

BRIEFING



THE DONKEY  
SANCTUARY

# DONKEYS IN GLOBAL TRADE



**WILDLIFE CRIME, WELFARE, BIOSECURITY  
AND THE IMPACT ON WOMEN**

**WARNING**

THIS REPORT CONTAINS GRAPHIC IMAGES THAT SOME READERS MAY FIND DISTRESSING



Donkey skins drying in the sun, Star Brilliant abattoir, Kenya

## ACKNOWLEDGEMENTS

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# THE GLOBAL TRADE IN DONKEY SKINS

The relentless demand for donkey skins, used in the production of ejiao, a traditional Chinese remedy, drives a global trade that is opportunistic, brutal and unsustainable.

The unregulated nature of the donkey skin trade makes obtaining precise figures impossible. However, there was an estimated 160 per cent increase in ejiao production in the five years between 2013 and 2021. Based on current manufacturer reports and currently available data, the minimum number of skins required by 2021 was 5.9 million and, if production continues to grow at the present rate, could reach a minimum of 6.8 million skins by 2027.

This calculation has been reached using previously published statistical models.

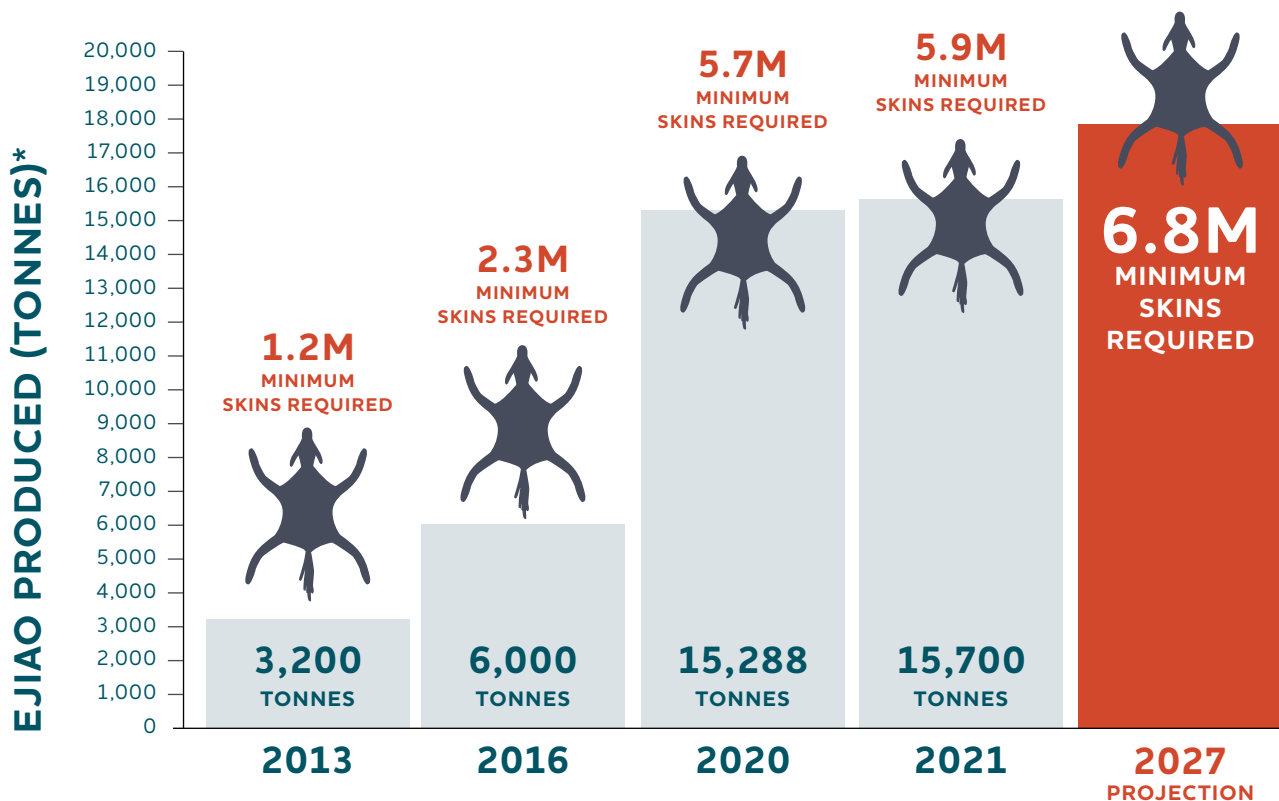
China's donkey herd has diminished from 11 million in 1992 to just under two million according to most recent data.<sup>1</sup> As shown in *The Donkey Sanctuary's Myths or money: Challenges and implications of donkey farming* report,<sup>2</sup> the ejiao industry's efforts to intensively

farm donkeys have failed to address demand and so the industry meets the ever-increasing shortfall by sourcing skins, often illegally, through a global trade.

This trade places pressure on donkey populations globally. This is particularly true in Africa where many people rely on donkeys for their livelihoods, transport, agricultural operations and to access essential resources such as food and water and where a deep human-animal bond often exists.

To meet the relentless demand for skins, donkeys are bought, captured or stolen, including from donkey-dependent communities. In many cases donkeys are walked for days, often across national borders; they are transported and held with scant regard for their suffering; and they are slaughtered, often in the most horrific ways.

The trade is frequently chaotic, covert and hazardous. A largely unregulated and untraceable international trade, in a product that is frequently derived from the unhygienic slaughter



\* Figures based on calculations from Bennett et al (2019)<sup>3</sup> using ejiao output estimates from Hui (2017)<sup>4</sup> and Li (2022)<sup>5</sup>

Many traders use cruel handling and transport methods that cause suffering and distress to donkeys.  
Donkeys on their way to the slaughterhouse near Dong'e China.  
(© Copyright George Knowles Hong Kong georgeknowles@yahoo.com)



of donkeys of unknown health status and origin, creates a high risk of disease, including zoonotic disease transmission.

### **This risk demands urgent action**

Immediate steps must be taken to stop the international trade in donkey skins, and to penalise those operating illegally. While the trade remains legal in some countries and illegal in others, there will always be traders who exploit this inconsistency.

Any company or agency engaged in, or aiding, the international trade in donkey skins is potentially complicit in an illegal trade that causes great harm to donkeys and the people who depend on them.

The impacts of the trade are serious and far-reaching and this briefing paper outlines five areas of greatest concern:

- **Donkey welfare**
- **Wildlife crime convergence**
- **Biosecurity risks**
- **The impact on women and communities**
- **Implications for the Sustainable Development Goals.**

This briefing includes information from previously published reports on the trade, wildlife links and biosecurity risks. To access those reports, visit [www.thedonkeysanctuary.org.uk/end-the-donkey-skin-trade/reports-on-the-donkey-skin-trade](http://www.thedonkeysanctuary.org.uk/end-the-donkey-skin-trade/reports-on-the-donkey-skin-trade)

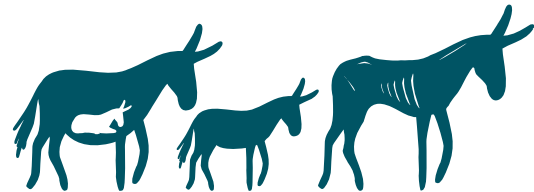
# DONKEY WELFARE

Donkeys are sentient, dependable and hardworking animals, yet millions of them experience appalling suffering every year due to the trade in their skins.

## Donkeys suffer at every stage of the trade.

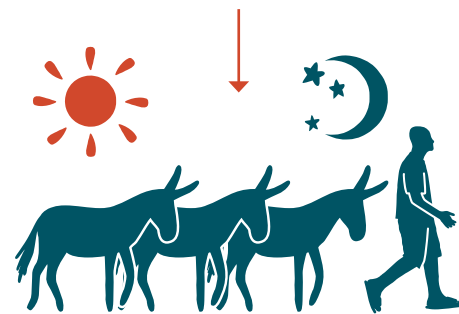
### SOURCING

Pregnant mares, young foals, and sick and injured donkeys are regularly transported and slaughtered for ejiao production.



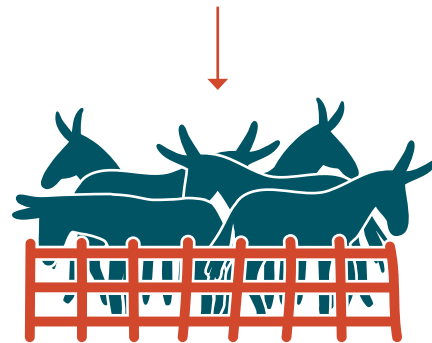
### TRANSPORT AND HANDLING

Many traders use cruel handling and transport methods that cause suffering and distress to donkeys. Donkeys are routinely moved on foot for several days in high temperatures without adequate food or water. Estimates indicate that around 20 per cent of donkeys die during transportation.<sup>6</sup>



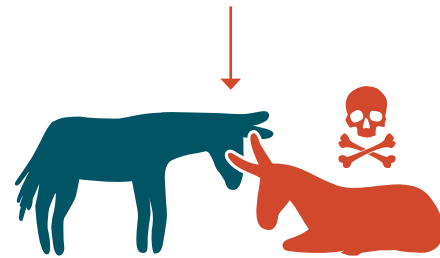
### HOLDING

After long journeys, many donkeys are kept in holding pens for days without access to food, water, shelter or veterinary care. One Kenyan slaughterhouse was found to have dead and dying donkeys, some with open, maggot-infested wounds; aborted fetuses in holding pens; and skinned carcasses dumped alongside the donkeys awaiting slaughter.



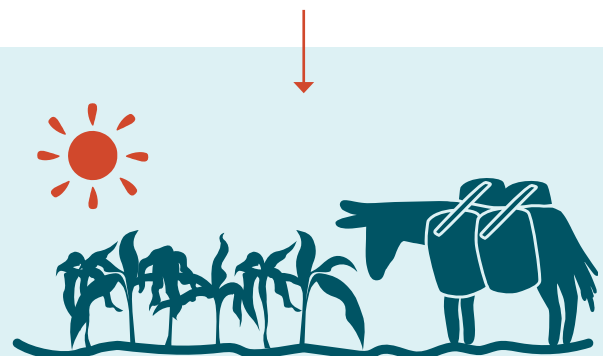
### SLAUGHTER

Animals are slaughtered, often brutally, in full view of other donkeys. Slaughter techniques contravene internationally agreed standards and donkeys routinely experience extreme pain and fear during slaughter.



### IMPACT ON REMAINING DONKEYS

The theft of donkeys from a community places pressure on those remaining as workloads fall to fewer and fewer donkeys resulting in longer hours, heavier loads and less time for rest, water or food.



Donkeys with poor body condition scores at a holding farm, Brazil



Donkeys awaiting slaughter, Goldox abattoir, Kenya



# WILDLIFE TRAFFICKING

“ *The illegal wildlife trade is a serious transnational organised crime. It is also a significant financial crime.*

David Fein, *United for Wildlife 2022*.<sup>7</sup>

The Donkey Sanctuary’s 2022 report, *The Global Trade in Donkey Skins: A Ticking Time Bomb*,<sup>8</sup> reveals evidence of wildlife crime convergence as wildlife traffickers use the global trade in donkey skins to hide their illegal activities. It exposes how business-to-business (B2B) and social media sites act as platforms through which illegal wildlife products are sold alongside donkey skins.

## B2B PLATFORMS

Business-to-business e-commerce platforms facilitate the sale of products globally, and not all of these products are legal. A 2019–2020 study by Oxford University’s Wildlife Conservation Research Unit (WildCRU) and Saïd Business School, supported by The Donkey Sanctuary, into products sold on B2B sites established clear links between wildlife trafficking and the legally complex

trade in donkey skins.<sup>9</sup> A total of 382 vendors, registered across 55 countries, were found to be selling donkey skins across seven B2B platforms. Around 20 per cent of those traders were also selling a total of 30 wildlife products from at least 11 species including pangolins, cheetahs, elephants, tigers and rhinoceros that are all listed under the Convention on International Trade in Endangered Species in Wild Fauna and Flora (CITES).

**382** vendors selling donkey skins



**30** types of wildlife product



**11** ENDANGERED/PROTECTED wildlife species traded with donkey skins



**55** COUNTRIES had donkey skin vendors registered



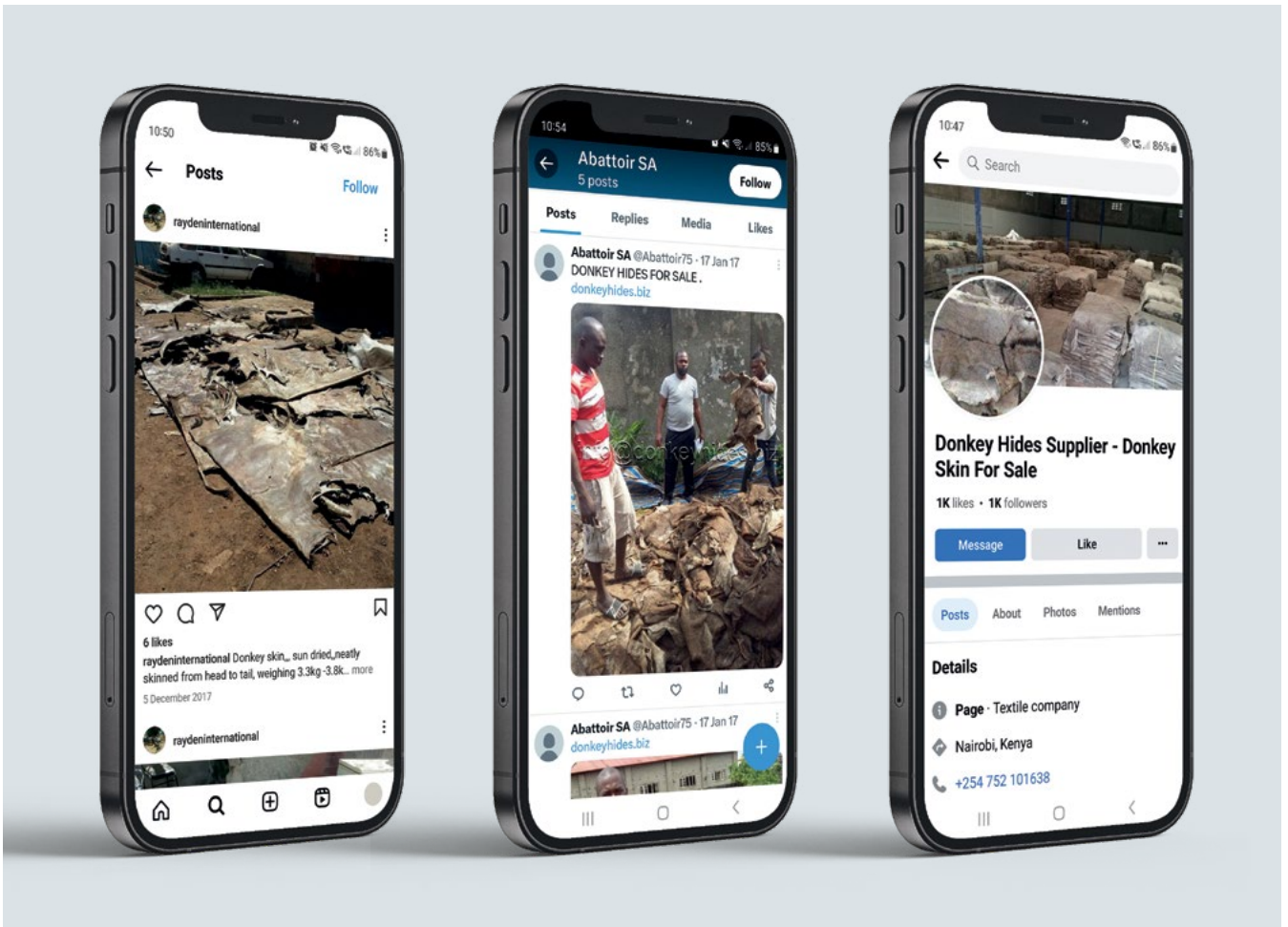
**7** B2B PLATFORMS involved in the sale of donkey skins



**20%** of donkey skin traders also selling wildlife products from CITES-listed species







## SOCIAL MEDIA

Social media platforms facilitate illegal trade by providing traders with anonymity and secure communication channels, and by developing algorithms that inadvertently but effectively connect buyers with illegal traders.

**Facebook** hosts donkey skin traders from countries where donkey skin export is illegal, including:

- Several Nigeria-based traders, one with over 200 photos of items for sale including donkey skins, hardwoods and pangolin scales.<sup>10</sup> The export of donkey skin is prohibited in Nigeria and pangolins are a CITES Appendix 1 species.
- A Kenyan-based company advertising '2000 pieces of donkey skin/hides available for sale now in Kitale, Kenya'. Kenya has not licenced donkey slaughterhouses since early 2020.
- A Thailand-based trader offering donkey skins alongside wildlife products including Ling Yang Jiao (saiga antelope horn), Tezhi Sanbian Jiu or Three-Penis Liquor (Cantonese dog, seal and deer penises) and Lu Bian (slices of sika deer testes).

**YouTube** hosts multiple donkey skin traders from a range of countries, including:

- A trader in Senegal who promotes sales of donkey skins and dried seahorses. Senegal has a ban on the export of donkey skins and many seahorse species are protected.
- An Italian-based trader openly advertising donkey skins from Ghana, with footage of 2,800 skins in its warehouse. Ghana prohibits the slaughter of donkeys for their skins.

**X (formerly known as Twitter)** hosts donkey skin traders from Nigeria. In addition, a 2018 tweet (x) from a company based in Abu Dhabi advertises donkey skins alongside lion and tiger teeth, as does another from a company in Romania. The same trader offers macaws and grey parrots for sale.

**Instagram** hosts traders from Kenya and Nigeria, both of which have slaughter/export prohibitions in place, and Cameroon, which has no facilities licenced by China for this purpose.

# A GLOBAL TRADE



## COLOMBIA

A 2021 InSight Crime investigation into donkey trafficking in Colombia revealed widespread purchasing, theft and slaughter of donkeys, and exposed the impact on people who use donkeys on their farms and for the transport of goods, food and people.<sup>11</sup>

The investigation found substantial evidence of loopholes and non-compliance with Colombian laws. Investigations commissioned by The Donkey Sanctuary uncovered links between the donkey skin trade in South America and the smuggling of jaguar teeth to Hong Kong and Vietnam.

## SOUTH AFRICA

A 2017 National Geographic investigation highlighted close links between the donkey skin trade in South Africa and the illegal trade in abalone, a shellfish popular in Asia. It also uncovered a plethora of other problems with the trade from abject cruelty to the contravention of local laws, environmental pollution and the active involvement of Chinese triad cartels.<sup>12</sup> It prompted high-profile seizures including:

**June 2016 – Bloemfontein:** a raid by authorities on a property found 82 dead and dying donkeys in an outbuilding; South Africa's National Society for the Prevention of Cruelty to Animals (NSPCA) found a gas burner and giant pots for processing abalone at the same property, which is smuggled out of South Africa in huge quantities. Illicit abalone exports from the country exceed 2,000 tons annually, equivalent to some 500,000 shellfish.

**January 2017 – Bapsfontein:** authorities discovered 2,921 donkey skins in a storage unit due for imminent shipment from Durban. Police linked the shipping instructions for the confiscated hides to Anatic Trading. Company invoices showed that Anatic Trading shipped a total of 12,776 donkey skins to Hong Kong between July 2016 and December 2016, a figure far exceeding the entire annual quota for South Africa.

**May 2017 – Benoni:** NSPCA inspectors discovered 1,000 donkey skins in bales tied together on a plot of land near Johannesburg. Hidden among the bales were seven tiger skins.

Consignments of illegally trafficked donkey skins seized by Nigerian customs, Lagos



Donkey skins drying in the sun while carrion birds circle the carcass pile, Star Brilliant abattoir, Kenya



# SHIPPING

Wildlife crime often occurs alongside other illicit trade such as money laundering, drugs, arms and human trafficking, with traders using existing routes and anti-detection methods to evade enforcement.

What has been less recognised, studied or understood is the role of the complex legal trade in donkey skins as a vehicle for illegal wildlife trade of CITES-listed species and other illicit trafficking facilitating serious, organised transnational crime.

Wildlife traffickers rely on land, air and sea transport networks to move illegal commodities across borders, oceans and often continents. Containerised shipping is the primary method used for illicit wildlife trafficking and the transport of donkey skins from source countries to overseas markets. This is due to cost

effectiveness for large and heavy loads, low detection rates and corruption along the supply chains.

The global shipping industry often unwittingly plays a pivotal role in facilitating this complex, harmful and illegal trade. It contributes to the movement of skins, which themselves are potentially hazardous and illegal, but which are also used to mask an illicit trade in other wildlife products. Wildlife trafficking can affect lawful business, having a direct impact on a company's reputational, legal and economic risk.

**In June 2022**, the 46th Meeting of the Facilitation Committee (FAL46) of the International Maritime Organization (IMO) adopted new '*Guidelines for the prevention and suppression of the smuggling of wildlife on ships engaged in international maritime traffic (FAL.5/Circ.50)*'.<sup>13</sup>

This endorsement by the United Nations' specialised agency sends a strong message about growing international efforts to combat illegal wildlife trade and its impacts on global biodiversity as well as the survival of many species in the wild. The guidelines are an additional tool to prevent and combat illegal wildlife trade and other forms of transnational organised crime in the maritime sector. It is hoped they will also encourage coordination and collaboration at the international, regional and national level, as well as between competent agencies, maritime transport operators, seafarers and shippers in the prevention and suppression of illegal wildlife trade.

Using a legal trade as a smokescreen for illegal activity is not new. Illegal wildlife traders often offer a diverse range of products and doing so

enables them to ship illegal products disguised or concealed within legal trade.

Donkey skins are often shipped with CITES Appendix I listed wildlife and/or products (a practice known as 'parallel trafficking') including pangolin scales, rhino horn, ivory, tiger skins, shark fins, seahorses, sea cucumber and fish maw. Being CITES Appendix 1 means that commercial trade in these animals and animal parts is either entirely illegal or at least tightly controlled.

While the shipping industry is increasingly aware that the donkey skin trade is being used as a vehicle for illegal trade, identifying donkey skin shipments is a significant challenge. With no dedicated World Customs Organization Harmonised System Code (WCO HS code), donkey skins are shipped under the HS code 410120 (raw hides and skins and leather), which covers all equine and bovine-derived skins.

This vagueness is routinely exploited by exporters who provide either ambiguous or false descriptions, or no description at all, making identification of donkey skin shipments very difficult.

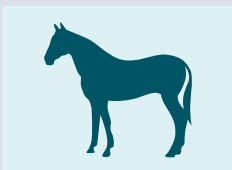
“ There is a market for space in the cargo hold. In addition to sending the treated donkey skins, exporters can send skins and furs of other animals that have been captured and killed illegally. Prosecutors also suspect that money launderers and drug traffickers can buy this space.

InSight Crime<sup>14</sup>

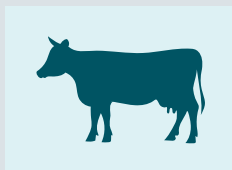


Donkeys held in pre-slaughter pens, Brazil (Image credit: Frente Nacional de Defesa dos Jumentos)

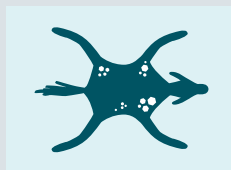
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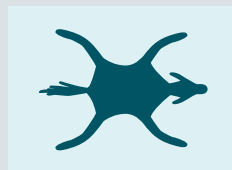
Equine



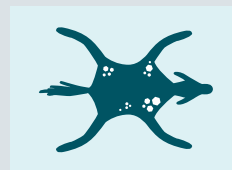
Bovine



Salted asinine skins



Dried donkey skins



Salted donkey skins

Shipping companies have previously been fined for failing to take adequate steps to prevent the shipment of contraband goods. Those transporting donkey skins that are not compliant with statutory quarantine and biosecurity rules (from an import perspective) or are derived from countries with a ban on donkey skin exports (from an export perspective), may find themselves in a legally vulnerable position.

**The shipping industry must invest in:**



**CAPACITY BUILDING, TRAINING AND AWARENESS**



**DIGITAL DOCUMENTATION TO MITIGATE DOCUMENT FALSIFICATION**



**AUTOMATIC RISK PROFILING TO IDENTIFY SUSPICIOUS SHIPMENTS, CUSTOMERS AND TRADE ROUTES**



**INCREASED CUSTOMS INVOLVEMENT UPSTREAM THE VALUE CHAIN FOR CONTAINER INSPECTION**

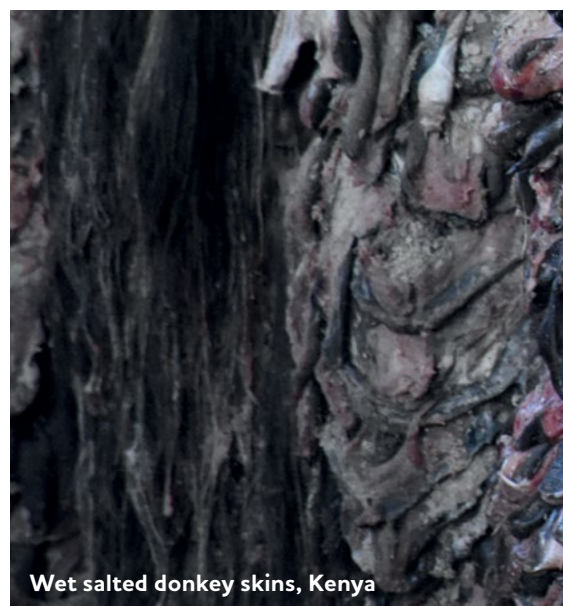


**CLOSER COLLABORATION BETWEEN THE PRIVATE AND PUBLIC SECTORS**

The risks associated with the global trade in donkey skins are more than sufficient to warrant shutting down the trade. But these risks are further escalated by the links between the trade in donkey skins and international wildlife trafficking. Evidence included in the first report of the *Ticking Time Bomb* series shows these links are both extensive and enduring. It has also formed part of investigations by authorities into the criminal actors behind wildlife trafficking and the illegal donkey skin trade.



Donkeys awaiting loading onto trucks, Nigeria



Wet salted donkey skins, Kenya

“ Illicit wildlife trafficking is a transnational topic, transcending jurisdictions, and collaborative multilateral efforts of many stakeholders are necessary to successfully fight it.

**International Maritime Organization Secretary, General Kitack Lim, 2022.<sup>15</sup>**



# BIOSECURITY

Whenever animals are transported within and across national borders, there is a risk that those animals will carry, and ultimately spread, diseases that are harmful to humans (zoonosis) and animals. Similar risks apply to the transport of animal-derived products.

The devastating and unparalleled public health and economic impacts of Covid-19, and the potential impact of any future zoonotic disease outbreak, gives us reason to urgently and seriously consider the risks associated with the phenomenal scale at which animals and their products are transported around the globe for human consumption and use. Once largely unseen, there is now greater public awareness of the magnitude of their global movement – billions of animals, thousands of species, and an immeasurable human health risk.

Illicit wildlife trade has implications for the environment as well as human health. With unregulated trade, humans and livestock are at risk of disease and pathogens, resulting in significant harmful outbreaks. The potential ramifications include impacts on human health, widespread damage to agricultural industries, destabilising economies and threatening national security.

One Health recognises the interconnection between people, animals, plants and their shared environment. It is a collaborative, multisectoral and interdisciplinary approach that involves working locally, regionally and nationally.

‘International trade is the single most important factor responsible for the dissemination of various equine pathogens,’<sup>16</sup> and this risk is further compounded in the donkey skin trade due to:

- the largely unregulated, and often illegal, nature of the trade
- poor animal health and unknown disease status
- unhygienic slaughter
- a lack of traceability and adequate biosecurity measures.

Countries importing live donkeys and their by-products are at great risk of introducing serious

infectious diseases to their equine populations, domestic livestock and humans. The intensive nature of donkey farming in some countries could lead to diseases spreading at a rapid rate with the potential for enormous negative economic effects, including to lucrative racing and sports horse industries.

Diseases vary in severity and impact to human health and can range from mild conditions such as ringworm, to potentially deadly diseases like rabies and glanders. Anyone who has close contact with infected live donkeys, or contaminated by-products, is at risk of zoonotic diseases.

As a prey species, donkeys often display only subtle or non-specific signs of disease. Infectious donkeys may go unnoticed or undiagnosed and, as a result, continue to mix with other donkeys, allowing infectious agents to spread to otherwise healthy animals.



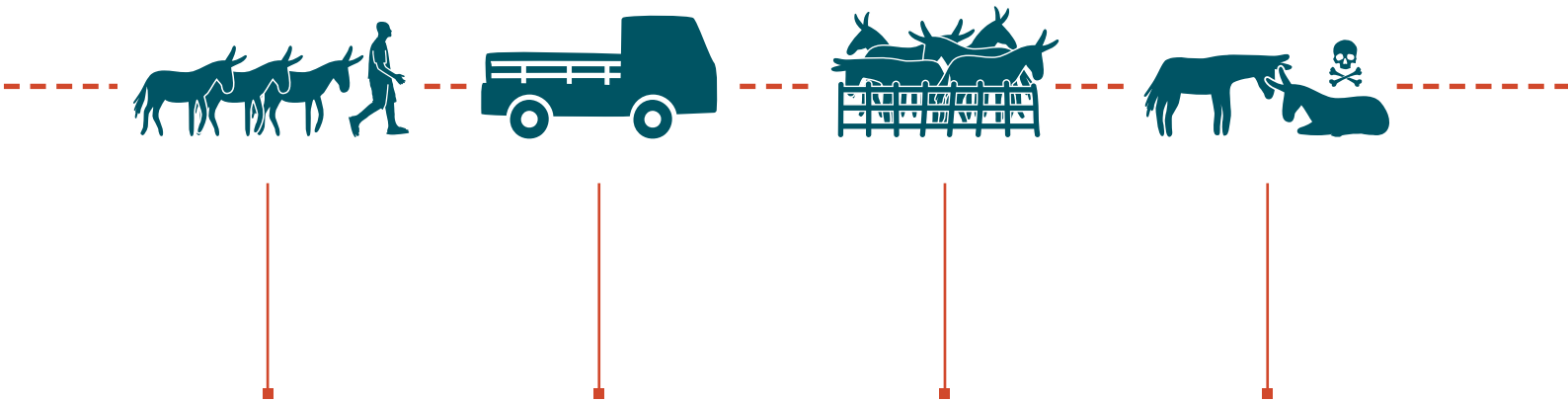
“ Reducing the risk of zoonotic diseases also reduces indirect societal losses such as negative impacts on the livelihoods of small producers, poorer nutrition, and restriction of trade and tourism that, when included, bring the global costs of some recent zoonotic disease events to tens of billions of dollars.

**Food and Agriculture Organization, World Organisation for Animal Health, and the World Health Organization, 2019.<sup>17</sup>**



Unhygienic slaughter conditions at a field slaughter slab, Northern Ghana

Each link in the donkey skin supply chain poses its own public health risk. These risks can no longer be ignored. Urgent action is needed to protect human and animal populations from potentially catastrophic impacts.



### TRANSPORT ON FOOT:

Donkeys are sourced and stolen from rural African communities before being trekked hundreds, or even thousands, of kilometres across international borders to reach slaughter hubs. The physical stress of these journeys weakens immune systems and sick and diseased animals routinely enter the supply chain.

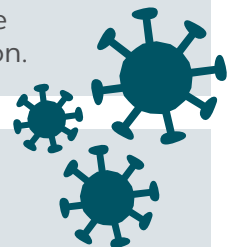
### TRANSPORT BY ROAD:

Donkeys are routinely trucked thousands of kilometres for slaughter. Cramped conditions and poor ventilation inside lorries aid infectious disease transmission. Respiratory infections, including equine herpes virus (EHV), strangles and equine influenza, are transmitted in nasal secretions from infected individuals to those nearby.

### HOLDING AND SLAUGHTER:

The prevalence of key diseases differs between countries and regions and, when donkeys from different populations are brought together, there is a high risk that disease will spread. Slaughterhouse staff are exposed to the risk of infection from any zoonotic disease the donkeys may carry.

Many donkeys are slaughtered outside of slaughterhouses, often on open 'slaughter slabs' or simply on the ground. This 'backyard slaughter' or 'bush slaughter' occurs in rural areas without basic facilities to ensure good hygiene, public safety and the avoidance of environmental contamination.



The Donkey Sanctuary has evidence of hundreds of donkeys, from as many as five countries, being confined in small compounds awaiting slaughter in Kenya. Many were injured, visibly diseased, others had collapsed from exhaustion. Despite this, these animals would be killed at the slaughterhouse and their skins exported for ejiao production in China.



Fresh donkey skins in range of other domestic livestock, Northern Ghana



In 2019 equid fatalities reached the tens of thousands along recognised skin trade routes in West Africa. 62,000 equids died in Niger alone.<sup>18</sup>



## PROCESSING:

Drying and salting, the primary means of processing donkey skins before shipping to China, allows the survival of some pathogens. For example, glanders bacteria and anthrax spores have the potential to survive some processing methods: there is a risk they could

be present in consignments of skins and cause disease in equids or humans at the place of arrival. Additionally, certain insect disease vectors could survive inside consignments of skins and have the potential to establish infection in a new population of equids or humans.

The International Livestock Research Institute (ILRI), commissioned by The Donkey Sanctuary, used standardised methods of DNA and RNA detection to test 109 donkey skins that originated from the Star Brilliant slaughterhouse in Kenya in May 2020, and were destined for consignment to China, most likely via Hong Kong. Samples from these skins were analysed for the presence of infectious disease-causing agents: two returned positive results for the African Horse Sickness (AHS) virus; and 88 tested positive for *Staphylococcus aureus*, 44 of which were identified as methicillin-resistant *Staphylococcus aureus* (MRSA) with three isolates being able to produce the toxin Panton Valentine Leukocidin (PVL), both of significance for human health.

The biosecurity risk associated with the donkey skin trade is exacerbated by its strong links to wildlife trafficking, which can

have devastating consequences in terms of human disease outbreaks as well as threats to livestock, international trade, rural livelihoods, native wildlife populations and ecosystem health. Most major disease outbreaks in human populations in the past 30 years, including ebola, HIV and SARS, have been linked to wildlife origins. The catastrophic potential of disease outbreaks has been abundantly demonstrated by the global Covid-19 pandemic.

Any country in which the donkey skin trade exists, either legally or illegally, is exposed to a level of risk that can only be truly mitigated by stopping the trade.

The global transport sector plays a critical role in facilitating the movement of donkey skins around the world. Action is urgently needed to address the risks and halt the trade to mitigate existing and emerging biosecurity hazards.

# THE IMPACT ON WOMEN AND COMMUNITIES

Working equids fulfil a particularly important function in many communities and, for some families, equid ownership represents the only viable escape from extreme poverty.<sup>19</sup>

Livestock ownership generally provides an unparalleled pathway out of poverty for a billion people globally.<sup>20,21</sup> This is particularly true in low- and middle-income countries, where they play a critical role in alleviating poverty for hundreds of millions of smallholders.<sup>22</sup>



Riziki Mwanamwali Mohamed of Matondoni Village and her donkey Aitogal

**Around 600 million people globally derive an income from working equids.<sup>23</sup>**

Equid ownership specifically brings great benefits to many people and plays a particularly important role in the lives of many of the world's most vulnerable women and children.

The benefits of donkey ownership are vast, and they are both immediate and long term.

- **Direct income** through agriculture and construction.<sup>26</sup>
- **Time and energy saving** through the transport of goods and water. This exhausting work is otherwise done by women who, with a donkey, can spend more time on activities such as childcare or paid employment.<sup>27</sup> In Ghana, for example, people report being able to take on paid work due to the time they gain by having a donkey.<sup>28</sup>
- **Investment potential** – additional income earned through donkey ownership can be invested in savings and loan schemes which, in turn, may strengthen people's financial position.
- **Increased social capital** and community standing as well as potential to contribute to the community by loaning the donkey.
- **Ability to care for children** – women who don't own donkeys may be forced to leave young children in the care of others while they make the journey to collect water or wood. Having a donkey enables the mother to carry their child while the donkey carries the load.
- **Children attending school** – some families without a donkey are forced to keep their children home from school to do the work that could otherwise be done by a donkey.

**For some people donkey ownership is what stands between them and poverty or ultra-poverty.<sup>24,25</sup>**



The loss of a working donkey can have a devastating impact on a donkey-dependent family. Without a donkey, it is usually women or children who are forced to carry the load. In some cases, young girls must leave school to do the work that was once done by the donkey.

Donkey owners who participated in research conducted by the University of Bristol into the socioeconomic value of donkeys in Ethiopia reported that they could not meet their or their family's basic needs if not for their donkeys.<sup>29</sup>

“ This donkey got me out of extreme poverty. There was a time my family couldn't eat two times a day, but now my family and I can get enough food. Thanks to my donkey, I am living a better life.

**University of Bristol study participant.**

## SAMUNA – ETHIOPIA



Samuna lost her husband 15 years ago and supported eight children on her own by rearing cattle, sheep and goats. Her three donkeys help her transport produce to market and to collect the water essential to her family, neighbours and livestock.

“ If there are no donkeys, there is no community. Donkeys are like my right hand. My donkey doesn't fail me – she is everywhere I am, doing everything.



## LILIAN – NAIROBI



Living on the outskirts of Nairobi, Kenya, Lilian uses her donkey to transport water, take vegetables to market and transport cement for income. Her first donkey was stolen, robbing her of her only source of income and forcing her to take a loan to purchase another. She doesn't have the money she needs to build a structure to protect her donkey at night so she tethers her closely to her bedroom window so she can hear any disturbances. Lilian knows her livelihood remains at risk from the skin trade.

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, is a shared blueprint for global peace and prosperity across 17 Sustainable Development Goals (SDGs). These are an urgent call for action by all countries, recognising that ending poverty and inequality must go hand-in-hand with strategies to improve health, education and employment and spur economic growth, while tackling major environmental challenges.



Donkeys are critical to millions of people and the global trade in donkey skins undermines global efforts to achieve the SDGs.



## SDG 1 – NO POVERTY

- For some families, equid ownership represents the only viable escape from extreme poverty.<sup>30</sup> Income generated by working animals not only funds immediate household needs, but also enables access to social savings schemes, providing a critical safety net.<sup>31</sup>
- Two-thirds of donkey owners in Mali report a monthly income of more than £100 (\$167) through the work of their donkeys; above the average per capita income.<sup>32</sup>
- Communities in Mexico, Pakistan, Kenya and Ethiopia say working equids are critical to income generation through transport of goods and crops.<sup>33</sup>
- Rural Ethiopian households report that working equids contribute an average of 14 percent of family income.<sup>34</sup> Donkey ownership enables families to save money, send funds to relatives and contribute to community savings schemes.<sup>35</sup>

“ Many of the world’s most urgent SDGs can be achieved by cost-effective and simple solutions that benefit some of the poorest and most vulnerable people in society. The most striking example is the welfare of working animals.

**International Coalition for Working Equids.**



## SDG 2 – NO HUNGER

- Donkeys enable farmers to reach markets, across difficult terrain, to both buy and sell produce, enabling farmers to earn an income and to access a reliable food source.



## SDG 3 – GOOD HEALTH AND WELLBEING

- Water-borne diseases and water and soil pollution are major human health issues.<sup>36</sup> Unregulated and unhygienic animal slaughter and carcass disposal pose high risks for both people and the environment, and evidence of soil and water contamination has been found across Africa.<sup>37</sup>
- Sick animals should not enter the human food chain, yet this routinely occurs in the donkey skin trade.



## SDG 4 – QUALITY EDUCATION

- Some families without a donkey are forced to keep their children home from school to do the work that could otherwise be done by a donkey.
- Donkeys are the only available mode of transport in some of the world's most remote and rural communities.<sup>38</sup>

“By providing additional income and undertaking labour tasks otherwise done by people, working animals release children from household work to attend school and help parents care for them at home.”<sup>39</sup>

**International Coalition for Working Equids.**



## SDG 5 – GENDER EQUALITY

- For many women and girls, a great portion of time is spent transporting water, firewood and household supplies. Without a donkey this is a laborious, strenuous and time-consuming task.
- By freeing up women's time, donkeys better enable some women to find paid employment and to be economically active, which, in turn, contributes to greater gender equality.
- By enabling women to be economically active, donkeys also help increase women's community status and personal resilience.<sup>41</sup>





“ The 200 million hours women and girls spend every day collecting water is a colossal waste of their valuable time. **UNICEF.**<sup>40</sup> ”





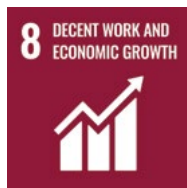
“ When clean water is consistently unavailable, the world’s poorest must spend much of their disposable income buying it, or a large amount of time transporting it, which limits development.<sup>42</sup>

**United Nations Environment Programme 2016.**



## **SDG 6 – CLEAN WATER AND SANITATION**

- Up to 80 per cent of Tunisians living in remote and mountainous regions rely on donkeys or mules to access fresh water.<sup>43</sup>
- Most households and businesses in Nouakchott, Mauritania are supplied water by watercarriers who use donkeys for transport.<sup>44</sup>
- When the donkeys used to transport water enter the donkey skin trade it is often women and children who must carry the water. For children, this may mean leaving school.



## **SDG 8 – DECENT WORK AND ECONOMIC GROWTH**

- Income generated through working animals enables people to save money, invest and fund education.<sup>45</sup>
- In the highlands of Central Mexico, smallholder farms with a pair of mules could attribute a net daily income of 30 percent of the local minimum daily wage to the work of their equids.<sup>46</sup>
- Most donkey-owning brick kiln workers participating in a study conducted in Ahmedabad, India say they are financially dependent on their donkeys.<sup>47</sup>



## **SDG 10 – REDUCED INEQUALITIES**

- For people belonging to communities or castes traditionally known for equid ownership, working equids provide an otherwise inaccessible opportunity for debt alleviation, promoting a state of economic inclusion within the casual worker community.<sup>48</sup>



## **SDG 13 – CLIMATE ACTION**

- Donkeys and mules are well suited to arid zones and, as such, can both support livelihoods and increase people’s capacity to adapt to climate change.<sup>49</sup>
- Donkeys and mules can assist with restoring income and productivity after a disaster and help their owners resume work.

# CONCLUSION

The global trade in donkey skins facilitates criminal activity, leads to the spread of disease and has often disastrous consequences for some of the world's most vulnerable people.

The trade is often illegal and untraceable, and impacts donkey populations in the countries where they are needed most. The loss of donkeys harms not only families and communities but also undermines global efforts to achieve the SDGs.

Companies, agencies and governments that facilitate the trade must take urgent steps to end their involvement. From governments allowing exports, to shipping companies unwittingly facilitating the trade, to online platforms providing a gateway for illegally traded skins – all must act.

Global, multi-sector action is urgently needed to end this animal welfare and humanitarian emergency.



Donkey skins and butchered carcass, Northern Ghana



# RECOMMENDATIONS

The ejiao industry is the driver for the donkey skin trade. We call on producers to stop importing donkey skins and end this brutal trade. We urge the industry to invest in developing new and lucrative technologies, such as cellular agriculture, that would enable the production of donkey collagen without causing immeasurable suffering on a global scale.

In the meantime, the following recommendations set out how other actors in the trade can take steps to drastically reduce the number of donkeys slaughtered and traded, so that working together we can reduce the impact of this animal welfare and humanitarian emergency.

## Shipping industry

Wildlife traffickers rely on land, air, and sea transport networks to illegally move wildlife and their products from source to consumer countries. Containerised cargo is the dominant method used for the illicit trafficking of wildlife due to cost effectiveness, transport of large volumes and heavy weights and low detection, with more than 800 million containers transported globally each year. Ninety per cent of International Wildlife Trade is trafficked via maritime routes, however less than two per cent of containers are inspected (United Nations Office on Drugs and Crime 2012 and Zavagli 2021).

- 1. Introduce and enforce a ‘No Donkey Skins Carriage Policy’** following the approach taken with wildlife trafficking.
- 2. Adopt the International Maritime Organization (IMO) guidelines for the prevention and suppression of the smuggling of wildlife of ships engaged in international maritime traffic** (FAL.5/Circ.50).
- 3. Implement World Customs Organization (WCO) international best practice in cargo risk assessment** including to:
  - a. Apply the SAFE Framework of Standards to enhance the security and facilitation of global trade
  - b. Implement the Cargo Targeting System (CTS), an automated risk profiling system enabling fast and comprehensive analysis of cargo to detect suspicious consignments
  - c. Recommend that the WCO Harmonized System code be mandatory on Bills of Lading. One of the main challenges is to identify suspected donkey skin shipments, as there is no dedicated WCO HS code for donkey skins yet the majority of shipments are recorded under Chapter 41 (‘raw hides, skins and leather’) with a single HS code, 410120, covering all equine and bovine-derived skins. This vagueness is routinely exploited by exporters who provide either ambiguous descriptions, or no description at all, posing a significant challenge for shipping companies to identify whether the cargo contains donkey skins.
- 4. Undertake due diligence** on customers and shipping documentation.
  - a. Know your customer:
    - i. Identify high-risk consignees who have previously shipped donkey skins/illicit wildlife products and share this information

- ii. Assess new customers and monitor existing ones
- iii. Develop and maintain a Red Flag/caution list of fraudulent shippers, customers and clients
- iv. Encourage shipping companies to submit relevant documents to customs departments through digital channels
- v. Move towards digital documentation (i.e., CITES) to automate and expedite transport processes.

b. Identify high risk countries/source of origin:

- i. Identify suspicious shipping trade routes
- ii. Identify actors in the countries of origin for shipments of donkey skins, including the trading ports and shipping companies frequently used by traffickers.

## 5. Review and monitor Red Flag Indicators

Many indicators of suspicious cargo are common to all forms of contraband, including trafficked wildlife. High levels of corruption at ports should be considered a major overarching Red Flag, since traffickers exploit these weaknesses.

- a. Improve screening systems and cargo risk profiling
- b. Monitor for high-risk language and wording on Bills of Lading that might indicate donkey skins
- c. Encourage consignees to use WCO HS codes on Bills of Lading
- d. Provide shipping documentation to customs in a timely manner
- e. Undertake supply chain assessments to identify gaps and loopholes and implement procedures to prevent corruption

f. Implement efficient reporting mechanisms.

## 6. Collaborate with law enforcement agencies and civil society

to coordinate investigations into suspicious customers/consignees and shipments and to share intelligence.

## 7. Train and equip staff

to ensure they have capacity to implement a 'No Donkey Skins Carriage' Policy. Regular training should include new trafficking routes, concealment methods and Red Flag Indicators.

## 8. Adopt a zero-tolerance policy for any act linked to illicit wildlife trade

(and other transnational, organised crimes) and corrupt behaviour by incorporating these guidelines into their standard operating procedures and adopting a 'No Donkey Skins Carriage Policy.'

## Importing governments

### 1. Immediately suspend or ban the export of donkey skins.

### 2. Instruct customs and enforcement agencies to seize consignments of donkey skins.

### 3. Proactively scrutinise consignments listed under the WCO HS 4100 code and ensure in-country companies who facilitate such consignments are aware of national prohibitions on donkey skin exports.

### 4. Recognise the risk of zoonosis and take a One Health approach to tackling the spread of infectious diseases.

### 5. Work closely with other stakeholders to develop, implement and enforce strong legislation that protects global donkey populations and the communities that rely on them.

## Exporting governments

1. Immediately suspend or ban the export of donkey skins.

**Until such time as enforced suspension is in place, act with urgency to:**

2. **Build capacity in state veterinary services** to support the enactment and implementation of legislation relating to animal welfare, food safety, hygiene at slaughter, certification of slaughterhouse outputs and other related legislation.
3. **Take a One Health approach to mitigate against equine infectious disease threats, public health concerns (zoonosis) and environmental degradation**, including the pollution of water and land, that arise from the slaughter, transport and trade in donkeys and donkey skins, by working collaboratively with national and global human health, veterinary and environmental protection communities.
4. **Work with law enforcement agencies at national and international levels** (such as internal/territorial/national police and Interpol) and revenue collection authorities (customs and border control) to implement and enforce existing legislation, including animal welfare and animal welfare related legislation.
5. **Proactively scrutinise consignments listed under the World Customs Organization (WCO) Harmonized System (HS) 4100 code** and ensure in-country companies who facilitate such consignments are aware of national prohibitions on donkey skin exports.
6. **Actively protect donkeys from theft and slaughter, safeguarding livelihoods**, and ensuring access to water, education and rural economic development, in donkey-dependent communities.

## Veterinary community

1. **Educate the veterinary community** through all available avenues (organisations, conferences, online platforms etc) leading to increased awareness about this trade and its implications, for example as related to global equine and human disease spread.
2. **Mobilise a veterinary voice** at grassroots level from among those who work with donkeys in low- and middle-income countries and throughout the Global South, speaking about the implications of this trade for donkey welfare and for the communities who depend on donkeys.
3. **Advocate at national veterinary level in exporting, transiting and importing countries** ensuring that state veterinary services, veterinary regulatory and representative organisations are aware of the infectious disease implications and reputational damage attached to this trade.
4. **Advocate at international veterinary level:**
  - a. At World Organisation for Animal Health (WOAH) to raise existing standards relating to working equids and to biosecurity, trans-boundary trade and disease.
  - b. At World Veterinary Association (WVA), World Equine Veterinary Association (WEVA) and Commonwealth Veterinary Association (CVA) to ensure they develop and promote evidence-based policy statements on this trade.



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**Donkeys bound and loaded for transport in horrendous animal welfare conditions, Nigeria**



Donkeys on a farm, Brazil

## **THE DONKEY SANCTUARY**

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The Donkey Sanctuary was founded by Dr Elisabeth Svendsen MBE in 1969. The Donkey Sanctuary (registered charity number 264818) and its sole corporate trustee, The Donkey Sanctuary Trustee Limited (Company number 07328588), both have their registered office at Slade House Farm, Sidmouth, EX10 0NU. Linked charities: The Elisabeth Svendsen Trust for Children and Donkeys (EST); The International Donkey Protection Trust (IDPT).