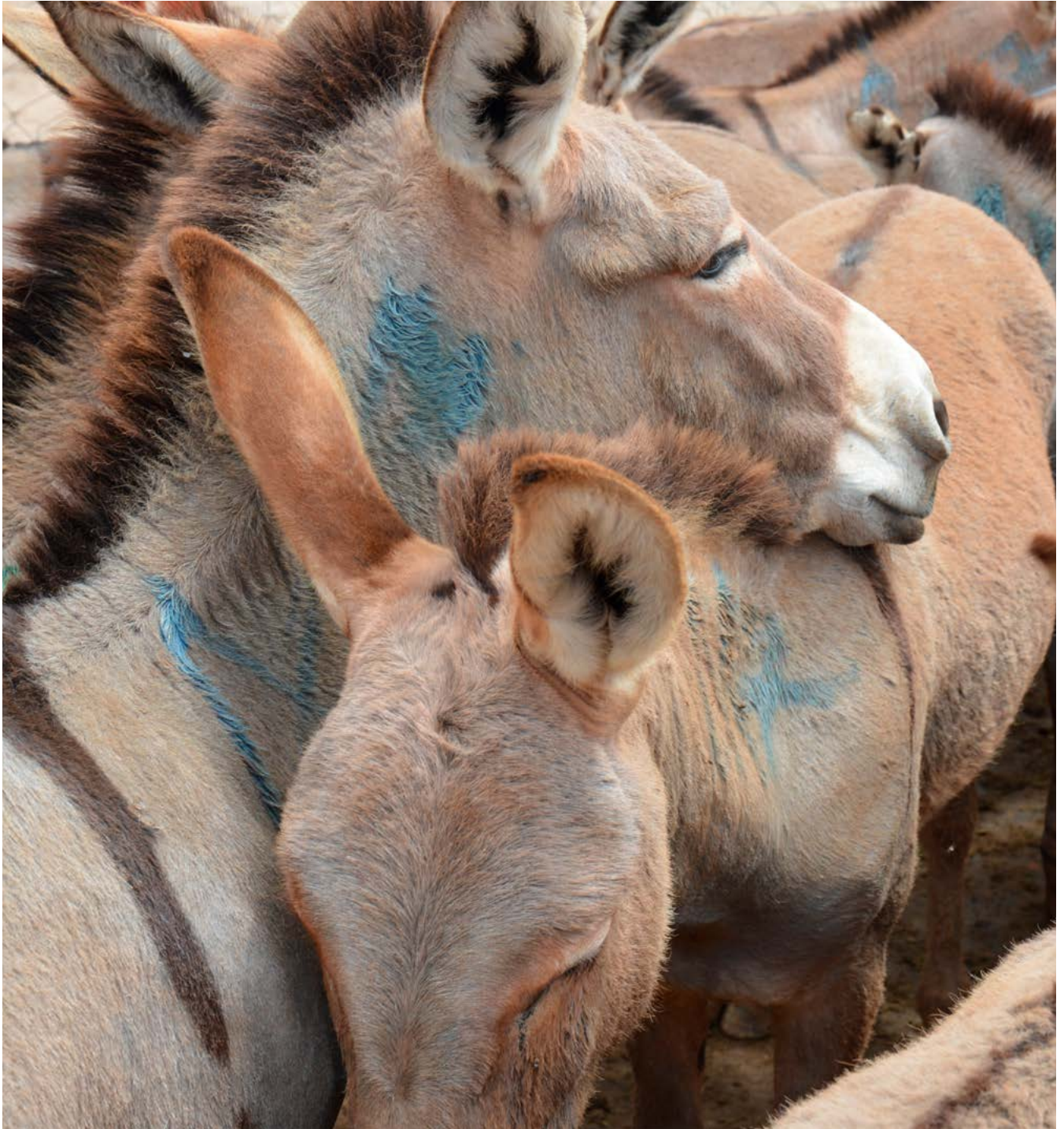


REPORT 1



**THE DONKEY
SANCTUARY**

THE GLOBAL TRADE IN DONKEY SKINS: **A TICKING TIME BOMB**



THE DONKEY SKIN TRADE AS A TROJAN HORSE FOR WILDLIFE TRAFFICKING

WARNING

THIS REPORT CONTAINS GRAPHIC IMAGES WHICH SOME READERS MAY FIND DISTRESSING



Donkey in slaughterhouse holding pen, Tanzania.

ACKNOWLEDGEMENTS

The Donkey Sanctuary offers sincere thanks to its network of friends, partners and colleagues around the world who contributed information and advice during the preparation of this report, including the Wildlife Conservation Research Unit (WildCRU) and Saïd Business School at the University of Oxford, United for Wildlife, Oxpickers Investigative Environmental Journalism, Focused Conservation, Advocates for Animals, Wildlife Justice Commission and Monitor Conservation Research Society.

We are very grateful to The Robert H.N. Ho Family Foundation Global for generously supporting this work.

Many others have contributed but cannot be named to protect their identities.

Simon Pope, Emily Reeves and Janneke Merckx, The Donkey Sanctuary.
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FOREWORD:
UNITED FOR WILDLIFE

The illegal wildlife trade is a serious transnational organised crime. It is also a significant financial crime. Worldwide, for every wildlife product trafficked illegally, money changes hands – from online marketplaces to cross-border wire transfers. At United for Wildlife, our mission is to bring together relevant and leading players from the public, private and not-for-profit sectors to combat this heinous crime and save protected species from extinction.

This report by The Donkey Sanctuary shines a light on an overlooked aspect of the illegal wildlife trade. It reveals how the trade channel has been co-opted by wildlife traffickers as a vehicle for their illegal activities. It shows how so-called business-to-business online sites and even social media are acting as platforms on which illegal wildlife items are being openly sold alongside donkey skins.

United for Wildlife and The Donkey Sanctuary have much common ground in the fight against wildlife crime,. By working together, they have highlighted the hidden associations with criminality that now stain the donkey skin trade.

Through collaboration like this, informed by innovative research and evidence gathering, we hope to raise awareness and ultimately eradicate the unsustainable, dangerous and illegal trade in donkeys and wildlife.



DAVID FEIN
CHAIR OF THE UNITED FOR WILDLIFE
FINANCIAL TASKFORCE



Stack of wet salted donkey skins.



AFRICOM CTF is using the analysis provided by The Donkey Sanctuary confluent with law enforcement information on illegal wildlife trade networks throughout the area of responsibility (AOR) in an effort to map and identity individuals, networks, and other witting malign actors while also providing case support to assist with potential US Government law enforcement finishes. The Donkey Sanctuary has provided significant support and their efforts have quickly become a vital piece for our strategic understanding of illicit networks. Specifically, analysis by The Donkey Sanctuary has advanced the defence enterprise’s knowledge on the illegal aspects of the trade (and other illicit activities) that occur via business-to-business marketplaces while identifying global retailers and online trading platforms, in addition to addressing concerns associated with the shipping industry in countries that have introduced bans on the export of donkey skins. This is of particular interest as donkey skins are often being traded and shipped with other illegal wildlife items.

INTRODUCTION

The Donkey Sanctuary's *Under the Skin* reports,^{1,2} lifted the lid on the vast reach and impact of the global donkey skin trade, demonstrating the harm done, not just to the donkeys themselves but also to the millions of people who depend on them for a livelihood. This opportunistic and extractive trade has operated under the radar of enforcement bodies for many years, causing immense suffering, depleting national donkey populations and depriving local communities of a precious resource. Despite the immeasurable impact on donkey welfare and donkey-dependent communities, donkey skin traders and the ejiao producers who drive the global trade in donkey skins operate largely without consequence.

“Selling illegal wildlife products alongside donkey skins enables traders to use a legally complex trade to mask an entirely illegal one

In an effort to protect their national donkey populations and the communities that rely on them, many countries have subsequently prohibited the export of donkey skins, either directly, or through delicensing of slaughterhouse facilities. The trade continues, despite this, often in open defiance of national laws and without adherence to international and national biosecurity protocols designed to prevent the spread of disease. Traders are highly opportunistic and, when it becomes difficult to source donkeys in one country, they simply move to another where donkeys are more plentiful and may be less protected by law.

Far more can, and needs to, be done to stop the international trade in donkey skins, and to penalise those that operate outside of the law. But while the trade remains legal in some countries and illegal in others, there will always be traders that exploit inherent enforcement challenges, to the detriment of donkeys. This report does more than expose the extent to which national laws are ignored – it uncovers a convergence of criminality, revealing the role that the international trade in donkey skins plays in facilitating wildlife trafficking and its connections to drug trafficking, e-commerce fraud and other illicit activity. Selling illegal wildlife products alongside donkey skins enables traders to use a legally complex trade to mask an entirely illegal one – using the donkey skin trade as a Trojan horse.

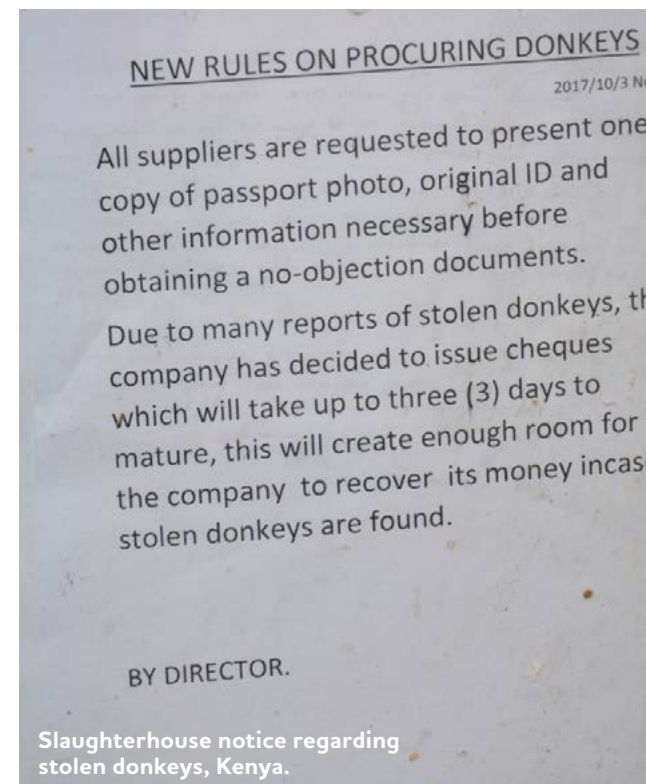
At a time when the world continues to suffer the impacts of Covid-19, and when governments are increasingly recognising the links between animal health and welfare and the health of people and the environment, a concept known as ‘One Welfare,’ the donkey skin trade operates largely unabated. Some of the world’s most dangerous diseases in humans are linked to animals – for example, MERS, SARS and now Covid-19 – making the vast scale of the global trade in donkeys and donkey products, alongside wildlife and wildlife products, a ticking time bomb.

Action is urgently needed to recognise and address the risks and halt the trade. In this, the ejiao industry, global shipping industry, online trading platforms, law enforcement agencies and national governments all have a critical role to play.

This is no ordinary trade and the action needed to tackle it cannot be ordinary either.



Pile of donkey carcasses and carrion birds.



Slaughterhouse notice regarding stolen donkeys, Kenya.



Skins drying at slaughterhouse with waste pile in background.

THE GLOBAL TRADE IN DONKEY SKINS



Penned donkeys awaiting slaughter.

The trade in donkey skins, which centres on Africa, the Americas and Asia but extends well beyond, sees millions of donkeys slaughtered annually. Their skins are exported to China for use as a raw material in the production of *ejiao*, a Chinese remedy believed by some to have medicinal properties.

Many donkeys experience extreme suffering at the hands of traders. They are often transported long distances, by truck or on foot, without adequate food, water and rest. They are then held, often for days on end, again without adequate food or water, before being slaughtered in brutal and unhygienic conditions. Others are stolen from their owners during the night and are ruthlessly slaughtered before their skins are removed and the carcasses left to rot.

4.8 
MILLION DONKEYS
SLAUGHTERED FOR THE SKIN TRADE ANNUALLY



Donkeys support the livelihoods of 500 million people worldwide.

Variations in figures reported by the *ejiao* industry, and the largely unregulated and often illegal nature of the trade, make it impossible to obtain precise figures for the number of donkeys required to produce current levels of *ejiao*,³ however estimates suggest it could be as high as 4.8 million donkeys.⁴

The trade has had catastrophic results for many communities and families that rely on donkeys for their livelihoods. When a donkey is stolen, it is often the women and children who are forced to do the work, such as carrying water, that the

donkey once did.

The wide scale movement and unhygienic, often illegal, slaughter of donkeys of unknown health carries inherent biosecurity risks, the consequences of which could be globally significant.

The risks associated with the trade demand urgent action. This urgency escalates as links between the global trade in donkey skins and the trade in wildlife, drugs and other illegal items are exposed.

THE DONKEY SKIN TRADE: A TROJAN HORSE FOR WILDLIFE TRAFFICKING

The multi-billion-dollar global wildlife trade is one of the most lucrative businesses in the world.⁵ The trade in wildlife and wildlife parts for use as souvenirs, pets, medicine or clothing not only has serious implications for global conservation efforts⁶ but also hinders social and economic development.

The trade represents a threat to national and global security⁷ and it undermines the efforts of national governments and intergovernmental bodies to achieve sustainable development goals.⁸ The direct cost of zoonotic diseases between 2000 and 2010 is estimated to exceed USD20 billion and the indirect costs are estimated to exceed USD200 billion.⁹ Approximately 70% of emerging infectious diseases are of zoonotic origin¹⁰ and these zoonotic diseases are increasingly being linked to the trade in wildlife and wildlife parts.¹¹

Wildlife trafficking is orchestrated by increasingly sophisticated transnational organised crime syndicates.¹² These groups frequently use the dark web to carry out their illicit activities,¹³ they take advantage of rapid and secure online communications,¹⁴ and they benefit from increased ease of communication and movement of goods in the era of global free trade.¹⁵

The routes used to smuggle wildlife and wildlife products around the globe are also often used to smuggle weapons, drugs, and people,¹⁶ and wildlife crime often occurs in conjunction with other offences such as passport fraud, corruption,¹⁷ money laundering and murder.¹⁸

What has been less recognized, studied or understood is the role that the trade in donkey skins has played in facilitating this arena of highly organized international crime.

Research commissioned by The Donkey Sanctuary and undertaken by the Wildlife Conservation Research Unit (WildCRU) at the University of Oxford from 2019 to 2021 demonstrates that donkey skins are both being offered for sale, and being shipped, with wildlife products, most commonly pangolin scales, ivory and seahorses.

“What has been less recognized, studied or understood is the role that the trade in donkey skins has played in facilitating this arena of highly organized international crime.”

Evidence shows that the legally complex trade in donkey skins may be acting as a vehicle for the wildlife trade as well as other illegal items including hardwoods and Class A drugs.

The practice of trading in multiple illegal products is known as ‘parallel trafficking’¹⁹ and is common in the illicit trade in wildlife where traders use existing routes and anti-detection methods to evade enforcement. As just one example among many in the global trade in donkey skins, an investigation by the Organised Crime and Corruption Reporting Project (OCCRP)²⁰ found that “...poly-traffickers from Zimbabwe and Botswana (are) operating contraband pipelines alongside their donkey smuggling businesses that traffic ivory, pangolin scales, contraband cigarettes and marijuana across jurisdictions.”

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 as, or concealed within, legally traded ones.²¹ In many cases however, the trade in donkey skins is itself illegal, since a growing number of countries have banned the export of donkey skins in an attempt to safeguard national donkey populations and the communities who depend on them. Despite this, donkeys are slaughtered, and their skins exported in direct defiance of national prohibitions,²² and recipient government administrations are complicit in this undermining of national efforts to protect donkey populations. Chinese customs authorities oblige in-source-country donkey slaughter and export facilities to register with them for the purposes of biosecurity, veterinary and



quarantine regulations. However, these facilities are frequently located in countries where an export prohibition on skins exists, either directly (Nigeria, Benin, Ghana) or because countries have withdrawn licences from donkey slaughterhouses (Kenya, Tanzania). Other countries known to be exporting donkey skins (South Africa, Egypt, Botswana, Mexico) have no slaughter/export facilities registered with Chinese customs.

Awareness about the role of the donkey skin trade as a vehicle for illegal trade is growing. A 2021 TRAFFIC report²³ gave donkey skins a red flag designation alongside illegally traded wildlife items such as elephant ivory and rhino horn.

“Red flags are indicators that can be applied to shipping transactions to help identify possible attempts to circumvent controls. Further enquiries will then assist in identifying whether a transaction is legitimate and compliant with

national laws and regulations, or if it should be refused and/or referred to an appropriate enforcement or regulatory authority for further investigation.” TRAFFIC 2021.

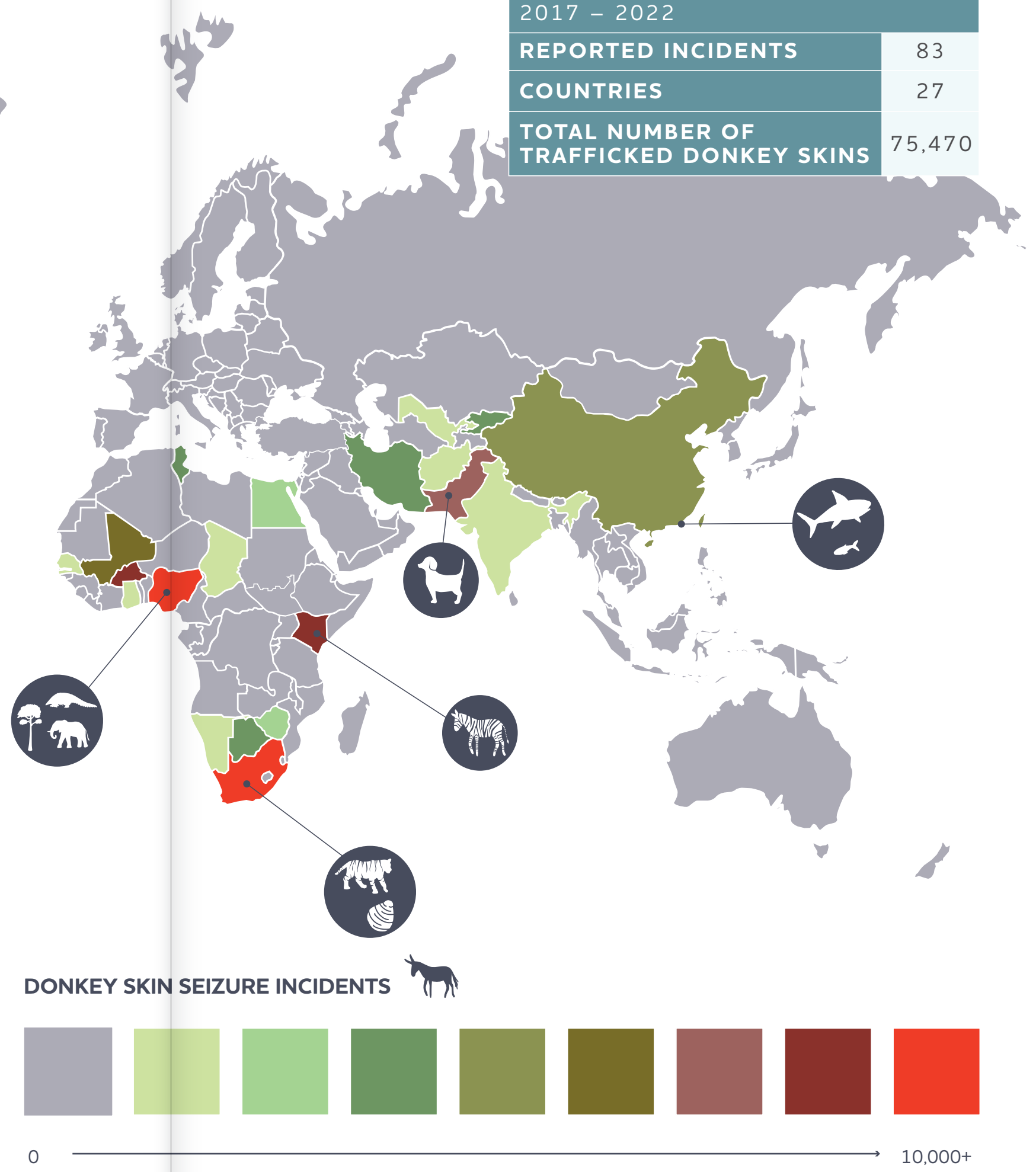
Donkey skins are both a smuggling vehicle, and a smuggled item itself – disguised in consignments, alongside other illegal items, from countries where donkey slaughter and donkey skin exports are prohibited. China not only recognises that smuggling of donkey skins takes place but that it is set to increase – a 2021 market analysis paper by the Donkey Branch of the China Animal Husbandry Association²⁴ concluded that due to market conditions “...some enterprises that do not abide by the law will increase their willingness to smuggle and participate.”

The legality of the trade in donkey skins is often ambiguous and this is exploited by traders for their benefit.

DONKEY SKIN SEIZURE REPORTS



| 2017 – 2022 | |
|---|--------|
| REPORTED INCIDENTS | 83 |
| COUNTRIES | 27 |
| TOTAL NUMBER OF TRAFFICKED DONKEY SKINS | 75,470 |



ONLINE TRADING: DONKEY SKINS AND WILDLIFE PRODUCTS SOLD TOGETHER

BUSINESS-TO-BUSINESS PLATFORMS

Business-to-business (B2B) e-commerce platforms serve wholesalers and retailers worldwide by facilitating the promotion and sale of products globally. Some offer a subscription-based model, charging fees to buyers and sellers for varying levels of service, while others take a commission from vendors for sales made or charge a fee for listing products. Considering the sheer numbers of products sold on these marketplaces, it is no surprise that some are illegal, and this includes wildlife products and illegally sourced donkey skins.

In 2017, The Donkey Sanctuary discovered online B2B traders offering donkey skins alongside wildlife products such as pangolin scales and seahorses. Instances of these co-sales were logged and monitored, and appeared to increase in number over the subsequent 12 months, along with a diversification of both the wildlife items offered and the range of countries from which they were being sold. Large numbers of traders registered on the B2B platforms during 2017 and 2018, with the biggest proportion from South Africa, Kenya and Cameroon, claiming to be able to source far more donkey skins in total than the national donkey populations of the countries in which they were operating.

The Donkey Sanctuary supported a study by Oxford University's WildCRU and Saïd Business School (2019/20) into the co-sale phenomenon in order to establish its size and its role in the illegal wildlife trade. These findings will be published in Conservation Science and Practice in May 2022.²⁵

This research established clear evidence of a link between wildlife trafficking and the legally complex global trade in donkey skins. WildCRU researchers identified seven large

B2B e-commerce websites through which donkey skins are traded. A total of 382 individual vendors, registered across 55 countries, were found to be selling donkey skins and 20% 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 (CITES).

CITES exists to prevent the over-exploitation of wild animals and plants, and to ensure that the international trade in those species doesn't threaten their survival.²⁶ The international trade in the 11 species being sold alongside donkey skins is either illegal or tightly regulated. There appeared to be a predominant association with marine-derived species including abalone, sea cucumber and fish maw (dried fish swim bladders).

The Donkey Sanctuary continued to monitor and investigate 12 B2B sites following the completion of the WildCRU research in early 2021 and into 2022. All the sites hosted traders

offering large volumes of donkey skins for sale. Traders were found to be offering wildlife products alongside donkey skins on all of the sites. On one B2B site, 14 traders were found to be offering a range of items including elephant ivory, tiger hides and rhino horns alongside donkey skins, and on another, 13 different traders offered items including pangolin scales, capuchin monkeys and hardwoods alongside donkey skins. Shark fins and seahorses of unspecified species, as well as sea cucumbers and abalone were found being offered for sale with uncertainty around their conservation status. Other traders offered wildlife products unassociated with donkey skins.

This research established clear evidence of a link between wildlife trafficking and the legally complex global trade in donkey skins.

B2B platforms are a growing segment of e-commerce, and thus are likely to represent an expanding threat to those working to combat illegal wildlife trade and the illegal trade in donkey skins. The freedom and reach provided by these platforms, and the so-called democratization of shipping and commerce globally, presents unscrupulous criminals with a multitude of opportunities to reduce risks and driveup profits.

B2B platforms are a growing segment of e-commerce, and thus are likely to represent an expanding threat to those working to combat illegal wildlife trade.

The table below shows the wildlife items being offered for sale by traders alongside donkey skins:

| www.tradekey.com | www.tradeford.com |
|---|--|
| Leopard skins, lion skins, live cheetah cubs, pangolin scales, abalone, seahorse, sea cucumber, shark fin, fish maw. | Pangolin scales, hardwoods (inc ebony). |
| www.ec21.com | www.globalsuppliersonline.com |
| Pangolin skin / scales, rhino horn, elephant tusk, dog fur, crocodile skins, african tiger skins, tiger fur (sic), leopard pelt, saltwater crocodile skins, zebra hides, hardwoods. | Pangolin scales, elephant ivory, fish maw, parrots, reptiles, live birds, rhino horn, capuchin monkey, tiger teeth / skin, live cubs, black scorpions, fish maw. |
| www.alibaba.com | www.eworldtrade.com |
| Sea cucumber, hardwood charcoal, conch, abalone, seahorse. | Lion teeth, tiger teeth. |
| www.ecplaza.net | www.engormix.com |
| Pangolin scales, sea cucumber, hardwood charcoal, walrus tusks, narwhal tusks, bear bile & fats, musk pods. | Ivory tusks, walrus tusk/skull/penis, dried northern fur seal penis. |
| www.exportersindia.com | www.ecrobot.com |
| Macaw eggs, elephant tusks, golden eagle eggs, python (live and eggs) 100 different species of parrot and eggs, seahorses, pangolin scales, rhino horn/powder, african lion skulls, shark fins/tails, fish maw, hardwoods, live tortoise. | Seahorse, sea cucumber, tiger & lion teeth, rhino horns, tiger/leopard skin, elephant tusks. |
| www.global-trade-center.com | www.go4worldbusiness.com |
| Removed pages of traders offering wildlife products after notification from TDS. | Pangolin, kosso wood, fish maw. |

B2B sites all contain search functions enabling potential buyers to find items offered for sale. Traders offering donkey skins were identified by using the search terms 'donkey skin/s' or 'donkey hide/s' and, once traders' pages were identified and logged, this was cross-checked against searches for wildlife items.

The Donkey Sanctuary has separately identified over 70 B2B traders advertising donkey skins alongside wildlife items. The most common wildlife species/products being offered alongside donkey skins were found to be pangolin scales, elephant ivory, rhino horn, lion/tiger teeth/skins and a range of marine items including fish maw, sea cucumber and seahorses. The Donkey Sanctuary research also discovered an increasingly diverse range of other illicit commodities being offered for sale including drugs such as cocaine, nembutal, MDMA/ecstasy and xanax, fake passports, currency and even human body parts. The largest number of co-sale traders (18) claimed to be based in Cameroon offering donkey skins alongside everything from elephant tusks to human bones. eight were based in Kenya and five in Nigeria. In some instances, not only are the wildlife products

being sold illegally, the donkey skins they are being sold alongside are also illegal. The slaughter of donkeys and the export of their skins has been prohibited from numerous, mainly African, countries owing to concerns about unsustainable offtake, rising donkey thefts and the subsequent risks to donkey-dependent communities.

Large numbers of B2B donkey skin traders claim to operate from countries where the export of donkey skins is currently prohibited or not permitted, including Kenya, Burkina Faso and Nigeria where, in 2020, the Federal Ministry of Agriculture and Rural Development took the drastic step of designating the domesticated donkey as an "...endangered species due to high haulage of the animal from north to the south-eastern part of the country for consumption and export."²⁷ Other traders are based in countries that do not have the requisite 'registered facilities' required by Chinese customs for veterinary and quarantine purposes, including Egypt, South Africa, Botswana and Mexico. Across the 12 B2B sites, where it was possible to identify the location of the traders, large numbers claimed to be based in Kenya (157), Nigeria (117), Thailand (67) and Cameroon (59).

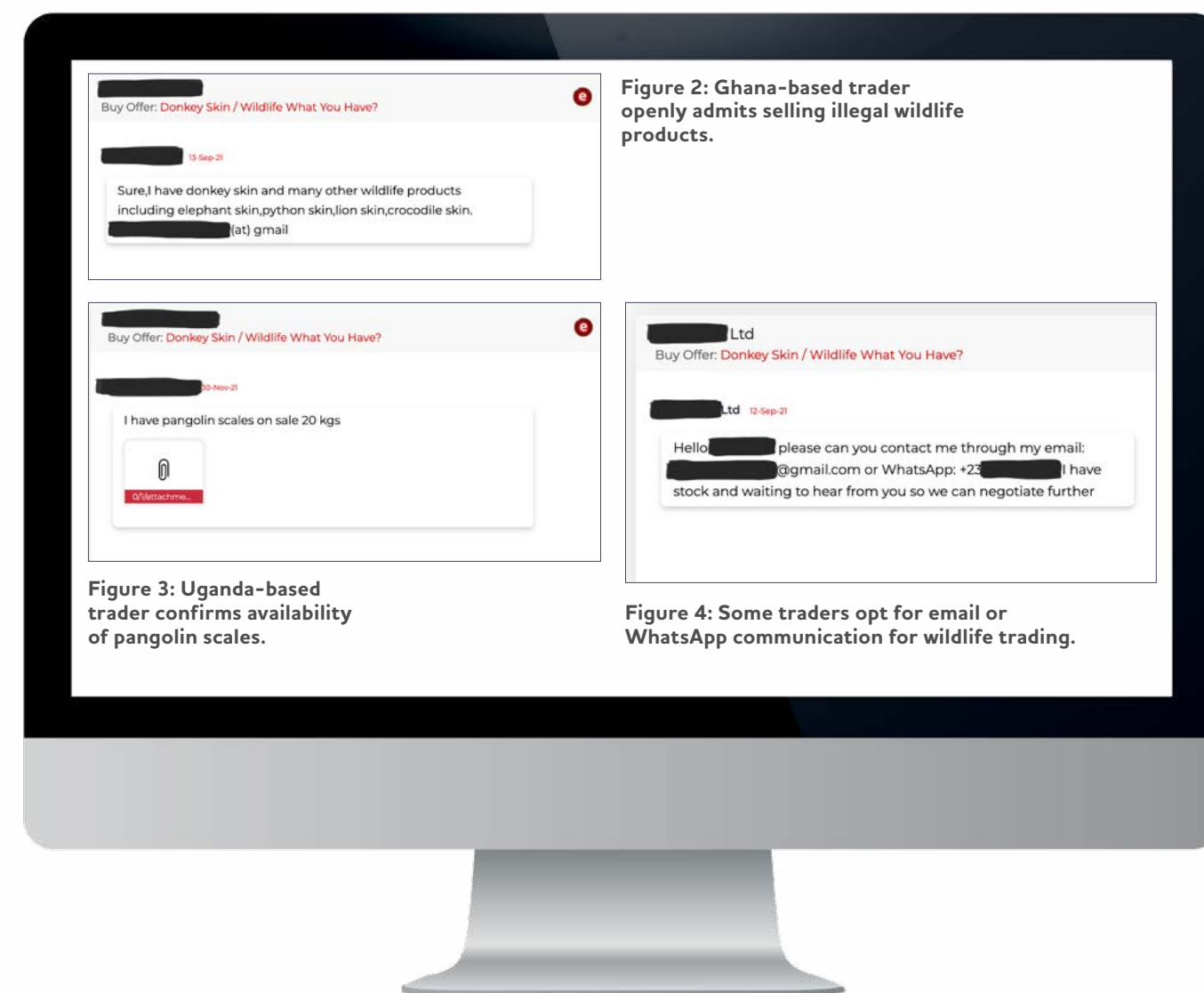
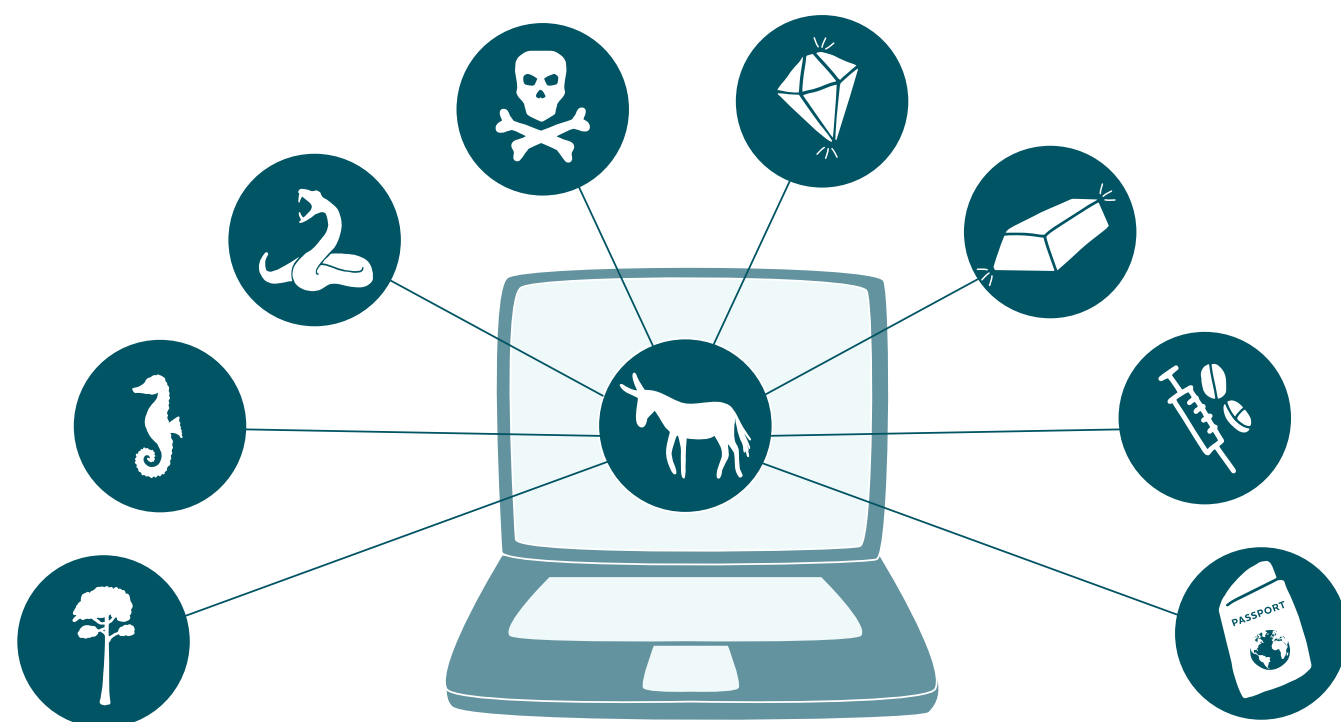
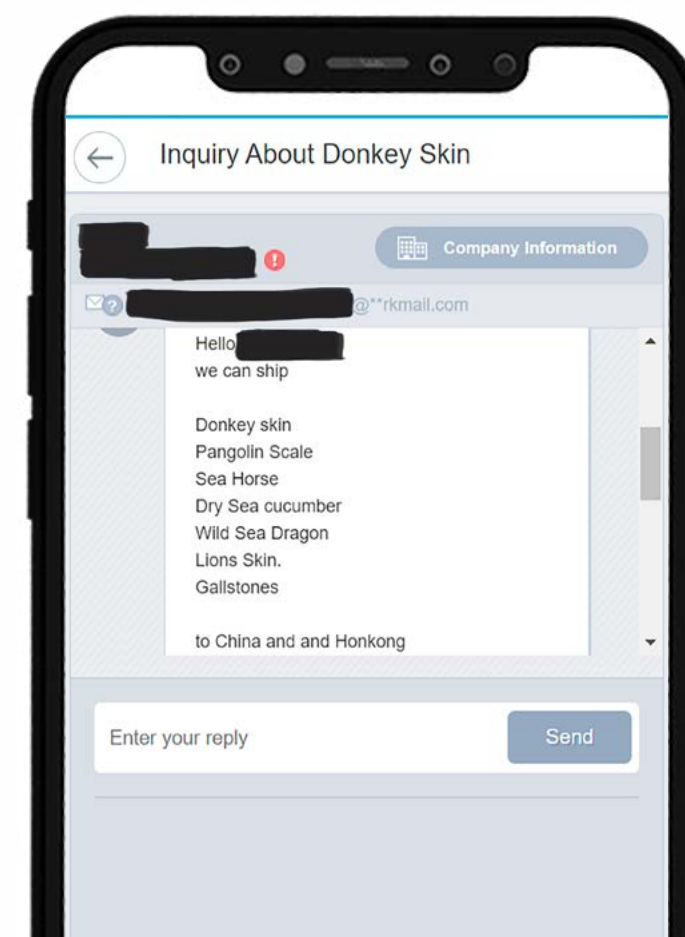


Figure 2: Ghana-based trader openly admits selling illegal wildlife products.

Figure 3: Uganda-based trader confirms availability of pangolin scales.

Figure 4: Some traders opt for email or WhatsApp communication for wildlife trading.



The Donkey Sanctuary research also discovered an increasingly diverse range of other illicit commodities being offered for sale including drugs such as cocaine, nembutal, MDMA/ecstasy and xanax, fake passports, currency and even human body parts.

Figure 5: online trader provides list of illegal items that can be shipped to Hong Kong or mainland China.

SOCIAL MEDIA SITES

The sale of illicit products on online platforms is not limited to illegal wildlife trade on B2B marketplaces. Social media platforms act as facilitators of illegal trade by providing traders with anonymity and secure communication channels²⁸ and by developing algorithms that inadvertently but effectively connect buyers with illegal traders.²⁹ In many instances, tech firms operate with impunity and this provides them little incentive to actively combat illicit activity.³⁰ It is little surprise then that donkey skin traders are exploiting social media sites to offer skins for sale alongside illegal wildlife items.

The Donkey Sanctuary used variations on the Google search terms ‘donkey skins’ ‘donkey hides for sale’ to identify social media platforms hosting donkey skin sales. This initial research identified multiple traders, often from countries with a ban on donkey skin export in place and, in many instances, alongside wildlife products. Despite an explicit export ban on donkey skins in Nigeria and a no-slaughter policy by the Kenyan Government, traders are using social media to offer skins for sale from both countries.

“The biggest social media platforms, Facebook, Instagram and WeChat have become ground zero for wildlife crime syndicates to connect with buyers, market their illegal goods, and move money.

– Alliance to Counter Online Crime³¹

Facebook

A Nigeria-based trader lists over 200 photos of items for sale including donkey skins, hardwoods and pangolin scales.³² There are several images of dead and dying donkeys in appalling conditions. Footage of hides being prepared in filthy facilities are also included.³³

- Three other Nigeria-based traders,^{34,35,36} also offer donkey skins on their Facebook pages, despite an explicit export prohibition on donkey skins in Nigeria. Images illustrating the pages show donkeys being slaughtered in appalling conditions. Hardwoods and fish maw are also offered for sale.
- A Kenyan-based company, posted on its Facebook page in January 2021³⁷ that it had “2000 pieces of donkey skin/hides available for sale now in Kitale, Kenya. Price \$40 per skin. We can ship you anywhere in the world. Email [redacted].com for more info.” Another trader also based in Kenya, offers camel and alligator skins alongside donkey skins. Kenya has not licenced donkey slaughterhouses since early 2020.
- A trader based in Thailand³⁸ offers donkey skins alongside a number of wildlife products including Ling Yang Jiao (Saiga Antelope horn), Tezhi Sanbian Jiu or Three-Penis Liquor (Cantonese dog, seal and deer penis) and Lu Bian (slices of Sika deer testes).

YouTube

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

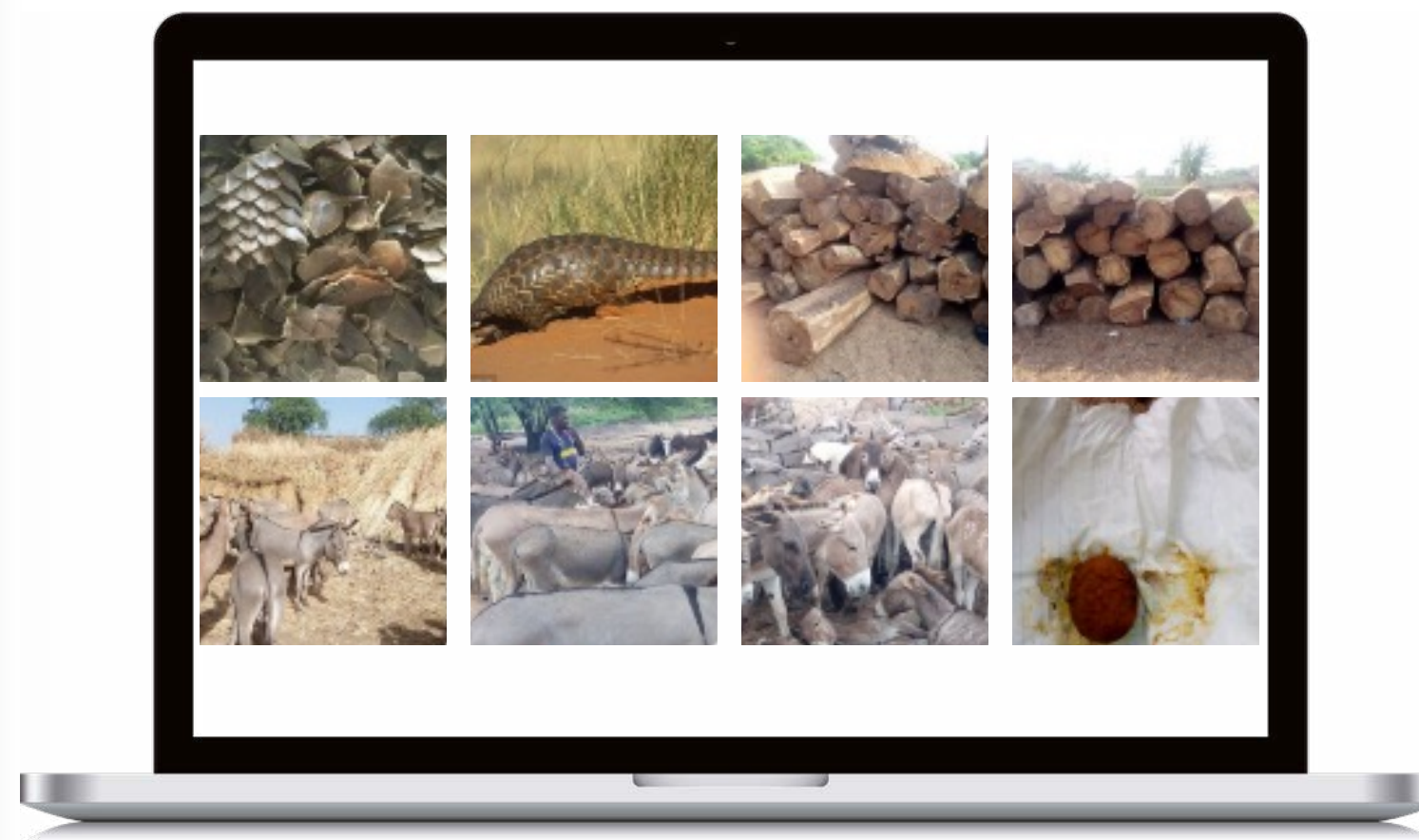
- A trader in Senegal who promotes sales of donkey skins and dried seahorses.³⁹ Senegal has a ban on the export of donkey skins. Many seahorse species are protected.
- An Italian-based trader which openly advertises donkey skins from Ghana, has footage of 2,800 skins in its warehouse in Tapa, Ghana currently on YouTube.⁴⁰ Ghana has issued a prohibition on the slaughter of donkeys for their skins.
- A donkey skin trader based in Nigeria.⁴¹

Twitter

Twitter⁴² hosts donkey skin traders from Nigeria. In addition, a 2018 post on Twitter from a company based in Abu Dhabi advertises donkey skins alongside lion and tiger teeth,⁴³ as does another from a company in Romania.⁴⁴ The same trader offers macaws and grey parrots for sale.^{45,46}

Instagram

Instagram hosts traders from Kenya⁴⁷ and Nigeria⁴⁸, which have slaughter/export prohibitions in place, and Cameroon,⁴⁹ which has no facilities licenced by China for the purposes of veterinary and quarantine regulations.



Donkey skins being offered alongside pangolin scales and hardwoods on Facebook.

GLOBAL TRADERS MAP

UK

Ben Wilson's Cleaning Lab

Chad

Afri Hides

USA

ACBS Fragrance
& Cosmetic Ltd

Senegal

Territorial Adverts UK

Burkina Faso

Burkinabe Native Dealer
Ltd
Italian Fashion

Nigeria

Stephen's World of Donkey Skin
Swala Simeon
Nwoaha Isaiah
Donkey SKIN dealers in Nigeria
MacGyver Services
Skills and Taz Ventures

Cameroon

Ewellecoof int. Ltd
Abattoir SA
Methoda Resourses
West Coast Livestock and Fisheries Co Ltd
Zoto Atangana
Bandecoal Limited
Agrogold

Poland

Browar Lomsa
Tradehouse.Kft

India

Jimdam Trading Ltd

Thailand

Nittaya Trade Co. Ltd

South Africa

Animal Skins

Tanzania

Daisy Agric Consultancy
Limited
Tranax Investment Limited

Kenya

Vrall Exotics Ltd
Great Lakes Foods

DETECTION AVOIDANCE

Online platforms often lack policies to protect against the sale of protected wildlife species, let alone legally ambiguous donkey skins, and the sheer scale of electronic activity makes enforcement of policies, where they do exist, particularly challenging.⁵⁰ This is evidenced by the blatant disregard for national and international law shown by some sellers. The trade is continually evolving, and traders move from one platform to another and use other avoidance tactics to escape detection.⁵¹

In several instances, traders advertising on online platforms openly acknowledge the illegality of their sale and provide potential buyers with information on the steps that will be taken to obfuscate the shipment of other illegal products. A US-based trader advertising illegal pangolin scales on the EC21 trade platform assures potential buyers that they will “...package them in corrugated cardboard boxes and make them look like electronic appliances to deter customs attention,”⁵² (see Figure 6). On being approached by investigators from The Donkey Sanctuary, the same trader offered a range of wildlife items for sale alongside donkey skins (see Figure 6) with shipping to Hong Kong or China.

Some online traders may be attempting to obfuscate or evade listing rules by using aggregated or deliberately misspelt descriptions such as the listing soliciting “...donkey hidesea hourseabalonefish bladder” on Tradekey⁵³ (see Figure 7) or selling “pangolinsss scales” on ECPlaza (see Figure 8).⁵⁴



Figure 6: A trader outlines detection avoidance tactics.

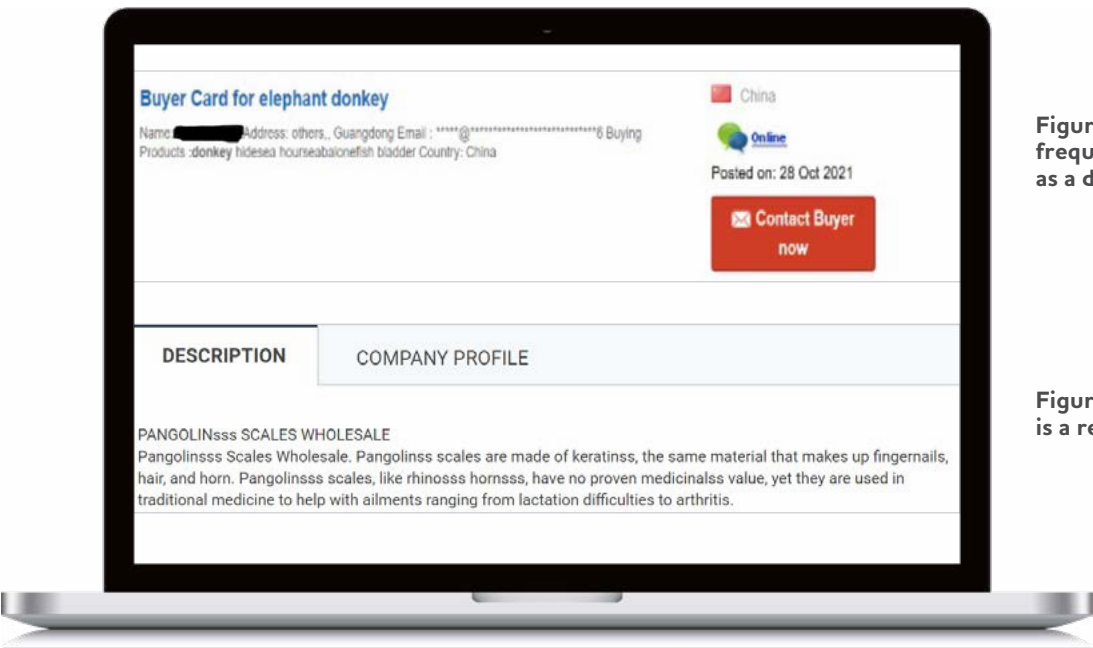


Figure 7: Product names are frequently misspelt, perhaps as a detection avoidance tactic.

Figure 8: Product misspelling is a regular occurrence.

CASE STUDY: KENYA

A Kenya-based company with connections to a range of other global businesses, websites and social media pages, which variously advertise products such as donkey skins, gold, diamonds, snake and toad venom, narcotics (ketamine, crystal meth) and wildlife products including hardwoods, shark fins, seahorses, and sea cucumbers. Claims made on the company website suggest that it acts as an intermediary, connecting buyers in Thailand, Germany, China and the USA with exporters and wholesale suppliers in Kenya, Cameroon and South Africa with companies and consumers.

Many products offered by the company are either trafficked or used to obscure other trafficked wildlife. The company also sells cashew nuts, sisal fibers, coffee, timber and cloth, commodities often used to obfuscate illegal shipments of wildlife from Africa to Asia.

The company offers donkeys skins for export from Kenya, even though it acknowledges this is illegal. In response to an email in January 2021 from investigators from The Donkey Sanctuary, the company said:



“Donkey skin is prohibited in Kenya as of now and we ship under total discretion alongside heavy bribery to the port authorities. Chinese residents are completely banned dealing with donkey skin in Kenya. We have 2,000 skins available now and priced at \$40 per skin. If you are interested, we can start shipping smaller quantities to avoid too much questioning. We can start with 500 skins.

– Mr Tony



Key figures from the Coalition to End Wildlife Trafficking Online's 2021 progress report. IFAW, WWF and wildlife trade monitor TRAFFIC launched the coalition in 2018. Since then, it has blocked or removed more than 11.6 million posts and ads. Image courtesy of the Coalition to End Wildlife Trafficking Online.



Confiscated wildlife products at JFK airport. Source: Wiki.

E-COMMERCE INDUSTRY ATTEMPTS TO TACKLE ILLEGAL TRADE

E-commerce platforms face an enormous task in detecting and combatting illegal activity on their sites. While some traders are openly trading illegal goods,⁵⁵ others take measures to avoid detection. The online trading environment is also dynamic and, particularly when involved in illegal activity, can involve complex webs spanning multiple countries. Traders use highly anonymized payment methods, such as Western Union or MoneyGram, which makes tracking the details of payments made for illegal products time-consuming and likely cost prohibitive.

An examination of the terms and conditions on the B2B sites showed that only six (EC21, eWorldTrade, Tradeford, Global Suppliers online, Alibaba, Go4worldbusiness) included a list of prohibited items. Four (Tradekey, Ecplaza, Exporters India and Ecrobot) merely state that unlawful items should not be sold on their platform and one (Global Trade Center) did not have terms and conditions listed at all. Of the six platforms with a prohibited item list, five (EC21, eWorldTrade, Alibaba, Go4worldbusiness, Tradeford) specifically mention protected animal parts.

As with most online platforms, traders appear to take advantage of the lack of oversight by B2B marketplaces and freely include pictures and detailed descriptions of goods, amounts available, minimum order amounts, prices, delivery areas, shipping options, and details on the quality of goods. This raises some pressing questions about how much effort the owners of B2B marketplaces are putting into the policing and removing of illegal content. The e-commerce industry has failed to effectively self-regulate, despite pledges to do so, and the B2B segment of the e-commerce world has been almost entirely overlooked as a potential enabler of criminality.⁵⁶

While the facilitating role that social-media platforms play in wildlife trafficking has attracted more attention, and many have joined the Global Coalition to End Wildlife trafficking online,⁵⁷ their efforts to stem the tide of wildlife sales are often similarly disappointing. Most platforms that committed to the coalition's target of reducing wildlife trafficking by 80% have failed in their efforts.⁵⁸ In February 2022, The Donkey Sanctuary wrote to all the B2B sites found to be offering donkey skins for sale alongside wildlife items, asking for both products to be removed from sale. Global Trade Center deleted the trader's sites we had drawn to their attention saying they valued "...environmental protection and animal protection...". No positive response has been forthcoming from others we contacted.

It remains unclear what percentage of the traders advertising on social media sites are either bona fide donkey skin traders or wildlife criminals, as opposed to perpetrators of schemes such as advanced fee fraud. The overt advertisement of illegal products, and the length of time the listings remain live, however demonstrates that current detection measures are insufficient to dissuade traders. More must be done to ensure that the cost of this illegal activity outweighs its benefits to such an extent that online traders are deterred. The Donkey Sanctuary is unaware of any enforcement activity having been undertaken in this online context.

“Online trading platforms have a greater role to play in detecting and addressing illegal activity occurring on their sites. Until they do, the donkey skin trade will continue to act as a Trojan horse for the sale and shipping of wildlife products.”

GLOBAL SHIPPING: DONKEY SKINS AND WILDLIFE PRODUCTS SHIPPED TOGETHER

The links between the global donkey skin trade and wildlife trafficking extend beyond products being offered for sale alongside each other. Seizure records maintained by customs authorities show that donkey skins are shipped alongside products from a wide range of wild animals, including those that are CITES listed. Customs seizure reports and records, as well as news reports, obtained by WildCRU show evidence of donkey skins being shipped with elephant tusks, pangolin scales, abalone, sea cucumber, shark fins, tiger skins and fish maw. Many of these items are CITES Appendix 1 listed meaning that commercial trade is either entirely illegal or at least tightly controlled.

Traders exporting donkey skins can simply designate their cargo under one of the internationally recognised Harmonised System or HS codes, which is the standardized numerical method of classifying traded products. Customs authorities globally use the HS system to identify products when assessing duties and taxes, and for gathering statistics, but shippers are under no obligation to provide any more detailed description of the consignment. A single HS code, 410120, covers all equine and bovine-derived skins, and this vagueness is routinely exploited by exporters who provide either ambiguous descriptions, or no description at all (See Table 2). For example, analysis of 410120 exports from South Africa, which has a national slaughter quota of 12,000 donkeys for export of skins to China, found only nine consignment records, none with descriptions and all from 2017. This practice is regularly seen in wildlife trafficking where, according to TRAFFIC, “Descriptions of commodities are vague or misleading. Examples of vague descriptions for wildlife shipments include ‘shell’, ‘horn’, and ‘rosewood’ (there are many species of rosewood, some of which can be traded legally, and others prohibited from international trade).”⁵⁹

“ Customs seizure reports and records, as well as news reports, obtained by WildCRU show evidence of donkey skins being shipped with elephant tusks, pangolin scales, abalone, sea cucumber, shark fins, tiger skins and fish maw.

Analysis of the Panjiva shipping database identified 1,600 consignments of 41020, valued at USD\$95 million, destined for China, Hong Kong, Thailand, South Korea and Vietnam between February 2017 and February 2022. 249 of these shipments originated in countries or regions that are not known to export donkey skins, so these are likely to be bovine in origin. Consignments within Asia accounted for 77 in total, with 31 from Kyrgyzstan which is a known donkey skin source country and 24 from India where it is suspected that the trade has been operating for some time.

500 consignments of 410120 from known donkey-skin source countries were examined.

While the lack of specificity of the 410120 code makes it impossible to know precisely what was in each of the consignments, the majority were either listed as donkey or equine skins or were shipped by known donkey skin exporters and received by known donkey skin importers. This analysis has revealed that donkey skins may be being sourced and shipped from a much more diverse range of countries than we had previously realised. There is also no explicable reason for the huge variation in average values for the consignments going to China and those to Vietnam and Hong Kong.

| Importing country | Source country | Number of consignments | Total \$ Value/\$ av. consignment value | Equine/bovine/any description | Mode of transport |
|-------------------|----------------|------------------------|---|-------------------------------|-------------------|
| China | Peru | 121 | \$26m (av. \$214,876 | Equine | |
| | Mexico | 115 | \$15m (av. \$130,434) | Equine/Donkey | |
| | Uruguay | 73 | \$2.7 (av. \$36,986) | Equine | |
| | Panama | 8 | \$96,000 | Not given | |
| | Brazil | 13 | Not Given | Salted Asinine Skins | |
| | Venezuela | 4 | \$48,000 | Not given | |
| | Colombia | 3 | \$76,000 | Not given | |
| | South Africa | 9 | \$353,000 | Not given | |
| | Egypt | 3 | \$1.4m (\$466,666) | Not given | |
| | Mauritania | 1 | \$254,000 | Not given | |
| | Nigeria | 2 | \$557,000 | Not given | By air |
| | Tanzania | 1 | \$161,000 | Not given | |
| Hong Kong | Kyrgyzstan | 31 | \$7.3 million (\$235,483) | Not given | By road |
| | Mongolia | 3 | \$68,000 | Not given | By road |
| Vietnam | Brazil | 34 | Not Given | Salted Asinine skins | |
| | Colombia | 17 | \$837,000 | Not given | |
| Vietnam | Nigeria | 1 | Not Given | Dried Donkey Skins | |
| | Brazil | 35 | Not Given | Asinine Skins | |
| | Colombia | 15 | \$815,000 | Not given | |
| | Peru | 1 | \$416,000 | Equine | |
| | Mexico | 10 | \$955,000 | Mainly equine, some bovine | |

Table 2: Donkey skin exports / imports (data from Panjiva shipping database).

Only 17 consignments of 410120, valued at \$USD2.7 million in total, were recorded from Africa to China. Details of shippers are not listed, and quantities of product are not recorded.

Based on what is documented about the scale of the trade in Africa⁶⁰ these consignments can only represent a fraction, less than 1%, of the actual numbers of skins exported from Africa over the five-year period.

A similar analysis of the TradeAtlas and Volza shipping databases found 97 consignments of 410120 destined for China between January 2015 and February 2022, in addition to 184 for Hong Kong and 50 to Vietnam. Source countries such as US and Canada were discounted as they do not supply donkey skins. Searches were undertaken for donkey hides/skins in the descriptions (where given) and for HS code variations and miscodes.

“ This analysis has revealed that donkey skins may be sourced and shipped from a much more diverse range of countries than we had previously realised.

Table 3 & 4: Donkey Skin Exports / Imports (from TradeAtlas and Volza databases)

| Importing country | Source country | Number of consignments / HS Code | Equine/bovine/Any description | Notes |
|-------------------|----------------|--|--|---|
| China | Mexico | 65 coded to 410120 | Mainly Equine | |
| | | +4 coded to 410007 (Code not identified) | Wet Salted donkey skin | |
| | | +4 coded to 410009 (Code not identified) | Donkey Skin Wet Salted | HS Tariff 400120 given in description- HS 400121 is a code for Natural Rubber in Sheets |
| | | +4 coded to 410009 (Code not identified) | | |
| | | +14 coded to 41012002 | Salted Donkey Hides | |
| | | +2 coded to 41012002 | Salted Donkey Hides | |
| | Brazil | 10 coded to 410120 | Equine | |
| | Peru | 4 coded to 410007 (Code not identified) | Salted Donkey Hides | |
| | Kenya | 8 coded to 410120 | Not given | From Star Brilliant slaughterhouse |
| | Nigeria | 7 coded to 410006 (Code not identified) 7 coded to 410006 (Code not identified) | Donkey Skin Dried Salted Donkey Skins | |
| | Ethiopia | 1 coded 05051000 (HS code for Raw feathers for stuffing) | Salted Donkey Skin | NB from Volza database |
| | Tanzania | 2 uncoded | Salted dried donkey skins | From Fang Hua donkey slaughterhouse |
| | Egypt | 1 coded to 410120 | Not given | |
| | South Africa | 1 uncoded | Not given | |
| | Vietnam | 8 uncoded | Equine | |
| | Malaysia | 1 uncoded | Dried Salted Donkey Skins | |
| | | 9 uncoded | Dried Salted Donkey Hides | |
| | | 3 uncoded | Dry Salted Donkey Hides | |

| Importing country | Source country | Number of consignments / HS Code | Equine/bovine/any description | Notes |
|-------------------|----------------|---|----------------------------------|--|
| Hong Kong | Mexico | 43 coded to 410120 | Not given | |
| | | 34 coded to 410007 (Code not identified) | Salted donkey hides | |
| | | 4 coded to 410007 (Code not identified) | Salted Donkey Hides | |
| | Brazil | 17 coded to 410120 | Not given | |
| | Colombia | 33 coded to 410120 | Not given | |
| | Chile | 17 coded to 410120 | Not given | |
| | Cyprus | 16 (2 coded to 410120, 8 to 430219 (HS code for Furskins), 4 to 180200 (Cocoa shells and husks), 2 to 292143 (HS code for Toluidines) | Donkey Skins | Exporter is Ortiz Lan based in Colombia so this seems to be miscode. |
| | Peru | 6 coded to 410007 (Code not identified) | Salted Donkey Hides | |
| | Uganda | 1 coded to 410120 | Not given | |
| | Ghana | 4 coded to 410150 (Equine skins exceeding 16kg) | Dry Donkey Skin | |
| | Kenya | 2 uncoded | Not given | From Star Brilliant donkey slaughterhouse |
| | | 1 coded to 410692 (Tanned or crust hides and skins of animals other than equine or bovine) | Not given | From Goldox donkey slaughterhouse |
| | Tanzania | 1 coded to 410120 | Not given | |
| | South Africa | 1 coded to 410120 | | |
| | China | 2 coded to 960000 - (Closest code is HS 960110 which is worked Ivory) | 15 Pallets Raw Donkey Skins (x2) | |
| | | 2 coded to 960000 | Donkey Hides | |
| Vietnam | Togo | 5 coded to 410000 | Donkey Skin | +2 (Volza) 2020 |
| | Nigeria | 4 coded to 320014 (HS code for Tanning and dying extracts) | Dried Salted Donkey Hides | +2 (Volza) |
| | Kenya | 1 uncoded | Dry Donkey Skin | |
| | Mexico | 10 coded to 410007 (Code not identified) | Salted Donkey Hides | |
| | Peru | 20 coded to 410007 (Code not identified) | Salted Donkey Hides | |
| | Turkey | 10 coded to 410002 (Code not identified) | Wet salted donkey hides | |

Note: Data shows results from searches undertaken for donkey skins and HS codes used to identify equine skins.

It appears that some specific source countries predominantly ship to countries that are not the ultimate destination. A high percentage of donkey skin exports from Brazil and Colombia, for example, are shipped to Hong Kong. The reason for this is unclear and will be examined further.

Another anomaly being investigated is the diverse number of HS codes that are used for donkey skin shipments, some of which bear no relation to the consignment description.

A December 2021 paper in Biological Conservation⁶¹ examined 80 Nigeria-linked seizures of pangolin scales between January 2010 and September 2021, finding that 65% of the total mass of seized pangolin scales were

consignments shipped by sea. The seizures discovered co-shipments of ivory, dried African grey parrot carcasses, agarwood, shark fin, worked coral, rhino horn, crocodile skin and unidentified animal bones. An unspecified number of donkey skins are listed as having been found in consignments of pangolin scales. Nigerian-based companies on a range of B2B sites currently offer donkeys skins in association with a range of wildlife items including pangolin scales, elephant ivory and hardwoods. A 2021 crime index report on Nigeria produced by the Global Initiative Against Transnational Organised Crime⁶² states that “Nigeria has become a major transit hub for wildlife trafficking, particularly for Central African ivory and pangolin scales as well as for donkey hides destined for Vietnam and China, the primary markets for wildlife products.”



Live Pangolin. Source: Wiki.



Donkey skins seized by Hong Kong Customs. Source: Hong Kong Customs.

- In May 2018, Nigerian customs authorities intercepted a Chinese national attempting to smuggle 23 bags of pangolin scales, eight bags of elephant tusks and 99 bags of ‘unprocessed’ donkey skins out of the country. The suspect had been attempting to board a Qatar Airlines flight to China.⁶³ In September 2021, two 40-foot containers of donkey skins (12,500 in total) were seized by Nigerian customs, along with five 20-foot containers of logs and a 20-foot container of charcoal.⁶⁴
- In March 2022, Nigeria Customs Service⁶⁵ seized donkey skins valued at £4,400. The skins were being stored in a warehouse in Lagos, alongside cannabis valued at £24,000.
- On 11 April 2020, the South China Morning Post⁶⁶ reported on the interception at the Kwai Chung Customhouse Cargo Examination Compound in Hong Kong of a consignment of table salt from Egypt. The shipping container was found to contain smuggled items including 17 tons of donkey skins, 520kg of sea cucumbers and 2kg of fish maws. This followed on from a seizure on 9 April of a container of table salt, again from Egypt,

in which 16 tons of donkey skins had been hidden.⁶⁷ Analysis of the TradeAtlas shipping database however found that not one of the 38 consignments of salt arriving in Hong Kong during March and April 2020 originated from Egypt; this raises serious questions about the reliability of the information provided in the documentation accompanying the shipments. The case was reportedly handed to the Agriculture, Fisheries and Conservation Department. In an email from January 2022, customs authorities indicated that the case was “...currently under court proceedings...”

- In 2017, customs officials in Hai Phong, Vietnam, discovered a ton of seahorses disguised in a consignment of donkey skins originating from Peru. It was estimated that the consignment comprised 300,000 seahorses, although the particular species could not be identified.⁶⁸

CASE STUDIES: NOTABLE SEIZURES


25,000
DONKEY
SKINS

Location: Nigeria
Date: September 2021
Product: Donkey skins: timber

NCS Intercepts N643.73m Worth of Donkey Hides, Charcoal in Lagos
September 3, 2021 3:41 am

Nigerian customs officials seized 12,500 donkey skins and five containers of unprocessed timber, amongst other items. The products were being prepared for shipment.

News report: [Customs seizes N643m donkey skin, others | Dailytrust](#)
[NCS Intercepts N643.73m Worth of Donkey Hides, Charcoal in Lagos | THISDAYLIVE](#)



23 BAGS OF
PANGOLIN
SCALES, 8
BAGS OF
ELEPHANT
TUSKS, 99
BAGS OF
DONKEY
SKINS

Location: Nigeria
Date: May, 2018
Product: Pangolin scales: Elephant tusks: Donkey skins

Customs arrests Chinese trying to smuggle Pangolin scales out of Nigeria
May 10, 2018 10:00 am

Nigerian authorities intercepted a Chinese national attempting to smuggle 23 bags of pangolin scales, 8 bags of elephant tusks, and 99 bags of unprocessed donkey skins out of the country. The suspect, Liu Hui, was attempting to board a Qatar Airlines flight to China with the contraband product.

News report: [Ships and Ports Customs arrests Chinese trying to smuggle Pangolin scales out of Nigeria | Ships & Ports \(shipsandports.com.ng\)](#)



16 TONNES
OF DONKEY
SKIN, 1 TON
OF DRIED
SHARK
FINS, 520KG
OF SEA
CUCUMBERS,
2KG OF FISH
MAW


Location: Hong Kong
Date: April 2020
Product: Donkey skins: Shark fins: Sea cucumbers: Fish maws

Hong Kong customs officers seize HK\$1.45 million worth of donkey skin and sea cucumbers from container arriving from Egypt
April 15, 2020 10:00 am

In Hong Kong's largest seizure of donkey skins, customs officers seized 16 tonnes of donkey skin, one ton of dried shark fins, and 520kg of sea cucumbers, and 2kg of fish maws in a haul worth almost USD\$260,000.

The seizure was made following the interception of two consignments of salt arriving from Egypt. Donkey skins, shark fins, sea cucumbers, and fish maws were found hidden inside the container.

News report: [South China Morning Post: Hong Kong customs officers seize HK\\$1.45 million worth of donkey skin and sea cucumbers from container arriving from Egypt | South China Morning Post \(scmp.com\)](#)



11,000
DONKEY
SKINS, 7
TIGER SKINS

Location: South Africa
Date: May 2017
Product: Donkey skins: Tiger skins



BREAKING: One thousand donkey skins and seven tiger skins found on BAH plot
May 20, 2017 10:00 am

Inspectors from the National Council of SPCAs and the Benoni SPCA were tipped off to a property on which 1100 donkey skins, seven tiger skins, and equipment linked to the illegal donkey skin trade were found.

In a statement the NSPCA said "donkeys appeared to have been hacked behind their necks to presumably render them paralysed in order for them to be skinned. In earlier donkey skin cases, the NSPCA made the shocking discovery that the donkeys were still alive, but paralysed or unconscious, whilst being skinned"

Suspects fled the scene.

News report: [Benoni City Times: Customs shut Lagos airport warehouses over Chinese smuggling of donkey skin from Kenya | City Voice Newspaper \(cityvoice.com\)](#)



70 DONKEYS
WERE FOUND
TOO WEAK
TO STAND


Location: South Africa
Date: September, 2017
Product: Donkey skins: Abalone

Abalone mafia targeting SA donkeys, says NatGeo investigation
September 20, 2017 10:00 am

A Cape Town journalist investigating abalone poaching uncovers a property on which 70 donkeys were found too weak to stand having been deprived of food for a week. Donkey skins were also found drying in the sun as well as pots and gas burners used to process abalone.

According to the National Geographic investigation, "illicit supply chains cross borders and involve diverse products, driven by the steep margins of the black market. With the demand for donkey skins rising sharply in China, wildlife traffickers have begun moving in on the trade."

News report: [Sunday Times: Abalone mafia targeting SA donkeys, says NatGeo investigation \(timeslive.co.za\)](#)




Location: Vietnam
Date: March 2017
Product: Seahorses

Vietnam seizes nearly 300,000 dead seahorses smuggled from Peru
March 20, 2017 10:00 am

Customs officials in Vietnam intercepted a boat smuggling more than a ton of dried seahorses from Peru.

Paperwork for the consignment of around 300,000 individual seahorses was falsified as a shipment of donkey skins.

News report: [VN Express International: Vietnam seizes nearly 300,000 dead seahorses smuggled from Peru - VNExpress International](#)



300,000
INDIVIDUAL
SEAHORSES
WERE
FALSIFIED AS
A SHIPMENT
OF DONKEYS

FOCUS ON COLOMBIA

A 2021 InSight Crime investigation into donkey trafficking in Colombia⁶⁹ revealed widespread purchasing, theft and slaughter of donkeys, and exposed the impact of this on people who use donkeys on their farms and for the transport of goods, food and people. The investigation found substantial evidence of loopholes and non-compliance with existing Colombian laws by companies involved in the trade. This was seemingly an issue that the authorities have been aware of for some years. In a 2016 interview with, the El Heraldo newspaper⁷⁰ with Luis Humberto Martínez, National Director of the Colombian Agricultural Institute, ICA said that:

"This activity (donkey skin export to China and Hong Kong) is carried out without a health certificate for exports, that is, without the certification of specific health requirements, since exporters present a declaration indicating that the countries of destination do not require the Animal Health Certificate. With this, they automatically exonerate the ICA from responsibility for possible returns. At the exit point only the physical verification of the merchandise is carried out and the respective health inspection certificate is issued on site. As a result... it is impossible to be certain of the origin of the skins."

As an example of the high levels of ambiguity that plague the trade in donkey skins, Martínez indicated that China does not specify import requirements when, in fact, China has clear and specific rules regarding veterinary and quarantine certification on donkey skin imports, and only allows imports from source-country production facilities it has licenced for that purpose. No listings of any such facilities in Colombia are recorded on China's customs database. When questioned by InSight Crime, the Colombian authorities admitted that none of the donkey skin export companies "...complied completely..." with export regulations, saying that many consignments of exported skins "...did not have a certificate to prove they had been cleaned and sanitized for export."⁷¹

InSight Crime spoke with a state forensics investigator, who had been commissioned by Colombia's Attorney General, to investigate the illegal donkey trade. He revealed that prosecutors suspected local representatives of the Regional Autonomous Corporation (Corporaciones Autónomas Regionales) as having overstated production numbers at a licenced crocodile-breeding farm in the Antioquia department, which was legally exporting crocodile and alligator skins. These extra animals on paper gave the exporters space in the cargo hold to send additional items.

Attached to the breeding farm was a 'clandestine' donkey slaughterhouse and tannery, all run and operated by the same couple who the authorities claimed were trafficking donkey skins. According to InSight Crime:

"The tannery, breeding zoo and slaughterhouse were complementary businesses. Stolen donkeys were run through the slaughterhouse for their skin, which was processed with a brine, then stored in cold rooms. Later, they were transferred to refrigerated trucks, before being sent abroad alongside the products from the tannery. Their destination, the Attorney General's Office believes, was China. The donkey carcasses were sent to the zoo, where the owners would feed them to the alligators and crocodiles they were breeding, one former employee told InSight Crime."

“ *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

In 2016, Colombian news outlet La FM reported⁷² that 760 donkey skins had been seized by police in Córdoba's animal protection unit. Police Colonel Engelbert Grijalba indicated that donkey skin "...is also used by drug traffickers, with the intention of 'camouflaging' coca shipments in the inspections of anti-narcotics dogs." A news report from February 2017⁷³ detailed the activities of a gang named the 'Pela Burros' (Donkey Peelers) operating on the Colombian-Venezuelan border and stealing donkeys for their skins. Local speculation was that donkey skins were used to "...camouflage cocaine that is shipped to Asian countries."

STOP PRESS

At the time of writing, ongoing investigations commissioned by The Donkey Sanctuary are uncovering evidenced links between the donkey skin trade in South America and the smuggling of jaguar teeth to Hong Kong and Vietnam. Investigations in Africa have found donkey skin traders operating in countries with a ban on the slaughter of donkeys and the export of their skins, and who are involved in the trading of a range of prohibited wildlife items from endangered species. This information has been shared with the relevant international enforcement authorities who are acting on the intelligence.



Freezer room at a donkey slaughterhouse.

FOCUS ON SOUTH AFRICA

One of the key alerts to the link between the donkey skin trade and the wildlife trade was an insightful 2017 National Geographic feature by South African journalist Kimon de Greef.⁷⁴

This revealed a close link between the individuals involved in South Africa's illegal abalone trade and the donkey skin trade. It also uncovered a plethora of other problems with the trade from abject cruelty to contravention of local laws and environmental pollution and the active involvement of Chinese Triad cartels. It sparked a flurry of enforcement activity by the authorities and some high-profile seizures in a short space of time.

June 2016 - Bloemfontein

Following a tip-off by the Highveld Horse Care Unit,⁷⁵ a raid by the authorities on a property outside Bloemfontein in June 2016 found 82 dead and dying donkeys, corralled for days without food or water and awaiting slaughter for their skins. One of the South African SPCA inspectors, Reinet Meyer said it was the worst case she had seen in 27 years of service.

*"The donkeys had begun eating cardboard and bark from desperation," Meyer says. "Many had deformed hoofs and were infected with herpes. Several mothers had aborted their pregnancies from stress. We found at least 19 fetuses, but counting was difficult—they were small and had started decomposing."*⁷⁶

In an outbuilding at the property, Meyer discovered a gas burner and giant pots for processing abalone, a prized shellfish in Asia, which is smuggled out of South Africa in huge quantities. De Greef concluded: "Cases like the Bloemfontein raid help connect the dots. Dried abalone, a status food that can sell for more than \$90 per pound in China, forms the nucleus of a criminal economy worth millions each year in South Africa, with documented links to money laundering and the drug trade. Police confiscated fewer than two dozen dried abalone from the Bloemfontein property, a tiny haul, given that illicit exports from the country exceed 2,000 tons annually, equivalent to some 500,000 shellfish. But the find added credence to suspicions that donkey skins have been shifting onto the black market."



Donkey skins seized during Bapsfontein raid. Image courtesy of Highveld Horse Care Unit.

January 2017 – Bapsfontein

South African company, Anatic Trading Pty Ltd, founded in September 2015,⁷⁷ was investigated by South African Police Service on 16 January 2017. Acting on a tip-off, Captain Ockert Jaco Van Der Walt of the Cullinan Stock Theft Unit discovered 2,921 donkey skins in a storage unit in Bapsfontein near Johannesburg, which were about to be imminently shipped from Durban.

Captain Van der Walt was "...handed seemingly false invoices to account for the possession of the donkey hides..."⁷⁸ and subsequently "...obtained further shipping invoices of previous shipments of donkey hides by Anatic Trading." These invoices showed that Anatic Trading shipped a total of 12,776 donkey skins to Hong Kong between July 2016 and December 2016, a figure that far exceeded the entire annual quota for South Africa. The shipping instructions for the seized hides were linked by the police back to Anatic Trading.

The National Prosecuting Authority issued a press statement on 10 May 2017 stating:

"The invoices received only account for the purchase of 133 donkeys. This leaves the origin of 2788 donkey hides unexplained. It is the State's case that the only reasonable inference that can be drawn from the lack of documentation is that the remaining 2,788 donkey hides, if not all, were illegally acquired or stolen, which is a contravention of the Stock Theft Act."

"Captain Van der Walt obtained statements from two of the three registered equine abattoirs. Both Middelvlei and Vaalbank Abattoirs deny that the hides seized originate from their abattoirs. What is disturbing is that both Middelvlei and Vaalbank Abattoirs were approached by Chinese nationals after the search and seizure for false invoices. None of the 2,921 donkeys were therefore legally slaughtered which is an offence in terms of section 7 of the Meat Safety Act."

May 2017 – Benoni

On 29 May 2017, the NSPCA responded to a tip-off regarding a plot of land at Benoni, near Johannesburg⁷⁹. Entering the property with a warrant, inspectors discovered 1,000 donkey skins in bales tied together with wire. It was noted that “... the slain donkeys appeared to have been hacked behind their necks to presumably render them paralysed in order for them to be skinned. In earlier donkey skin cases, the NSPCA made the shocking discovery that the donkeys were still alive, but paralysed or unconscious, whilst being skinned.”

Hidden among the bales of donkey hides, were seven tiger skins described by Grace de Lange, of South Africa’s National Society for the Prevention of Cruelty to Animals (NSPCA) Farm Animal Protection Unit, as “...still bloody, like they’d been processed a few days earlier.”

According to the National Geographic feature, “South Africa has no native tigers, though several hundred are kept in captivity, and trading their parts is weakly regulated.” Captain Ockie Fourie of the South African Police Service also recognised the potential for the trade in donkey skins to be used to mask a trade in other illegal products, saying: “Aside from the animal cruelty issues, we’re concerned that these skins could be used to hide other goods.”⁸⁰



Images courtesy of the National Council of SPCAs South Africa.



Tiger skins hidden among bales of donkey skins awaiting shipment. Image courtesy of National Council of SPCAs South Africa.

The Benoni City Times reported⁸¹ that on 10 July 2017, Diederik Johannes Myburgh was charged in connection with the case, seemingly for slaughtering animals at a place other than an abattoir. He was fined R10,000 (£470) under a plea-bargaining deal which reduced his sentence. According to the NSPCA⁸², the Stock Theft and Endangered Species Unit of the South African Police Services “...opened a docket, however, Chinese nationals were involved, and they consequently disappeared from the premises and could not be traced. The police had no leads to pursue the investigation.”



Tiger skins hidden among bales of donkey skins awaiting shipment. Image courtesy of National Council of SPCAs South Africa.

February 2017 – OR Tambo International Airport

On 15 February 2017, officials at the OR Tambo International Airport in Johannesburg, along with the Highveld Horse Care Unit, inspected and seized thirty-nine “foul-smelling” cargo containers labelled as “cladding”. Inside were over 300 undeclared donkey skins registered to a Chinese exporter/businessman⁸³ and destined for Hong Kong.⁸⁴ Media reports at the time⁸⁵ linked the exporter to a rented property in Brandvlei near Randfontein where just four days later on 19 February, 1,000 donkey skins were seized in a police raid.



Donkey skins seized at Johannesburg airport labelled for export as cladding. Image courtesy of Highveld Horse Care Unit.



Donkey skins seized at Johannesburg airport labelled for export as cladding. Image courtesy of Highveld Horse Care Unit.

March 2017 – Tosca

A further raid by the NSPCA at the Excelsior Lion breeding farm in Tosca, North West Province in March 2017, found piles of donkey skins and meat in an outbuilding. The farm did not have a permit to carry out donkey slaughter. The owner of the Lion Farm and primary accused was charged by the NSPCA on the grounds of inhumane slaughter of donkeys, but he died before the commencement of the trial. No charges were followed up with the secondary accused.



Image courtesy of National Council of SPCAs South Africa.

TOSCA RAID DETAILS

“Having obtained a warrant to enter the property of the Excelsior Lion Farm near Tosca in the North West province, NSPCA personnel uncovered evidence of large numbers of donkeys having been inhumanely slaughtered. We also uncovered approximately 100 skins.

“The donkeys had not been pre-stunned to render them unconscious prior to slaughter. The method of killing is therefore in contravention of the Animals Protection Act, in terms of which criminal charges are being laid. It is confirmed that 10 donkeys had been slaughtered during the night of 28 February.

“On the property is an abattoir which is registered for the slaughter of cattle plus sheep and goats, but not for equines. Slaughtering donkeys in this facility is an offence.

“The NSPCA team alerted the SAPS Stock Theft Unit and the North West Province’s Veterinary Public Health Service. As a result, these organisations have worked alongside and in collaboration with us. Charges are being laid in terms of the Animals Protection Act, Stock Theft Act and the Meat Safety Act.”⁸⁶



Images courtesy of National Council of SPCAs South Africa.

In January 2017, Counsellor Yu Yong from the Chinese Embassy in South Africa responded to reports from the BBC and South African media⁸⁷ about the Benoni raid, saying that: “China and South Africa do not have any agreement on entry-exit inspection and quarantine of South Africa donkey skins and meat. And, according to our knowledge, there is no Chinese company importing donkey skins from South Africa through legal channel(s).”⁸⁸

Analysis of Chinese customs records by The Donkey Sanctuary has established that there are still no donkey slaughter or processing facilities in South Africa registered with China for the purposes of facilitating the export of donkey skins or meat. Despite extensive searching on shipping databases (Panjiva and TradeAtlas), no recorded consignments of donkey skins could be found originating from South Africa to either China or Hong Kong over the past six years. A November 2021 report⁸⁹ by the expert working group of the South African Money Laundering Integrated Task Force (SAMLIT – a coalition of South Africa’s principal financial institutions and United for Wildlife) concluded that donkey skin traders were among a number of ‘front businesses’ for the wildlife trade.

Earlier investigations by de Greef⁹⁰ found that abalone fishermen traded their hauls with Triad groups who, in return, supplied precursor chemicals for the production of methamphetamine, ephedrine and pseudoephedrine, meaning the drug could be produced cheaply and at a largescale. Although both parties saw the financial benefits of this, the effects in fishing communities were devastating with “...the convergence of poaching and hard drugs culminating in an unprecedented wave of addiction.”

The National Geographic report warned that “...with demand for donkey skins rising sharply in China, wildlife traffickers have begun moving into the trade.” De Greef spoke with a former member of South Africa’s Chinese mafia, the underworld group controlling the illegal abalone trade, who told him: “An abalone buyer I know started buying donkey skins last year (ie 2016). He’s been involved in everything before, from prostitution to selling leopard skins and lion paws. But donkey skins are basically legal. Really, it’s easy money.”



Pangolin scales. Photo courtesy of Wildlife Justice Commission.

“Chinese importers began asking about donkeys in 2014... there were seven companies each looking to buy around 10,000 skins a year. It was a big opportunity for rural development, but there were no frameworks to support legal trade. And when you can’t go legally, you go through the mafia.”⁹¹

– As reported in Foreign Policy, 2017.

IMPLICATIONS FOR ONLINE TRADING PLATFORMS AND THE GLOBAL SHIPPING INDUSTRY

This trade in potentially hazardous materials, shipped between countries often in direct defiance of national bans, and in conjunction with illegally traded wildlife, has serious implications for both online trading platforms and the global shipping industry.

Social media-based marketplaces are not typically legally liable for content posted on their platforms. Both the US and the EU,⁹² for example, have legislation that safeguards platforms from liability as hosts, but B2B platforms that charge fees for transactions involving the trade in CITES-listed species, or in violation of national legislation, may be violating the law. In the United States, for example, they may be violating the Lacey Act, and could therefore be subject to law enforcement actions. Regardless of potential legal immunity, online trading platforms have a moral responsibility not to facilitate a trade that poses a significant biosecurity risk, contravenes national bans, facilitates appalling animal welfare and harms both people and animals.

Likewise, the global shipping industry currently plays a pivotal role in facilitating this complex, harmful and often illegal trade. It actively contributes to the movement of skins that themselves are potentially hazardous and illegal, but which are also used to mask an illicit trade in wildlife products.

BIOSECURITY

The very limited processing of skins taken from animals of unknown origin and health status prior to shipment means that anyone who comes into contact with those skins is potentially at risk of contracting a zoonotic disease. The application of salt, or drying skins in the sun, may be insufficient to destroy all potentially harmful substances. Indeed, drying skins in the open air in countries where African swine fever is endemic, may increase the risk of contamination. Much of the donkey skin trade occurs outside of the law and, as such, cannot possibly be compliant with the statutory biosecurity protocols and quarantine processes that apply to legal exports. A second report in this series will be released by The Donkey Sanctuary later this year and will detail the considerable biosecurity issues that have been identified and evidenced.

REPUTATIONAL

The global donkey skin trade, and the suffering it causes donkeys, the harm it causes to donkey-dependent communities, and the biosecurity risk it represents, has come under increasing scrutiny by governments and the international media. Companies may experience reputational damage if seen to be knowingly, or unwittingly, supporting this trade. Furthermore, now that the links between the donkey skin trade and wildlife trafficking are irrefutable, companies face further risk of reputational damage if seen to be facilitating the unchecked exploitation of both donkeys and wildlife.

LEGAL

Shipping companies have previously been fined for failing to take adequate steps to prevent the shipment of contraband goods⁹³ and those transporting donkey skins that are not compliant with the rules surrounding the transport of dangerous goods or are derived from countries with a ban on donkey skin exports may find themselves in a legally contentious position. They have, on other matters, agreed to abide by national instructions to not carry specified commodities,⁹⁴ and this needs to be similarly adopted in the case of donkey skins.

ECONOMIC

Legal proceedings and reputational damage, as a result of legal action or simply due to the immense suffering and unacceptable biosecurity risk caused by the donkey skin trade, could prove financially costly to shipping companies associated with the trade.



Stock image for illustrative purposes only. Source: Wiki

CONCLUSION

The links between the global trade in donkey skins and wildlife trade are irrefutable: donkey skins and wildlife products are being offered for sale together by the same traders and there is evidence to show that they are shipped together using known trade channels and processes. In this convergence of criminality, the legally complex and ambiguous donkey skin trade has the potential not only to stimulate demand, but to provide a convenient conduit and cover for the illegal trade in wildlife products. Although domestic donkeys themselves are not a CITES-listed species, their unprecedented, unregulated and unsustainable trade is acting as a convenient and lucrative Trojan horse for the illegal wildlife trade.

While we now know far more about how the trade operates, much is still to be discovered. Our investigations have thrown light on its mechanics, but there is still a huge gap between the known numbers of donkeys slaughtered for the trade annually, and the numbers recorded in shipments. The reasons behind the shipment of skins to countries such as Vietnam, Hong Kong and Thailand first, presumably for onward shipment to China, is not understood and will be examined. And while we have looked closely at shipping records, this investigation has not looked in detail at air transport, despite evidence that it is used to transport skins from source countries to China and Hong Kong.

This is a global trade with little or no regulation, in a commodity with an idiosyncratic, opportunistic and irregular supply chain, with evidenced biosecurity hazards. It is an enabler for organised criminality, causes socio-economic disruption and even poverty at a local level, is worth millions of dollars annually and involves the slaughter of three million donkeys each year.

“ Governments, trade and customs authorities, enforcement organisations, online trading platforms, shipping companies and their facilitators must now recognise that the donkey skin trade represents a ticking time bomb and take swift and decisive action to stop the slaughter.



**STOP THE
SLAUGHTER**
END THE DONKEY SKIN TRADE

Donkey entering stunning box, Kenya.

RECOMMENDATIONS

Ejiao industry

The ejiao industry must:

- Urgently halt the global trade in donkey skins and support national governments in their efforts to protect their national donkey populations.
- Publicly commit to not source donkey skins from countries such as Nigeria where export prohibitions exist.
- Accelerate moves towards more sustainable sources of raw materials, specifically utilising the field of cellular agriculture.



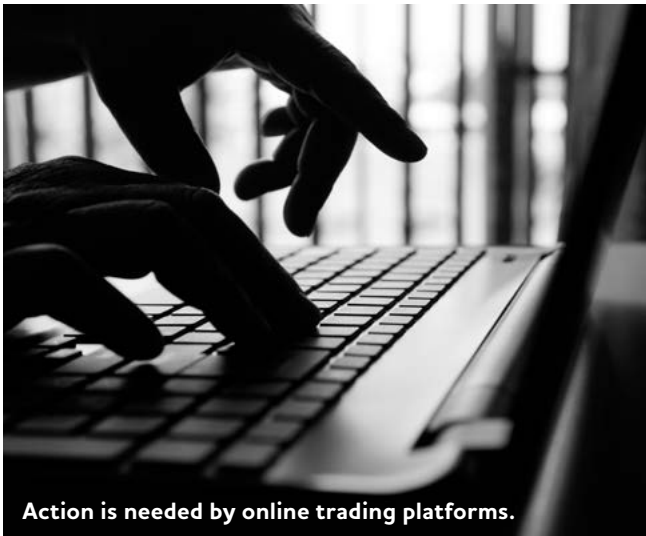
Range of ejiao products.

National Governments

- The Governments of China, Hong Kong, Thailand and Vietnam should immediately suspend the import of donkey skins.
- National governments of exporting countries should take immediate steps to stop the trade in donkey skins. Until such time as an enforced suspension is in place they must:
 - a. Work with the global veterinary community to take urgent action to mitigate against the risk of global disease spread and the biosecurity threat posed to livestock and people by the largely unregulated trade in donkeys and their skins.
 - b. Instruct enforcement agencies to apply and enforce existing legislation around quarantine and veterinary regulations, including animal welfare protection, where it is currently being ignored by operators in the trade.
 - c. Take urgent steps to protect donkeys and thus safeguard livelihoods, access to water, education and rural economic development in donkey-dependent communities.
 - d. Act to address the ongoing environmental impact and degradation caused by the trade in donkey skins, including the pollution of water and land.
 - e. Proactively scrutinise consignments listed under the HS 4100-heading code and ensure in-country companies who facilitate such consignments are aware of and comply with national prohibitions on donkey skin exports.
- Where countries have existing prohibitions on donkey slaughter and export of skins in place, whether through a policy of not licencing donkey slaughterhouses or a prohibition on export of skins, advisory notices should be issued to the shipping industry requesting that they refuse to carry any consignments of donkey skins.

Online trading platforms should

- Identify and prevent or remove advertisements for donkey skins, most urgently from countries:
 - a. That have prohibitions on the slaughter of donkeys and/or the export of their skins (eg Ghana, Benin, and Nigeria) Where the slaughter of donkeys and/or export of skins is not legally licenced (eg Tanzania, Kenya).
 - b. That do not have facilities registered with Chinese customs for the purposes of processing and exporting donkey skins. (eg, Mexico, Botswana, Ethiopia and South Africa).



Action is needed by online trading platforms.

The global shipping industry and its facilitating agents should

- Urgently undertake not to carry consignments of HS 410120 from countries:
 - a. That have prohibitions on the slaughter of donkeys and/or the export of their skins (e.g Ghana, Benin, Nigeria).
 - b. Where the slaughter of donkeys and/or export of skins is not legally licenced (eg Tanzania, Kenya).
 - c. That do not have registered enterprises with Chinese customs for the purposes of processing and exporting skins to China and for the purposes of ensuring compliance with China's quarantine and biosecurity regulations and protocols (eg Mexico, Egypt, Cameroon, Ethiopia and South Africa).
- Ensure that donkey skin traders do not circumvent and undermine recipient country safeguards on biosecurity controls by shipping to ports such as Hong Kong or Thailand first.
- Support the introduction of a specific HS code for consignments of donkey skins instead of relying on the generic 410120 code, which at present does not distinguish between bovine and equine skins.



The global shipping industry urgently needs to address its facilitating role in the donkey skin trade.

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Donkeys in holding pen awaiting slaughter, Kenya.

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).