



A Series

Seeking Climate Justice in International Agreements

Part 2 :

A Short Reflection on the Egyptian Biodiversity
Strategy and Action Plan 2015–2030

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منصة العدالة الاجتماعية
Social Justice Platform



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Background

The Conference of Parties (COP) on the *Convention on Biological Diversity* met in Egypt from the 17th to the 29th of November 2018 to discuss the global legal framework for biodiversity action. Held in Sharm El Sheikh, the 14th meeting aimed to inaugurate the process of adopting a post-2020 biodiversity framework, set to be officially adopted during the 15th COP meeting in Beijing in 2020. Furthermore, the agenda included discussing the strategic directions for the 2050 Vision for Biodiversity, review of the effectiveness of CBD processes, and other issues regarding reporting, assessment, capacity building, and financial mechanisms. Parties also had to discuss the current progress in the implementation of the Strategic Plan for Biodiversity 2011–2020.

The main goals of the Strategic Plan 2011–2020, referred to as the Aichi Biodiversity Targets, are to: 1. address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society; 2. reduce the direct pressures on biodiversity and promote sustainable use; 3. improve the status of biodiversity by safeguarding ecosystems, species, and genetic diversity; 4. enhance the benefits of biodiversity and ecosystem services for everyone; and 5. enhance implementation through participatory planning, knowledge management, and capacity building. The primary idea is that by 2020 all these goals should be accomplished through achieving specific targets respective to each goal.

In Egypt, as in many other countries, biodiversity values are not well integrated into national development plans. Movement toward sustainable production is still hampered by economic growth logics, and the government’s misdirected efforts to subsidize large producers in spite of their net negative ecological impact. Ecosystems that provide services essential to human life are being increasingly privatized, and anthropogenic pressures on these ecosystems have not been adequately minimized.¹ Given that the Aichi Targets haven’t been adequately realized, activists have called for a [more stringent framework](#) for the Beijing meeting in 2020.

This conference is one link in the long chain of drafting targets, failing to realize them, pointing out the inadequacy of global biodiversity efforts in the following COP, and then redrafting new targets, a cycle that should now be put to question. Nele Marien, an environmental activist and coordinator of Friends of the Earth International’s Forests and Biodiversity program, who attended the COP 14 in Sharm El Sheikh, [argued](#) that corporate pressure was steadfast throughout the negotiations, which made it extremely difficult to have faith in the COP process. Marien contends that the solution to the biodiversity crisis cannot be found by working with the same industries that destroy biodiversity while expanding unchecked. “There is no way for extractivism to operate in harmony with biodiversity, this is a contradiction in terms,” she puts it.

¹ Anthropogenic refers to what is caused or influenced by humans. When discussing climate change, it is often used to refer to emissions produced as a result of human activities.

In ways [similar to the proceedings of the UNFCCC](#), the Convention on Biological Diversity is praised by myriads of groups that value the process of drafting international agreements and getting all members to sign them, without critically interrogating the effectiveness of such processes. The outcomes of COP 14 still do not move toward real solutions to the biodiversity crisis, which must start with stringent regulation of and restrictions on corporations. The endless drafting and redrafting of plans for 2020, 2030, 2050, forces us to question whether the involved stakeholders are actually committed to mitigating the situation, or whether they are adopting a business-as-usual approach that indefinitely postpones action. It seems that the latter is the case, despite the ongoing efforts of some groups committed to realizing climate and environmental justice in biodiversity work.

Globally, biodiversity is threatened by factors such as excessive urbanization and destruction of natural habitats, pollution of air, water, and soil, climate change, continuing deforestation, overuse of green spaces and wild areas, invasive species, and overexploitation of species (e.g. overfishing). When it comes to Egypt, there is a major biodiversity threat to coastal reefs and marine life in the Red Sea. The crisis is exacerbated by water pollution, [continuous oil spillage from offshore rigs](#), problematic [diving practices](#), and poor waste management along the Red Sea. Massive urbanization on agricultural land, the expansion of industrialization, and waste production by key sectors engender more biodiversity loss. The Egyptian government is [aware](#) of the problem, and Egypt currently has 30 [protected areas](#) that are managed by the Ministry of Environment. But this does not mean that the structural changes needed for the protection of biodiversity are observed or even seriously considered.

The biodiversity crisis, like global warming, is an issue that cannot be conceptualized or addressed separately from global and local systems of environmental governance. Biodiversity loss is the logical consequence of climate change, which is in turn caused by anthropogenic destruction of the environment. [For that reason, all strategies to save biodiversity need to propose solutions that do not isolate it from the economic and political structures sustaining environmental injustice.](#) Biodiversity conservation is not a neutral process. Environmental and climate justice principles need to be taken into account when describing the problem and proposing solutions. Corporate's stronghold of the COP on biodiversity will continue to hamper this ideal.

Biodiversity Threats in Egypt

In January of 2016, Egypt published a [Strategy and Action Plan for Egyptian Biodiversity](#) in 2015–2030. It is a full-fledged document laying out the biodiversity situation of Egypt and the governmental plans to protect habitats and species. The document is quite frank about the threats to biodiversity and their indirect as well as direct causes. In this section we will briefly analyze the Egyptian Biodiversity Strategy and Action Plan 2015–2030 to show that biodiversity issues in Egypt are tightly related to questions of environmental justice, politics, and political economy. According to the document, the threats to biodiversity are divided between marine ecosystems, wetland ecosystems, mountain habitats, and agricultural biodiversity.

1. Marine Ecosystems

According to the report, many major factors harm marine ecosystems. The first is unregulated tourism and its resulting exploitation of marine resources. The second is that 40% of industrial activities are conducted in coastal zones without sufficient regulation and monitoring by the appropriate bodies, in addition to the lack of sufficient infrastructure to protect the natural resources that exist in these areas. The report also cites the lack of coordination and cooperation between the “concerned parties” in Egypt to collect data and conduct research on biodiversity losses in this domain, as well as the “absence of a comprehensive legal protection of biodiversity” outside the Protected Area framework. [Invasive species](#) are also mentioned as a major problem that is exacerbated by factors such as the new development of the Suez Canal. Large development projects upset the ecological balance of habitats and species—particularly along the Suez Canal and in the North Coast.

Some of the proposed action plans to mitigate the situations mentioned above are vague, while others are effective. By 2018, the government was supposed to have applied CBD tools for monitoring and controlling the impact of destructive tourism (National Target 6). In August of 2019, the Ministry of Environment indeed issued a few administrative decisions targeting harmful touristic practices in natural protectorates (PAs). By 2020, measures that include waste management plans and law enforcement to reduce the impact of pollution in marine and coastal ecosystems should be put in place. Action recommendations include establishing criteria for monitoring pollution inside Protected Areas (PAs) and buffer zones and investing in the appropriate infrastructure to protect biodiversity.

There is an intricate web of political-economic knots that vividly reflects the difficulty of separating biodiversity concerns from the structures of governance in Egypt. Unregulated tourism, for instance, is part of a long history of resource and land exploitation done for the purposes of economic growth. It is also part of a long-standing [struggle over land rights and access to resources](#) between the state (often in support of business interests) and indigenous tribes who have historically inhabited the coastal zones of Egypt. Unfortunately, this system

is rooted in national economic policies that go unquestioned. It is there where productive solutions to unregulated growth-oriented tourism must be implemented.

The lack of adequate infrastructure to safeguard biodiversity in pressured marine ecosystems (i.e. touristic sites/resorts and industrial zones near the coast) again leads us to a similar predicament, whereby the interests of industrial growth are blindly sought after without any consideration for the effects on the environment. Without doubt, matters become more complicated when industrial growth is presented as a means to provide jobs and end poverty. Economically disenfranchised groups become co-opted in the machinery that destroys biodiversity.

2. Wetlands Ecosystems

The deterioration in wetland habitats has been quite [rapid and violent](#). The biggest factors affecting Egypt's Northern coastal lakes are habitat loss and pollution. The latter is caused by the infrastructural failure of industrial and household sewage systems, as well as agricultural drainage of pesticides. National Target 9 stipulates that by 2021 the rate of wetland loss should be reduced by 25% and water efficiency rates should increase by 50%. There is no comprehensive data on the cumulative wetland loss in Egypt in the present moment, but for example, studies show that Lake Burullus already [lost a third of its size between 1953 and 2002](#). There is only one proposed action under this target which is to continue wetland restoration and programs aimed at fighting desertification.

3. Mountain Ecosystems

The biodiversity of mountain ecosystems is harmed by human hunting, logging, urban development, invasive alien species, and climate change or natural disasters resulting from it. While there are no proposed actions combined under one theme for mountain ecosystems, there are solutions that spread across different national targets. For example, National Target 12 promotes the achievement of sustainable hunting by the year 2020. An ongoing campaign the government and Nature Conservation Egypt called "Until The Birds Return" aims to raise awareness about the harmful impacts of hunting migratory birds. It is a positive step towards popularizing this particular issue.

The above-mentioned action plans relating to tourism apply in this section, particularly when it comes to the development of tourist resorts. It is difficult to find a balance, however, given the general decline in the tourism industry, which affect both the national economy and low-income groups who used to depend on tourism as a primary source of income. It is also worth noting that often it is economically and politically disadvantaged groups that rely on hunting for subsistence.

4. Agricultural Biodiversity

According to the document, agricultural biodiversity has suffered because of:

1. The expansion of urbanization on agricultural land.
2. The introduction of high-yielding varieties and their wide use that led to the neglect and disappearance of traditional varieties and local breeds, and the erosion of crop plant and livestock genetic diversity.
3. The abandonment of traditional agricultural practices caused loss of cultural landscapes associated with biodiversity.
4. Invasive species, such as palm weevil, invasive weeds, and various agricultural pests that caused significant economic losses.
5. Excessive use of agrochemicals has led to the disappearance of important agricultural wildlife (pollinators, kites, owls, foxes, mongeese, and wild cats) and groundwater contamination.
6. The absence of suitable successive agricultural cycles.
7. The use of surface flooding irrigation that led to land degradation.
8. Reduced soil fertility.
9. Increased migration from rural to urban areas with increasing burden on resources.

Agrobiodiversity has been undermined on several levels over the years. There have been a few powerful movements to pressure the government to preserve Egypt's seed heritage. Demands for [food sovereignty](#) are especially important in that regard—a fact that the plan acknowledges—and those efforts have been mostly brought forth by the collective efforts of civil society organizations and local activists. There is also an increased awareness that traditional agricultural practices need to be incorporated into a sustainable ecological framework in such a way that preserves the cultural heritage of farming yet does not further damage the soil or waste natural resources. The proposed actions for agrobiodiversity in the plan include 1. the development of a national agrobiodiversity conservation program with the relevant authorities; 2. doing research on local varieties and their preservation methods; and 3. training the relevant governmental agencies with this knowledge.

Concluding Commentary

While Egypt's strategy for biodiversity clearly lays out the challenges, it is unclear whether the gravity of the situation is receiving an adequate response in the proposed action plans. The action plans follow the CBD style of setting strategic goals, national targets, and specific priority actions. What we end up with is indeed a lengthy plan, but not without its gaps and loopholes. For example, it is clearly stated that industrial activities near coastal zones disturb the ecological system of natural habitats and exacerbate pollution, but none of the proposed solutions address how to stop this from further developing. Industrial buffer zones are not

called into question. In fact, Egypt has been welcoming more investments in building [new industrial zones](#).

Meanwhile, cited lack of coordination between the concerned parties and responsible entities in Egypt regarding the biodiversity crisis is a major problem that will not be solved by compartmentalizing the mechanics of Egyptian governance. Some scholars, such as Jeannie Sowers, have discussed the complicated layers of environmental politics in Egypt, and how precisely the presence of many “concerned parties” hampers productive environmental policies. Moreover, the implementation process of certain actions—some of which have been mentioned above—needs to go through each and every single one of those bodies, sometimes without clarity as to who the final arbiter is or what the terms of coordination are.

Agricultural biodiversity is one of the most politically sensitive matters, especially as Egypt faces the possibility of losing local farming traditions and seed biodiversity. It becomes crucial to ask: agriculture for whom? When we understand the multilayered answer to this question, we can understand where 1. the crisis begins; and 2. what “the danger” means for different sectors of society. It is hard to understand how the government plans to save agricultural biodiversity when its system of agricultural policy-making is effectively destructive to agricultural biodiversity, local varieties (due to their low profit margin), and the persistence of small farmers.

The problem with isolating biodiversity issues to a small enclave is that it does not adequately account for their interconnectedness to larger questions about environmental governance. But there seems to be a discrepancy between efforts to document biodiversity challenges (as Egypt has produced official documents such as the one discussed here) and the efforts to implement long-lasting changes. Moreover, even if adequate “action plans” are officially announced, the act of announcing or sharing the announcement via international channels such as the Convention on Biological Diversity does not necessarily mean those actions will be taken seriously by the government. The international system of environmental governance thrives on agreements and campaigns, but can often have very little power in the face of multinational corporations, trade agreements, and global trends towards the liberalization of the economy.

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