWA and CMS scientific and technical bodies and of the CMS Scientific Council Working Group on African Eurasian Landbirds, and international and national NGOs (BirdLife International, Nature Conservation Egypt (NCE), the Libyan Society for Birds (LSB), the Nature and Biodiversity Conservation Union in Germany (NABU), the Royal Society for the Protection of Birds in the UK (RSPB).

NCE, the Birdlife Partner in Egypt developed a draft Action Plan, which was revised at the meeting. The Action Plan was finalized and agreed in March 2014.

This review of Egypt's national legislation and enforcement mechanisms related to bird hunting and trapping is one of the key agreed actions of the Action Plan. It provides a summary of existing laws and regulations related to bird hunting and trapping in Egypt and an assessment of their compliance with international conventions which the Egyptian government has signed. It assesses the gaps and weaknesses in the enforcement of these laws and regulations and proposes a series of recommendations to improve law enforcement to combat illegal bird killing in Egypt.

## **Legislation**

Egypt is a signatory to all of the major conventions and agreements that aim to conserve biodiversity. Stipulated obligations are included in Egypt's Environmental Conservation Law (4/1994) (Annex 2), its executive regulations, and the relevant ministerial decrees that manage and regulate hunting practices on an annual basis. While these laws and regulations aim to reduce illegal hunting and trapping, they are under jurisdiction of different Ministries (Ministry of Environment, Ministry of Agriculture, Ministry of State for Local Development, Ministry of Interior and Defense). **This makes it challenging for the various enforcement authorities to access, understand and enforce them.**

## **Enforcement mechanisms**

The Egyptian Environmental Affairs Agency (EEAA) is responsible for issuing hunting and trapping regulations in accordance with local and international laws. However, the local government administrations are responsible for issuing the necessary permits for hunting and trapping along the coast, as well as following up with law enforcement to ensure compliance with the EEAA's regulations. While sustainable hunting practices are a priority of the EEAA, they are not for the local governmental administrations responsible for implementing and enforcing laws and regulations. **There a need for increased cooperation and coordination between the relevant governmental bodies and enforcement authorities to enable more robust implementation of laws and regulations on the ground.**

## **Recommendations**

As a result of this review of Egypt's national legislation and enforcement mechanisms related to bird hunting and trapping, the following recommendations are proposed:

### **Legislation:**

- Establishment of a Hunting Management Unit within Nature Conservation Sector (NCS) of the Egyptian Environmental Affairs Agency
- Legal amendments to ensure integration of biodiversity conservation into economic development plans and involvement of local communities in efforts to reduce illegal bird killing and trapping
- Amendments to the annual hunting regulations issued by the EEAA (Annex 1) to ensure compliance with Egypt's obligations as signatory of international conventions (in particular the African-Eurasian Migratory Waterbirds Agreement)
- Eventual compilation of existing laws and regulations (environmental conservation law, agricultural law, internal regulations etc) under one unified hunting management law

### **Enforcement:**

- A Memorandum of Understanding between coastal governorates and law enforcement authorities to ensure closer coordination of enforcement efforts
- Technical capacity building for local government bodies and law enforcement personnel
- Establishment of monitoring committees to be funded by the fees acquired from hunting and trapping permits
- Enhancement of the role of EEAA Rangers in law enforcement (to be represented on the monitoring committees) along the Mediterranean Coast
- Review of current fees allocated for trapping permits
- Involvement of local communities in law enforcement

## **Section 1: Introduction**

### **1.1. Background on the status of illegal bird killing in Egypt**

Illegal bird killing in the Mediterranean region has been an issue of global concern for several decades. Until recently, significant efforts have focused on addressing the issue in northern Mediterranean countries. However, the focus has recently shifted to the widespread killing of birds in southern Mediterranean countries, most notably Lebanon, Libya and Egypt. As part of Birdlife International's first scientific review of illegal killing across the Mediterranean region, estimates have indicated that between 490,000 and 9,000,000 individual birds are illegally killed in Egypt annually, furthering the need for research and monitoring. These results also suggest that Egypt is the country in the Mediterranean region where the most birds are illegally killed every year.

Hunting and trapping of migratory birds has been practiced in Egypt for thousands of years. The Ancient Egyptians viewed the arrival of migratory birds as an annual blessing, increasing available food supplies and indicating the change of season. The Ancient Egyptians did not only hunt migratory birds, but also worshipped. This means that indiscriminate killing of birds was not accepted in Ancient Egypt. Instead, hunting was regulated by strictly enforced laws, specifically pertaining to birds of prey, herons, and ibises.

The hunting and trapping of migratory birds remains a common practice in Egypt, especially during the autumn migration season. However, more attention has been brought to the increased scale of hunting and trapping during the past decade. Although laws and regulations do exist to manage the hunting and trapping of birds, they were never properly enforced on a wide scale, nor were they integrated into general policy concerns. Furthermore, following the political instability in the country from 2011, the state's ability to enforce such laws and regulations was significantly hindered.

The use of mist nets has increased drastically in recent years, with cheaper nets being imported and set up all along Egypt's 800-kilometer northern Mediterranean coast. Although the main target species is Quail, a popular seasonal delicacy consumed by Egyptians for thousands of years, many other birds are caught indiscriminately in the process. The use of mist-nets in Egypt is legal subject to regulations. However, these regulations are rarely respected and enforced.

Hunting using rifles is also legal but theoretically subject to strict regulations, specifically with regards to the types of species that can be hunted, as well as hunting seasons. However, such regulations are mostly ignored and lack enforcement.

Forms of prevalent illegal hunting include the use of lime sticks, large nets draped over trees, as well as smaller hand-made traps. While illegal hunting and killing of birds was mostly limited to autumn, it has now extended to spring due to the increased use of bird-call devices.

Since 2012, the illegal hunting and trapping of birds in Egypt has come to the attention of the international community through a variety of media outlets, increasing calls for urgent actions to be taken on the matter.

In November 2013, the Secretariat of the African Eurasian Migratory Waterbird Agreement (UNEP/AEWA Secretariat) convened an emergency meeting in Bonn, specifically to address the trapping of birds on the Mediterranean coast of Egypt and Libya. This was the first time a meeting of this type had been convened for this issue. The meeting was attended by representatives of governments (the Egyptian Environmental Affairs Agency, the Environmental General Authority of Libya and the German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety), Secretariats of Multilateral Environmental Agreements (the African Eurasian Migratory Waterbird Agreement (AEWA), the Convention on Migratory Species (CMS), the CMS Raptors MOU), the chairpersons of the AEWA and CMS scientific and technical bodies and of the CMS Scientific Council Working Group on African Eurasian Landbirds, and international and national NGOs (BirdLife International, Nature Conservation Egypt (NCE), the Libyan Society for Birds (LSB), the Nature and Biodiversity Conservation Union in Germany (NABU), the Royal Society for the Protection of Birds in the UK (RSPB).

NCE, the Birdlife Partner in Egypt developed a draft Action Plan, which was revised at the meeting. The Action Plan was finalized and agreed in March 2014.

Major components of the agreed Plan of Action to End Illegal Bird Killing in Egypt include: scientific monitoring of illegal bird killing in Egypt, socioeconomic studies to better understand the drivers for hunting and trapping, and legal assessments to review the legislative framework and enforcement mechanisms relating to the hunting and trapping of birds in Egypt.

### **1.1. Objectives of the legal review**

This review of Egypt's National legislation and enforcement mechanisms related to bird hunting and trapping is a key component of the implementation of the agreed Action Plan.

It aims to provide a comprehensive summary of existing laws and regulations related to bird hunting and trapping in Egypt, including an assessment of their compliance with international conventions which Egypt has signed. The document will also assess the gaps and weaknesses in the enforcement of existing laws and regulations. Finally, this review will propose a series of preliminary recommendations aiming to improve law enforcement to combat illegal bird killing in Egypt.

## **Section 2: Local Legislation and Executive Regulations**

### **2.1. Egypt's legislative system**

Egypt is run by a presidential governmental system, where the elected president appoints a cabinet of ministers who are responsible for the executive branch of government. This executive branch of government is vested with the responsibility to propose legislation to parliament and/or the president for approval, and they are vested with responsibility for drafting the executive regulations for laws that fall under their scope. The legislation process is described below:

#### *2.1.1. Drafting Legislation*

This is the most important phase of legislation, and is considered the first step in the legislative process. The relevant executive body (ministry, agency, or authority) drafts new legislation to assist in the process of executing already existing laws or policies (in the case where no legislation exists). The relevant executive body appoints a group of technical, administrative and legal experts to draft the proposed law.

#### *2.1.2. Local and Administrative Stakeholder Hearings*

Once the law has been drafted, it is passed on to the local stakeholders as well as to other relevant administrative bodies. This is to ensure that all stakeholders are included in the process of drafting the law before it is approved.

#### *2.1.3. Proposal of Legislation*

The relevant executive authority submits an explanatory memo to the Cabinet of Ministers with all the necessary information on the proposed law, including a summary of its chapters and articles. The Cabinet then proceeds to discuss the proposed law. If approved, the Cabinet passes the law onto the Ministry of Justice's legislative department to review the proposed law's legal format and phrasing, as well as its compatibility with the constitution and other laws. After it is reviewed, it is returned to the Cabinet of Ministers, and then it is passed onto the House of Representatives (parliament).

#### *2.1.4. Passing Legislation*

Under regular circumstances, Egypt's elected parliament votes on the proposed law. However, as of 2015, Egypt is yet to elect a parliament after its most recent dissolution in 2012. Until a new parliament is elected, Egypt's Council of State (an Administrative Court – judiciary) assumes the role of the parliament, reviews proposed laws, and passes them onto the president for signature.

#### *2.1.5. Publication and Enforcement*

Upon the parliament/president's final approval, the proposed law is officially published in the *Egyptian Gazette*, the official publication for Egypt's laws and decrees.



## 2.2. Laws

This section will provide an in depth review of existing laws that address the protection of birds and biodiversity:

### 2.2.1. Law for the Protection of Environment - Law 4/1994 (Amended by Law 9/2009) - see Annex 2.

- This is the main law relating to matters of environmental protection. This law led to the establishment of the Egyptian Environmental Affairs Agency (EEAA), the main governmental entity designated with jurisdiction over environmental matters. This law is the main legal framework for the Ministry of Environment and its executive body, the EEAA.
- The first chapter of this law dictates that all developing institutions and projects submit an environmental impact assessment (EIA) that integrates the protection of wildlife and biodiversity, including birds. This chapter goes on to address solid and liquid waste management, air and water pollution, use of chemicals and habitat degradation for mining.
- The third chapter specifically refers to the protection of coasts and wetlands from pollution
- The law encourages the establishment of protected areas, to ensure biodiversity protection.
- Article 28 explicitly forbids the hunting, killing, catching or trading of species determined by the law's executive regulations:  
*"It is forbidden to hunt, kill, or catch the species of wild birds and animals determined in the executive regulations of this Law or to possess, transport, circulate with, sell or offer to sell such birds and animals either dead or alive. It is also forbidden to damage the nests or eggs of these birds. The executive regulations of this Law shall determine the areas to which the provisions of this article apply and shall specify the conditions for a hunting license in these areas as well as the competent administrative authorities responsible for implementing the provisions of this article."*
- Article 84 specifies the legal consequences of violating the previous article (28):  
*"Whoever violates the provisions of Article 28 of this Law shall be sentenced to jail and/or fined a sum of not less than five thousand Egyptian pounds and not more than fifty thousand Egyptian pounds. In addition, birds and animals seized as well as the machines and equipment used in the violation shall be confiscated."*

### 2.2.2. Law for Protected Areas – Law 102/1983

- This law organizes the establishment and management of protected areas in Egypt. It was initially passed to promote the establishment of a network of protected areas to promote biodiversity conservation, providing safe areas for

birds and other wildlife in order to protect them against hunting, pollution and other forms of disturbance.

- Article 2 of this law explicitly prohibits hunting, trafficking or disturbing any wildlife, located within the boundaries of the protected area (alive or dead,)
- This law also prohibits any activities taking place outside the boundaries of the protected area if such activities are damaging or harmful to the protected area and the creatures residing within it.
- Any provinces that contain a protected area are expected to ensure that the protected area is not encroached by any development plans, to ensure the protection of the wildlife residing within it.
- Park rangers and other administrative staff working within a protected area are vested with full authority to enforce the law and its executive regulations, to ensure the continued protection of the protected area's natural resources.
- Similar to the *Law for the Protection of the Environment (4/1994)*, violating such laws can result in a jail sentence and/or a fine, as well as confiscation of equipment and machinery.
- Under this law, five different protected areas were established along the northern Mediterranean coast.

### **2.2.3. Law on Fishing, Aquatic Life and Aquaculture – Law 124/1983**

- Article 14 of this law prevents the hunting of birds on any of the islands located within wetland lakes falling under the jurisdiction of the *General Authority for Fisheries Resources Development (GAFRD)*, unless a permit is acquired from the GAFRD.
- Article 20 of this law's executive regulations prohibits the hunting of waterbirds in areas that fall under the jurisdiction of GAFRD, unless a permit is requested and acquired from the GAFRD.

### **2.2.4. Law on Agriculture – Law 53/1967**

The Egyptian government previously placed most matters pertaining to animals and plants under the jurisdiction of the Ministry of Agriculture, to be organized by some of its executive regulations, addressed later in this document. Articles 117 and 146 specifically prohibit the capturing, hunting and trading of wildlife.

## 2.3. Executive Regulations

Once a law is passed by the parliament (or the alternative legislative authority in the absence of parliament), the executive body of the government specialized with executing a specific law must issue a set of *executive regulations* that indicate how to implement and enforce the new law. This process does not require approval from the parliament, but is subject to judicial review if a conflict arises between the executive regulations and the law it pertains to. This section will cover some of the executive regulations that address bird hunting and trapping.

### 2.3.1. Executive Regulations relating to the Environmental Protection Law (4/1994)

- Article 23.1 of the executive regulations refers to Appendix 4 (See annex 3) in the executive regulations, which stipulates the types of species that cannot be hunted, trapped, traded, or disturbed.

- Article 24.1. directly addresses the issuing of hunting permits:

*- It is forbidden to issue licenses for the hunting of the birds and wild animals referred to in Annex (4) hereof except for purposes of scientific research, overcoming an epidemic or for such other purposes as are approved by the EEAA.*

*- The application for a license shall be submitted in writing to the Ministry of Interior, indicating the species and number of birds or wild animals for which the hunting license is required, the purpose for which they will be hunted, the hunting period, the names of the person or persons to be licensed, and the method and weapons to be used in hunting. The said Ministry shall refer the application to the EEAA in order to ascertain its importance.*

- Appendix 4 of the executive regulations prohibits the hunting, capturing and trade of all wildlife, including all birds, with the exception of a list of birds determined by the EEAA as being eligible for hunting, during the specified hunting seasons, and upon acquiring the necessary permits stipulated above. This list does not contain any species that are prohibited on the global level. Explicit reference is also made to species that are determined by CITES as illegible for hunting and trade. Appendix 4 also prohibits the killing of birds and the destruction/degradation of their natural habitats in Important Bird Areas, wetlands determined by the Ramsar Convention, and protected areas established under the Protected Areas Law (102/1983). It is also prohibited to hunt any endangered species specified by the EEAA.

### 2.3.2. Decree 187/1984 – General Organisation for Veterinary Services

The General Organisation for Veterinary Services is the governmental body specialised with all issues pertaining to animal health across the country. It is affiliated to the Ministry of Agriculture, and vested with jurisdiction over wildlife that resides outside of protected areas.

## **2.4. Enforcement of laws & regulations**

In the field of bird conservation, there are a number of administrative bodies responsible for the execution and enforcement of laws and regulations relating to the killing of birds:

### **2.4.1. Egyptian Environmental Affairs Agency (EEAA)**

The EEAA is the Ministry of Environment's executive body, with the jurisdiction of implementing and enforcing the Law 4/1994 for the Protection of the Environment and its executive regulations. This dictates that the protection of wildlife, specifically resident and migratory birds, is one of its key priorities.

The EEAA's Nature Conservation Sector (NCS) is responsible for protected areas and biodiversity.

The Department of Biodiversity within the NCS is specialised in dealing with local and migratory birds, and responsible for issuing the annual hunting guidelines and regulations that are sent to local government administrations to be implemented and enforced. These annually produced guidelines determine the timings for hunting seasons, the permitted methods of hunting and related guidelines, as well as the permitted species.

### **2.4.2. Ministry of Agriculture**

The Ministry of Agriculture has a variety of jurisdictions, including jurisdiction over wildlife outside of the realms of protected areas. The Egyptian Wildlife Service is a department working under the auspices of the Ministry of Agriculture, and is specialised in matters pertaining to wildlife, including the relationship between specific birds and benefits to agriculture. The Ministry of Agriculture is also responsible for preventing the import or export of birds without permits, as well as monitoring the health of birds and the effects of the use of agro-chemicals on birds.

### **2.4.3. Egyptian Management Authority for CITES & Standing Committee**

While the EEAA is the focal point for most international conventions and agreements relating to biodiversity conservation, the CITES agreement falls under the jurisdiction of an independent technical committee that includes representatives from a number of different fields, including the EEAA, Ministry of Agriculture, and other national experts in the field of biodiversity. The role of this committee is to issue permits relating to the trade of birds in light of international agreements, as well as to monitor the illegal hunting of birds.

### **2.4.4. Governorate Offices – Environmental Department**

Egypt is split into 27 administrative divisions called governorates. Each governorate is a middle-level government, between the national government and the local city/town administration. Each *governorate office* includes a number of specialised departments, including an *environmental department*. This *environmental department* issues the “environmental permits” required for setting up nets along the coast, using the EEAA's regulations and decrees as guidelines for issuing said permits to ensure the sustainability of placing nets in different areas along the coast.

### **2.4.5. City Halls / Town Halls**

City halls or town halls, depending on the size of the administrative unit, represent local governments at the lowest level. They are responsible for issuing the permits required to place nets along the coast. After receiving copies of the “environmental permit” (issued by the Environmental Department - 2.4.4.), the city/town hall determines whether or not the permit-seeker can place nets in the requested area. This is to ensure that there are no concurrent claims over the same plot of land when placing nets. After issuing such permits, permit-seekers head to the local coast guard office to issue the security permits.

#### **2.4.6. Coast Guard – Ministry of Defense**

The Egyptian Coast Guard has jurisdiction over all coastal areas across the country, meaning that any activities are only to take place after acquiring security permits from their local offices. The local Coast Guard Intelligence offices issue security permits for nets after determining that there are no security risks in the areas designated for netting. This is merely a security clearance for netters to be present at a specific time and place along the coast. Furthermore, the Coast Guard Intelligence offices issue the same security clearance for individual hunters using rifles.

#### **2.4.7. Local Police – Interior Ministry**

The local police force in each governorate is responsible for issuing licenses to possess arms and purchase ammunition, a prerequisite for legal hunting using rifles. The police force is also responsible for the enforcement of laws and regulations with regards to illegal hunting practices, in coordination with the EEAA, as they provide the “manpower” to enforce laws and regulations.

### **2.5. Procedures to issue hunting & trapping permits**

This section covers the process of issuing permits for the hunting and trapping of birds along Egypt’s Mediterranean coast.

#### **2.5.1. Trapping**

- The Ministry of Environment issues its annual ministerial decree (Annex 3) containing the hunting and trapping regulations for the autumn and winter seasons of the current and following year.
- This decree is sent to a number of administrative bodies, including the coastal *governorate offices*, their respective *environmental departments*, the Coast Guard, and the Environment & Water Police.
- In coordination with their *environmental departments*, some of the *governorate offices* will issue a set of tailored regulations for bird hunting and trapping along the Mediterranean coast as well as other areas allocated for hunting (lakes, wetlands, etc.)
- The *governorate offices* will inform the local government administrations (city/town halls) and the Coast Guard offices, that permits for netting are to

be acquired through the city and town halls, in accordance to the upcoming procedures.

- Citizens seeking permits for nets should first submit a request to the *environmental department* of the relevant *governorate office*, with information on the exact location intended for bird trapping. Upon approval (based on environmental considerations), the *environmental department* issues an “environmental permit” to the citizen seeking a permit.
- Citizens then visit the local government administration at the city/town hall, and submit a request for a permit, also including the exact location intended for netting. This is to ensure that there are no clashing claims over the right to set up nets in a specific plot of land. Upon approving the request and issuing the permit, permit-seekers are to pay the allocated fees to the city/town hall.
- With the acquired permit at hand, citizens then submit a request to the designated Coast Guard Intelligence office, to issue the necessary security permit (clearance) to allow those engaging in the bird-netting to be located on the coast during the allocated hunting and trapping seasons. Upon receiving this security clearance, citizens have the right to engage in bird-netting in accordance to the EEAA’s regulations.
- After issuing the relevant permits, representatives of the city/town hall can engage in monitoring and enforcement procedures along the coast to ensure that nets are placed in accordance to the issued regulations. These representatives have the power to take the necessary legal action against those not abiding by the law and partaking in illegal killing.

### **2.5.2. Hunting Using Rifles**

- If/when a gun license is acquired from the local police administration; individual citizens wishing to hunt using a rifle are required to submit a request to the designated Coast Guard Intelligence office to issue the necessary security permit (clearance). Upon issuing this security permit, a citizen can immediately engage in hunting along the coast without having to undergo the same procedures as those for trapping (section 2.5.1.)
- If a citizen is a member of an official shooting club, then all the relevant procedures for issuing permits are handled immediately through his/her club. Shooting clubs issue their permits directly from the EEAA.

## Section 3: International Conventions & Agreements

### 3.1. Egypt's commitments under international conventions & agreements

Article 93 of the Egyptian Constitution of 2014 dictates that Egypt shall abide by all of the international conventions and agreements it has signed and ratified. This is the legal foreground for asserting Egypt's responsibility to uphold its duties and obligations under international law.

Egypt is a signatory of all the major international agreements and conventions regarding the conservation of migratory birds.. Below are examples of the main treaties and conventions that Egypt has ratified:

#### 3.1.1. Convention of the International Trade in Endangered Species of Wild Fauna and Flora (CITES)

*\* Focal point: Egyptian Management Authority for CITES & Standing Committee*

The agreement ensures the protection of certain endangered species from over-exploitation by means of establishing an import and export licensing system. The Agreement includes the trade of live birds, dead birds, bird parts, or their derivatives. Article 2 of CITES contains its fundamental principles, and entails the following:

- *Appendix I shall include all species threatened with extinction which are or may be affected by trade. Trade in specimens of these species must be subject to particularly strict regulation in order not to endanger further their survival and must only be authorized in exceptional circumstances.*
- *Appendix II shall include: a) all species which although not necessarily now threatened with extinction may become so unless trade in specimens of such species is subject to strict regulation in order to avoid utilization incompatible with their survival; b) other species which must be subject to regulation in order that trade in specimens of certain species referred to in subparagraph (a) of this paragraph may be brought under effective control.*
- *Appendix III shall include all species which any Party identified as being subject to regulation within their jurisdiction for the purpose of preventing or restricting exploitation, and as needing the cooperation of other Parties in the control of trade.*

#### 3.1.2. Convention on Biological Diversity (CBD)

*\* Focal point: Nature Conservation Sector - EEAA*

The overall objectives of the Convention were to establish a means for the conservation of biodiversity, and the sustainable use of its components. This convention requires that national action is taken through the development of national plans and strategies, as well as integrating biodiversity concerns into existing national plans, strategies and decision-making, to ensure the sustainable use of nature across different sectors. There is also a focus on supporting local

populations and the private sector to promote the sustainable use of natural resources, which in this case would encompass birds.

### **3.1.3. Convention on Migratory Species of Wild Animals (CMS)**

*\* Focal point: Nature Conservation Sector – EEAA*

As a signatory of this Convention, Egypt recognizes that it must actively protect migratory birds that live within or pass through its national jurisdiction, and should aim to conserve avian migratory species throughout its territories. The convention strictly prohibits the “taking” (which includes any form of disturbance) of migratory birds that are endangered, however noting several exceptions. The Convention also stipulates that migratory birds that are not endangered are to also be actively protected through research and policies of sustainable use. While CMS generally refers to migratory species, it dictates that additional agreements are to be drafted and followed entailing specific actions for different migratory species, to be undertaken by parties that lie within the migratory route of such species. The significant example here is the African-Eurasian Waterbird Agreement (AEWA).

### **3.1.4. The Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA)**

*\* Focal point: Nature Conservation Sector - EEAA*

AEWA is an intergovernmental treaty developed under the framework of CMS, dedicated to the conservation of migratory waterbirds and their habitats across Africa, Europe, the Middle East and Central Asia, including Egypt. It covers 255 species of birds that are ecologically dependent on wetlands. It applies a transnational approach to ensure the conservation of waterbirds through improved policies and practices, to ensure sustainable conservation beyond national borders.

AEWA dictates that any “taking” of migratory birds has to be sustainable, keeping in mind the conservation status of the species concerned over their entire range as well as their biological characteristics. This Agreement has specified a number of species that are not to be “taken” under any circumstances, while others are only to be “taken” sustainably, prohibiting any form of indiscriminate killing or trapping.

Annex III – [Action Plan] specifies a list of prohibited hunting techniques and mechanisms, including the use of nets and traps (Article 2.1.2.b). However, exceptions are made when trapping using nets forms an integral part of local livelihoods: *“Parties may grant exemptions from the prohibitions laid down in paragraph 2.1.2 (b) to accommodate use for livelihood purposes, where sustainable.”* This means that Egypt is obliged to prevent illegal killing, and ensure sustainable trapping using nets if it concerns local livelihoods.



## **Section 4: Assessment of Existing Legislation & Enforcement**

### **4.1. Assessing adequacy of existing laws and executive regulations**

This section assesses the adequacy of existing laws, executive regulations and legislative issues that hinder law enforcement and may encourage illegal killing.

#### **4.1.1. General Legislative Framework**

Although legislation is in place to address illegal bird killing in Egypt, its components lack unity. Regulations related to illegal bird killing in Egypt are included within a number of different laws and decrees, and are enforced by many different governmental and administrative bodies that are not always able to collaborate and coordinate their efforts.

While the EEAA is specialised in the field of biodiversity conservation, it only has jurisdiction over protected areas, while the Ministry of Agriculture (through the Egyptian Wildlife Service) has a general mandate over issues pertaining to research, captive breeding of wildlife and wildlife trade.

Although the current legal framework dictates that the EEAA issues hunting guidelines and regulations, most requests for hunting and trapping permits are submitted to other administrative bodies (Coast Guard Intelligence, local government offices, city/town halls, etc.)

Furthermore, Egypt currently has no single legal document that highlights the monitoring and enforcement duties of all the relevant governmental bodies. This leads to coinciding jurisdictions with regards to the hands-on enforcement of the law and its violations. In protected areas, the park rangers (employees of the EEAA) have the same powers as local police, including the ability to directly enforce the law without needing to refer to the police or Coast Guard. However, coastal protected areas also fall under the jurisdiction of the Coast Guard, and there is no clear legal framework that facilitates the collaboration of both entities for law enforcement, as one is a civilian entity (EEAA) and the other is a military entity (Ministry of Defense). Furthermore, the city/town councils and the *environmental departments of governorate offices* are technically responsible for following up on compliance with hunting regulations and abiding by the terms set by the permits; however there is no single legal document that highlights these responsibilities and duties to follow up with compliance.

#### **4.1.2. Law 4 / 1994 – Law for the Conservation of the Environment**

While this law, its executive regulations, and relevant ministerial decrees, do not directly contradict Egypt's obligations as a signatory to international conventions, a number of gaps have been identified which hinder its power to address the issue of illegal killing in Egypt. These include:

- The law does not state the need to integrate migratory birds and more general biodiversity conservation in local urban and

economic development plans and strategies. The law does not state the need for the relevant administrative authorities to coordinate efforts to reduce illegal bird killing, nor provide a legal framework for this. The law does not state the need to involve local communities in biodiversity conservation efforts, particularly in relation to the reduction of illegal bird killing.

- The law does not currently require the establishment of a database to keep a record of all the individuals and companies that have filed for permits to hunt birds. This reduces the EEAA's ability to accurately determine the socioeconomic drivers behind bird hunting, and limits the potential for collaboration between enforcement officials and local hunters.

The EEAA's annual hunting regulations explicitly prohibit the indiscriminate taking of birds by stipulating that any species that are not included in the list of permitted species are to be instantly released. However, AEWA's regulations only make an exception for the use of nets and traps if they are used for livelihood purposes. Egyptian legislation, its executive regulations, and relevant ministerial decrees do not distinguish between the use of nets for sustaining livelihoods and commercial netting.

Furthermore, they do not highlight the necessary enforcement mechanisms required for monitoring compliance with regulations versus illegal bird killing.

## **4.2. Assessing current enforcement of legislation**

### **4.2.1. Addressing illegal bird killing is not a political priority**

Following the political instability in Egypt in early 2011, public security across the country was severely impacted. National and local authorities thus focused their attention on addressing criminal activity directed at people. This naturally reduced the authorities' capacity to combat illegal hunting and trapping of birds.

Furthermore, the plight of migratory birds in Egypt has never been given much public attention nor been a significant concern for law enforcement bodies aside from the Nature Conservation Sector (NCS/EEAA) and the Egyptian Wildlife Service. The lack of understanding of the issue as well as the population's weakened connection with nature means that there was neither a bottom-up push nor a top-bottom push to ensure that the illegal hunting and trapping of birds became an urgent matter of public policy, thus reducing the chances of proper law enforcement to combat illegal bird killing.

### **4.2.2. Lack of understanding of the different law enforcement bodies and administrative offices**

Matters relating to biodiversity conservation and sustainable hunting practices have remained a niche topic that only selected groups are aware of. This also

applies to law enforcement personnel and employees at local government offices, thus reducing the chances of proper implementation and enforcement of laws and regulations to address illegal hunting and trapping of birds.

This can be largely attributed to the lack of coordination between the technical experts specialised in biodiversity conservation, the employees of the local government offices, and the security apparatuses specialised in law enforcement.

#### **4.2.3. Lack of coordination between relevant governmental bodies**

As mentioned in Section 4.1.1, there are several different entities with parallel and/or concurrent jurisdiction over bird hunting and trapping along Egypt's Mediterranean coast. Laws and regulations are spread across a number of different ministries and local government offices. This has reduced the chances of effective communication and collaboration between the technical experts responsible for issuing laws & regulations, the administrative bodies responsible for issuing the necessary permits, and the law enforcement bodies vested with the implementation and enforcement of said laws and regulations on the ground.

Additionally, incidents have been reported where local government offices (city/town halls and *governorate offices*) succumb to the demands of local hunters and trappers, thus relieving certain regulations and restrictions pertaining to the issuing of permits for hunting and trapping.

With regards to concurrent jurisdiction over the issuing of permits, Article 20 of the Law on Fishing, Aquatic Life and Aquaculture stipulates that the General Authority for Fisheries Resources Development (GAFRD) have the authority to issue hunting permits for waterbirds that exist within the vicinity of their jurisdiction (specific wetlands, some of which are IBAs like Lake Bardawil in North Sinai).

#### **4.2.4. Insufficient follow up on hunters' compliance with laws and regulations**

One of the most significant issues with law enforcement and illegal bird killing is insufficient follow up on compliance with hunters and trappers if/after they acquire their permits. With no follow up on compliance, there is no way to ensure that hunters and trappers are abiding by the regulations in place to ensure sustainable hunting and trapping. Records showing police reports, confiscations and judicial decisions taking action against illegal bird killing are very limited. This proves that there is minimal initiative for action on part of the law enforcement bodies, with most legal actions taken incidentally (by chance), or as a result of a direct complaint, rather than on the ground active follow up.

It is very important to note that the governmental bodies responsible for following up on the ground are either underequipped, understaffed, or lack the strength of security-based enforcement that would allow them to comfortably enforce the laws and address violations..

#### **4.2.5. Bureaucratic difficulties to acquire necessary permits**

In order to acquire permits for net use, citizens are required to apply for three sets of permits, usually from three separate locations/institutions. The inconvenience of this process may discourage some from hunting/trapping legally after acquiring the necessary permits, and instead taking part in illegal hunting and trapping.

With regards to permits for hunting birds using rifles, decisions for issuing a gun license are at the sole discretion of the Egyptian Interior Ministry. Since the instability after 2011, the Interior Ministry drastically reduced the gun licenses granted for hunting, as well as the licenses required for the purchase of ammunition. The increased difficulty in acquiring such a license could be a driving factor to encourage illegal bird hunting, particularly in remote areas along the coast.

#### **4.2.6. Lack of community engagement in law enforcement processes**

There is a lack of community engagement in law enforcement processes pertaining to illegal hunting and trapping along Egypt's northern Mediterranean coast. It is clear that the responsibility of upholding and enforcing the law is vested with the local government representatives, park rangers, and the security apparatuses (police and coast guard). However, this continued divide between government and society, particularly with regards to upholding the law, will reduce the effectiveness of properly enforcing the laws and regulations that ultimately affect local communities the most.

## **Section 5: Preliminary Recommendations**

### **5.1. Recommendations for improved legislation**

Following review of the existing legislation, enforcement mechanisms, and the identification of issues related to reducing illegal hunting and trapping through adequate law enforcement, EEAA and Nature Conservation Egypt have identified a number of preliminary recommendations to support immediate action.

#### **5.1.1. Unified law for hunting management**

In order to ensure Egypt's hunting management laws are clear, accessible and better enforced on the ground, it is essential to compile all existing laws and regulations under one unified hunting management law.

Such a unified law should:

- identify the roles and responsibilities of the different governmental bodies vested with issuing regulations,
- Identify the roles and responsibilities of those institutions responsible for issuing permits,
- Identify the roles and responsibilities of the institutions responsible for ensuring the enforcement of the relevant laws and regulations through a collaborative effort between the Ministry of Environment, Ministry of Agriculture, and the Ministry of State for Local Development, in coordination with the Ministries of Interior and Defense.

#### **5.1.2. Amendments to Law 4/1994 – Environmental Conservation Law**

Until a unified hunting management law becomes a reality, there are other amendments that can be made to the current environmental laws, to ensure more realistic enforcement to reduce illegal hunting and trapping of birds. These include:

- Establishment of a *Hunting Management Unit* within NCS-EEAA, concerned with all matters relating to the hunting and trapping of migratory birds, acting as the Ministry of Environment's focal point for all correspondences with relevant parties.
- Legal amendments to ensure integration of biodiversity conservation, particularly migratory birds, into local and urban economic development plans and strategies. This will ensure that there is a political intent, on part of the local and national governments, to reduce illegal bird hunting and trapping.
- Legal amendments to ensure local communities' involvement in biodiversity conservation efforts to reduce illegal bird killing and trapping. This is to ensure a collaborative and sustainable approach to conservation that truly integrates local communities' well-being into the conservation efforts.

### **5.1.3. Amendments to annual hunting regulations (ministerial decree)**

The EEAA's annually produced hunting and trapping regulations (issued in the form of a ministerial decree – see Annex 3) should clearly stipulate that the trapping of birds is only allowed for “livelihood purposes, if sustainable”, to ensure compliance with Egypt's obligations under AEWA. This should include definitions for “livelihood purposes”, as well as “sustainable,” in reference to the trapping of birds.

The EEAA's regulations should also clearly prohibit any form of hunting during the spring, as well as aggregate all the prohibited acts under one clear and concise list.

## **5.2. Recommendations to improve enforcement of legislation**

### **5.2.1. Memorandum of understanding between coastal governorates & law enforcement authorities**

To ensure the actual support of local government officials and law enforcement personnel, a binding document (such as a Memorandum of Understanding) should exist between the Egyptian Environmental Affairs Agency (EEAA), the Ministry of Agriculture, the coastal governorates, the Ministry of Interior and the Ministry of Defense. This MOU intends to ensure support of the relevant administrative stakeholders, and to build a collaborative platform for reducing illegal killing along the north coast of Egypt. Such a step should address the lack of interest that different governmental bodies have shown to date towards the plight of migratory birds as they fly over Egypt.

### **5.2.2. Building technical capacity of local government bodies and law enforcement personnel**

It is crucial that all parties engaged in the issuing of hunting/trapping permits along the coast, as well as parties responsible for law enforcement and monitoring illegal practices, are provided with the necessary knowledge to understand the scope of illegal bird killing, the importance of regulating hunting and trapping, as well as the technical know-how pertaining to on-the-ground enforcement. Such knowledge should be supplemented with the results of the socioeconomic study and the autumn monitoring of illegal hunting (both being undertaken as part of implementation of the Action Plan), to provide a more insightful and scientific approach to law enforcement. This should include EEAA protected area rangers, representatives from the *environmental department* of each *governorate office*, representatives from the city/town hall, as well as representatives from the Coast Guard and the Environment and Water Police.

### **5.2.3. Formally establishing monitoring committees in local government**

City/town halls, as well as the *environmental department* of the *governorate office*, should formally establish committees aiming to monitor hunters/trappers'

with the regulations set forth to ensure legal and sustainable hunting. While these monitoring committees may currently exist on an informal basis, it is important that they are formally established with clear duties and responsibilities. These committees should work in coordination with one another to ensure more effective enforcement of the law by taking the necessary legal procedures with violations, while simultaneously raising awareness among hunters and trappers, to ensure that these monitoring committees are not viewed as an obstacle to the livelihoods of local communities.

#### **5.2.4. Enhancing the role of EEAA Rangers along the coast**

Park rangers fall under the umbrella of the Nature Conservation Sector (NCS) of the Egyptian Environmental Affairs Agency (EEAA), the administrative body designated with managing hunting all across Egypt. This should further enhance the role of park rangers in the process of enforcing hunting regulations all along the coast, including the protected areas that fall under their jurisdiction. This should be done under the proposed *Hunting Management Unit* (Section 5.1.2.) Park rangers should be included in the local government monitoring committees proposed in Section 5.2.3, and should also conduct their own specialised activities for monitoring and enforcement. To ensure the effectiveness of rangers' enforcement of laws and regulations, coordinated efforts between them and the local Environment and Water Police is a necessity, as the security situation along Egypt's north coast may put rangers at risk while trying to enforce the law.

#### **5.2.5. Using permit fees to fund local government monitoring committees**

Fees that are paid for acquiring trapping permits are collected by the local city/town hall, and then deposited to the EEAA's Environmental Protection Fund. These fees should be reinvested by the EEAA in the local government monitoring committees (Section 5.2.3.), to relieve city/town halls and the *environmental departments of governorate offices* of the financial burdens associated with monitoring and enforcement.

#### **5.2.6. Reviewing current fees allocated for trapping permits**

The current fees for trapping permits are set to 10 Egyptian Pounds (approximately €1.3) per 1,000 meters of nets. This is extremely low, and should be reassessed in coordination with the Administration for the Economics of Biodiversity in the EEAA, to help determine the appropriate pricing for such permits.

#### **5.2.7. Involving local communities in law enforcement**

One of the biggest obstacles to law enforcement for sustainable and legal hunting is the large divide between local government and local communities. While local government is responsible for the implementation and enforcement of laws and regulations, it is the local communities who may view such enforcement as negatively impacting their livelihoods and economic wellbeing. Therefore, if the local government bodies become less active in monitoring compliance and enforcing regulations, this is likely to increase illegal hunting and trapping.

It is thus critical to ensure that local hunters and trappers are included in the process of monitoring compliance with laws and regulations as well as law enforcement. Through coordination with local hunting and trapping groups, as well as hunting leaders, it is important to ensure that existent regulations are clarified from both a legal and a socioeconomic perspective. There have been examples of coordinated enforcement efforts between local government bodies and local hunting group leaders, however such efforts were not formalized nor were they institutionalized. Therefore, it is critical that law enforcement efforts integrate the considerations of local hunters and trappers, to ensure sustainable practices that are implemented out of understanding the regulations rather than just fearing the legal consequences of not complying.



## **Section 6: Annexes**

### **6.1. Annex 1- Hunting Regulations 2015-2016**

**Decree  
Minister of Environment  
No. 212  
Dated 16/08/2015**

#### **Article 1**

It is permitted to hunt wild quail and teal between 01/09/2015 and 15/11/2015, only in the following coastal governorates and in accordance to the following regulations: North Sinai, Port Said, Damietta, Daqahleyya, Kafr El Sheikh, Beheira, Alexandria and Marsa Matruh).

#### **Article 2**

It is permitted to hunt wild bird species specified in this decree as well as Law 4/1994 (amended by Law 9/2009) and its executive regulations, starting 15/11/2015 up till 31/03/2016, in accordance to the regulations attached in this decree. The protocols and permits issued by the EEAA for research and monitoring avian flu are to continue in place.

#### **Article 3**

All governmental bodies specialised with issuing permits relating to hunting are to comply with the regulations specified by this decree.

#### **Article 4**

This decree is binding as soon as it is published in the *Egyptian Gazette*.

#### **Article 5**

All relevant governmental bodies are to take the necessary measures for enforcement..

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### **Technical Regulations for Hunting Quail and Common Teal - 2015**

1. Hunting quail and common teal in accordance to the EEAA's provisions set out by the EEAA is permitted between 01/09/2015 and 15/11/2015, only in the following coastal governorates: North Sinai, Port Siad, Samietta, Daqahleyya, Kafr El Sheikh, Beheira, Alexandria and Marsa Matrouh.

2. Permitted tools for hunting wild quail are the following: mist-nets, handheld nets, traps/limesticks, and air rifles.

3. Permitted tools for hunting common teal are the bird-shot rifles (12mm, 16mm, 20mm), single or double barrels.

4. With regards to wild quail, it is forbidden to place nets at a distance less than 500 meters from the shore. 25% of the permitted distance for nets should be left empty without nets, and each net should not exceed 3 meters in height, including at least a 5-meter distance between each net from all sides. This is to allow some migratory birds to continue their life cycle, protecting species from threats.
  5. Those who have requested permits are obliged to release all other birds that fall into the net, including corn crake, raptors, songbirds, and others, after confirming their wellbeing. All unhealthy birds are to be taken to the nearest protected area for care before it is released.
  6. Permits for hunting quail are to be issued from the designated city council or the town council that fall underneath it. Permits are to specify the area permitted to set up nets, as well as the individuals permitted to hunt, once the designated fees have been paid.
  7. Permit-seekers and those accompanying them are to issue the relevant security permits to engage in hunting practices on the coast. These security permits can be issued through the local Coast Guard Intelligence office, or the local Environment and Water Police, depending on the areas allocated for hunting.
  8. The Interior Ministry should facilitate for hunters holding permits the process of purchasing the necessary ammunition (bird-shots) to engage in hunting activities.
  9. With regards to quail, it is permitted for trappers to transport the birds that have been caught to areas designated for slaughtering birds (slaughter houses and other specialised facilities) that are accredited by the governorate office.
  10. It is strictly prohibited to use any audio devices that emit supersonic frequencies in any hunting activities relating to the permitted bird species.
  11. The Ministry of Environment, through the Programme to Combat Avian Flu, is to conduct regular research and sample collection to ensure that birds are free of Avian Flu.
  12. In the case that any of these provisions are violated, the violator's permit is to be revoked, and s/he will not be allowed to partake in hunting activities for the remainder of the season, and the violator's nets and other hunting tools are to undergo administrative confiscation till the end of the hunting season.
  13. The Egyptian Hunting Federation is to assist in monitoring hunters' compliance with the hunting regulations.
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## **Technical Regulations for the Hunting of Wild Birds in 2015-2016**

1. The following regulations apply to hunting activities for tourism, sustenance, and hunting as a hobby (sport).
2. The following list contains the wild birds permitted for hunting in the Arab Republic of Egypt between 15/11/2015 and 31/03/2016, in accordance to Law 4 of 1994 (amended by Law 9 for 2009), and its executive regulations:

	<b>English Name</b>	<b>Scientific Name</b>
1	Northern pintail	Anas acuta
2	Mallard duck	Anas platyrhynchos
3	Common shelduck	Tadorna tadorna
4	Common Teal	Anas crecca
5	Common Pochard	Aythya ferina
6	Northern Shoveler	Anas clypeata
7	Tufted duck	Aythya fuligula
8	Gadwall	Anas strepera
9	Collared Dove	Streptopelia decacacoocto
10	Egyptian goose	Alopochen aegyptiacus
11	Moorhens	Gallinula
12	Coot	Fulica
13	Jack snipe	Gallinago media
14	Turtle dove	Streptopelia turtur
15	Rock dove	Columba livia
16	Laughing dove	Stigmatopelia senegalensis
17	House sparrow	Passer domesticus
18	Common snipe	Gallinago gallinago
19	Wigeon	Anas penelope
20	Cormorant	Phalacrocorax carbo

3. Hunting is prohibited within protected areas in the Arab Republic of Egypt.
4. The permitted equipment for hunting ducks and other birds permitted for hunting include:
  - Bird-shot rifles (12mm, 16mm, 20mm), one barrel or double barrel.
  - It is prohibited to use bird-shot rifles that fire multiple shots simultaneously. However, it is permitted to use plastic bullet casings that allow two shots to be fired.
5. The Ministry of Environment (Programme to Combat Avian Flu) shall monitor avian flu in wild birds all across the Arab Republic of Egypt in accordance to their action plan.

6. The Egyptian Hunting Federation (wild hunting committee) is to cooperate with the Programme to Combat Avian Flu by supplying samples when requested to combat avian flu.
7. With regards to tourism hunting, the tourism companies are obliged to acquire the relevant administrative and security permits to conduct this activity.
8. Tour companies are obliged to supply representative samples for the monitoring of avian flu, these samples coming from the total number of birds hunted.
9. The Interior Ministry should facilitate for permit-holders the process for acquiring the necessary ammunition (bird-shots) for hunting activities in light of the set provisions.
10. Entities wishing to conduct academic research and/or training with birds that have been legally hunted, are required to provide a representative sample of the birds caught to the Programme to Combat Avian Flu at the Ministry of Environment. In the case that such entities reside in another country, requests are submitted through that country's official representative bodies in Egypt, in order to obtain the approval for the required species by the General Authority for Veterinary Services.
11. In the case that any of these provisions are violated, the violator's permit is to be revoked, and s/he will not be allowed to partake in hunting activities for the remainder of the season, and the violator's hunting tools are to undergo administrative confiscation till the end of the hunting season.

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*Environmental Provisions to Manage the Hunting of the Egyptian Goose*

1. Hunting is prohibited near tourism destinations, floating hotels (boats), or near the city of Abu Simbel.
2. Hunting is prohibited in the areas of Qostol and Adendan, because of their close proximity to Wadi Allaqy Protected Area, as well as the borders.
3. Foreign hunters are only allowed to take 10 Egyptian Geese, as well as whatever permitted birds that have been hunted.
4. The tourism company representative is responsible for the enforcement of all provisions.
5. The Protected Areas Administration in Aswan is to monitor hunting activities in Lake Nasser, in cooperation with the Environment and Water Police as well as other enforcement bodies.

## **6.2. Annex 2 – Environment Law – 4/1994 (amended by Law 9 2009)**

### Article 281:

Any of the following acts shall be prohibited:

Firstly: Hunting, killing, catching birds and wild animals or marine living organisms; as well as possessing, transporting, importing and exporting or offering to sell such birds and animals, either dead or alive, as a whole, in part or their derivatives, or practicing activities that tend to destroy their natural habitats or properties or damage their nests, eggs or their offspring.

The Executive Regulation of this law shall determine species of these creatures and sites to which the provisions of the above mentioned paragraph shall apply.

Secondly: Cutting or damaging plants as well as , possessing, transporting, importing and exporting, or offering them to sell as a whole, in part or their derivatives and products thereof, practicing any activities that tend to destroy their natural habitats or change their natural properties or habitats.

The Executive Regulation of this law shall determine species of these plants.

Thirdly: Collecting, possessing, transporting, or offering to sell kinds of fauna and flora fossils or changing their features; as well as destroying their distinguished geological formations or environmental features or harming their aesthetic value in the Natural Protected Areas

## **6.3. Annex 3 – Appendix 4 of Executive Regulations for Environment Law – 4/1994 (amended by Law 9 2009)**

### Appendix 4: Birds and Wild Animals Prohibited to Hunt, Kill or Catch

#### *Firstly: Prohibited Species of Birds & Animals*

- i. Birds and animals prohibited in the Minister of Agriculture's decree 28/1967 in accordance to Article 117 of Law 53/1966.
- ii. Any birds or animals prohibited by international agreements that Egypt is a party of.
- iii. Any birds or animals included in a decree by the Minister of Agriculture in coordination with the Egyptian Environmental Affairs Agency (EEAA).

#### *Secondly: Areas Prohibited of Hunting Activities*

- i. Areas specified by the Minister of Agriculture's decree 472/1982 in North and South Sinai:
  - a. Zaraniq and Bardawil and Teena
  - b. St. Katherine and Mount Sorial
  - c. Tiran Island
- ii. Protected areas determined by Ministerial Decrees from the Prime Minister, in accordance to Law 102/1983.

- iii. Areas determined by governorate decree 442/1980 for hunting management in North Sinai.
- iv. Areas determined by governorate decrees 15/1980 and 16/1980 for hunting management in South Sinai.
- v. Areas determined by international agreements that are binding to the Arab Republic to Egypt.
- vi. Any other areas subject of a decree issued by a relevant body, in coordination with the EEAA.