

Fishing Under Military Order

**Lake Bardawil Under the Management
of the Future of Egypt Authority
for Sustainable Development**



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Authority for Sustainable Development

A report issued by:

EgyptWide for Human Rights

The Sinai Foundation for Human Rights (SFHR)

Egyptian Front for Human Rights (EFHR)

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July, 2026

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Executive Summary

This report, jointly produced by the Sinai Foundation for Human Rights, EgyptWide for Human Rights and the Egyptian Front for Human Rights, addresses the social, economic, and environmental repercussions of the acquisition of administrative control over Lake Bardawil (Sinai) by the Future of Egypt Authority for Sustainable Development (hereinafter "*the Authority*"), an entity affiliated with the Egyptian Air Force at the Ministry of Defense. Since the agency acquired control over the area through Presidential Decree No. 114 of 2024 in November 2024, a pattern of human rights violations against local fishing communities has emerged, which this report documents. Our research employs twenty-eight field interviews conducted between December 2025 and March 2026 with fishermen, traders, sales agents, and employees of the lake administration agency, alongside analyzing some of the criminal case files brought against fishermen in the same timespan, complemented by a policy review of relevant laws and international conventions on indigenous peoples' rights, Egyptian constitutional and legal texts, relevant administrative decisions, and prior studies and research on the environmental conditions and the economy of Lake Bardawil.

Our report documents the adverse impact of the militarized administration of Lake Bardawil on local fishing communities. On the economic level, the field interviews reveal that the Authority exercises a monopolistic control over the production and trade of fishing products from the lake, negatively affecting civilian businesses and traditional fishing practices. Contrary to its administrative mandate, the Authority's role is not limited to regulation and oversight of fishing activities, but has extended to controlling the sale of fishing products with the imposition of prices whose profit margin, sometimes exceeding 100%, is retained by the Authority itself with no benefits to local fishers. The Authority also controls the entry and trade of fishing-related equipment and fuel inside the Bardawil area, imposing suppliers and prices at its discretion without any form of transparency. This has led to a sharp deterioration in fishers' economic conditions and a mounting accumulation of debt.

Under the administrative and security profile, since the Future of Egypt Authority took charge, fishers have faced increasingly prohibitive conditions for the exercise of their profession, including unreasonable increases in the cost of fishing licenses, and growingly burdensome or lengthy bureaucratic procedures. Additionally, arbitrary administrative regulations have been

introduced under Presidential Decree No.294 of 2019, which placed water bodies under military jurisdiction, paving the way for a long series of civilian arrests and trials before martial courts in case of breaches to the new administrative regulations. Such trials, documented in this report, saw at least 13 fishermen from the Lake Bardawil area arbitrarily detained or requested to pay unreasonably high fines, while their right to a fair trial was overtly disregarded. Fishers of Lake Bardawil attempted to resist this arbitrary imposition of new measures and their negative impacts on their activities by organizing a strike in May 2025. The authorities, however, responded with the revocation of fishing licenses or barring fishers from accessing lake waters, while refusing to address their grievances.

This report is complemented with a series of recommendations addressing the violations documented and incorporating fishers' grievances, including: restoring civilian administration of Lake Bardawil; ending the Future of Egypt Authority's monopoly over fishing equipment, fuel, and fishing products in the area; allowing competitors to operate in the area, and restoring market prices; halting the referral of fishermen to military courts and releasing those arbitrarily detained in connection with Cases No.5, 6, and 324 of 2025, and No.14 of 2026, before the Military Misdemeanors court of Ismailia.

We also call for the implementation of independent environmental and social impact studies, whose findings must be accessible to local communities and the public, before any development interventions are conducted in the area of Lake Bardawil; the transparent consultation of local fishing communities in decisions concerning the lake's future; and state support for their cooperative associations to restore their historic representative and service-providing role.

Introduction

The Egyptian Armed Forces (EAF)'s activism in Egypt's national economy has expanded unprecedentedly under President Abdel Fattah El-Sisi. The repercussions of this military expansion across various sectors of the Egyptian economy have not been limited to governance, but extend directly to productive activities affecting the lives of millions of citizens. The impact of these repercussions is exacerbated when concerning vulnerable groups, whose class, gender, ethnic or religious affiliation, and geographic location place them at greater risk for political, social, or economic marginalization.

This report documents the negative impacts of the EAF-affiliated Future of Egypt Authority for Sustainable Development's administration of Lake Bardawil, in the North Sinai governorate. The administration was officialized in November 2024, and it is legally sustained under Presidential Decree No.294 of 2019, which places Egypt's major lakes under military administration and jurisdiction by classifying them as "*military-adjacent areas*".

In its first section, the report reviews the demographic and economic characteristics of Lake Bardawil's fishing communities, including the characteristics which make them fit to be considered as an indigenous people in Egypt, and the consequent recognition of a set of rights associated with that status in addition to the rights shared by all Egyptian citizens, including their right to development, to the protection and respect of their material and immaterial heritage, and to actively participating in the governance of the natural resources of their land.

In the same section, the report reviews the expansion of military activism in Egypt's economy, particularly after 2014, leading up to the establishment of the Future of Egypt Authority and its legal status and mandate under military law.

The second section analyzes data from interviews and cases filed against the fishers of Lake Bardawil, discussing the violations committed against them since the transfer of administrative control of the Future of Egypt Authority in November 2024. This section also documents the arrests and military trials of fishers under the new administrative regulations, or in connection with their attempts to protest the arbitrary restrictions introduced by the Authority.

The report concludes with a set of recommendations to decision makers to restore fundamental human rights and environmental safeguards for Lake Bardawil's fishing communities, including redress measures for victims and affected persons.

Methodology

This report documents the human rights violations committed against local fishing communities following the transfer of administrative authority over Lake Bardawil to the Future of Egypt Authority for Sustainable Development through a qualitative approach, triangulating data from field interviews, policy analysis, and OSINT sources.

While unequivocally stating the right of affected persons and communities of Lake Bardawil, Sinai, to enjoy all the constitutional rights guaranteed to them as Egyptian citizens, this report expands the examination of international standards related to indigenous peoples' rights and the constitutional and legislative status of these communities in Egypt, discussing how the status of indigenous peoples and the consequent rights should also apply to this community. The normative frameworks discussed in this report include relevant international conventions and declarations, the Egyptian constitution of 2014 and subsequent legislation, and the decrees that enabled the progressive concentration of administrative and economic control over Lake Bardawil by the EAF.

Secondary sources consulted for this research include news reports, press statements, and relevant research papers documenting the detrimental social or environmental impacts of the Future of Egypt Authority's operations in the lake area, alongside files concerning the legal proceedings against thirteen local fishermen who were arbitrarily tried before military courts between January 2025 and March 2026 over breaches of the new regulations.

28 field interviews were conducted between December 2025 and March 2026 with people representing different segments of the communities of Lake Bardawil, including fishers, traders, sales agents, and employees from the lake administration. The interviews enabled us to draw a comprehensive picture of the conditions and transformations in the lake's management and their repercussions on the lives of local communities. To mitigate risks to participants, considering Egypt's highly repressive context, pseudonyms are used to refer to all interviewees.

The interviews also sought to understand the trajectories of institutional and administrative change, including the escalation of regulatory restrictions and the shifting power relations between the Authority and local fishers, tracking their economic and social repercussions and exploring locals' views on fairness in resource distribution, the possibility of participation in decision-making, and the effectiveness of grievance or negotiation mechanisms. The

relatively open-ended nature of the interviews granted participants the space to recount their experiences in depth, which enriched the data and its analysis.

1. An Indigenous Community Facing the Expansion of the Military Economy

This section provides a demographic description of the local communities of the Lake Bardawil area, which, forming part of the population of the Sinai Peninsula, are distinguished by socio-cultural characteristics that set them apart from the general population of Egypt. The fishing community of Lake Bardawil presents a distinctive group identity and a strong symbolic and material connection to the lake as a living space, not merely as an economic resource. The section then traces the intensification of the EAF's economic activism, contextualizing the creation of the Future of Egypt Authority for Sustainable Development and its acquisition of administrative control over Lake Bardawil.

1. Lake Bardawil and the Local Indigenous Community

The community of Lake Bardawil represents a distinctive model of fishing community, given the environmental specificity of the ecosystems, geographic location within the Sinai Peninsula, and its historical connection to traditional ways of life that depend on fishing as a primary source of livelihood. Understanding the characteristics of Bardawil's fishing community, therefore, first requires some consideration of the broader socio-cultural landscape of Sinai, including the tribal structure of its populations, and the unique patterns of social organization shaping community life and traditional economic models.

As per official figures disclosed in January 2020, the population of the Sinai Peninsula was approximately 559,289 people,¹ and included urban, rural, and Bedouin populations. Population density is concentrated more in coastal cities than inland ones, particularly El-Arish, Rafah, Sheikh Zuweid, Bir al-Abd, Qantara, and the coastal plain extending along the Gulf of Suez, including El Tor, Abu Rudeis, Abu Zenima, and Ras Sudr. Population clusters have also grown in tourism development areas, especially along the Gulf of Aqaba, Sharm El-Sheikh, Dahab, Nuweiba, Saint Catherine, and Taba, in addition to numerous population clusters spread across the mountainous areas of

1 "Sinai: Land, History, Customs and Traditions," State Information Service, <https://tinyurl.com/2p9m46wj>.

central Sinai, such as Al-Hasana and Wadi Feiran. The Bedouin population is divided into various tribes maintaining distinguished cultural heritage, whose diversity remains evident today despite the fact that the vast majority of them have abandoned nomadic life and settled into permanent dwellings. This settled life has been an added incentive for them to preserve what they consider their distinctive identity and traditions.²

The social life of Sinai's residents is heavily shaped by kinship bonds, with the population cohering into tribes, clans, and families. The Sheikh represents the apex of the tribe's social hierarchy, assisted by customary judges and tribal elders. Each tribe has its own territory with defined boundaries shared with neighboring tribes, and herders and farmers do not seek pasture or water outside the bounds of their territory. Sinai Bedouins reportedly only abandon their territory under compelling circumstances, since the high importance placed on loyalty to tribe, clan, and family of origin, which represents a significant source of pride and collective identity rooted in memory and immaterial heritage, such as the memorization of genealogies. Each tribe has its own customs and traditions that distinguish it from other tribes in food, drink, housing, and dress, and individuals are encouraged to prioritize relationships with fellow tribe members and cultivate their own social standing within the group.³

Lake Bardawil constitutes the primary high-quality fishing grounds of the Sinai region, second by surface among Egypt's natural lakes, and third among all lakes. The lake is situated in the vicinity of the northern coast of North Sinai Governorate, between longitudes 32.40° and 33.30° north and latitudes 31.03° and 31.14° east. A coastal strip no more than one kilometer wide separates it from the Mediterranean Sea, and it lies about 18 km west of the city of El-Arish. The lake stretches 95 km along the Mediterranean coast, with a maximum width of approximately 22 km. Its surface water area is estimated at about 165,000 feddans (equivalent to 693 km²). Due to its shallowness, its waters and currents can shift slightly with the seasons, and overall its surface can be segmented into three areas: the central area, covering approximately 106,000 feddans; the Western area of 48,100 feddans; and Lake Zaraniq in the East, with an area of 10,200 feddans. The lake communicates with the sea through two artificial inlets (bughazes): Inlet No. 1, located in the Western area, and Inlet No. 2, the Eastern opening. A third, natural inlet (Bug haz Al-Zaraniq) is situated at the end of the lake's Eastern portion, which opens

2 Sofian Noor, "Who Are Egypt's Sinai Bedouin?," Egyptian Streets, 27 April 2014, <https://egyptianstreets.com/2014/04/27/who-are-egypts-sinai-bedouin/>.
Mohamed Abu Eita, "Sinai Bedouin Heritage... Customs and Traditions Passed Down Through Generations," Jamal bin Huwareb Center for Studies, <https://tinyurl.com/22yxs7en>.
Walid Badran, "One of Roman Origin: Get to Know the Most Prominent Tribes of the Sinai Peninsula," BBC, 2 June 2024, <https://www.bbc.com/arabic/articles/cxrrqk4dyw4o>.

3 Walid Badran, *ibid*.

naturally and has a weak effect on the lake's water flow and salinity, since this section is shallow and separated from the rest of the lake by small islands.⁴ The lake is overall characterized by its relative shallowness, with depths ranging between half a meter and three meters, and it contains a number of islands. Its environmental and economic importance lies largely in its production of economically valuable fish, with its fish yield reaching 2,500 tons per year, while the lake is also home to vast numbers of birds.⁵

Between 3,488 and 5,000 people are registered as licensed fishers in the lake administration's records; 70% of whom live in Bir al-Abd district, while the remaining 30% are distributed between El-Arish and Sheikh Zuweid. The lake is the primary source of income for these fishermen, as well as a source of livelihood for other residents, such as traders and commercial agents, engine repair workshops, net and yarn merchants, ice factories, and boat-building and repair workshops. The lake is also known to employ around 20,000 people from other areas in North Sinai, as well as other governorates across Egypt.

Fishing crafts in Lake Bardawil have historically been divided into two types: the "*Daba*" craft, considered the least taxing method for the lake, dedicated to catching bottom-dwelling fish such as gilt-head bream, sea bass, grouper, crab, shrimp, and sole. The Daba craft represents about 92.8% of the boats actually operating. Fishermen cast their nets in the lake before sunset, retrieve them early in the morning, then head to their designated mooring to deliver their catch. A second technique is the so-called "*reed craft*," dedicated to catching mullet-family fish, and accounts for 7.2% of the total boats operating in the lake. These boats are permitted to go out fishing early each morning and work through the day until light fades, then return to deliver their fish to each boat's designated mooring.⁶

The testimonies of fishermen and vendors interviewed at Lake Bardawil reflect a highly distinctive social and economic pattern, in which fishing is deeply rooted as a traditional activity inherited across generations. The interviews emphasize that the vast majority of those employed at the lake entered this field at a very early age, beginning in childhood or adolescence, often within a family context, reflecting the limited educational opportunities and economic

4 Mansour, Tamer, Soliman A. Esleem, Salah S. Abd El-Ghani, and Amira E. E. Eid. "Challenges Facing Fishermen in Bardawil Lake, North Sinai, Egypt." *International Journal of Agricultural Extension* 10, no. 3 (December 2022): 399–414. <https://doi.org/10.33687/ijae.010.03.4084>

5 "Sustainable Development of Lake Bardawil," General Authority for Fish Resources Development, <https://www.lfrpda.org/posts/541520>; Dalia Yousry, "Lake Bardawil" A National Project for Comprehensive Development," *Egyptian Watch*, 10 February 2021, <https://marsad.ecss.com.eg/50994/>

6 Mansour et al., "Challenges Facing Fishermen," 401–403, <https://www.sciencedirect.com/science/article/pii/S168742852200053X>; Abdeltawab Barakat, "Sinai's Squandered Economic Opportunities and Potential," *Al-Araby Al-Jadeed*, 10 February 2025, <https://tinyurl.com/463fdvc2>

alternatives available, and their near-total dependence on this activity.

Naji, a fisherman and boat owner, said:

Since I was 13 years old, I've been working at the lake... my father and grandfather were fishermen, fishing is the family's trade.⁷

Khaled, another fisherman, affirmed:

We were raised in the lake by our grandfathers and fathers; we have no other trade.

Hammad likewise explains that he used to go out with his father since he was young, considering fishing the “family trade” that everyone works in.⁸

This family continuity in the profession reflects what might be described as the “inheritance of the trade,” where fishing is not seen merely as a means of sustenance, but as part of social and cultural identity. This was reinforced by the testimony of Sweilem:

I've been a fisherman for 18 years, it's a family trade.⁹

For fishermen of Lake Bardawil, switching to a different professional sector represents not solely an economic hazard but also a source of potential friction among community members, particularly as social safety and support nets are built around the connection to the fishing industry. Testimonies also elucidate that careers in fishing and related businesses often span across individuals' life courses, shaping professional experience and the acquisition of skills.

Abdelkarim, a man who worked at the lake for more than 30 years, having started at age eighteen, affirmed that his primary motivation was passion for the trade, saying:

I became a fisherman because I'm an enthusiast, I love fishing.¹⁰

Hussein, a boat owner, likewise mentioned that he has worked in fishing since 1995, adding:

7 Personal interview conducted between December 2025 and March 2026.

8 Personal interview conducted between December 2025 and March 2026.

9 Personal interview conducted between December 2025 and March 2026.

10 Personal interview conducted between December 2025 and March 2026

That's 30 years in this trade, I've seen every authority that has run the lake¹¹

In reference to the institutional changes the lake's administration has gone through over time.

In consideration of their distinctive social and cultural identity and strong ties to the land, shaping social structures and economic models, the local communities from the Lake Bardawil area are hereby considered as one of the indigenous peoples living in Egypt, as is the Bedouin population of the Sinai region.¹² The relevant international standards which this report employs to categorize them as such are enshrined in the International Labour Organization Convention No. 169,¹³ and the United Nations Declaration on the Rights of Indigenous Peoples.¹⁴

Indigenous peoples are defined within these frameworks as human groups possessing historical continuity with societies that existed before colonization or the emergence of modern state entities, and who are distinguished from the rest of society by their own particular social, cultural, economic, and political characteristics. These groups generally live in close connection with their land and natural resources, depending on them as a primary source of livelihood and group identity. Importantly, the definition of Indigenous Peoples is not reduced to a rigid legal standard, but is based primarily on these communities' self-identification and collective belonging, alongside the retention of their traditional structures, customary systems, and inherited ways of life.

The two frameworks referenced above represent the international legal cadres for identifying indigenous peoples and conceptualizing and protecting their rights through the introduction of minimum standards for the recognition, protection, and promotion of their integrity, heritage, and prosperity. They incorporate both individual and collective rights, cultural and identity-related

11 Personal interview conducted between December 2025 and March 2026

12 The Egyptian legislative system contains no reference to the term "*indigenous peoples*," or any alternative terms such as "*native population*." However, Article 236 of the current Egyptian Constitution does recognize the cultural specificity of these local communities, and explicitly provides for implementing development plans for these communities — alongside others — with the participation of their inhabitants. The article states: "*The state shall ensure the formulation and implementation of a plan for comprehensive economic and urban development of border and underprivileged areas, including Upper Egypt, Sinai, Matrouh, and the Nubia regions, with the participation of their inhabitants in development projects and in priority access to their benefits, taking into account the cultural and environmental patterns of the local community, within ten years from the date this Constitution comes into force, in the manner regulated by law. The state shall also work to formulate and implement projects to return the population of Nubia to their original regions and develop them within ten years, in the manner regulated by law.*"

13 ILO Convention No. 169 concerning Indigenous and Tribal Peoples in Independent Countries. Note that Egypt has so far abstained from ratifying the Convention. <https://www.ohchr.org/en/instruments-mechanisms/instruments/indigenous-and-tribal-peoples-convention-1989-no-169>

14 United Nations Declaration on the Rights of Indigenous Peoples. <https://www.ohchr.org/en/indigenous-peoples/un-declaration-rights-indigenous-peoples>

rights, and essential socioeconomic rights such as those to education, health, employment, language, and development.

The ILO Convention No.169 and the UN Declaration on the Rights of Indigenous Peoples prominently affirm that indigenous and tribal peoples fully enjoy all human rights and fundamental freedoms without hindrance or discrimination, and establish states' responsibility to recognize, integrate, and fully respect and ensure equality for indigenous peoples, particularly in the context of achieving the Sustainable Development Goals (SDGs 2030). The provisions on "*Participation in decision-making on matters that affect their rights*"¹⁵ as well as the right to obtain "*free, prior, and informed consent*" before the adoption of any legislative or administrative measures affecting them ensure that they are not marginalized in development policies and interventions.¹⁶

Article No.15 of ILO Convention No.169 unequivocally states the right of indigenous peoples to own and participate in the management of natural resources connected to the land where they reside. Article No.15(1) of the same Convention specifically affirms that: "*Special measures shall be adopted to safeguard the rights of the peoples concerned to the natural resources pertaining to their lands. These rights include the right of these peoples to participate in the use, management, and conservation of these resources*", reflecting a shift from mere usufruct to substantial participation in decision-making and administrative processes. Article No.15(2) also places a clear obligation on states to conduct prior consultations with these peoples before undertaking any activities to explore or exploit resources in their territories, in order to determine the extent to which their interests would be affected, while ensuring their participation in the economic benefits and fair compensation for potential loss and damages. This provision is complemented by Article 26 of the UN Declaration, affirming the right of indigenous peoples to own, use, develop, and control the lands and resources which they traditionally own or occupy, while Article No.32(2) emphasizes the necessity of obtaining free, prior, and informed consent before implementing any project affecting these resources.

These frameworks also affirm the responsibility of states to recognize and protect traditional economic activities. Article 23(1) of the ILO Convention No.169 states that:

Handicrafts, rural and community-based industries, and subsistence economy and traditional activities of the peoples concerned, such as hunting, fishing, trapping and gathering, shall be recognised as important factors in the maintenance of their culture and in their

15 Article 18 of the United Nations Declaration on the Rights of Indigenous Peoples.

16 Article 19 of the United Nations Declaration on the Rights of Indigenous Peoples.

economic self-reliance and development .Governments shall ,with the participation of these peoples and whenever appropriate, ensure that these activities are strengthened and promoted.

This provision establishes a direct nexus between natural resources and indigenous groups' traditional social and economic models. Paragraph 2 of the same article also obliges governments to provide technical and financial support for these activities in a manner consistent with these groups' cultural specificity.

The case of Lake Bardawil intersects directly with one of the fundamental rights of indigenous peoples: the right to development, framed as a comprehensive, multidimensional process tied to the preservation of identity, ecosystems, and culture, ensuring participation in decision-making. In this broader sense, development goes beyond an economic definition to include various social, cultural, and political dimensions: for instance, Article No.7 of ILO Convention No.169 affirms that indigenous peoples enjoy *"the right to decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being,"* and guarantees them *"control, to the extent possible, over their own economic, social and cultural development,"* as well as their right to participate in *"the formulation, implementation and evaluation of plans and programmes for [...] development."* This provision reflects a fundamental reconfiguration of international approaches to development, from a top-down model imposed by the state to a participatory one in which indigenous peoples are recognized as key actors influencing the determination of their own development paths.

The right to development is thus not limited to its economic components, as international human rights standards contain multiple references encompassing participation, justice, sustainability, and respect for the cultural and constitutive specificity of indigenous communities. This approach creates a responsibility for states to adopt development policies and interventions based on consultation, effective participation, equal opportunity, and the fair distribution of development benefits. This also requires the recognition of indigenous peoples' local knowledge as an essential resource for achieving sustainable development, rather than marginalizing them in favor of external models that may not align with their reality. In this way, the right to development becomes a comprehensive framework reflecting the balance between improving living conditions and preserving the identity and human dignity of indigenous peoples in their own unique political, social, and environmental context.

2. From War Factories to the Lakes... How Did the Military Economy Expand to Reach Lake Bardawil?

Yezid Sayigh explains in his analytical study of the Egyptian military economy that the roots of military dominance of the economy date back to the period following the July 1952 coup, when President Gamal Abdel Nasser began establishing structural and legislative privileges for the military establishment.¹⁷ These privileges were progressively enshrined in policy and economic development with the creation of a network of fully state-subsidized military factories, alongside the near-total neutralization of civilian oversight. At that stage, the military establishment's activity was confined to producing weapons, ammunition, and related equipment. These arrangements contributed to providing the armed forces with a degree of financial and organizational independence, which later allowed them to expand the scope of their management into resources and economic activities outside the military framework. With President Anwar Sadat's rise to power, the Ministry of Defense established the National Service Projects Organization (NSPO) shortly after signing the peace agreement with Israel, to serve as the armed forces' arm in civilian economic activities. The Arab Organization for Industrialization was also established,¹⁸ which, contrary to its original purpose of building an Arab defense industry, quickly shifted toward producing civilian goods such as televisions, washing machines, and stoves. It was the beginning of the overlap between military and civilian activity.

Since 1981, the Egyptian military economy has gone through successive transformations, beginning with President Mubarak's support for self-financing policies, adopted to secure loyalty within the military establishment amid state austerity and declining military spending. This enabled the army to gradually expand into economic activities while retaining a set of privileges such as tax exemptions, access to the commons, and the use of conscripted labor in its production plants. This trend was led in particular by Defense Minister Field Marshal Abu Ghazala in the 1980s, who inaugurated a new phase in which the armed forces established ventures, production plants, and farms producing far more than their food and pharmaceutical needs, with their activity also extending into civilian sectors such as real estate and tourism.¹⁹

17 Yezid Sayigh, "Owners of the Republic: An Anatomy of Egypt's Military Economy," Carnegie Middle East Center, 14 December 2019, 39–46, https://archive.org/details/20200409_20200409_1547, cited in: Yomna Sami, "The Expansion of the Military Economy in Egypt Since 2014: Impact on Investment Dynamics and Investors' Rights," Rowaq Arabi 30 (1), <https://tinyurl.com/55kcts84>.

18 Note from the report preparation team: the Arab Organization for Industrialization was not the primary driver of the army's civilian economy, but rather the National Service Projects Organization was the foundation. The Arab Organization for Industrialization's involvement came later, with the conversion of its military-industrial facilities to civilian industries.

19 Yezid Sayigh, *ibid.*, 39–46.

This process was sustained through a series of laws granting the military establishment broad economic privileges. Law No. 204 of 1957 granted the EAF major financial privileges by exempting the Ministry of Defense and its affiliated bodies from taxes, fees, and regulations related to arms contracts and customs.²⁰ Law No. 186 of 1986 expanded the scope of these exemptions to include the Ministry of Military Production and the Arab Organization for Industrialization, covering imports of equipment, vehicles, medicines, and non-combat materials and weapons, which allowed for tax-free importing and trade for decades.²¹

In parallel, a legal foundation was established, exempting the armed forces' assets and activities from external oversight and accountability by civilian authorities, including the Parliament and the Ministry of Finance. As Prime Minister, Gamal Abdel Nasser issued Decree No. 263 of 1956, which exempted military "secret stores" from inspection by the Central Auditing Organization and the Ministries of Finance and Economy, assigning oversight instead to the Ministry of Defense. This legal precedent likely paved the way for excluding military bodies from civilian scrutiny in the long term.²²

The EAF's control over state land and natural resources is one of the areas where military dominance became entrenched gradually through legislation and policy decisions that undermined civilian oversight and weakened public transparency. Presidential Decree No. 143 of 1981 (known as the Desert Land Law)²³ expanded the definition of desert land to include all unregistered areas not considered owned by individuals or legal entities, covering more than 90% of Egypt's land area. The decree granted the Minister of Defense the authority to designate strategic areas requiring his approval for ownership or use.

Subsequent amendments in 1988, 1991, 1995, and 2001 further expanded the scope of military control over public land and its mechanisms of exploitation. Desert Land Law No. 143 of 1981 was followed by Law No. 531 of 1981, which established the Armed Forces Land Projects Organization, the body authorized to retain and oversee revenues generated from armed forces-owned property, particularly in desert and border areas.²⁴

In 1988, a Cabinet decree obliged various ministries and civilian bodies to obtain permission from the Ministry of Defense to conduct any activity in areas that the Ministry classified as militarily significant. Law No. 7 of 1991

20 "Exemption of Armament Contracts from Taxes, Fees, and Financial Rules," Manshurat Qanuniya, <https://manshurat.org/node/40578>

21 "Customs Exemptions Organization Law No. 186 of 1986," Manshurat Qanuniya, <https://manshurat.org/node/11802>

22 Yezid Sayigh, "Owners of the Republic: An Anatomy of Egypt's Military Economy," *ibid.*, 39–46.

23 "Desert Land Law No. 143 of 1981," Manshurat Qanuniya, <https://manshurat.org/node/259>

24 "Rules for Disposing of Land and Property Vacated by the Armed Forces, and Allocating Their Proceeds to Establish Alternative Cities and Military Areas," Manshurat Qanuniya, <https://manshurat.org/node/12906>

consolidated this authority by requiring new public economic bodies to coordinate with the Ministry of Defense on land-use plans and geographic divisions.²⁵ The law also granted the President of the Republic additional discretion in classifying desert areas as strategic areas of military importance.

However, the most notable shift came with Presidential Decree No. 152 of 2001, which granted the Ministry of Defense the authority to designate “strategic areas of military importance” within desert lands, including land allocated for commercial investment as well as military use.²⁶ As a result, all public and private bodies became required to obtain prior military approval for any work in desert areas, which strengthened the EAF’s ability to collect coordination fees and exercise near-monopolistic control over land use. This entrenched the military establishment’s role as a key economic actor in urban development and investment projects, while expanding the discretionary authority of the President and Ministers in allocating land without effective accountability mechanisms.

1 The January Revolution, Sisi’s Rule, and the Rise of the EAF’s Economic Activism

The January 2011 revolution marked an important phase for the reorganization of the military establishment, having led to the removal of the economic class close to the ousted Mubarak regime. Such reorganization enabled the military establishment to expand its influence through a set of new provisions designed to protect and reinforce the army’s economic gains and shield them from accountability. Under the Supreme Council of the Armed Forces’ management of the transitional period, a package of laws was issued enshrining the immunity of military economic activities from any form of independent oversight.²⁷ This unscrutinized concentration of power reached its peak with Sisi’s appointment in 2014, as the military establishment shifted from a marginal role to a principal partner in the national development and economic system, extending its control over economic governance and shaping public policy. Its activity expanded to encompass diverse sectors, including infrastructure, housing, roads, agriculture, food industries, mineral wealth, fish farming, technology, and media. Thousands of economic

25 Sayigh, Yezid. *Owners of the Republic: An Anatomy of Egypt’s Military Economy*. Ibid.

26 “Designation of Strategic Areas of Military Importance Within Desert Lands and Their Governing Rules,” Manshurat Qanuniya, <https://manshurat.org/node/37900>

27 For example, in May 2011 the [Supreme] Council amended the military judiciary law to add an article granting military prosecutors and judge,s sole authority to investigate illicit-gains cases involving army officers, even if the investigation began after the officer’s retirement. See: Mohamed El-Senhour, “Tantawi Approves a Law Giving the Military Judiciary Sole Jurisdiction Over Army Officers’ ‘Illicit Gains’ Crimes Even After Retirement,” Al-Masry Al-Youm, 18 June 2011, <https://www.almasryalyoum.com/news/details/138863>

enterprises and projects were placed under the control of military bodies such as the Engineering Authority, the National Service Projects Organization, and the Future of Egypt Authority for Sustainable Development, in a clear bypassing of competition and transparency safeguards.²⁸

Military expansion was further enshrined in policy through frameworks such as Presidential Decree No. 233 of 2016, which broadened the scope of Presidential Decree No. 152 of 2001 by classifying 21 national roads as strategic areas of military importance, effectively granting the Ministry of Defense exclusive commercial privileges along these roads.²⁹ Later that same year, amendments were introduced to the military judiciary law, expanding the jurisdiction of military courts to include incidents occurring in civilian areas managed by military bodies. Earlier legislation in 2014 had placed public and vital facilities under military jurisdiction, and this was extended until 2021.

Presidential Decree No. 446 of 2015 marked another important turning point, allowing the Armed Forces Land Projects Organization to use its assets as an in-kind contribution in establishing joint companies with local and foreign firms.³⁰ Just one month later, Presidential Decree No. 127 came to authorize any government body to establish joint-stock companies upon Cabinet approval,³¹ opening the door to a significant expansion in military enterprises and joint ventures.

However, despite its visible material outputs, according to Sayigh, this material expansion and the accompanying legislative reinforcement exposed deep structural imbalances in the Egyptian economic system. The military establishment has come to follow a rentier economic pattern based on capturing resources and exploiting bureaucratic influence, rather than relying on actual production or creativity and innovation. Instead of competing in the open market, military-affiliated economic actors operate under a system of legally protected contracts and privileges, and continuously seek to expand their reach and entrench their dominance.

28 Abdallah, Kareem I.; Jiráňková, Martina, *State Capitalism and the Role of the Armed Forces in Egypt*, World Economy and Policy (WEP), 10; Abdel Fattah Barayez, "No Approaching, No Photography: The Army and the Economy in Egypt," *Jadaliyya*, 25 January 2016, <https://www.jadaliyya.com/Details/32900>; Ahmed Gamal Ziada, "Everything We Know About the Egyptian Army's Economic Empire," *Al-Safir Al-Arabi*, 21 September 2017, <https://tinyurl.com/378j687m>; cited in: Yomna Sami, "The Expansion of the Military Economy in Egypt Since 2014: Impact on Investment Dynamics and Investors' Rights," *ibid.*; CNBC Arabia, "Future of Egypt Authority for Sustainable Development Takes Over the Role of the General Authority for Supply Commodities," 6 December 2024, <https://tinyurl.com/2nz4xvu9>

29 El-Gally, Mohamed, "A Republican Decree Allocating Land to the Ministry of Defense and Designating It a Strategic Area," *Yom7*, 9 June 2016, <https://egyptwide.short.gy/S5AWKJ>; Mamdouh, Rana, "Normalizing the Military Judiciary: How the Constitutional Amendments Bring the Armed Forces into Egypt's Judicial System," *Mada Masr*, 7 August 2019, <https://egyptwide.short.gy/a7EQk4>

30 "Amendment of the Decision Regulating the Disposal of Land and Property Vacated by the Armed Forces," *Manshurat Qanuniya*, 2019, <https://manshurat.org/node/11251>

31 "Authorization for Public Law Entities to Establish Joint-Stock Companies," *Manshurat Qanuniya*, 2019, <https://manshurat.org/node/1429>

Compounding this state of things is the problem of financial opacity, one of the most serious manifestations of military dominance of the Egyptian economy: the revenues of military economic institutions remain outside the public treasury, shielded from any parliamentary review or independent civilian oversight, amid a total absence of documented financial reports and data, making it extremely difficult to grasp their actual scale.³² This produces a distorted economic environment lacking equal opportunity, where private economic actors face a competitor enjoying legal immunity and exceptional privileges that empty the concept of competition of its meaning.³³ The report *"Troubled Waters: The Human Rights Cost of Military-led Enterprises in Egypt's Fishing Sector,"* issued by EgyptWide for Human Rights, sheds light on the legislative framework behind the military economy's expansion in the fishing industry, affirming that this accumulated body of legislation has produced a normative landscape lacking even minimal standards of transparency and accountability.³⁴

2 The Future of Egypt Authority: An Ambiguous Birth and a Striking Expansion

The Future of Egypt Authority for Sustainable Development was formally established in 2022, in what was an ambiguous birth, having been part since 2017 of the national agricultural *"million and a half feddan"* project, launched in 2015 and operating across the governorates of Giza, Beheira, Fayoum, and Marsa Matrouh, under the supervision of a state-owned joint-stock company, *"New Egyptian Countryside Development."* The Countryside Company allocated land to military and civilian bodies, including the Air Force, which assigned the *"Future of Egypt Project,"* supervised by Air Force Lieutenant Colonel Bahaa El-Ghannam, an area of 200,000 feddans in the *"New Delta"* region, 30 kilometers from 6th of October City. Land was also allocated, under the name *"Egypt's Paradise,"* to the Air Defense Forces, the NSPO, and the Ministry of Agriculture. Within less than three years, the Future of Egypt Authority succeeded in fully acquiring property of its assigned land, growing crops for the domestic market, mainly wheat,

32 Yezid Sayigh, *"Retaining Capability, Restructuring, or Divesting? Policy Options for Egypt's Military Economy,"* Carnegie Middle East Center, 31 January 2022, <https://tinyurl.com/bdewkeny>; cited in: Yomna Sami, *"The Expansion of the Military Economy in Egypt Since 2014: Impact on Investment Dynamics and Investors' Rights,"* *ibid.*

33 Yezid Sayigh, *"Retaining Capability, Restructuring, or Divesting? Policy Options for Egypt's Military Economy,"* Carnegie Middle East Center, 31 January 2022, <https://tinyurl.com/bdewkeny>; cited in: Yomna Sami, *"The Expansion of the Military Economy in Egypt Since 2014: Impact on Investment Dynamics and Investors' Rights,"* *ibid.*

34 *"Murky Waters and Empty Nets: The Human Rights Cost of Military Establishment Projects in Egypt's Fishing Sector,"* Egypt Wide for Human Rights, 2026, https://drive.google.com/file/d/15G2Byym_qjks9njBxht-tj7H8advtnT/view

barley, corn, and beet, and others for export, such as potatoes, onions, vegetables, and citrus. This early success, compared with other similar initiatives, granted the Authority a political boost and drew President Sisi's direct attention, leading him to entrust Colonel El-Ghannam with the administration of an agricultural area in the New Delta, exceeding one million feddan, in 2021.³⁵

The name *"Future of Egypt Authority for Sustainable Development"* first appeared in the media in May 2022, coinciding with Sisi's inauguration of the agricultural land that the Authority had successfully reclaimed along the Rod El-Farag-El-Dabaa axis within the New Delta project. The project was presented as the core foundation for a plan to reclaim an additional 800,000 feddans within the same initiative. The presidency announced at the time that around 350,000 feddans had already been reclaimed and cultivated using 2,600 advanced central-pivot irrigation systems, cultivated twice yearly (summer and winter), producing crops described as among the finest agricultural products. Despite this, Presidential Decree No. 591 of 2022 (not published in the Official Gazette, but referenced in subsequent decrees) establishing the Future of Egypt Authority for Sustainable Development was only issued years after the Authority had already begun operating, as a body affiliated with, and directly supervised by, the Egyptian Air Force. Subsequently, the name of Colonel Dr. Bahaa El-Ghannam emerged as the Authority's executive director. Colonel El-Ghannam is a high-profile member of the Air Force known to have been consulted directly by the President, the Prime Minister, and other Ministers in the context of the Future of Egypt Authority's administration of state-assigned development projects for years.³⁶

Despite the opacity surrounding the legal premises for the establishment of the Future of Egypt Authority for Sustainable Development, which problematically extends to the definition of the basis and limits of its mandate, the pace of land allocations accelerated steadily. In April 2024, el-Sisi issued Presidential Decree No. 114 of 2024, allocating a set of lands in Suez, Ismailia (East of the canal), and in North and Central Sinai to the Future of Egypt Authority for Sustainable Development, revoking previous decisions allocating them to the NSPO, for use in reclamation and farming activity.³⁷ This geographic expansion was not the most significant development, however; rather, it was the scope of the Authority's mandate, which came to control sensitive sovereign portfolios that had not previously been administered by a

35 Nada Arafat, "Whose Land Is It Today? 'Future of Egypt,'" Mada Masr, 5 June 2025, <https://tinyurl.com/49p357fy>

36 Ibid.; Mohamed Basal, "Transfer of Lake Bardawil to the Future of Egypt Authority for Sustainable Development... What Are the Backgrounds and Goals?," Al-Shorouk, 1 November 2024, <https://www.shorouknews.com/news/view.aspx?cdate=01112024&id=2307f249-bbc6-429b-a05f-67c8aa6ca510>

37 "Decree of the President of the Arab Republic of Egypt No. 114 of 2024," Official Gazette, Issue 14 bis (e), 4 April 2024, <https://moj.gov.eg:73/Doc/002/700311142024.pdf>

single agency. In 2024, the Authority alone took over the wheat and strategic commodities import portfolio, a function that had previously been assigned to the civilian General Authority for Supply Commodities for more than five decades, then shared with the Ministry of Supply in receiving local wheat from farmers. The Authority also began granting livestock import approvals, a mandate which should be administered by the Ministry of Agriculture. In 2025, the Authority also acquired the largest share in the Egyptian Commodities Exchange, which had been established as a joint-stock company to serve as a platform setting commodity prices based on supply and demand to regulate the market, but which, five years after its launch, had seen virtually no activity. As the Authority prepares to expand the exchange's activity to include staple crops, animal feed, fertilizers, pesticides, and other production inputs, the exchange — even while dormant — becomes a strategic tool in its hands, granting it indirect control over the country's agricultural and food market. The Authority's operations prominently extended to livestock wealth, including raising and fattening cattle, and producing dairy and poultry.³⁸

On top of these developments, the Authority also announced new expansions in industries linked to agricultural production with the purported aim of increasing their value, resulting in the launch of food-manufacturing production plants for drying onions and garlic, producing black molasses from sugarcane, animal feed, manufacturing sugar from beet, potato cold-storage facilities, and grain silos with capacities reaching hundreds of thousands of tons. It also began the construction of an industrial zone in the New Delta spanning 1,000 feddans, including factories for frozen vegetables and fruit, half-fried potatoes, sugar and starch, and a food-industries complex for its affiliated Qaha and Edfina companies.³⁹

To further diversify its mandate, the Authority began expanding its control to other sectors. Its new ventures prominently feature the plan for urban developments in the New Delta, which is intended to adopt principles of sustainable development and green communities through environmentally friendly projects relying on recycling and reducing carbon emissions.⁴⁰ In August 2024, stock exchange disclosures revealed the Authority's acquisition of 89.66% of shares in the Arab Company for Agricultural Reclamation, and within days, an announcement followed of an increase in its stake in El-Mansoura Poultry Company's capital from 4.77% to 22.54%, buying 111.03

38 Nada Arafat, "Whose Land Is It Today? 'Future of Egypt,'" *ibid.*; Mohamed Basal, "Transfer of Lake Bardawil to the Future of Egypt Authority for Sustainable Development... What Are the Backgrounds and Goals?," *ibid.*

39 Mona Lotfi, "Will Egypt Achieve Food Security Through the Future of Egypt Project?," Egyptian Watch, 13 May 2024, <https://marsad.ecss.com.eg/81605/>

40 "Future of Egypt Agricultural Production Project," State Information Service, 16 May 2024, <https://tinyurl.com/mtrbym7j>

million shares, before announcing its acquisition of a stake in "ICAM."⁴¹ The Authority is also reportedly establishing a plant for the production of baby formula, following Sisi's remarks in May 2024 on the need to reduce baby-formula imports, despite the absence of any published feasibility studies for the initiative, whose costs were, however, initially estimated at \$500 million, and whose implementation would require importing 40,000 cows and cultivating 50,000 feddans of clover.⁴²

Since 2024, the Authority has begun expanding the scope of its mandate to include natural lakes, having obtained management of four of the country's largest lakes: Nasser in southern Egypt, and Manzala, Burullus, and Bardawil in the North, which had previously been under the authority of a civilian body, the Lakes and Fish Wealth Protection and Development Authority, established in 2021 and sidelining the civilian Fish Wealth Authority, under the Ministry of Agriculture.⁴³ At the end of October 2024, the Cabinet announced that the management and development of Lake Bardawil had been assigned to the Future of Egypt Authority for Sustainable Development, purportedly to oversee the lake's economic development, restore its natural ecosystems to their former state, develop fishing moorings, increase fish production, and develop transport infrastructure and trading operations, with the aim of increasing the income of local fishermen and lake workers. Official statements affirmed that directives had been issued by the political leadership to work on providing a diverse package of social assistance to fishermen, to sustain them while the Authority would oversee the restoration of lake habitats and the development of its productive capacity.⁴⁴ To date, however, no official decree has been published in the Official Gazette containing the details of the lake assignment to the Authority or the legal framework regulating this mandate.

Meanwhile, and within two years only, the Future of Egypt Authority for Sustainable Development has turned Lake Bardawil from a limited asset within a broader national economic development project into a revenue-generating asset, transferring wealth from local communities directly to the Ministry of Defense without any real parliamentary oversight, solely through founding

41 "Future of Egypt Authority Expands Its Stock-Market Investment Portfolio... 6 Acquisitions During 2025," Maaloomat Mubasher, 10 December 2025, <https://tinyurl.com/mpfavjtc>

42 "'Future of Egypt'... an Authority Managing Massive Investments Without Oversight," Al-Araby Al-Jadeed, 11 June 2025, <https://tinyurl.com/yacazez8>; "Future of Egypt Authority Plans to Build a Baby-Formula Factory with \$500 Million in Investments," Al-Shorouk, 2 June 2025, <https://tinyurl.com/43x6fkcr>

43 "'Future of Egypt Authority for Sustainable Development' Takes Over Development of Lake Bardawil," Cabinet of Ministers, 31 October 2024, <https://tinyurl.com/48a479v8>; Nada Arafat, "'Future of Egypt' Prepares to Take Over Management of Lake Burullus," Mada Masr, 21 May 2025, <https://tinyurl.com/3t7b8vvp>; "Prime Minister Receives a Presentation on Future of Egypt Authority's Development Projects Nationwide," Cabinet of Ministers, 28 April 2025, <https://tinyurl.com/5n7basc8>; Mohamed Basal, "Transfer of Lake Bardawil to the Future of Egypt Authority for Sustainable Development... What Are the Backgrounds and Goals?," *ibid*.

44 Information and Decision Support Center, Cabinet of Ministers, 31 October 2024, <https://tinyurl.com/36u8mhh3>

decrees unpublished in the Official Gazette. This expansion exemplifies the opacity surrounding the military establishment's economic activism in Egypt, raising the legitimate question as to whether the Future of Egypt Authority for Sustainable Development is truly a development agency, or rather a gateway for the EAF to control vital sectors and collective resources, amid an absence of public accountability and independent civilian oversight.

2. Hunting the Nets of the Poor: Bardawil's Fishers Facing the “Future of Egypt”

The state shall ensure the formulation and implementation of a plan for comprehensive economic and urban development of border and underprivileged areas ,including Upper Egypt ,Sinai, Matrouh ,and the Nubia regions ,with the participation of their inhabitants in development projects and in priority access to their benefits ,taking into account the cultural and environmental patterns of the local community ,within ten years from the date this Constitution comes into force ,in the manner regulated by law .The state shall also work to formulate and implement projects to return the population of Nubia to their original regions and develop them within ten years ,in the manner regulated by law..

— Article 236 of the Egyptian Constitution

This section addresses the repercussions of the Future of Egypt Authority's control over Lake Bardawil since November 2024 on fishermen and local communities, by analyzing the enforcement of relevant policy frameworks on the ground as documented through field interviews, assessing their social, economic, and environmental impacts.

The testimonies of fishermen, vendors, and lake workers reveal a contradiction between governmental statements, according to which the transfer of authority over the lake's administration to the Future of Egypt Authority would favor economic development and poverty reduction, and the actual reality of a system of economic, administrative, and security restrictions that transformed the lake from a vital space for livelihood into a space for resource extraction and expropriation. These violations are distributed across four interconnected levels, encompassing economic, administrative, security, and environmental domains, which this section documents and analyzes.

Before full responsibility for the lake's management was transferred to the Future of Egypt Authority in November 2024, Lake Bardawil was officially under the administrative and regulatory oversight of a specialized civilian body, the Lakes and Fish Wealth Protection and Development Authority (which replaced the General Authority for Fish Wealth Development under Law No. 146 of 2021).⁴⁵ This civilian body was in charge of overseeing the

45 “Law No. 146 of 2021,” Manshurat Qanuniya, <https://manshurat.org/sites/default/files/146-2-30.pdf>

day-to-day operations on the lake, such as regulating fishing seasons, setting net specifications, and supporting the cooperative associations representing fishermen. Its authority was, however, practically constrained as military intelligence and security agencies exercised real, effective control on the ground, particularly with regard to issuing and renewing fishing permits and the security approvals fishermen and traders needed to access the lake, a pattern in which military-security dominance overlapped with civilian administration for decades in the Sinai Peninsula.⁴⁶ This security control was further reinforced by the issuance of Presidential Decree No. 294 of 2019,⁴⁷ discussed in the next sections, which paved the way for the militarization of lake and fish resources by classifying the lake as an area adjacent to the country's external borders (referred to as "military-adjacent", or "border-adjacent" zones).

1. The Normative Framework Regulating Fishing Activities in Lake Bardawil under the Future of Egypt Authority for Sustainable Development's Administration

The Future of Egypt Authority is not the first military economic agency to be appointed in charge of Lake Bardawil in North Sinai. A few years earlier, in 2017, the National Company for Fisheries and Aquaculture (NCFA), affiliated with the military-run National Service Projects Organization (NSPO), was appointed through a governmental decision to conduct a nature restoration and economic development project on Lake Bardawil. The initiative included upgrading and developing four fishing moorings, removing obstructions, dredging the inlets, and overseeing the implementation of the lake's biological rest periods on scheduled dates, at a cost of 120 million Egyptian pounds at the time.⁴⁸

According to Abdelsalam, one of the lake's fish-wealth employees:

About two years ago, companies started working in the lake on dredging. They did it in phases. In the first phase, they dug radial channels inside the lake itself, because there are shallow spots where the bottom is close to the surface — they started deepening it so the

46 Personal interviews conducted between December 2025 and March 2026.

47 "Amendment of the Decision Designating the Areas Adjacent to the Borders of the Arab Republic of Egypt and Their Governing Rules," Manshurat Qanuniya, 2019, <https://manshurat.org/node/65296>

48 "Development of Lake Bardawil," Presidency of the Republic, Arab Republic of Egypt, <https://tinyurl.com/mwheupj8>

bigger fish could find rest in the depths, away from the lake's surface, and so other species from the sea could come in. They worked on that and widened the openings of some of the inlets, and there are still inlets they haven't worked on. The inlet needs constant dredging, because the tides keep filling it back in with sand — you might dig today and find half of what you dug filled back in by next year.⁴⁹

وزارة الدفاع
جهاز مستقبل مصر للتنمية المستدامة
قبط
الشارع : 2025/ /

تعليمات الإدارة الفنية (رقم 1 / 2025)

إيماناً منا بأهمية الحفاظ على أرواح الصيادين وأدوات الصيد والمراكب يرجى إتباع التعليمات الآتية :-

- 1- صيانة مراكب الصيد دورياً وقبل الترخيص .
- 2- صيانة مواتير مراكب الصيد دورياً وقبل الترخيص والالتزام بقدرة الماتور (9.9 حصان) .
- 3- وضع لافتة اكريلك برقم المركب 30 * 30 على جانبي مقدمة المركب (البروة) (الكابينة) والكتابة بالطلاء بشكل مقروء وواضح على البروة وعدم طمس الرقم .
- 4- دهان مقدمة المركب (البروة) بالألوان المصرح بها لكل مرسى عن العام الحالي 2025 وهى :-
 - مرسى التلول اللون الأخضر .
 - مرسى أغزوان اللون الأزرق القاتم .
 - مرسى النصر اللون الأبيض .
- 5- الالتزام بتعليمات السلامة والصحة المهنية للمركب وهى :-
 - وجود جهاز GPS جهاز تحديد المكان و التتبع يتم تدبيره بواسطة جهاز مستقبل مصريتم توزيعه بالتسليم على عامين.
 - معدات إنقاذ للأفراد (3 ستره نجاه او طوق نجاه) ايهما ارخص و ايسر .
 - طفلية حريق بحالة جيدة و يتم تدبيره بواسطة جهاز مستقبل مصريمصر او الصياد ايهما أرخص للصياد .
 - الالتزام بحمولة المركب 3 أفراد .
 - شنطة الاسعافات الأولية (شاش / قطن / مطهر / لصق طبي) .
- 6- يلزم لاستخراج الترخيص ان تكون المركب مستوفيه مواصفات الطلاء العازل طبقاً للألوان المصرح بها لكل مرسى و خالية من العيوب الفنية للماتور و جسم المركب و فى حالة مخالفة ذلك لا يتم اصدار الرخصة .
- 7- لا يتم تسليم رخصة المركب الى الصياد قبل اعداد و تجهيز المركب طبقاً للتعليمات المذكورة اعلاه .
- 8- حالة عدم تنفيذ اجراءات رفع الكفاءة يتم وقف السروح لحين استيفاء المطلوب .
- 9- الالتزام بتعليمات هيئة سلامة الغذاء :-
 - غسل المصيد فور اصطياده وفرزه ووضعته فى الثلج .
 - تنظيف مخلفات يوم العمل خارج جسم البحيرة والتخلص منها فى صندوق النفايات على المرسى .
 - تطهير جسم المركب بمطهرات صديقة للبيئة وغير مؤثرة سلباً على البيئة والاسماك المصيدة .
- 10- سيتم بدء اجراءات التراخيص (المراكب / بطاقة الصيد / التصريح الامنى) بواسطة جهاز مستقبل مصر اعتباراً من تاريخ 2025/2/ 25 .

د . عبد الرحمن يس إبراهيم
مدير فروع البحوث والحصر السمكى
د . إبراهيم بيومى إبراهيم
مدير المعامل والمكتب الفنى للبحيرة

The initiative relied on cooperation among competent state bodies, and a strategy was developed to prevent fry fishing and overfishing, effectively enforce fishing laws, and enhance fishers' living conditions. Foreign expertise was also brought in from the Chinese contractor "Evergreen" to develop the local fish industry,⁵⁰ with the establishment of a sorting and export hall and the acquisition of an export license for the European Union. The project also established a research and development center containing specialized

49 Personal interview conducted between December 2025 and March 2026.

50 The same Chinese company is also a key partner with Ministry of Defense bodies in establishing the Lake Ghalyoun project near Kafr El-Sheikh, despite the absence of any publicly available contracts that can be audited or reviewed.

then reaching 35 mm by 2027 — to enhance ecological balance. Fishing was banned in shallow areas with a depth of less than 3 meters for some crafts, in order to avoid scraping the lake bed and to protect the breeding environment for both bottom-dwelling and surface fish.⁵³

The new regulations also introduced a strict time framework for each fishing operation, such that actual working hours do not exceed 6 to 8 hours daily, depending on the type of craft, distinguishing between night fishing (as in the rod-and-line and Al-Daba crafts) and day fishing (as in the reed craft). Maximum net lengths were set for each boat to prevent overcrowding in fishing areas. As for targeted sizes, the regulations prohibit catching species below specified weight standards (such as banning the catching of gilt-head bream weighing less than 200 grams), with fishermen required to return small fish to the water immediately without harm, to ensure the continuity of the lake's biological cycle.⁵⁴

To further develop its new security and oversight system, the Authority requires all fishers to meet technical and structural requirements for their boats before licenses are granted; these include standardizing boat paint colors for each mooring (green for Al-Tilul mooring, blue for Aghzawan mooring, and white for Al-Nasr mooring) for ease of tracking and monitoring. The instructions also emphasize the need to equip every fishing unit with occupational safety equipment, including GPS devices, life jackets, and fire extinguishers, in addition to complying with a specified engine capacity not exceeding 9.9 horsepower, in order to preserve the calm of the aquatic environment and prevent overfishing associated with high speeds.⁵⁵

Despite the clarity of these instructions and regulations set by the Future of Egypt Authority, they have not contributed to improving fishers' working conditions and the sustainability of fishing activities in Lake Bardawil. Some of the fishermen interviewed indicated that the Authority's administration of the lake has produced negative economic, administrative, security, and environmental repercussions, resulting in violations of political, civil, economic, and social rights. The analysis of such violations sheds light on the contradiction between the regulations on one hand, and actual practices and their impact on the fishing sector, the working conditions of fishers and local communities, and the sustainability of fish production, on the other.

According to many of the testimonies we gathered from Lake Bardawil's fishermen, the agencies responsible for managing the lake before the Future

53 The Future of Egypt Authority, via the Lake Bardawil Facebook page — Future of Egypt, 23 February 2025, <https://web.facebook.com/photo?fbid=122113479218753515&set=a.122109055850753515>

54 Ibid.

55 Ibid.

of Egypt Authority⁵⁶ were more receptive to fishermen's demands and circumstances, and the regulations in place were mostly clear and enforced with fairness, leading to an equitable distribution of revenues between the administration and the fishermen. Inspections were limited and administrative compliance procedures smooth, creating an environment where fishers enjoyed a certain security and a sense of fairness. After the lake's oversight was transferred to the Future of Egypt Authority, the situation changed radically: fishers described the introduction of vaguely defined, arbitrarily enforced regulations, with fishing and work permits becoming increasingly costly and difficult to obtain. The Authority also imposes strict restrictions on fishing times and permitted areas, with severe penalties amounting to imprisonment and high fines.

The new administration's engagement and communication with fishers appears to be merely procedural. Although a communication channel with the Authority's director is made available to fishermen, traders, and lake workers, the problem lies in the lack of follow-up with the concerns or grievances presented by local civilians.

Abdelaziz explained how his and other fishers' requests remained unanswered, or promises failed to translate into action:

They said the invoice for the roe was 100 pounds per kilo, and people objected and called the administration, and the administration didn't lower it.

He further noted that:

There's no problem with communication — the problem is in implementation after communication. Only what suits the Authority's mood gets carried through and done.⁵⁷

Similarly, the testimony of Hussein, a fisherman with extensive experience, reflects a general sense of frustration and loss of trust:

With this Authority there's no trust and no respect at all. They treat us like we're criminals. We tried to talk, we put forward demands, they promised us things, but nothing was ever carried out.⁵⁸

56 Prior to the appointment of the Future of Egypt Authority for Sustainable Development, Lake Bardawil was de facto managed by the National Service Projects Organization (NSPO), affiliated with the Ministry of Defense, through the National Company for Fisheries and Aquaculture (NCFA), in coordination with the local branches of the Border Guard Intelligence Unit ("the Intelligence" in fishers' testimonies).

57 Personal interviews conducted between December 2025 and March 2026.

58 Personal interviews conducted between December 2025 and March 2026.

The absence of tangible improvements increases fishermen's frustration about being able to rely on the administration to protect their interests.

The introduction of the new regulations created a series of burdensome procedures and standards that did not solely undermine fishers' trust in the administration but directly compromised their ability to secure their livelihoods through fishing and related activities. Such impacts are discussed below:

1 Unreasonable Increase in the Cost of Fishing License Renewal and Introduction of Burdensome Procedures

Fishing in Lake Bardawil requires multiple permits and licenses, which are issued by the competent administrative authority. Fishermen, boat owners, and traders are mandated to secure the necessary approvals, each regulating specific aspects of fishing activities and associated services within the lake area, including fishing vessel licenses, personal permits for fishermen, and access permits for traders' vehicles at landing sites. Fishers, boat owners, and traders are all subject to general national tax and social insurance regulations. Additionally, under the special administrative and security regime into force in the whole North Sinai governorate, fishers must obtain security clearances from the Armed Forces.

Based on information gathered through interviews with fishermen and other civilian workers of the Lake Bardawil area, until 2024, and before the appointment of the Future of Egypt Authority, fishermen were required to obtain a security permit from the Border Guard Intelligence Office to fish in the lake, amounting to 50 Egyptian pounds. The permit was issued individually to each fisherman, not per vessel; consequently, every fisherman working on a boat, as well as those fishing near the shore—locally known as "foot fishermen" (*rijlah*)—was required to obtain it.

Fishermen were also required to pay an annual fee of 130 Egyptian pounds to the General Authority for Fisheries Resources Development (later the Lake Protection and Fisheries Development Agency) to obtain a license proving their status, which legally authorized them to practice the profession.

Following the appointment of the Future of Egypt Authority, the cost of licenses imposed on *rijlah* fishermen, who are mostly youth or elders who do not own boats and fish on foot at a distance not exceeding 200 meters from the shore, rose to 300 Egyptian pounds, with a duration of 3 months each, insufficient to cover the entire fishing season. Restrictions were introduced on the number of *rijlah* fishermen allowed to access the lake, which prevented many low-income individuals from exercising their profession. As a result, many of them lost their only source of income.

The testimonies we collected highlight the suffering of the *rijlah* fishermen of Lake Bardawil, who represent the most vulnerable group in the local fishing community. If the physical copy of a fisher's permit is damaged or lost, or the fisher initiates the procedure for its renewal even one day after its expiry date, the fisherman is barred from obtaining another permit for the remainder of the season. Fishermen reported that some are also arbitrarily excluded from obtaining licenses for no clear reason, even when they have not violated any rules.

Khaled, a *rijlah* fisherman, denounced:

*All we rijlha fishermen [...] have no income other than the lake. We were banned as soon as the lake was opened [under new administration], and we cannot get a new permit. So, only those who have a permit are working, and the rest are sitting at home without income.*⁵⁹

Hussein, a boat-owning fisherman, sympathizes with the suffering of the *rijlah*, saying:

*The[y] are poor people. They go down to the shore to cast their net, pull it back up, and get 2 or 3 kilos of fish to spend on their children. They don't affect the lake or take anyone's rights. The Authority has banned them completely, [and if they try to fish anyway, it] persecutes them, imprisons them for a year, and makes them pay a 50,000 EGP fine.*⁶⁰

As for fishermen working on boats they do not own, locally known as "mariners," until 2024 they were not required to pay any fees except for the 50 EGP security permit, in addition to the annual 130 EGP payment to the General Authority for Fisheries Resources Development. Under the Future of Egypt Authority, these fishermen became obligated to pay 600 EGP every three months to be allowed to work on the boats.

Hussein, a boat-owning fisherman, estimated his costs for fishing permits as follows:

*I used to pay 50 EGP for the annual permit during the days of the Intelligence; now I pay 600 EGP every 3 months, which means 1,800 EGP in a single season.*⁶¹

59 Personal interviews conducted between December 2025 and March 2026.

60 Personal interviews conducted between December 2025 and March 2026.

61 Personal interviews conducted between December 2025 and March 2026.

The Future of Egypt Authority also introduced new regulations concerning the number of fishing vessels allowed to operate in the lake. Under the previous administration, the number of boat licenses was determined in proportion to the lake's extension and productive capacity, amounting to a number between 1,225 and 1,250 licenses according to testimonies. The vessels granted such permits would normally operate throughout the fishing season, unless their owners rented their licenses to other boat owners.

Until the Authority's appointment, the cost of fishing vessel licenses was paid to the General Authority for Fisheries Resources Development, and its amount was established in accordance with the categories stipulated in the executive regulations of the Law on the Protection and Development of Lakes and Fisheries, varying according to the type of boat and its engine power. According to fishermen, they amounted to 350 EGP for boats without an engine, 450 EGP for boats with an outboard motor, and 500 EGP for boats with a fixed inboard engine of less than 40 horsepower, with fees increasing in proportion to the engine's power.⁶² Under the Future of Egypt's administration, however, fishing vessel license holders became obligated to pay an annual fee of 2,500 EGP for license renewal.⁶³

Additionally, fishers reported that, while the annual fee for leasing a vessel license before the transfer of the lake's administration to the Future of Egypt Authority amounted approximately to 22,000 EGP, which could be paid in installments during the fishing season, the new administration took over issuing and leasing licenses to boat owners, increasing the price to 30,000 EGP per fishing season, to be paid in full upfront before the leasing.

Fishers are not the only category negatively affected by the unreasonable increases in permits' costs imposed by the Future of Egypt Authority. Traders operating in the fishing sector at Lake Bardawil have also suffered from a decline in their revenues since November 2024, as a result of increasingly prohibitive restrictions and additional costs eroding their revenues.

Gomaa, a trader, explained his situation as follows:

I now pay 1,000 EGP for the vehicle, and the assistant pays 1,000, and if I have 2 workers, I will pay 1,000 for each of them every 3 months, and all of this is now on my shoulders. Before the Authority, you paid 50 EGP for the vehicle and entered the market freely, taking whatever fish you wanted and weighing it as you pleased. Now, everything is

62 Executive Regulations for the Law on the Protection and Development of Lakes and Fishery Resources, issued by Prime Ministerial Decree No. 706 of 2023.

<https://manshurat.org/content/sdr-llyh-ltnfydhy-lqnwn-hmy-wtnmy-lbhyrt-wlthrw-lsmky>

63 A post shared in a Facebook group for residents of the village of Al-Kharba, one of the villages in the Bir al-Abd district of North Sinai, home to the fishermen of Lake Bardawil. Posted on February 11, 2026, accessible at: <https://www.facebook.com/groups/253128135433626/permalink/2146668379412916/>

*calculated and restricted, prices are astronomical, invoices [taxes] are doubled, and the fisherman himself is hit from all sides.*⁶⁴

On top of rising costs, the bureaucratic procedures for obtaining such permits have multiplied exponentially the workload of local administrative offices, which now suffer from chronic congestion.

Abdel Karim, a resident, commented:

*We went to get the permits; they told us the fees are 300 EGP per person for a 3-month license, and you also have to bring a police clearance certificate and two copies of the ID card, and the employees need days to finish the transaction.*⁶⁵

Some testimonies also indicate that certain individuals and groups have been completely excluded from obtaining permits, citing security issues deriving from real or perceived political affiliations.

The steep increase in administrative costs and the burdensome nature of procedures is eroding fishers' revenues. Many testimonies indicate that while such businesses were previously able to sustain workers' families, particularly as fish from Lake Bardawil could be freely sold even outside Sinai, fishers currently struggle to cover even production costs, and they are thus pushed into a cycle of poverty, debt accumulation, food insecurity, and inability to access basic services such as healthcare and elementary education.

2 Imposition of Fishing Equipment Unsuitable to the Nature of the Lake Bardawil Fish Population

Before the Future of Egypt Authority's administration, fishermen could reportedly choose the type of fishing nets suited to each season and species, based on their local knowledge of the lake. Nets were employed according to the season and the size of the fish: for example, wide-mesh nets were used after the fry season⁶⁶ ended to prevent capturing young or smaller fish, and narrow-mesh nets were used exclusively to catch specific species, such as shrimp. The more flexible nature of the regulations enabled fishers to plan their activities ahead of the season. Under the Authority's administration, however, net and yarn specifications were unilaterally reformed, including

64 Personal interviews conducted between December 2025 and March 2026.

65 Personal interviews conducted between December 2025 and March 2026.

66 The fish fry season is the natural breeding and spawning season, when fish lay eggs that hatch into tiny babies (fry).

the imposition of using only one type of net throughout the entire season, regardless of the size and quantity of fish available at different points in time. According to the fishers interviewed, the permitted mesh became much wider, limited to catching crab and large fish, while smaller fish, which had been a primary source of income for many of them, could no longer be caught.

Naji reported, for instance, that the Authority mandates:

*[Nets] size 34, and this size only catches the super-sized fish. But the fish we actually have is smaller than that, so the net won't catch it.*⁶⁷

Specifications were also modified several times within a single season, with a certain net allowed and then banned shortly after, forcing fishermen to dispose of old nets and buy new ones at a high cost reaching tens of thousands of Egyptian pounds, with a complete loss of their previous investment.

Abdelsalam commented:

*Fishermen have a big problem in that nets cost large amounts, and the Authority changes the specifications twice in a single year. Many had to dispose of old nets and buy new ones, and this causes huge financial losses and leaves them unable to plan for the fishing season.*⁶⁸

The frequent changes in the specifications not only affect fishers' revenues, but also harm productivity. Many of the new nets introduced are not compatible with the size of fish present in the lake, so fishermen found themselves forced to work at minimal productive capacity, which significantly reduced their daily income.

Hussein complained:

I've been in this profession for 30 years, I knew when to go out with which net and get a good catch. Now the Authority bans us from using the net we know, and keeps changing the specifications, until I lost about a quarter of a million pounds just on netting.

Sweilem, another fisher, added:

The [permitted] tools changed completely, and the least a fisherman now has is netting worth between 100,000 and 150,000 pounds

67 Personal interviews conducted between December 2025 and March 2026.

68 Personal interviews conducted between December 2025 and March 2026.

*sitting at home, unable to work with it. Every day we're losing fishing opportunities and money that should have gone into our pockets.*⁶⁹

As a result of this regime of regulatory volatility, many fishers of Lake Bardawil face significant financial loss, and the productivity of their businesses is reduced to a minimum. This state of normative and economic uncertainty undermines socioeconomic security among a community that traditionally relies on fishing for its livelihoods, generating financial and psychological pressure at a level previously unknown to locals.

3 Monopolistic Control over Supply Chains, Bribing, and Revenue Diversion

From November 2024, fishers' boats returning to the mooring (the harbor) are required to hand over a percentage of their daily catch ranging between 70 and 100% to agents affiliated with the Future of Egypt Authority, or to contractors employed by the Authority agents. The new regulations prohibit them from trading or selling their catches to any other actors unless for the small amounts which the Authority doesn't take over, establishing a monopoly over the fish products from Lake Bardawil, which benefits the Authority exclusively.

Following the mandatory handover, the Authority's employees sort and weigh the fish and determine their value based on price lists set separately by the Authority, which do not reflect fair market value or suffice to cover the costs of fishing operations under the new licensing regime. Other traders interested in purchasing fish are thus pushed to purchase fish from the Authority's outlets inside the harbor, at prices determined by the Authority and usually aligning with free-market prices.

Its double mandate as a regulator and economic actor- which speaks for itself of the evident conflict of interest- enables the Future of Egypt Authority to impose significant profit margins on the fish sales, in what constitutes a disguised mechanism of value extraction that siphons off the largest share of the lake's revenues in favor of the military economy. Civilian fishers are financially penalized by this monopolistic regime not solely by the diversion of revenues from their businesses to the Authority's, but also by the strategic withholding of payments for their daily catches, which the Authority's agents record as dues whose payment is issued after deducting a percentage associated with administrative costs, and whose calculation can delay payments for unpredictable timespans.⁷⁰

69 Personal interviews conducted between December 2025 and March 2026.

70 Personal interviews conducted between December 2025 and March 2026.

On the other hand, civilian traders purchasing fish from the Authority face similar bureaucratic and financial barriers. The new administration has imposed an immediate cash-payment system for the purchase of fish, whereas previous administrations allowed small traders to buy and settle payments through a customary system of credit, which better aligned with the nature of local businesses and the relations of trust within the community. Traders buying from the Authority's agents are not permitted to transport the fish out of the port until the transaction has been completed and an official "*financial clearance invoice*" has been obtained, forcing them to handle every such transaction separately on a day-to-day basis.

Abdelaziz, one of the traders, reported that, since payments must be issued "*in cash, on the spot*," traders are forced to allocate a remarkable amount of liquidity- reaching 5,000 Egyptian pounds for 100 kilos- just to settle the invoices before leaving the market.

The price at which the Authority's agents currently sell fish has reportedly increased by over tenfold.⁷¹ Comparing traders' invoices before and after November 2024, it is possible to notice that prices rose from 1-5 Egyptian pounds per kilo, depending on the species, to up to 50 Egyptian pounds per kilo.⁷² This sharp increase, which appears unjustified when considering that the quantity and quality of fish products have not varied as significantly in the same period of time, places traders' businesses under significant strain, eroding their revenues.

According to testimonies, the price rise is sometimes compounded by an additional, non-registered levy imposed by agents themselves, representing either an individual or Authority-sponsored bribing system, protected by the Authority's monopolistic regime over the Bardawil fish trade, and putting local fishers' businesses under further strain.

According to Naji:

*Every kilo of any fish has an extra 10 pounds on top of the invoice price, with no paperwork at all. For crab, you pay a mandatory 5 pounds on top of the official invoice. This is thuggery with no legal basis at all, and a kilo of mullet's invoice is 20 pounds, but they take 30 pounds — 20 on the invoice and 10 outside it.*⁷³

71 Invoices ("*fawatir*") are mandatory fees imposed by the Future of Egypt Authority on every kilogram of fish that a fisherman delivers or a trader purchases, paid to the Authority in exchange for permission to complete a sale or to leave the mooring with the fish, and they are usually collected by soldiers and civilian employees affiliated with the Authority.

72 Image of fish-price invoices set by the Future of Egypt Authority for each kilo of fish, 27 April 2025, <https://tinyurl.com/4s4ekumf>

73 Personal interview conducted between December 2025 and March 2026.

Combined, these either regulated or informal practices of wealth extraction significantly erode civilian fishers' revenues, while traders attempt to recover the margin of profit lost to the price rise by re-pricing their products and deducting invoice costs from the amounts owed to fishermen. Abdelaziz, a trader, explained that:

*In the old days, the invoice was 5 or 10 pounds per kilo; now it's 30, 50, or 100 pounds. To buy 100 kilos, I need to have 5,000 pounds ready just for invoices. If you don't have the money, you won't get out of the mooring with the fish. The new system has worn traders out, and they don't want to buy from people like before.*⁷⁴

According to traders' testimonies, trade has become confined to a limited group of major traders who possess sufficient liquidity, marginalizing hundreds of small businesses and depriving their owners and workers of their livelihood, producing a distortion of the traditional economy on which the community depends, while preventing potential civilian competitors from entering the market altogether.

Even when able to meet the prohibitive bureaucratic and financial conditions imposed by the Authority, civilian traders and agents are reportedly subjected to a discretionary application of the new regulations, particularly concerning ice supply and the calculation of fish net weight, creating further uncertainty and hazards along the supply chain. Under the new regulations, traders can purchase ice for fish conservation exclusively from the Authority's own supplier, despite the fact that many reported dissatisfaction with its quality as well as with the quantity available for sale on a daily basis.

Abdelaziz further commented:

*Sometimes the ice isn't available at the factory, and they ban me from using ice bought elsewhere. Even if I use it, they weigh the fish together with the ice and charge me for the extra weight.*⁷⁵

Testimonies also denounce that the power disparity between military personnel and civilians creates an atmosphere of impunity where abuses and the mistreatment of local residents become permissible. Abdelaziz reported that military personnel employed by the Authority or serving at Lake Bardawil:

74 Personal interview conducted between December 2025 and March 2026.

75 Personal interview conducted between December 2025 and March 2026.

treat [him] like a second-class citizen; most of the time it's just orders to be carried out, and any objection is considered an offense and exposes you to trouble.

Agents and traders denounce being imposed with arbitrary deductions, also through the manipulation of fish quantity and net weight, by the administration.⁷⁶ The agent or fisherman hands the fish over to the administration and waits for the accounting the next day, only to be surprised by the administration's claims that there is "*spoiled or wasted fish*," and an amount is deducted from their dues.

Fishers, lake workers, and business owners consistently denounced that, under the Authority's administration, they have become unable to access any complaint mechanisms to report on the daily abuses to which they are exposed. On the contrary, interviewees reported that the Authority's approach to handling their grievances concerning the quality, quantity, or price assigned to fish products can be summarized in the logic: "*Accept it, or I'll confiscate it.*"⁷⁷

4 Imposition of Arbitrary and Disproportionate Penalties on Fishermen, and the Absence of Independent and Effective Mechanisms for Grievance and Remedy

Most testimonies confirm that, in its function as an administrative body, the Future of Egypt Authority for Sustainable Development imposes penalties in the form of financial sanctions, which are often applied arbitrarily and significantly outweigh the value of the breaches that they intend to punish. This regime of unfair punishment constitutes a violation of the principle of proportionality of punishment, generating further uncertainty and financial strain on lake workers and communities. Before the current administration, fines imposed in connection with administrative violations used to amount to a few hundred Egyptian pounds. Under the Authority's administration, fishers can be liable for the very same administrative breaches for the payment of fees of a value ranging between 20,000 and 60,000 Egyptian pounds. The increase, which exceeds the average fisher's financial capacity,

⁷⁶ Agents ("*manadeeb*") are the category that serves as the link between fishermen and traders on one hand, and the bodies overseeing the lake's management on the other. The agent's role changed after the Future of Egypt Authority took control of the lake. Previously, the agent was permitted to move flexibly between fishermen and traders, as well as bring in fuel and operating supplies from outside for the boats. After the Future of Egypt Authority's takeover, the agents' role was placed under strict oversight by the Authority's employees and soldiers, such that their role was limited to receiving fish from fishermen and handing it over to the Authority.

⁷⁷ Personal interviews conducted between December 2025 and March 2026.

turns administrative penalties intended to discourage harmful conduct into a punitive tool used to terrorize local fishers, dissuading them from operating in the sector or pushing them to the brink of bankruptcy and debt, which can lead to imprisonment under Egyptian penal law.

More concerning, Authority employees reportedly determine the value of such penalties on arbitrary grounds, generating further uncertainty and preoccupation among lake workers. Fisher Hussein, whose family business has been affected by the new fining regime, described this situation by saying:

The fines are unbelievable, before if something was confiscated it was a small fine, now it's 20,000, 30,000, 50,000, and sometimes imprisonment for a year. Once my son got close to the inlet by mistake, we paid 25,000, and they stopped the boat for a whole month, and we lost the work, and I had to borrow money to pay the fine, and I'm still paying it off.⁷⁸

In some cases, fines appear to have been imposed even in the absence of any administrative violation.

Naji recounted:

If I bring in 5 kilos of shrimp, and of course shrimp comes in different sizes, and I've caught it with a licensed net — if I have two kilos of small shrimp and I caught it with the licensed net, they say no, you caught this fish by trawling,⁷⁹ and they confiscate all five kilos of shrimp and seal the net with dye and a lock. We've had many fishermen [who were] stopped over this and [had to pay] a 20,000 fine, when [they had] actually caught it with the [allowed] net.

Abdelaziz reflected on the impact of such heavy fines on fishers' productivity and the stability of the local market, saying:

People agreed to the net specifications they asked for, but if the fish happens to be small — through no fault of the fisherman — they confiscate it and ban the net. Even if a fish's weight is acceptable but falls outside the precise specifications, the Authority imposes a fine.

Similar cases have occurred irrespective of the fish types caught, and fishers

78 Personal interviews conducted between December 2025 and March 2026.

79 "Al-jarr" (trawling) is a fishing method that relies on dragging a large net behind a boat along or near the seabed to catch large quantities of shrimp.

have been fined amounts ranging between 20,000 and 50,000 Egyptian pounds, or, in some cases, even imprisoned for several months without the possibility to defend themselves through a fair trial.⁸⁰

Fines and penalties have also reportedly been imposed in cases where administrative violations were ascribed to force majeure, such as boats' accidental drifting toward the inlet area, where fishing is prohibited, due to changing tides.

Abdelaziz recounted that, in one such case, the fine imposed on the boat's owner amounted to 60,000 Egyptian pounds and the confiscation of its entire catch, which was 300 kilos, with the administration refusing to consider the case as force majeure and relying entirely on the report issued by the officer who witnessed the violation.

Similar episodes have become increasingly common also because the personnel in charge of monitoring operations in the lake and assessing technical violations are military personnel and conscripts lacking any specialized training, hands-on experience, or technical expertise to distinguish between potential misconduct by fishers and boat drifts accidentally caused by weather conditions and lake tides. Unable to have civilian experts issue counter-reports, fishers of Lake Bardawil are thus subjected to the final and binding conclusions issued by unspecialized military personnel, often resulting in the unjust imposition of heavy fines and the confiscation of equipment.

The most dangerous effect produced by the new regulations, however, stems from their disregard for lake workers' security. The Authority recently introduced the prohibition for fishers to approach the shores of lake islands to shelter from strong winds, untangle nets, or even cook food. This has reportedly led to the drowning of at least one fisherman who was unable to land and shelter during a storm.

Sweilem, a fisher, reported that approaching any island shore within a distance of less than 200 meters exposes fishermen to a two-month suspension and a 20,000-pound fine. The severity of the penalty dissuades many from seeking shelter even in the case of immediate danger to their lives. In the absence of search and rescue operators or mechanisms in the lake, the disproportionate nature of this provision directly infringes upon fishers' right to a safe work environment and to life.

According to testimonies, fines are also imposed in relation to charges of smuggling, formulated on the basis of suspicion alone, if a fisher's daily catch is significantly smaller than his peers'. Ghanem, a fisher, recounted:

80 Personal interviews conducted between December 2025 and March 2026

Say I took my gear on Friday and went down and fished, and came back the next day at dawn and I got, say, 5 kilos of fish, and another guy got 30 kilos of fish, and he says no, you're smuggling fish and you only brought 5 kilos, here, hand over your record and go home [hand in your permit and go home]. You'll be stopped for, say, a month or 3 weeks or so just because you didn't bring [enough] fish — meaning you're expected to bring fish out of thin air.⁸¹

Fishers have on occasion been fined in relation to unverified smuggling charges if they leave the lake with a quantity of fish for personal consumption exceeding the strict limit set by the new administration. Until November 2024, fishers were allowed to withhold up to 5 kilos of fish from their daily catch for personal consumption; however, under the Authority's administration, draconian restrictions were introduced on the quantity and types of fish that could be kept for personal consumption, further exacerbating food insecurity among the community.

Hazem, a fisherman, claimed:

We used to be able to take 5 kilos of fish [to bring] home, now certain types are banned from being taken out. My friend had 15 pieces of gilt-head bream, about 2.5 kilos, for his family — they confiscated it and stopped his boat for two months and fined him 40,000 pounds. And the fines are imposed without any official receipt [of payment].⁸²

Abdelaziz commented on the unfairness of the new regulation by saying:

I should basically be able to take any amount of fish I need for the house, not whatever the Authority chooses for me. But now there are certain types that are forbidden to take, like large sea bass, gilt-head bream, shrimp, and sole, even if I caught them for myself. Once they confiscated fish from a fisherman while he was grilling it on the boat to feed his kids.⁸³

Hussein recalled:

I was coming back from the sea after a long day, I had about 25 kilos

81 Personal interviews conducted between Dec. 2025 and March 2026

82 Personal interviews conducted between December 2025 and March 2026

83 Personal interviews conducted between December 2025 and March 2026

of fish with me, I took 3 fish for myself for lunch. The agent saw them and said, No, you have to hand over all the fish, and he'll cut you an invoice for it. I had to hand it over and went home with no fish at all, and I had to buy food from outside.⁸⁴

Civilian fishers' livelihoods and socioeconomic security are not threatened solely by the unfair regulations disciplining the conditions of their work under the Authority's administration, but also by the insufficiency of subsidies and welfare schemes intended to support their businesses. Fishers reported that the Authority initially promised a monthly 1,000-pound subsidy to support their businesses outside the fishing season, between January and April, when fishing in the lake is not permitted. The promise, however, proved to be hollow: according to Sweilem, a fisherman:

They said during the ban period every fisherman would get 1,000 pounds a month, and they asked us to do a 'visa' [registration] and submit applications, we did the registration and submitted the applications, and they really did pay out 1,000-pound grants to a very, very small number — around 60 people — out of the total number of fishermen. I mean, you're fine, every now and then you write something on your page, and we're the ones carrying it out, and suddenly we found him writing that the grant provided by the state to the fisherman has been disbursed, and we didn't get anything. Fine, you disbursed it from the state — tell me, at minimum, for 5,000 fishermen, you gave it to 60 fishermen, where did the rest of the money go?⁸⁵

Hussein added:

[Fishing in] the lake is banned from the first of January until the 15th of April, about four and a half months. We used to be able to fish at least from the shore for household expenses, now that's banned too, and if anyone goes down they get caught and imprisoned and pay a fine of 50,000 pounds or more. They said they'd give us 1,000 pounds a month, I submitted all the papers and still haven't received anything.⁸⁶

The combined effects of these administrative regulations and practices have entrapped fishermen and their families in a spiral of poverty, food insecurity,

84 Personal interviews conducted between December 2025 and March 2026

85 Personal interview conducted between December 2025 and March 2026

86 Personal interview conducted between December 2025 and March 2026.

and debt, despite governmental praises for the Authority's capacity to develop the economic potential of Lake Bardawil. In this sense, the mandate of the Future of Egypt Authority for Sustainable Development contravenes the state's constitutional duty to provide safety nets and social support for the most vulnerable groups.

While punitive and unjust regulations or penalties are broadly enforced upon fishers of Lake Bardawil, testimonies reveal a pattern of discriminatory treatment in favor of fishermen who had previously proved their "loyalty" by undermining or deserting the collective protests organized by local communities against the Authority. Fishermen held a strike against the imposition of the new regulations set by the Future of Egypt Authority for Sustainable Development in May 2025. To undermine their struggle, the Authority reportedly established secret deals with a small group of local fishers, who, in exchange for more favorable conditions, have since become a key instrument in the surveillance and repression of the local community's opposition to the Authority's monopolistic regime. Reportedly, the privileges granted to these "collaborators" include the informal permission to fish outside permitted areas and times, using nets and other equipment that violate the specifications, and the full exemption of their boats from the daily inspection procedures and administrative harassment to which ordinary fishermen are subjected.

Abdelkarim, a fisher, explained:

The Authority's own fishermen have far more privileges. If you're an ordinary fisherman, you'll be exposed to fines, but they go to the inlet and enter places no one else can enter and bring in more fish. It's all about your affiliation with the Authority.⁸⁷

The Authority's extractivist and monopolistic management of the lake's natural resources is thus reinforced through the fragmentation of community and workers' ties and solidarity, fueling a competition where some are offered better chances of survival at the cost of facilitating the repression of their fellow fishers and community members.

Abdelaziz further observed:

There are about 100 boats affiliated with the Authority; they work anywhere, whether it's banned areas or protected areas, and no one says anything to them. But whoever isn't with them gets inspected and punished constantly, and this has created a monopoly in the lake and in the whole market.⁸⁸

87 Personal interviews conducted between December 2025 and March 2026.

88 Personal interviews conducted between December 2025 and March 2026

Collectively, the testimonies hereby presented draw a picture of growing socioeconomic insecurity and vulnerability fueled by the monopolistic management of natural resources, and the intentional weaponization of administrative and penal sanctions to discourage resistance and the very continuation of traditional Bedouin businesses in the fishing sector at Lake Bardawil, channeling wealth away from the civilian economy and towards the military establishment.

According to some fishermen, the new administrative sanctions have driven a decline in production due to fishers' inability to cope with the frequent confiscation of equipment, the risk of being imposed fines, and diminishing revenues.

Hussein observed:

In 2024, we used to bring in 20 or 25 tons a day... Now we're not bringing in 10 or 12 tons... It's not because there are fewer fish, it's because the fishermen aren't comfortable, they don't have their nets, they don't know how to work freely, and they're scared of fines and violations.

Growing restrictions on fishing activities and the burdensome nature of permit renewal procedures have significantly reduced the productivity of these traditional civilian businesses, undermining the stability of local markets as well as the lake workers' capacity to secure their livelihoods.

The combined impacts of the administrative regulations and sanctions hereby described amount to violations of local fishers and communities' social and economic rights, including fundamental labor rights (employment, fair remuneration, workplace safety), the right to life (protected by Article 59 of the Egyptian Constitution and Article 3 of the Universal Declaration of Human Rights) and adequate nutrition, the right to property (particularly concerning fishing boats and equipment, whose arbitrary confiscation contravenes the provisions set in Article 35 of the Egyptian Constitution, and Article 17 of the Universal Declaration of Human Rights), and the right to a fair trial before a civilian court for workers charged with breaching administrative regulations. The arbitrary and targeted treatment of *rijlah* ("foot") fishermen, in particular, stands out as a violation of the right to equality and non-discrimination, as it systematically deprives an already marginal group within an indigenous community of their sole source of income, infringing upon their right to an adequate standard of living. Such discriminatory treatment runs counter to Article 53 of the Egyptian Constitution, which states that "*citizens are equal before the law*," as well as Article 2 of the Universal Declaration, which prohibits discrimination.

On top of these violations, the absence or ineffectiveness of complaint and redress mechanisms contrasts directly with Article 97 of the Egyptian Constitution, which guarantees the right to litigation, and Article 8 of the Universal Declaration, which guarantees every individual the right to seek redress through the judiciary. The combined effects of these violations reflect a pattern of interconnected abuses affecting the core of economic, social, and civil rights of local Bedouin communities, undermining the principles of justice and transparency in resource management.

In the exercise of its normative and regulatory mandate, which places it in an evident state of conflict of interest, the Future of Egypt Authority for Sustainable Development is deliberately impoverishing Bedouin fishers of Lake Bardawil through the extraction of wealth generated through their activities, with complete disregard for their and their families' fundamental rights, and failing to consider the catastrophic repercussions on the local economy.

The consequences of military dominance of the economy of Lake Bardawil do not stop at the boundaries of daily material suffering, but have extended to constitute an existential threat to the social structure of local fishing communities and their demographic stability, threatening their indigenous ways of life and cultural heritage. A growing number of fishers reportedly now consider abandoning their historic profession, inherited across generations, and seek alternative employment outside the sector, as a result of fishing's transformation from a secure source of livelihood into a financial and security burden, hunted by heavy monetary sanctions and imprisonment. The absence of economic alternatives in the lake vicinities, and the proximity of the Mediterranean Sea, strongly incentivize internal migration towards other governorates, or irregular departures towards Europe via sea- exposing locals to even greater risks for their safety, dignity, and survival. In addition to these risks, the current migratory trend from the Bardawil area threatens the demographic depletion of the region and the complete dismantling of the historic social fabric of these indigenous communities.⁸⁹

2. The Future of Egypt Authority's Monopoly Over the Sale of Fishing Production

In addition to fish products, the Future of Egypt Authority for Sustainable Development has also extended its monopoly also over the local market of fishing equipment, fuel, and services connected to the fish industry in the Lake Bardawil area. In this way, the Authority extracts the highest possible value from the entire value chain of fish at Lake Bardawil, benefiting from the

89 EgyptWide for Human Rights, 2026, *ibid.*

complete lack of transparent oversight from independent civilian institutions or regulatory authorities, and the absence of complaint or representation mechanisms for local communities, workers, and affected persons to activate to seek redress.

The key axes of the Authority's monopolistic control over the fish production chain at Lake Bardawil are presented below.

1 The Single-Buyer Policy

The testimonies of fishermen and traders reveal a clear pattern of complete monopolization of the production and marketing of fish products by the Future of Egypt Authority, as its role expands beyond regulation and oversight to directly intervening in, and extracting value from, the local fish production, while imposing a single-buyer policy on fishers and setting prices at its discretion. The absence of market competition, granted by the Authority's administrative mandate and enshrined in the designation of Lake Bardawil as "*military-adjacent*" under Decree No.294/2019, allows for these practices to go unchecked, depriving all affected civilian actors (including fishers, traders, and local communities) of access to remedy and redress mechanisms under civilian law.

Fishers interviewed in the context of this research reported that the Authority buys gilt-head bream from them at 100 Egyptian pounds while its market price is around 250 pounds, and Groupe, whose market price stands at around 850 pounds, at only 300.

One trader, Gomaa, observed that:

The Authority has taken over 80% of production... and takes it at whatever price it wants,

Adding that the Authority does not just buy, but resells at large profit margins, since:

it takes the fish for 90 or 100 pounds from the fisherman and sells it to the trader for 150 or 160... it's taking a 100 percent profit.⁹⁰

The testimonies indicate that sometimes the Authority takes over the entirety of a fisherman's daily catch, or at best allows him to retain only 20-30% of it to sell autonomously to civilian traders.

90 Personal interview conducted between December 2025 and March 2026

Naji explained that:

*the fish gets taken from me by force... and the price is also at the Authority's whim*⁹¹

Hussein reported that the Authority's agents acquire gilt-head bream from him for 100 pounds and grouper for just 300, despite their market value usually standing at 250 for gilt-head bream and 850 for grouper, saying:

*I used to sell gilt-head bream for 200 or 250, now the Authority takes it from me for 100 and turns around and sells it for 200 or more.*⁹²

Ghanem, another interviewee, stressed that:

The Authority takes half and more while sitting in its chair... and the fisherman loses out on nets, effort, and gas,

Pointing out that the Authority buys mullet at meager prices (70-90 pounds) while it sells in the governorate for 300 pounds.⁹³

Abdelsalam, an employee at Lakes and Fish Resources Development Agency, explained that what is happening represents a shift from regulatory management to engaging in trade and profiteering, saying:

The Authority takes the fish at one price and sells it to the trader at another price, and pockets a huge difference in its favor,

confirming that this gap is ultimately “borne by the consumer,”⁹⁴ Meaning that the effects of the monopoly are not limited to fishermen and traders, but create broader market distortions.

The Authority's monopoly and regulatory mandate over the fish value chain at Lake Bardawil has not solely eroded fishers' revenues, but drove a complete restructuring of the market, such that fishers, traders, and other actors now operate within a closed system controlled by Future of Egypt Authority, lacking competition and transparency, and regulated through unilateral provisions which appear heavily influenced by a conflict of interests, ultimately jeopardizing the stability of the value chain.

91 Personal interview conducted between December 2025 and March 2026

92 Personal interview conducted between December 2025 and March 2026

93 Personal interview conducted between December 2025 and March 2026

94 Personal interview conducted between December 2025 and March 2026

2 Monopoly of Boat Fuel and Other Inputs Necessary for Fishing Operations

Testimonies indicate that boat owners at Lake Bardawil are struggling as a result of the Authority's monopolization of gasoline sales, not necessarily because its price exceeds market prices, but mainly due to the imposition of a single supply source.

Abdelkarim, a fisherman, complained that:

gasoline is currently banned from coming in from outside, and the Authority has started selling gasoline at a higher price... 2 pounds more per liter,

which is above market value.⁹⁵

Sweilem, another fisher, observed that even when the gasoline prices offered by the Authority do not differ from market prices, the single supplier policy means no alternative in case of disruptions in the supply:

The gasoline at their station is priced the same as outside... but the problem is you're not allowed to buy from anyone but them.

This single-supplier policy is enforced even during shortages or emergency situations, with negative repercussions on the continuity of work at the lake. Sweilem explained that a power outage at the fuel station can lead to a work stoppage, with no permission to obtain gasoline from outside, whereas previously agents were allowed to bring fuel in from outside to ensure continuity of work:

*In the old days... the agents used to bring gasoline from outside and let you work, today no... I've had nets cast since the morning and left out there, and I don't know how to retrieve them.*⁹⁶

This situation reflects the fragility of the monopolistic supply system. Moreover, local trader Mahmoud reported an additional burden to their business caused by the imposition of immediate cash payments, marking a change from the previous system, which used to be more flexible.

The Authority's monopoly over fishing equipment and other necessary goods

95 Personal interview conducted between December 2025 and March 2026

96 Personal interview conducted between December 2025 and March 2026.

and services extended to boat engine oils, with fishermen reportedly forced to buy poor-quality, unreliable types of unknown origin, “Off-brand oils,” while being banned from bringing in higher-quality oils to protect their engines, which are worth tens of thousands of pounds.

Sweilem described this trade saying:

They bring you a jerrycan of rotten oil... and you're forced to work with it, you're not allowed to bring it from outside.⁹⁷

The absence of alternatives raises significant concerns related to equipment safety and rising maintenance costs in the long term.

Testimonies also indicate that the Authority's monopoly extends to drinking water, which has to be transported to the site or accessed through a dedicated plant. Mahmoud claimed that locals have started being forced to pay even for drinking water:

We pay 10 pounds for the jerrycan... even though this water-production line is something we built ourselves.

Sweilem added:

Fishermen are banned from bringing in water from outside... it's all so you have to buy from them.

Although fishers believe that the quality of the water provided is questionable.⁹⁸

The risks associated with this monopolization of the entire value chain of fish at Lake Bardawil, extending to the commercialization of essential goods and services such as drinking water and fuel, are not limited to their direct economic effects, but directly jeopardize the safety and well-being of residents, violating several fundamental rights enshrined in the Egyptian constitution as well as in international human rights law and covenants.

Article No.30 of the Egyptian Constitution explicitly establishes the state's responsibility to recognize and uphold the rights of fishers, stating that:

The state is committed to protecting fish wealth ,and protecting and supporting fishermen ,and enabling them to practice their work without harming ecosystems ,in the manner regulated by law.

97 Personal interview conducted between December 2025 and March 2026.

98 Personal interview conducted between December 2025 and March 2026.

Essential socioeconomic rights are enshrined in Article No.27:

The economic system aims to achieve prosperity in the country through sustainable development and social justice ...and adherence to standards of transparency and governance ,support for investment pillars ,prevention of monopolistic practices ,price regulation ,and fair distribution of development returns to citizens...

and Article No.28:

Productive ,service ,and information economic activities are fundamental pillars of the national economy ,and the state is committed to protecting them ,increasing their competitiveness ,and providing an attractive investment climate.⁹⁹

Deliberate disregard for the working and living conditions of fishers and their families directly violate their social and economic rights as defined by Article No.12 of the Egyptian constitution:

work is a right ,a duty ,and an honor guaranteed by the state ...and no work may be forcibly imposed on citizens except by virtue of a law

Article No.13:

The state is committed to preserving workers' rights ,and works to build balanced labor relations between the two parties of the production process ,and guarantees means of social protection for workers

and Article 78:

The state guarantees citizens the right to adequate housing ,security, and a decent life.¹⁰⁰

The International Covenant on Economic, Social and Cultural Rights also states in Article No.6 that:

The States Parties to the present Covenant recognize the right to work, which includes the right of everyone to the opportunity to gain his living by work which he freely chooses or accepts ,and will take appropriate steps to safeguard this right

in Article No.7 that:

The States Parties to the present Covenant recognize the right of everyone to the enjoyment of just and favourable conditions of work

99 "The Amended Egyptian Constitution 2019," Manshurat Qanuniya, <https://manshurat.org/node/14675>

100 Ibid

which ensure ,in particular) :a (Remuneration which provides all workers ,as a minimum ,with ...a decent living for themselves and their families

and in Article No.11 that:

The States Parties to the present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food ,clothing and housing ...and recognize the fundamental right of everyone to be free from hunger.¹⁰¹

The sharp deterioration in social and economic conditions faced by the fishers of Lake Bardawil as a result of the Authority's administration indicates overt disregard for all such fundamental rights.

Khaled, a fisherman, described his current condition as follows:

Now even if I worked every day and brought in 50 pounds a day, you couldn't live on that,

While Ghanem, another fisherman, went further pointing out that:

if my child gets sick I can't take him to the doctor,

Which reflects the erosion of the ability to access to the most essential basic services, such as healthcare.¹⁰²

Another increasingly widespread repercussion of the Authority's administration of Lake Bardawil, according to the local community, is debt.

Abdelaziz, a trader, denounced that:

there isn't a single fisherman who's paid off his debt... all the fishermen are in debt and the traders are in debt too,

Explaining that the current system has by eroding revenues, the administration has also disrupted customary relations between fishers and vendors, none of whom is anymore able to cover the basic costs of their businesses- including nets and fishing licences- without resorting to loans, which further increase financial pressure on them. In his experience, the revenue gap between the previous situation, which allowed for fair market

101 "The International Covenant on Economic, Social and Cultural Rights," United Nations, <https://tinyurl.com/3n9bjb47>

102 Personal interviews conducted between December 2025 and March 2026.

competition and did not drain civilian businesses of their income, and the present regime of monopoly exceeds 200%, which is telling of the sharp deterioration of local, small-scale civilian businesses.¹⁰³

Hussein, a fisher who proudly reported that:

in over 30 years of work, I was able to build a house and marry off three daughters

Explained that this shift represents a break from a long pattern of stability, saying:

I used to be able to save good money... now I can barely cover food and drink expenses... and I'm in debt about 40,000 pounds.

The crisis does not affect new fishermen and businesses only, but reaches even those with a more solid position in the local fish production chain.

Hazem, another fisherman, denounced that, under the Authority's administration, the profits of an entire season for a family of 4 do not exceed 2,000 Egyptian pounds — an amount less than the insurance and licensing fees required to return to work the following year, turning the lake's work cycle from a stable source of sustenance into an endless spiral of debt, until the fishermen's only prayer became *"that God settle their debt for them."*¹⁰⁴

3. From the Lake to Prison: The Criminalization of Lake Bardawil's Fishermen

Since the Future of Egypt Authority for Sustainable Development took charge of the administration of Lake Bardawil, local fishermen have been exposed to frequent and intrusive practices of surveillance, inspection, and even arrests on arbitrary, unjustified grounds. Presidential Decree No.294/2019,¹⁰⁵ which placed Lake Bardawil- alongside lakes Manzala, Burullus, Edku, Mariout, and Nasser, including their shores and surroundings- under military jurisdiction, forms the legal basis for the investigation and trial of civilian fishers in martial courts. The Decree also prohibits civilian fishers from accessing the lake without a permit issued by the competent authority or with unauthorized equipment.

103 Personal interviews conducted between December 2025 and March 2026.

104 Personal interviews conducted between December 2025 and March 2026.

105 "Amendment of the Decision Designating the Areas Adjacent to the Borders of the Arab Republic of Egypt and Their Governing Rules," Manshurat Qanuniya, 2019, <https://manshurat.org/node/65296>

Incidents concerning the arrest of local fishers and their trial in military courts under Decree 294 have been documented in January 2025, when five fishermen from the Lake Bardawil community were arrested on charges of fishing outside the fishing season and being present in “border-adjacent zone” without a permit, and subsequently charged in Cases No.5 and No.6 of 2025 before an Ismailia Military Misdemeanor court.

The militarization of lakes and their surroundings exposes locals to disproportionate, unfair judicial proceedings before military courts and under military law despite their civilian status, undermining their right to a fair trial. While the Lakes and Fish Wealth Protection Law, No. 146 of 2021, sets narrow terms for the detention of fishers- circumscribed to cases whose gravity justifies such a restriction of personal freedom-, indicating fines or the revoking of fishing licenses and boats as most appropriate measures to most other administrative offenses, fishers operating in areas categorized as “*military-adjacent*” or “*adjacent to borders*” under Decree No.294 of 2019 are vulnerable to draconian measures under military law, even when the alleged violations of which they are accused are of administrative nature. The terms of the pretrial detention under military law are not as clearly defined as those set by civil penal law, and detainees do not enjoy the same guarantees intended to ensure their right to a fair trial.

This reality is not unique to Lake Bardawil. Between 2020 and 2024, EgyptWide has documented over 140 arbitrary arrests of fishers and residents from the areas of Lakes Ghalioun, Manzala, and Mariout, all classified as military-adjacent under Decree No.294.¹⁰⁶

According to Amnesty International, the trials held in relation to Cases No. 5 and 6 of 2025 before the local Military Misdemeanors court were marred by violations of fair trial guarantees. One of the lawyers defending fishers during the trial sessions held for each of the two cases on the 28th January denounced that the court ignored their request to cross-examine the prosecution’s witnesses, a standard practice which should always be guaranteed in a fair trial. The court also held two sessions on the 5th and 6th February, 2025, to which none of the defendants was present, thus further undermining their right to self-defense.¹⁰⁷ In February 2025, the Ismailia Military Misdemeanor Court issued a one-year prison sentence and a fine of 50,000 pounds for the fishermen charged in Cases No. 5 and 6 of 2025.¹⁰⁸

In June 2025, four other fishermen were similarly arrested while fishing in the

106 EgyptWide for Human Rights, 2026, *ibid*.

107 “Egypt: Military Trials of Fishermen an Affront to Justice,” Amnesty International, 11 February 2025, <https://www.amnesty.org/en/latest/news/2025/02/egypt-military-trials-of-fishermen-an-affront-to-justice>

108 “Military Court Sentences Bir al-Abd Fishermen to a Year in Prison and a 50,000-Pound Fine for Violating Fishing Instructions at Lake Bardawil,” Sinai Foundation for Human Rights, 19 February 2025, <https://sinaifhr.org/show/484>

"Al-Rawaq" area, a fishing zone inside the lake, about 2-2.5 kilometers from the shore, by a military police patrol. According to the father of one of them, the fishers had nothing on them but traditional fishing tools, namely, nets and small motorless boats, and limited quantities of fish:

*They were just fishing normally because it's their livelihood... there's no income except the lake; a person goes out to bring in 100 or 200 pounds to spend on the household.*¹⁰⁹

A report was filed against them with the military prosecution on the 26th June, on the charge of "trespassing on a border-adjacent zone," irrespective of the fact that their presence in the area represented an attempt to secure their sustenance amid growing difficulties in fishing in Lake Bardawil, and they were referred to military trial in case No. 324 of 2025, also handled by a Military Misdemeanors court.

Since June 2026, the four fishers have been transferred several times to different facilities, including Marsa Ghezewan (Aghzawan mooring), Bir al-Abd police station, Ismailia security forces station, and the Central Prison in El-Arish, before a one-year prison sentence and a fine of 50,000 pounds per person was handed down.

Detention conditions in Egyptian prisons and other facilities have been extensively documented as inhumane, degrading, and associated with a high risk of deteriorating health conditions, also a result of medical neglect and intentional mistreatment potentially amounting to torture. The conditions described by families and lawyers of fishers from Lake Bardawil include severe overcrowding forcing detainees to sleep on the floor, forced proximity to violent individuals, and medical neglect, which had particularly concerning consequences when one of them suffered internal bleeding and authorities failed to provide adequate treatment. Families of detainees faced significant financial burdens to cover the costs of visits and meals, as prisons do not provide adequate nutrition, and fines amounting to tens of thousands of Egyptian pounds, which forced them to sell personal belongings or apply for loans.

One interviewee denounced:

*We sold our gold [women's jewels] and borrowed and begged just to pay... should someone be imprisoned for 6 months over a fish?*¹¹⁰

109 Personal interview conducted between December 2025 and March 2026.

110 Personal interview conducted between December 2025 and March 2026.

The consequences of this criminalization process are not limited to detention and judicial proceedings, but extend beyond release, as some fishers are prevented from returning to work or obtaining licenses, while mistrust and fear of further legal harassment dissuade them from interacting with authorities.

Four other fishermen from the Bardawil area were arrested by the military police on the 19th February, 2026, while fishing on simple boats in the Aghzawan mooring area. According to the interrogation report, which we were able to access, and the testimony of one of their relatives, the arrest came in the context of growing financial pressure, especially with the approach of the month of Ramadan, which pushed them to venture into the lake outside the permitted fishing season to secure their sustenance. The relative commented:

We're in circumstances that only God knows... they told us to go down and get something to spend, because there's no income except the lake.

The detainees were successively transferred several times to different facilities, including Bir al-Abd police station and the prison in El-Arish, and were arbitrarily detained without formal charges until March 2026, a period during which they were not permitted any visits or communication with families and lawyers. The relative whom we interviewed reported:

We haven't met any of them at all, and we don't know how to talk to them since the day they were caught.

In March, they were referred to a military trial in case No. 14 of 2026, Ismailia Military Misdemeanors Court.¹¹¹

Detained fishers' families also suffer from severe social and economic repercussions, as they often rely solely on fishing for their family income. The detention of fishers plunges them into a state of severe food insecurity, aggravated by the regime of arbitrariness surrounding the judicial proceedings, which prevents or delays access to case-related documentation proving the loss of income and thus, potential eligibility for food subsidies and other income support measures. In some cases, fishers' absence due to detention also deprives families of essential care work, as in the case of a fisher who used to be his disabled father's sole caregiver. An acquaintance, interviewed in the context of this research, claimed:

111 Personal interview conducted between December 2025 and March 2026.

*He was his father's right hand... now the man keeps crying all the time.*¹¹²

Following the arrest, the detained fishers' fishing equipment, including boats and nets, was confiscated without being returned, compounding their economic losses. Testimonies focused on families' concerns with the financial pressure generated by the loss of income, as many were forced to take loans just to cover basic expenses, alongside the burden of visits costing up to Egyptian 500 pounds each.

These incidents indicate a repressive pattern aggravating the atmosphere of insecurity and volatility experienced by the Bedouin communities of Lake Bardawil, which is at the root of multiple human rights violations, including the right to liberty and personal security- as fishermen have been repeatedly arrested and detained without justification in unpredictable circumstances and on vaguely defined grounds, in violation of Article 54 of the Egyptian Constitution, which states that personal liberty is a natural right that may not be infringed, as well as Article 9 of the International Covenant on Civil and Political Rights, which prohibits arbitrary arrest or detention. The cases hereby described also reflect a clear violation of fair trial guarantees and the prohibition of trying civilians in military courts under Article No.204 of the Egyptian Constitution, as well as overt disregard for their right to self-defense, compounded by the large number of trial sessions held in absentia. The latter conflicts with Article 97 of the Egyptian Constitution, which guarantees the right to litigation before the natural judge, and Article 14 of the International Covenant on Civil and Political Rights, which guarantees the right to a fair and public trial before a competent and independent court.

These cases also fueled a pattern of interconnected violations of social and economic rights against the affected fishers and their families, foremost among them the right to work and the right to an adequate standard of living. The right to property was also violated through the confiscation of boats and fishing equipment without compensation. No less serious are the violations related to the right to human dignity and decent detention conditions, as testimonies point to overcrowding, the absence of medical care, and mistreatment, in violation of Article 55 of the Egyptian Constitution, which requires that detainees be treated in a manner that preserves their dignity, and Article 10 of the International Covenant on Civil and Political Rights. Overall, these violations reflect a systematic pattern that undermines not only fishermen's rights as individuals, but also the social and economic security of their communities, and their right to safe and sustainable livelihoods.

112 Personal interview conducted between December 2025 and March 2026.

4. Negative Environmental Impacts of Conservation and Development Initiatives

In 2017, the Egyptian government launched an ambitious nature restoration and economic development project on Lake Bardawil, aimed at upgrading and developing four fishing moorings, removing obstructions totaling 3,500 tons, and dredging the lake inlets, at a cost of 120 million Egyptian pounds at the time.¹¹³ Despite this intervention, a study conducted in 2022¹¹⁴ found the lake to suffer from deteriorating environmental conditions, also as a consequence of the lack of feasibility and sustainability studies informing the 2017 development project. The project also reportedly failed to integrate consultations with the communities living in the vicinity of Lake Bardawil, thus overlooking the social impacts and sustainability of the intervention. Counterproductive and harmful repercussions on fish production have since been reported by local fishers.

Hussein, a fisherman, denounced:

The inlet is in a very bad state now, filled in with sand. It's supposed to be 500 meters wide, but now there's only about 30 or 40 meters open. This inlet is the lake's main source of nourishment. If it's filled in, how is the lake supposed to be fed? The dredgers they brought never once cleaned the inlet.

Sweilem, another fisher, added that:

*There have been changes in the lake for the worse; the inlet is filled in now.*¹¹⁵

Fishermen point out that the dredging within the lake was carried out without scientific planning, which increased the intensity of currents and reduced the vegetation and natural protection for fish. This vegetation used to serve as the natural nursery for fish fry and the main food source for fish, and its removal forced fish to feed on “mud,” which fundamentally affected their quality, size, and growth rates.

Hussein explained:

113 “Development of Lake Bardawil,” Presidency of the Republic, *ibid*.

114 Tarek O. Said. 2022. “An Overview of the Status of Bardawil Lake Environment: Contemporary Constraints, Current Government Policy and Proposed Sustainable Actions.” *Egyptian Journal of Aquatic Research* 48 (3): 181–190. <https://doi.org/10.1016/j.ejar.2022.08.002>

115 Personal interview conducted between December 2025 and March 2026.

At first, the area around the inlet was about 200 meters, and on some days the catch reached 25 tons of fish; nowadays, a day's catch is 13 tons.

Poorly planned delicate environmental interventions have negatively affected lake ecosystems and food production, jeopardizing the achievement of the project's sustainability goals.

Similarly, fishermen's testimonies reveal an evident contradiction between the purported goals of the Future of Egypt Authority's administration of Lake Bardawil and the actual reality experienced by local communities, including Bedouin communities whose indigenous knowledge of the lake tides and ecosystems could significantly help design socially and environmentally sustainable management strategies and approaches to development. While the Authority's administration is officially intended to enhance fish production and quality, improve the lake's environmental condition, and increase employment, fishermen's testimonies point to a decline in fish quantities and revenues.

Abdelkarim attributed this to the absence of a scientific vision, reliance on experts *"from outside the Sinai environment,"* and the marginalization of fishermen who know the movement of currents best, explaining that the dredging work was carried out randomly along the shore without dredging the inlets, leading to their blockage and an increase in water salinity — a biological obstacle that prevents the flow of fish from the sea into the lake.

Under an ecological perspective, new security provisions, such as the ban on bird hunting in the lake vicinity, caused a parallel environmental disaster: facing no natural predators in the area, birds are now depleting fish wealth at an unsustainable pace, which, alongside the factors of landfilling and bottom-scraping, contribute to a sharp decline in fish populations with the consequent collapse of daily production rates from an average of 25 tons over past years to less than 13 tons at best, according to fishermen. This alteration of ecological balances is not merely a loss of biodiversity, but also a threat to the sole source of livelihood for thousands of families. The role of poor environmental policy design and planning by military authorities in the loss of ecological balances and social security for local communities reflects an economic logic that treats natural resources solely as strategic assets for the extraction of profit, not as integrated ecosystems that require care through participatory development.

The research conducted by Said (2022)¹¹⁶ shows that the lake historically enjoyed thriving fishing activity, but in recent decades, the deterioration of its environmental condition led to a significant decline in fishing, which represents a fundamental pillar of residents' livelihoods. Water quality and fish habitats in the lake have also experienced notable deterioration in

116 Ibid.

recent years, leading to a gradual decline in the quantities of fish caught. To address these challenges, compounded by the adverse impacts of climate change, new effective interventions must be implemented to rehabilitate the lake's marine environment and restore the well-being of fish populations. According to the study, as well as to fishers' opinions, enhancing water exchange with the Mediterranean Sea by reactivating tidal movement is the primary mechanism for improving the lake's environmental conditions, primarily through dredging the inlets. This, alongside allocating additional areas within the lake to support fish wealth, would contribute to a significant increase in fish populations.

From a human rights standpoint, the approach pursued by the Future of Egypt Authority for Sustainable Development is at the root of multiple violations of local communities' rights, including, ironically, the right to development and to a safe and healthy environment. In consequence of its harmful impacts, this approach is also a root cause of the erosion of their fundamental rights to work and a decent standard of living.

On top of this, the lack of scientific planning in the project's design, and the disregard for local communities' expertise and priorities reflect a failure of the principles of careful natural resource management and local communities' right to participation, echoed in Article 32 of the Egyptian Constitution, which obligates the state to preserve natural resources and ensure their proper use, as well as Article 27, which emphasizes the state's responsibility for the achievement of sustainable development. The severe environmental degradation fueled by ill-conceived interventions can also be viewed as an infringement on the right to a healthy and balanced environment, as stated in Article 46 of the Constitution, and directly linked to fishermen's ability to exercise their profession.

5. Local Communities' Opposition to the Future of Egypt Authority for Sustainable Development's Administration

Fishermen of Lake Bardawil opposed the unsustainable measures introduced by the Authority's administration by launching a strike in May 2025. In addition to the draconian restrictions and sanctions imposed on the exercise of their profession, the fishers also protested against the announcement that the Authority intended to facilitate the arrival of fishermen from other governorates to operate in Lake Bardawil, which they identified as a further threat to their sole source of income. The fishermen's demands in this strike included allowing them to trawl-fish for shrimp at the start of the fishing

season, lowering invoice values associated with the sale of fish, an end to the Authority's interference in the fish trade processes and the procurement of fishing equipment and fuel, and canceling any imminent initiative to facilitate the arrival of fishermen from outside Sinai to work at the lake.

Notwithstanding the importance of the strike as an attempt to negotiate decent living and working conditions, interviews with fishermen revealed internal divisions and conflicting accounts among fishermen regarding the motives and course of the protest. For example, Abdelkarim considered the strike to have been instigated by the previous administration, and that it was not an expression of genuine demands or grievances from the fishermen, although most participated in it.

In contrast, Naji's testimony emphasized that the strike was indeed an expression of fishermen's demands and a rejection of the Authority's policies that negatively affect their living and working conditions. He also stressed that the administration used a strategy of division to put protesters against one another in order to break the strike and prevent further mobilization:

Fishermen went on strike because of the bad [regulations], but they turned fishermen against each other, and talked to the diving and lighting people and told them to work whether they liked it or not, so it would look like the lake was working and we were forced to go back. ¹¹⁷

After the strike ended, some of the fishermen who had participated in it were subjected to arbitrary restrictions in retaliation for their mobilization, such as being barred from accessing the lake and having their licenses revoked. As soon as the boats returned to work, lists of the "banned" began to appear, including about 50 fishermen who were suspended "permanently" and had their permits revoked. The list included some who had not even participated in the strike, which qualifies the measures not solely as retaliatory but as a form of collective punishment designed to instill a generalized sense of fear.

Fishermen also recount arbitrary, sudden incidents that took place at the mooring gates; some were asked to hand over their records and licenses, then taken to the military police offices to meet Commander Mohamed Al-Bahiri, who reportedly forced them, under threat of "the box" [solitary confinement] and imprisonment, to sign declarations that they would not enter the lake again.

To weaken the mobilization further, some fishers who had participated in the strike were invited to negotiate a solution with representatives of the Future of Egypt Authority in its headquarters in El-Dabaa, Matrouh, hundreds of kilometers away from their place of residence, hollowing out the very meaning of collective negotiation by making it materially inaccessible.

¹¹⁷ Personal interview conducted between December 2025 and March 2026.

One of the fishermen taken to the police station reported:

*They asked us to sign a declaration that we wouldn't go down to the lake again, and if we refused we'd be arrested... and in the end we were banned for good.*¹¹⁸

The Authority was ultimately able to crush the strike and divide the fishermen's front through the combined use of retaliatory measures- occasionally delegated to the police-, the abuse of its administrative powers as a regulatory agency, and the creation of incentives offered to those willing or desperate enough to abandon the struggle and cooperate.

Following the failure of the first strike, fishermen tried to organize a sit-in by gathering in front of the Authority's headquarters in Matrouh. The protest was, however, prevented by the intervention of the National Security Agency (NSA). Abdelkarim recalled:

*The sheikh [leader] of the fishermen got a call from National Security banning the gathering, and they said if it happened, it would be dispersed, and the sheikh became a mediator between us and the Authority.*¹¹⁹

Meetings were indeed held between tribal sheikhs and the Authority's representatives, but they failed to deliver on any of the fishers' demands.

The limits of strike as a pressure tool in a context characterized by the absence or inaccessibility of transparent grievance and redress mechanisms became tragically evident to local communities after these episodes. Abdelkarim reflected bitterly on the complete lack of accountability in the Authority's approach to fishers' demands:

*There's nobody we can turn to in order to talk... once the instructions come down, that's it, there's no one you can talk to.*¹²⁰

This response pattern- or rather, lack thereof- is indicative of a closed decision-making structure that does not allow for the representation of fishermen's interests or their negotiation.

Internal divisions, whether among fishermen or between different crafts, also contributed to fragmenting the strike. Naji explained:

118 Personal interview conducted between December 2025 and March 2026.

119 Personal interview conducted between December 2025 and March 2026.

120 Personal interview conducted between December 2025 and March 2026.

They turned fishermen against each other... the diving and lighting people worked whether they wanted to or not, so it looked like the lake was working.

This fragmentation weakened the lake workers' ability to sustain the strike and created an atmosphere of suspicion and distrust among fishermen, which limited the possibility of building a unified collective stance.

The decline in attempts at collective resistance, such as strikes and sit-ins, was also a consequence of the weakening of the organizational frames and structures that had represented fishermen in the past. Historic worker cooperative associations, such as the "El-Arish" and "Al-Salam" associations (representing fishermen of El-Arish city and Sheikh Zuweid), the "6th of October," "Al-Sahel," "Al-Bardawil," and "Sina" associations, representing fishermen in the Bir al-Abd district and Ramana sub-district, used to act as mediators in protecting fishers' interests, providing them with logistical support and supplying equipment at nominal prices and on installment plans, and marketing fish on behalf of their members, as well as providing health and social care for association members and their families.¹²¹

With the decline of these associations' role, they lost their resources and representative function, leaving fishermen of Lake Bardawil deprived of an institutional actor representing their interests and voices in collective negotiation with state and market actors. This organizational vacuum implies that collective action is now organized without expert coordination or leadership, and is vulnerable to rapid disintegration or containment. The absence of a recognized institutional mediator also increased fishermen's reliance on informal mediations, such as tribal sheikhs or security forces, who do not operate within the framework of clearly defined negotiation mechanisms and do not necessarily possess the expertise to represent workers' interests in negotiations with a military-affiliated entity acting both as a regulator and a market actor.

The limited impact of the strike organized spontaneously in May 2025 cannot be understood in isolation from the decline of the associations' role, as the weakening of fishermen's organizational structure contributed to fragmenting their capacity for collective action, leaving them in direct confrontation with authority without effective representatives or negotiation frameworks. This explains how attempts at resisting the Authority's unsustainable governance model failed to achieve change, and were sometimes met with retaliatory measures.¹²²

Interviews with lake workers and employees of the lake administration

121 Mansour et al., "Challenges Facing Fishermen," 405.

122 EgyptWide for Human Rights, 2026, *ibid*.

additionally indicate that, since taking over, the Authority militarized the entire administration's apparatuses through a strategy of "*exclusion and replacement*", where technical cadres and civilian managers were sidelined through humiliating methods, and employees were given the choice between full compliance with the Authority's military discipline, in exchange for promises of incentives that never materialized, or being laid off. Fishermen describe this situation as "*grinding*," in which military ranks dominate technical engineers, which further shrinks the space for dialogue and the negotiation of disputes between lake workers and the administration, replaced by a vertical system of military-style unilateral governance that sustains the extraction of profit while dismissing affected persons' concerns, grievances, and fundamental rights.

Conclusion

This report has shed light on the social, economic, and environmental repercussions of the Future of Egypt Authority for Sustainable Development's management of Lake Bardawil, in the Sinai governorate of Egypt. The pattern of dispossession, marginalization, and violations against local communities and workers in the context of a state-sponsored "*sustainable development*" initiative, described here, is not unique to Lake Bardawil.

Rather, it represents part of a broader, documented process of extractivist governance of natural resources, sustained by political authoritarianism, which enabled the concentration of wealth and productive activities in the hands of the Egyptian Armed Forces, justified in the name of development and economic growth. EgyptWide for Human Rights has documented patterns similar to those described in this report in four other Egyptian lakes, which were placed under military jurisdiction through the same Presidential Decree, No.294 of 2019, paving the way for land and water grabbing practices enabling the military establishment to profit from the local fish production, while entirely excluding local communities and workers from the benefits.

The findings presented in this report unequivocally point to the catastrophic social and environmental consequences of public intervention planning conducted without transparency and public scrutiny, and excluding local communities and civilian experts from decision-making processes. They also show that this unsustainable and harmful management of natural resources is enabled by institutional failures resulting from the concentration of powers in the hands of the executive and the military establishment, including the absence of public accountability and the weakening of democratic institutions, such as the Parliament; the legalization of harmful practices rooted in conflicts of interest through presidential decrees not published in the Official Gazette; and the diversion of revenues, which are channeled into the military establishment's funds without passing through the public treasury. These practices create a model of economic governance operating in any framework of accountability or transparency, paving the way for widespread human rights abuses, corruption, and the unsustainable management of natural resources and key economic assets.

The criminalization of fishermen through arbitrary arrests, trials before military courts marred with violations, and disproportionate sanctions for minor administrative violations- many of which are a direct consequence of their worsening economic conditions- compound this process of wealth extraction by mobilizing the judiciary and the prison system to ensure that

local communities are excluded from the possibility of partaking the benefits of natural resources and of their own hard work.

Even when justified in the name of *"sustainable development"*, military dominance of economic assets and natural resources ultimately undermines the social and economic security of civilians, fueling poverty and the dismantling of community social fabric, local economies, and traditional or indigenous ways of life.

As a result, affected communities suffer from eroding incomes, accumulating debt, and an inability to cover production costs, which jeopardizes the very existence of their businesses. Poverty forces children to drop out of school and seek employment, depriving them of their fundamental rights and perpetuating spirals of vulnerability. The criminalization of fishermen and their arbitrary detention threatens the food security of entire families.

At the communal level, the social fabric of the Bedouin communities historically tied to Lake Bardawil is disintegrating, and organizational structures representing workers, such as cooperative associations, are disappearing, depriving lake workers of fundamental resources and expertise to sustain collective negotiation and the defense of their interests.

This local crisis ultimately fuels internal and international migration, which exposes affected persons to severe human rights abuses and isolates them from their social safety nets. This phenomenon is documented as well in EgyptWide's (2026) report investigating the socioeconomic impacts of military-led development projects in the Delta region.

This model of economic and natural resources governance affects not solely local communities and businesses, but produces distortive effects on the national economy as well, due to the cumulative effects of its replication across economic sectors- including agriculture, aquaculture, food manufacturing, infrastructure building, healthcare and associated services-, and the diversion of revenues from the public treasury towards the military establishment's finances, which places upon the state the cost of privileges granted to military-led enterprises without reaping their returns in the public budget. The unsustainability of this concentration of resources at a macroeconomic level is evident, particularly considering Egypt's vulnerability to a debt crisis and cyclical borrowing from international institutions, with the employment of new loans to cover previous debts, or to fund *"development mega-projects"* of dubious sustainability.

The ability of military-affiliated entities to enjoy tax exemptions and privileges in acquiring and exploiting natural resources, or securing contracts with the state outside of any transparent public bidding procedures, places the civilian private sector in a position of unequal competition and uncertainty, which discourages investments and drains its growth. This distortion produces

a shrinking of the civilian productive base and a decline in its capacity to generate employment, aggravating widespread poverty and eroding the already meager profit margins keeping small-scale civilian businesses afloat.

The case documented in this report shows how the governance model applied to Lake Ghalioun, Manzala, Burullus, and Mariout, discussed in EgypWide's (2026) report, has been replicated at Lake Bardawil, with the same disastrous socioeconomic and environmental consequences. The origin of the project's adverse impacts cannot be ascribed to individual mistakes or insufficiency of administrative oversight, but resides in the overall design of the project and the authoritarian, exclusionary model of natural resources governance informing it. The diffusion of this model raises fundamental questions concerning the Egyptian government's commitment to principles of sustainability, participation, and fairness in sharing development returns with the local communities, such as the Bedouin communities of Lake Bardawil, for whom the lake is not merely an economic asset but a source of identity and pride inherited across generations. Unless a shift is produced in the state's approach to economic and natural resources governance, prioritizing transparency, participation, and sustainability, Egypt's lake-fishing communities will likely continue paying the price of a development model that they had no part in shaping, and from whose returns they reap nothing.

Recommendations

With respect to the violations documented in this report, and to protect the human and constitutional rights of Lake Bardawil's lake workers and local communities from further harm, and considering the demands presented by the community members interviewed in this research, we urge the Egyptian government and Parliament to undertake the following steps:

1. Ending military dominance over the national economy ,including the fishing sector ,particularly by introducing standards of democratic oversight ,public accountability ,and participatory decision-making across all economic governance processes and at every level of government ;subjecting companies owned, controlled ,or run by the armed forces to the supervision of civilian bodies and state institutions ;repealing Presidential Decrees No 127 .and No 446 .of;2015 and ensuring respect for the economic and social rights enshrined in the Egyptian Constitution ,as well as the UN Guiding Principles on Business and Human Rights, particularly Principles 3(b), 4, and 8.
2. The immediate cessation of all forms of criminalization and repression against fishermen at Lake Bardawil under Presidential Decree No 294 .of ;2019 dropping all charges that lack a sound legal basis ,and dismissing all related cases ,including Case No ,324 .Military Misdemeanors ,of ,2025 and Case No 14 .of ,2026 North Sinai Military Misdemeanors ;and ensuring civilians' right to appear before competent, independent ,and impartial civilian courts ,instead of military courts ,in line with Egypt's obligations under international human rights law ,including Article 14 of the International Covenant on Civil and Political Rights.
3. Repealing Presidential Decree No 294 .of ,2019 which designates the lakes, including Lake Bardawil ,as military-adjacent zones ,and the consequent halting of referrals to military trials ,and ensuring that sanctions imposed on fishers for minor administrative violations are determined impartially by a competent judicial authority ,respecting the principle of proportionality.
4. Immediately terminate all arbitrary administrative regulations and requirements for the exercise of fishing in Lake Bardawil introduced and enacted by the Future of Egypt Authority for Sustainable Development, and reinstate the administration of the Lakes and Fish Protection and Development Authority under the Cabinet, in consideration of both its civilian nature and its expertise and technical capacity to oversee interventions and ordinary fishing activities in the lake.
5. Ensuring that ,following the restoration of the Lakes and Fish Wealth Protection and Development Authority's administration ,its role is limited to regulatory oversight and the collection of legally established fees ,to be determined in consideration of

the most vulnerable fishers' financial capacity, restoring fair competition through the liberalization of production and supply, and preventing the formation of monopolistic clusters.

6. Providing, through the competent administration under the Ministry of Social Solidarity (MoSS), the necessary financial and administrative support to restore workers' cooperative associations representing fishermen.
7. Conducting transparent environmental and social impact assessment studies as part of the design of nature restoration and protection projects on Lake Bardawil, engaging the relevant ministries such as the Ministry of Agriculture and the Ministry of Environment, as well as specialized research centers within Egyptian universities.
8. Integrating Lake Bardawil's fishermen into the national social insurance system as informal workers, with the consequent enjoyment of the associated benefits, such as subsidies to sustain their businesses during the months when fishing in the lake is prohibited.
9. Establishing tailored financial support schemes for fishers and lake workers of Lake Bardawil to facilitate the recovery of the local economy. Potential measures could include financial services and subsidized loans for maintaining and upgrading fishing equipment, which could be funded through government development finance institutions such as the Micro, Small, and Medium Enterprise Development Agency under the Cabinet, or competent government banks such as the Egyptian Agricultural Bank.
10. Establishing permanent democratic dialogue mechanisms between the relevant government bodies and Lake Bardawil's local fishing communities, whether under the umbrella of North Sinai Governorate or other governmental bodies, dedicated to ensuring the participation of fishermen's representatives in the study, planning, implementation, and evaluation of any development initiatives on Lake Bardawil and its coasts and ecosystems.

Fishing Under Military Order

**Lake Bardawil Under the Management
of the Future of Egypt Authority
for Sustainable Development**



SFHR is an independent, nongovernmental, nonpartisan organisation which focuses on monitoring, documenting and reporting on human rights abuses in Egypt, particularly in the Sinai Peninsula and other marginalised areas.



Egyptian Front for Human Rights (EFHR) is an independent European organization established in 2017. The Front works to improve the human rights situation in Egypt through research, advocacy and legal work, specifically in criminal justice.



EgyptWide is an independent civil society organization that monitors and investigates human rights violations, and works for a just, inclusive, and democratic Egypt, where human rights, civic participation, and social justice are fully guaranteed to all –so to say, Egypt-wide.