

# UNDER THE SKIN

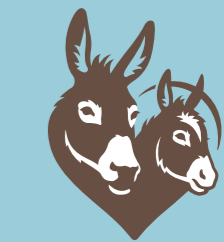
Update on the global crisis for donkeys and the people who depend on them.

NOVEMBER 2019



**THE DONKEY  
SANCTUARY**

**UPDATE**



**THE DONKEY  
SANCTUARY**

## CONTENTS

FOREWORD BY MIKE BAKER.....	4
EXECUTIVE SUMMARY.....	6
THE EJIAO INDUSTRY.....	10
A CRISIS FACING GLOBAL DONKEY POPULATIONS.....	12
ANIMAL WELFARE.....	14
LIVELIHOODS.....	20
WOMEN.....	24
ENVIRONMENT.....	26
OVERVIEW OF THE SKIN TRADE:	
A GLOBAL THREAT TO DONKEY WELFARE.....	30
ILLEGALITY IN THE TRADE.....	32
LINKS TO OTHER CRIMINALITY.....	36
BIOSECURITY.....	38
OPPOSITION TO THE TRADE.....	42
FARMING.....	46
WHAT WE ARE DOING.....	48
A HUMANE AND SUSTAINABLE FUTURE.....	52
RECOMMENDATIONS.....	54
REFERENCES.....	56

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## FOREWORD BY MIKE BAKER



There is a global crisis affecting donkeys.

Never before have donkeys faced this level of threat, as their local populations in some countries collapse due to relentless demand for their skins. It is a crisis that demands immediate action and we are calling for an urgent halt to the global trade in donkey skins.

These dependable, hard working, sentient animals experience appalling suffering as a result of the activities of skin traders across the world. They are often transported long distances, without food, water or rest and they can be held for days in yards without shelter, before being slaughtered in often brutal conditions.

They support the livelihoods of an estimated 500 million people in some of the world's poorest communities. They transport goods to market, carry water and wood, provide access to education and are a vital source of income for vulnerable communities, particularly women.

We have an obligation to ensure that these resilient, intelligent animals are treated humanely and have a life worth living.

The Donkey Sanctuary supports the efforts of national governments and local communities to protect their donkey populations and calls on governments and the ejiao industry to put in place urgent plans to ensure the best practical outcomes for donkeys and the people that depend on them.

Time is running out and we must act now to save these incredible animals.

A handwritten signature in black ink that reads "Mike Baker".

Mike Baker  
CEO, The Donkey Sanctuary



## EXECUTIVE SUMMARY

Global donkey populations are in crisis. Donkeys are being traded and stolen as the demand for their skins increases, driven by the production of ejiao, a traditional Chinese remedy believed by some to have medicinal properties.

It is estimated that the ejiao industry currently requires approximately 4.8 million donkey skins annually. With China's donkey herd reducing from 11 million in 1992 to just 2.6 million currently, the ejiao industry has had to source donkey skins from around the world, placing unprecedented pressure on donkey populations globally, and contributing to the collapse of some national donkey populations.

For many of the world's most vulnerable communities, and women in particular,

donkeys are a pathway out of poverty and can be the difference between destitution and modest survival. They are used daily to collect water and provide transport for families to attend health clinics and children to attend school. The income generated by donkeys transporting goods to market enables owners to invest in savings schemes, contributing to building stronger economies within their communities. For these people the trade in donkey skins has had a catastrophic impact.

It also has disastrous consequences for donkey welfare. Cruel and often illegal treatment of donkeys by local traders is rife, and many donkeys experience horrendous and inexcusable suffering. Sourcing is often indiscriminate, with mares in the late stages of pregnancy, young

foals and sick and injured donkeys entering the trade. They are often transported, sometimes for days on end, in overcrowded trucks without food, water or rest. In some cases, up to 20 percent of donkeys will be dead by the time they arrive at the slaughterhouse. Others will have broken or severed legs, or infected wounds, and be near starvation. On arrival at the slaughterhouse, donkeys can be held for days in packed compounds, again without access to food or water, before finally being slaughtered, often brutally. As injury and illness do not outwardly affect the quality of the skin, there is no incentive for local traders to ensure the humane treatment of donkeys. The death of a donkey due to injury, disease, thirst, starvation or stress is, at times, viewed favourably as slaughter fees are avoided and the skin is still processed.

Where legislation exists to safeguard donkey welfare, prevent disease transmission and protect the environment, overwhelming evidence demonstrates that it is ignored. Where the trade operates legally, it has grown so rapidly in size and complexity that it is almost entirely unregulated, with no means of monitoring the welfare of donkeys, or of tracking the source of individual skins. Where the slaughter of donkeys and the export of their skins is illegal, donkeys are being stolen and traded indiscriminately in defiance of national and local laws and cultural traditions. The trade has also been linked to the illegal trafficking of wildlife and drugs.

A largely unregulated international trade in a product frequently derived from the unhygienic



slaughter of donkeys of unknown health creates a high risk of the spread of infectious diseases across the globe. There are risks to human health from zoonotic diseases such as anthrax and tetanus. This represents an immediate health threat to people handling the skins and working in this trade, and demands urgent action.

The threat to equines is clear too. The recent death of tens of thousands of donkeys across West Africa from numerous diseases, some of which remain undiagnosed, demonstrates the devastation that can be caused by the spread of disease, which is largely attributed to the movement of animals.

There is growing opposition to this unsustainable trade. To date, 18 countries have taken action, many due to concerns about the security of their donkey populations, the risk of disease spread and the impact on livelihoods. Communities are uniting to protect their donkeys against this incessant threat. The Donkey Sanctuary, along with its local partners and with Brooke and the Society for the Protection of Animals Abroad (SPANNA), is working with national governments and local communities to protect their donkeys.

With populations in some source countries collapsing, and an increasing number of countries taking a stand against the trade, the ejiao industry faces a challenge. Its supply from the international trade is finite and the number of skins required by the industry is simply not sustainable. Some in the ejiao industry have recognised these challenges and taken some steps to become self-sufficient in the supply of raw materials.<sup>1</sup> Some industry representatives have indicated their intention to establish a reliable and sustainable source of raw materials domestically, thereby ending their reliance on the international skin trade,<sup>2</sup> where it is virtually impossible to be sure that the supply has been sourced ethically and legally.

There has been significant investment in donkey farming within China, and it has also been promoted to African countries as a business opportunity. Efforts have been made by some producers in China to introduce good welfare practices and the industry has engaged with global welfare experts as well as committed to setting and meeting good animal welfare standards. But, while good welfare practices can be introduced to donkey farms, the species has complex welfare needs and lengthy reproduction cycles and farming them requires a significant investment of both time and money. Evidence suggests it would take over 20 years to reach the number of donkeys required by the ejiao industry.

Donkey farming, which exists in China for both meat and milk, does not represent a quick return on investment, nor is it a solution to the rapidly dwindling supply of donkeys.

We urge the ejiao industry to move away from sourcing donkey skins internationally and put in place measures to pursue humane and sustainable ways of meeting the industry's needs. Huge strides are being taken, for example, in the cellular agriculture industry in China and around the world. Groundbreaking advances in the production of animal collagen set an encouraging precedent and may provide a promising option for the future of ejiao, with artificially grown, donkey-derived collagen, or even skin grown in laboratories, now a realistic prospect. This potential solution is already being explored by some ejiao producers. If realised, this could provide the ejiao industry with a regular, controlled and hygienic supply of raw products.

As the crisis facing donkeys continues, it is more important than ever that we look towards humane, sustainable and safe alternatives that could meet the demand for ejiao without compromising the welfare of donkeys, the sustainability of communities, the health of the environment and the safety of the people who work in the trade and who consume ejiao products.

**4.8 MILLION**

DONKEY SKINS ANNUALLY

 **CHINESE DONKEY POPULATION**



## THE EJIAO INDUSTRY

The ejiao industry has experienced significant growth over the past six years, characterised by increased consumer demand and regular price increases. In the three years from 2013 to 2016 the annual production of ejiao increased from 3,200 to 5,600 tonnes,<sup>3</sup> representing an annual growth of more than 20 percent.

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. Research by the University of Reading, however, suggests that an estimated 4.8 million skins were required to meet the 2016 production rates of 5,600 tonnes of ejiao.<sup>4</sup> The industry is able to source approximately 1.8 million of these skins domestically; the remaining three million are sourced through the global donkey skin trade. This number could, however, be much higher. In October 2018, a spokesperson for ejiao producer Dong-E-E-Jiao, confirmed that China imported 3.5 million donkey skins in 2016.<sup>5</sup>

This over-exploitation of a finite global resource has alarmed communities, national governments, intergovernmental bodies and non-governmental organisations (NGOs). The ejiao industry has also long expressed concerns about the unsustainability of the trade due to reducing supplies of donkeys. In 2015, Qin Yufeng, the president of China's largest ejiao producer, Dong-E-E-Jiao, said that numbers were falling at a rate of three to five percent annually. "The ejiao industry is facing a major challenge due to the shortening supply of donkey hide. It's hard for us to expand capacity," Qin said.<sup>6</sup>

These warnings were echoed in 2017 by a spokesperson for one of the industry's major suppliers, the Goldox slaughterhouse in Kenya, who said that there is "a worldwide donkey shortage is looming...and it could take only three years for the species to become extinct."<sup>7</sup>

The ejiao industry is now facing a crisis of supply. With a growing number of countries closing supply routes, including those with large donkey populations such as Ethiopia, Nigeria and Brazil, there are simply not enough donkeys to sustain the trade in donkey skins.

The Happiness Biotech Group identified a shortage of donkey skins for the almost 16 percent drop in revenue from ejiao sales from September 2017 to September 2018.<sup>8</sup> China's largest ejiao producer Dong-E-E-Jiao predicted a plunge in company profits of approximately 75 percent in the first half of 2019 and for profits to continue to fall thereafter.<sup>9</sup>

The ejiao industry has taken steps to become self-sufficient in the supply of raw materials, aiming to establish a reliable and sustainable source of raw materials domestically, thereby ending their reliance on the international skin trade. There has been significant investment in donkey farming within China and efforts made by some producers to ensure good welfare practices are in place on some of these farms. The industry has also explored the possibility of meeting the demand for ejiao using cellular agriculture and non-donkey alternatives.

The future of the industry remains unknown but, regardless of the trajectory of the industry in years to come, the current demand puts unsustainable pressure on global donkey populations and is having a disastrous impact on national donkey populations.



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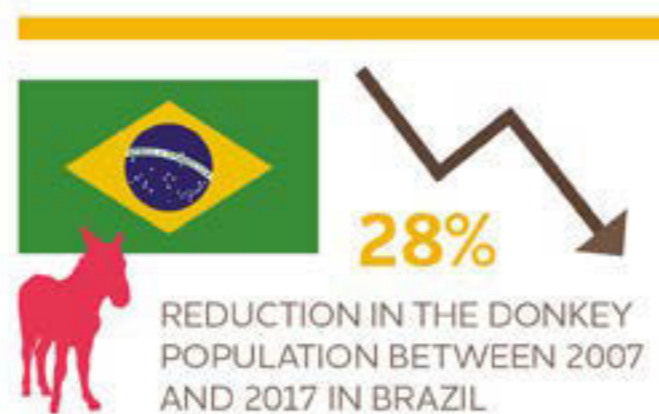
## A CRISIS FACING GLOBAL DONKEY POPULATIONS

According to the Food and Agriculture Organization of the United Nations (FAO), in 1992 there were over 11 million donkeys in China, the largest donkey herd in the world. In 2017, the FAO estimated that the figure had more than halved to a population of 4.6 million donkeys. However, the China Statistical Yearbook for 2017 gives a figure as low as 2.6 million.<sup>10</sup> The annual supply of donkeys from within China is estimated to be fewer than 1.8 million.<sup>11</sup> The international donkey skin trade supplies the remaining approximately three million skins required for ejiao production. This demand places relentless and unprecedented pressure on donkey populations globally and has led to a collapse in national donkey populations.

- Government officials in Kenya have expressed serious concerns for their national herd as the slaughter rate of up to 378,000 donkeys annually puts relentless pressure on populations.<sup>12</sup> According to a Kenyan veterinary officer, who asked to remain anonymous due to fear of reprisals, "...donkeys are being stolen and either transported in a very bad way or slaughtered in the bush without papers for proper health standards." According to Dr Samuel Kahariri, Chairperson of the Kenya Veterinary Association and member of the Kenya Veterinary Board, a government body that regulates the livestock sector, "...with huge demand in China, the country's donkey population is now in danger."<sup>13</sup> These fears are echoed by Raphael Ngome of the Kenya Society for the Prevention of Cruelty to Animals, "...the donkey hide trade will lead to an extinction of the species. Kenya faces a future without donkeys."<sup>14</sup>
- In Kyrgyzstan, where approximately 70 percent of the country's population live in rural areas, many people rely on donkeys for transport and mechanisation. The trade has contributed to the national donkey herd plummeting 53 percent in the six years between 2011 and 2017. It has left entire communities without the economic benefits of these essential animals, and with serious concerns about the disregard for local religion,<sup>15</sup> environmental pollution and the risk of disease spread as donkeys are brought in from neighbouring Tajikistan without any quarantine or health checks.<sup>16</sup>
- In the same six-year period, donkey numbers in Botswana dropped by 37 percent.<sup>17</sup> This collapse, fuelled both by a legal trade and underground operations, caused donkey prices to soar, making replacement of stolen donkeys impossible for some donkey owners.
- Brazil has seen a steady decline in donkey populations, with FAO figures showing an almost 28 percent reduction in the donkey population between 2007 and 2017. This figure is potentially much higher as roaming donkeys, which have

- been targeted by the skin trade, are unlikely to have been counted in the censuses.
- In 2017 The Ghana Veterinary Services Directorate expressed fears about the future of the national donkey herd. "The Veterinary Services has observed, with alarm, a sharp decrease in the number of donkeys, especially in the northern parts of the country," said the organisation's Director, Dr Kingsley Micky Aryee, "and at this rate, the population of donkeys is likely to be depleted in two to three years."<sup>18</sup>

The reduction in these national donkey populations has led to fears that donkeys will soon be a rarity in some countries and has led researchers at the Beijing Forestry University to warn that the demand for skins may cause donkeys to "become the next pangolin."<sup>19</sup>



## ANIMAL WELFARE

Donkeys are sentient and intelligent animals. They are aware of their feelings and emotions and can experience pleasure and joy as well as pain and suffering. At the very least, they deserve a life free from suffering. The treatment of donkeys, and the intense suffering they can endure at every stage of the skin trade, from sourcing to their eventual slaughter, is unethical, unacceptable and quite often illegal.

### SOURCING

Demand for skins is so high that even pregnant mares, young foals, and sick and injured donkeys are being sourced and slaughtered. The World Organisation for Animal Health (OIE) guidelines state that animals in the final stages of pregnancy, or who are sick or injured, should not be transported unless for the purpose of taking them to receive veterinary care.

Despite this, operators within the trade regularly demonstrate complete disregard for the fitness and suitability of animals to travel. Sick and injured donkeys are regularly selected for transport and slaughter. In some instances, slaughterhouses specifically target sick and old donkeys, requiring them to be loaded onto trucks for long distances to slaughterhouses.<sup>20</sup>

The Donkey Sanctuary and its partners also have evidence of the transport of donkeys that are in the final stages of pregnancy, some of which give birth or miscarry during the journey. On arrival, foals are slaughtered or left to die in holding pens before their carcasses, and the fetuses aborted during the journey, are disposed of.

Indiscriminate loading results in donkeys from multiple, and often unknown, origins being loaded onto the same truck, heightening the risk of disease spread.

Donkeys experience significant stress when they are separated from others they have bonded with, and often their caring owners. Being placed in situations that they are ill-equipped to deal with causes many points at which welfare will be compromised. Effects may be seen outwardly as donkeys may be sick, injured or die. However, the effects upon the emotional state of the donkey may be even more profound, with donkeys becoming so depressed, fearful and distressed that they simply stop eating and endure a prolonged death due to metabolic disease.<sup>21</sup>





## TRANSPORT AND HANDLING

Donkeys in the trade are often handled by local people interested in making quick money. As such, handlers often have limited experience or training in donkey handling and very minimal understanding of donkey behaviour. They resort to cruel handling methods that are, in many cases, illegal and which cause suffering and distress to donkeys. These methods include kicking, dragging and the use of spiked sticks called goads.

The Donkey Sanctuary has obtained evidence of the widespread use of these practices including:

- Video evidence obtained at the Bo Chang Group slaughterhouse in Francistown, Botswana, shows donkeys being dragged from trucks by their ears and tails.
- Footage from Tanzania's Shinyanga slaughterhouse, obtained by SPANA in early 2019, shows donkeys being hit repeatedly and hauled around the slaughterhouse, including over waist-high barriers, using chains around their necks. Similar footage was also obtained by The Donkey Sanctuary just two months earlier.

Tens of thousands of donkeys are regularly transported long distances to their destination where they are eventually slaughtered. The Donkey Sanctuary has witnessed and received many reports of donkeys being loaded into overcrowded trucks for lengthy journeys, sometimes passing through multiple countries, with no food, water or rest for the entire trip.

Donkeys that are injured, sick and in the late stages of pregnancy are all transported, despite international guidelines recommending such animals are not. Mares transported during the late stages of pregnancy sometimes give birth during transport or on arrival at the slaughterhouse. In many of these instances, the mares are still slaughtered and the foals are either left to die or are reportedly killed with the back of an axe.

These transport and handling practices have disastrous effects on the health and welfare of donkeys:

- A slaughterhouse employee in Zimbabwe disclosed that around 25 donkeys had been found crushed to death in different consignments unloaded at the slaughterhouse.<sup>22</sup>
- A truck driver in Brazil was seen dumping dead donkeys on the side of the road after they had died during transit. Elsewhere these donkeys would still be skinned but slaughterhouses in Brazil are prohibited from receiving dead



animals due to the risk of disease. Another driver in Brazil confirmed he regularly undertakes journeys of eight to ten days each trip. The truck these donkeys are transported in has no straw or bedding to protect the donkeys or provide comfort. It has only small slats to let air and light in, meaning conditions on the truck can be stiflingly hot. The donkeys are given no food or water throughout the trip.

- Transport in Tanzania can take up to 15 hours on flatbed trucks and when a donkey collapses through exhaustion or thirst, it is often trampled by others as they struggle to stay upright themselves. Broken legs are commonplace. The Donkey Sanctuary has seen severed hooves and lower legs on the ground at offloading sites, including those small enough to have belonged to foals.
- In West Africa, donkeys can be moved on foot for several days across hot, semi-arid areas including across international borders. Often donkeys in poor health, who may be lame, pregnant or malnourished, are made to undertake journeys, which they are not capable of. During such journeys debilitated donkeys unable to keep up may be left to die or may develop infectious diseases. Such diseases may pose a risk to any animal population along the route travelled.

This treatment, while appalling and often illegal, does not outwardly affect the quality of the skin being sourced for the trade. Broken bones and severed limbs, despite the immense suffering they cause donkeys, do not impact the final product. Therefore there is no incentive to treat the donkeys in the skin trade humanely.

OIE guidelines for the transport of animals by land establish clear instructions for ensuring the safe and humane transport of animals. Many countries through which donkeys are transported are signatories to these guidelines. Despite this, repeated and serious breaches of these guidelines are rife throughout the trade. Animals are selected, transported and handled in ways that directly contravene OIE guidelines, severely undermining animal welfare and increasing the risk of disease spread. The specific breaches are outlined in the *Under the Skin: Update supplementary briefing – OIE guidelines*.

## HOLDING

With daily quotas for slaughterhouses in place, many donkeys, following long journeys, are kept in holding pens for days without access to food, water, shelter or veterinary care. The Donkey Sanctuary has witnessed these inhumane

© Photo courtesy of Tanzania Humane Charity



A Kenyan donkey awaits his fate as skins dry on the floor and carcasses pile up

conditions in Tanzania, Botswana, Zimbabwe, Kenya and Brazil but the practice is even more widespread.

- In Bulawayo, Zimbabwe, 105 donkeys were found in shocking conditions at a feedlot while awaiting slaughter. Many of the donkeys were emaciated and had severe injuries including broken legs and large open wounds. Some of these donkeys were taken by SPANA but 78 had to be euthanised.
- The conditions witnessed in the holding pens of the Naivasha slaughterhouse in Kenya in 2017 led to its immediate closure. Video footage showed dead and dying donkeys, some with open, maggot-infested wounds: aborted foetuses were also seen. Skinned carcasses were dumped in pens alongside the donkeys awaiting slaughter.
- In Bahia, Brazil, over 700 hundred donkeys, most underweight and some severely so, were found in holding pens alongside hundreds of donkey carcasses. There was no food available and the only water source had been polluted by the donkey carcasses rotting nearby, putting remaining donkeys at risk of either infectious

disease or severe dehydration. These donkeys had travelled huge distances, in stifling heat and cramped trucks without food or water, before arriving at the overcrowded holding pens. The stress of the journey and the lack of food and water on arrival were directly responsible for the huge numbers of dead and dying animals.

- In South Africa, 70 donkeys were found starving and without food and water, many laying in the dirt, too weak to stand. An additional 10 donkeys were found dead. According to South African SPCA inspector Reinet Meyer, the donkeys had begun to eat rubbish out of desperation: many were infected with herpes, and several mothers had aborted pregnancies from stress. “We found at least 19 foetuses, but counting was difficult as they were small and had started decomposing,” she said.<sup>23</sup> The donkeys were unable to be saved and were euthanised the following day.

## SLAUGHTER

Animals are slaughtered, often brutally, in full

view of other donkeys, adding to the stress of the awaiting animals. This has been observed by staff from The Donkey Sanctuary at the Naivasha slaughterhouse in Kenya and on video footage collected at the Shinyanga slaughterhouse in Tanzania. Photographic and video evidence from the more informal slaughterhouses in West Africa suggests this practice is widespread.

Pre-slaughter stunning is a technique designed to render an animal unconscious prior to slaughter. When used appropriately, it decreases the suffering an animal experiences during slaughter. When it is not used, however, or when it is not carried out correctly, an animal being slaughtered can experience significant pain and fear.

Video footage taken at the Shinyanga slaughterhouse in 2019 shows inappropriate and unsuccessful stunning, meaning that donkeys were likely to be conscious at the point of death. This footage shows more than one occasion where

workers make several unsuccessful attempts to stun a donkey. The donkeys we witnessed were bludgeoned on the head with a hammer in an attempt to render them unconscious prior to killing. The attempts were unsuccessful due to the lack of expertise and the inappropriate equipment employed. These donkeys exhibited extreme fear and distress and they can be seen fighting for their lives. The donkeys’ experience is made worse by the fact that they are choked by a restraining chain around their necks while being bludgeoned, leaving the donkey completely trapped and unable to escape the repeated blows.

Slaughter also happens outside registered abattoirs. Stolen donkeys are incapacitated by various methods such as a blow to the head, before their throats are slit. These methods to stun donkeys are often ineffective, meaning that donkeys may still be conscious when they are slaughtered. This so-called ‘bush slaughter’ is rife in countries with either a legal or illegal trade.

This slaughter, often in the most horrific circumstances, occurs at an alarming scale. In Nigeria, between 2,500 and 4,000 donkeys were reportedly being killed every weekday at the Nkwo Jakki market, equating to between 650,000 and over one million donkeys every year.<sup>24</sup> The combined slaughter rate for the four Kenyan slaughterhouses was 1,512 per weekday, or over 390,000 per year, in the 2017/2018 period.<sup>25</sup> The four known slaughterhouses in Bahia, Brazil, killed 600 to 800 donkeys per day, or 156,000 to 208,000 every year.<sup>26</sup>

When this uppermost total of 1.6 million donkeys is added to smaller slaughter operations (in Tanzania and South Africa for example), and countries where a legal trade exists but for which we have no reliable export data (Mauritania, Mexico, Peru and Egypt for example), and to those countries where illegal slaughter exists (Ghana,<sup>27</sup> and Ethiopia for example), the number of donkeys slaughtered outside of China on an annual basis could easily be 2.8 million or more.

## IMPACT ON REMAINING DONKEYS

The theft of donkeys from a community has an impact not only on those stolen and the communities they are stolen from, it also places more pressure on the remaining donkeys. As donkeys are removed from communities, everyday workloads fall to fewer and fewer donkeys, which means longer hours, heavier loads and less time for rest, water or food for those left behind. These donkeys remain at risk of being stolen – a risk which increases as the supply of available donkeys for the trade diminishes.

## LIVELIHOODS

Millions of people worldwide rely on donkeys for their livelihoods and, as demand for donkey skins has increased, vulnerable communities have become the victims of the international skin trade. If the current rates of donkey slaughter continue, the impact on global donkey populations could be catastrophic and lead to several hundred million people losing part, or all, of their livelihoods.

Research by The University of Bristol into the socioeconomic value of donkeys in Ethiopia reveals that donkeys are major contributors to people's lives in both rural and urban areas.<sup>28</sup> They provide pathways out of poverty and are often the difference between destitution and modest survival. This is particularly true for women, who often rely heavily on donkeys to complete their daily work. Donkeys provide access to transportation for income generation, and to attend schools, markets and health clinics. They enable people to earn money, to invest in community savings and loans schemes, and to contribute to building a stronger economy within their communities.

Owners describe the importance and value that donkeys bring to their own lives and to their communities: "This donkey got me out of extreme poverty," says a participant in the study. "There was a time that 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." All donkey owners participating in the study reported that they would be living in extreme poverty if it were not for their donkeys.

Over 90 percent of participants reported being able to save money as a result of the income they earned when working with their donkeys. But the income generated by donkeys does more than just support livelihoods: it is important socially and establishes status and acceptance within communities. Donkeys afford their owners a position within rural society as a contributor with some decision-making power.

Wealth is earned through trading in rural villages and people use donkeys to transport firewood and grains to trade with neighbours, nearby villages and at markets. Donkeys also assist livestock owners in raising and selling their animals by transporting feed, water and shelter materials. They also transport sick animals, pulling them in carts to veterinary clinics.

Donkey owners expressed acute dependence on their donkeys. "The donkey has changed my life. I used to be poor and now I am living a better life," said one participant in the study.

But this dependence makes donkey owners vulnerable, and the loss or theft of a donkey can have an immediate and debilitating effect on a family.

As the global trade in donkey skins drives donkey prices continually higher, replacing a lost or stolen donkey is now impossible for many owners.

Donkey owners in Kenya protested about the licensing of donkey slaughterhouses, fearing that increased donkey thefts had led to a steady decline in numbers, and that they could lose their source of livelihood unless immediate action was taken.<sup>29</sup>

Kenyan donkey owners have resorted to extreme measures to protect their donkeys:

- Living on the outskirts of Nairobi, 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 it closely to her bedroom window so she can hear any disturbances. Lilian knows her livelihood remains at risk from the skin trade and wants the Kenyan slaughterhouses closed.
- Also on the outskirts of Nairobi, Richard has had four donkeys stolen in the past two years. He has purchased a fifth donkey so he can continue to transport water, cement and goods to market, but this has come at a considerable cost. Richard can't afford to lose this donkey to the skin trade so he has built a shelter in which his donkey is housed overnight. He is so fearful of another theft that he also uses a padlock on the donkey's tether.
- Jefferson lives in Naivasha, where one of Kenya's four slaughterhouses operates, and has also been the victim of donkey theft four times. Each time he replaced a donkey, the replacement was also stolen. He now resorts to teaming up with other donkey owners, using a rotating system to physically guard the animals at night. They have also had to build temporary shelters and pay security officers to watch the donkeys. This is a cost Jefferson can't afford but is his only way



to protect his donkey from theft. "All of my daily necessities are based on my donkey, so I care for my donkey very much," says Jefferson. "If the slaughterhouse could be closed today, I would be very happy."

These stories are widespread across Africa as the relentless demand for donkey skins puts extreme pressure on the people who can least afford it.

In cases where donkeys are sold to the global skin trade, owners are increasingly unable to replace them. The Invisible Workers report from equine welfare charity Brooke showed the net economic value of a working equid in Kenya to be up to US\$2,272 per year, or up to US\$40,000 over its 20-year lifespan as a working animal.<sup>30</sup> A donkey skin sold in Kenya may attract a price of up to US\$130, representing less than a month's value as a working animal. The scale of this problem means that millions of dollars are potentially being extracted from rural economies each year.



### Case Study: Yasso, Mali

On 23 April 2016, the inhabitants of Yasso, a small village in Southern Mali on the border of Burkina Faso, issued a plea for action on the trafficking of donkeys. Community members had witnessed a sudden growth in the trade of donkeys in the area, with numbers at the weekly marketplace increasing from approximately 50 donkeys sold to over 10,000.

They have also witnessed hundreds of young people abandoning the work necessary to prepare for winter to make quick money purchasing donkeys from the cities of Niono and Nara before walking them to Yasso, a journey of approximately four days. On arrival, the donkeys are slaughtered and their skins sold to the ejiao industry. Donkeys are bought for between US\$26 and \$43 (approximately) in the cities and the skin sold for between US\$52 and \$57.

"We are not insensitive to the huge economic benefit that can be derived from the exploitation of local resources," said Etienne Kamate, speaking on behalf of his community. "Our region desperately needs development, but if we analyse the current conception of development, which emphasises concern for the future and respect for the environment, then we relate this to the exploitation of our donkeys, then we are worried. Not all means of achieving wealth are good means."

"We consider that the current trade in donkeys shows neither respect for the future nor for the environment," said Mr Kamate. "The development of donkey trafficking in Mali in general, and in the rural commune of Yasso in particular, constitutes an anarchic exploitation of local resources and if this exploitation continues, the consequences will be disastrous. The number of households with donkeys will decrease and this will affect agricultural production."

"An entire generation of young people are abandoning traditional rural activities in order to get a foothold in the trade, with some selling their oxen to finance it, and this has reduced the available rural workforce," he said.



### Case Study: Bulbulla, Ethiopia

In the Ethiopian village of Bulbulla, 10-year-old Margartu and her older brother Romia have big responsibilities on their shoulders. Every day they collect the water that will sustain their family and others in their community, a task which is impossible without the help of their family donkeys. Each day after school they collect their donkeys and begin the long journey to the nearest water point. Along with other local children, they fill large yellow containers with fresh water.

The containers are bulky and heavy when full. They are difficult for the children to lift, let alone carry.

A donkey and cart can collect up to 20 containers of water in one journey, enough to supply Margartu and Romia's family and others in the community. Without their donkeys, it would be impossible for them to collect the water these families need to survive.

When not collecting water, the donkeys and carts are used to transport farm produce and animal feed, providing the family's primary source of income. Additional income is earned by using them to provide people with transport, and this enables the family to participate in a savings scheme that brings social as well as financial benefits.

Margartu and Romia know the value of their donkeys, but they also respect them and help with their daily care. "I feel lots of affection towards the donkey," says Margartu. "We will keep her forever and, even if she is old, I won't load her anymore, but I'll still look after her."

**"I FEEL LOTS OF AFFECTION TOWARDS THE DONKEY. WE WILL KEEP HER FOREVER"**  
*Margartu*



## WOMEN

Working donkeys in Africa are instrumental in lessening the burdens placed on women, enabling them more time to care for their children and families. Women who must carry firewood and water on their backs or heads are often forced to leave their young children at home, or to struggle carrying both. A donkey eases this burden immeasurably, carrying the load of water or firewood, and enabling the woman to carry her young child on her back and to continue to breastfeed and care for her child.

“Before I bought this donkey I was really suffering by carrying everything on my head while carrying a baby on my back,” said one participant in the University of Bristol study. “She shares my load. When I was pregnant my donkey transported all my goods to and from market,” said another.

When donkeys are stolen it is often women who are forced to do the work previously done by donkeys or, as in Ghana, girls are forced to leave school early to do the work themselves.



**“IF THERE ARE NO  
DONKEYS, THERE IS  
NO COMMUNITY”**

*Samuna*



### Case Study: Ethiopian women and donkeys – a strong partnership

- Samuna, in the village of Harabafata, lost her husband 10 years ago and supports 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. Samuna said: “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.”
- In Godino village, Mekdes supports her family of 10 by growing vegetables and crops. They rely on their donkeys to collect water and take produce to local markets as there is no road. Having a donkey has given Mekdes time to focus on her family. “When the children come back from school, I have time to spend with them and can help them with their studies in the evenings,” she said. “I have time to do household work like cleaning, washing clothes, making food and even resting.”
- Many women, such as Ayelech, use the money they earn with their donkeys to contribute to a savings scheme. “It would be difficult to participate in the scheme without the extra income from the donkey,” she said. “Because of the savings scheme, I could buy a cow and use the milk ourselves as well as sell it to make more money.” Ayelech feels indebted to her donkey: “When the donkey is too old, she will retire,” she said. “You can’t slaughter her, she has been helping you for many years and, when she can’t work, you have to pay her back.”
- On market day in Jido, Workite’s donkeys and cart provide transport for 10 people. The journey from her home takes two hours, across rough terrain which is impossible for most vehicles to cross. She also uses the donkeys to harvest crops, collect water and take grain to the grinding mill. “I love my donkeys,” said Workite (pictured opposite), “and I’m proud of the work I’m doing.”

## ENVIRONMENT

The waste disposal practices associated with donkey slaughter for the global skin trade cause significant environmental degradation. As the skin is by far the most valuable part of any donkey slaughtered for the skin trade, there is often minimal incentive to use the remainder of the donkey carcass, although this varies between slaughterhouses.

Many slaughterhouses do not abide by standards pertaining to the disposal of slaughterhouse waste.

- Kenya: the Goldox donkey slaughterhouse in Baringo, Kenya, was closed in November 2017 due to inadequate waste management systems and the establishment of an illegal dumping site. The Secretary of Kenya's National Environmental Complaints Committee, John Chumo, said at the time that Goldox had completed neither an environmental impact assessment nor consultations with local residents. Isaac Rutto, a public health officer with Baringo County, said the company had never complied with conditions for waste disposal.<sup>31</sup> A month before the closure, The Donkey Sanctuary visited a site close to the slaughterhouse. The site had signage indicating it was a donkey breeding centre. However, upon investigation, staff from The Donkey Sanctuary found a massive waste disposal facility where unwanted by-products from the slaughterhouse were poured into huge pits daily. Evans Kiprop, a farmer who lived a few metres away, claimed his cows had become sick from the pollution and that their milk production had fallen to just over a quarter of their usual output. He was apprehensive that feral dogs and vultures frequently gathered at the dumping ground, dragging donkey remains to areas where his children played, raising concerns about safety, sanitation and rabies. "They are making our village a dumping place," said another neighbour, Koros Kipkoeh, "we don't want to eat or sleep here."
- Botswana: in June 2017, people living near the Bo Chang slaughterhouse in Francistown, Botswana, increasingly noticed the smell of

rotting meat, which was attracting growing numbers of vultures. Acting on a tip-off, an inter-ministerial taskforce raided the site and found 452 emaciated donkeys in pens, awaiting slaughter.<sup>32</sup> Hundreds of rotten carcasses were found dumped in makeshift pits, with fluids seeping into the Tati River, a lifeline for the city of Francistown and people living further downstream. Most of the donkeys found at the site were euthanised on welfare grounds. On 28 June 2017, the government suspended all licences for the slaughter and export of donkeys.<sup>33</sup> One of three Chinese operators, an unnamed 24-year-old man, was fined 50 Botswanan Pula (US\$4.65) for animal cruelty.<sup>34</sup>

- Tanzania: in November 2018, the National Environment Management Council closed the Huacheng slaughterhouse in Dodoma, Tanzania, due to multiple violations of the Environment Management Act, including an absence of environmental management plans and blocked drainage systems. Huacheng was fined 30 million Tanzanian shillings (US\$13,000). The previous year the company had been fined 300 million Tanzanian shillings (US\$128,000) for failure to comply with environmental regulations, causing health risks for residents. Earlier in the same year, the authorities ordered the immediate closure of the Fang Hua slaughterhouse in Shinyanga for failure to protect the environment. Speaking at the factory, Deputy Minister of State, Kangi Lugola, said that the management of the factory had failed to destroy the remaining meat, bones and other by-products of donkey slaughter, leading to the spread of solid waste.

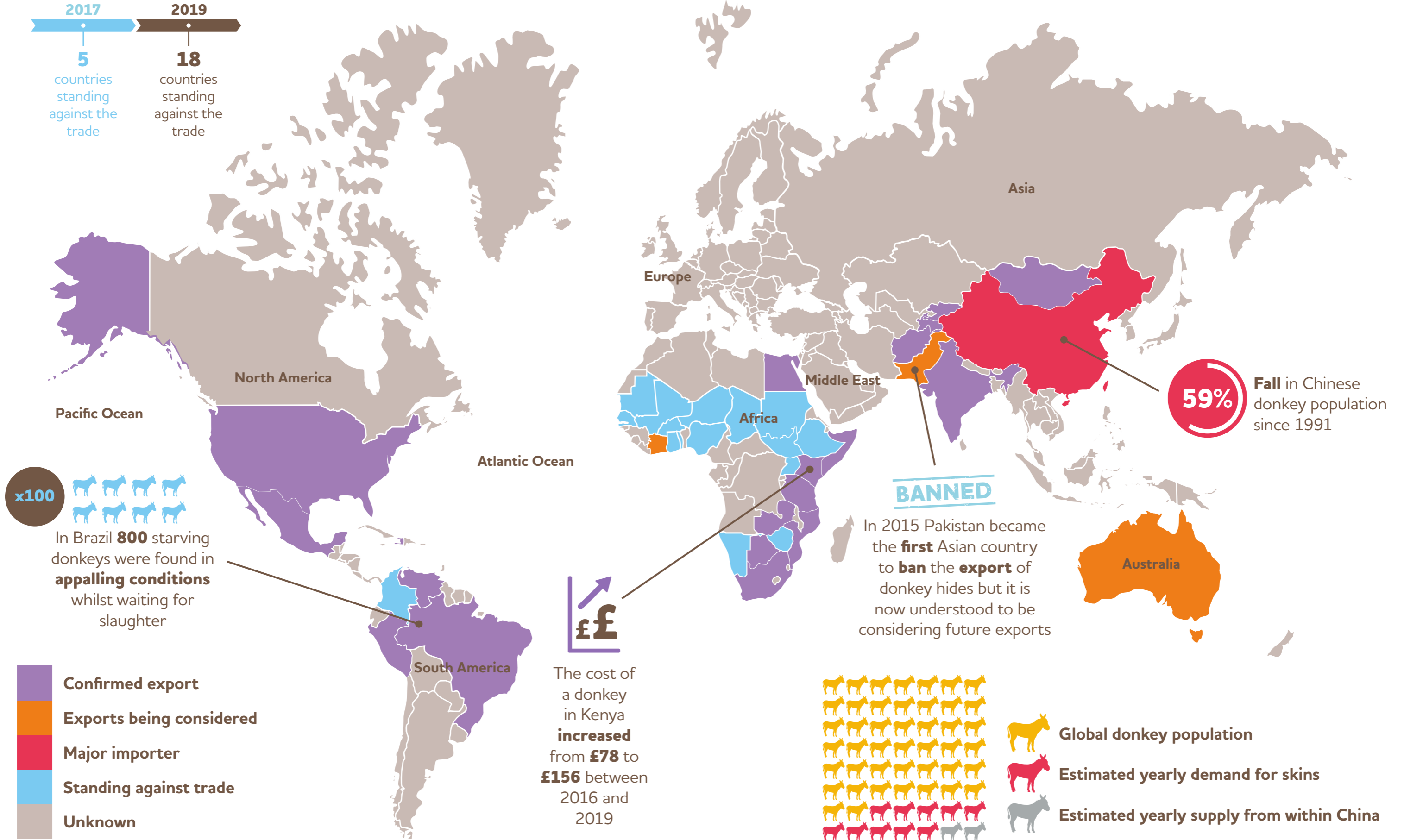
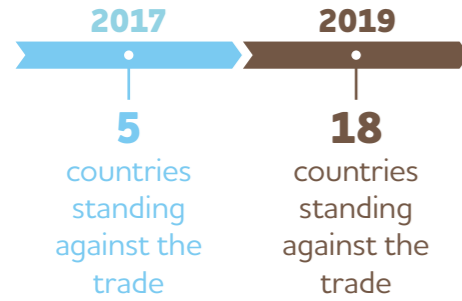


“IF YOU DON’T HAVE  
A DONKEY, YOU ARE  
THE DONKEY”  
*Ethiopian proverb*



# OVERVIEW OF THE SKIN TRADE: A GLOBAL THREAT TO DONKEY WELFARE

## General trade to China



**59%** Fall in Chinese donkey population since 1991

**x100**

In Brazil **800** starving donkeys were found in **appalling conditions** whilst waiting for slaughter

**BANNED**

In 2015 Pakistan became the **first** Asian country to **ban** the **export** of donkey hides but it is now understood to be considering future exports

The cost of a donkey in Kenya **increased** from **£78** to **£156** between 2016 and 2019





## ILLEGALITY IN THE TRADE

The live trade in donkeys is largely unregulated and much of it is illegal. In many countries where the skin trade is illegal, donkey trafficking and slaughter remain rife. Countries such as Mali, Burkina Faso and Ghana have all taken a stand against the trade, prohibiting donkey slaughter and the export of skins. But tens of thousands of donkeys are still being trafficked annually across the open border between Mali, through Burkina Faso and into Ghana for slaughter. There is minimal intervention from the authorities.

Even though Ghana introduced a ban on the slaughter of donkeys and the export of their skins in 2017,<sup>35</sup> a recent investigation funded by The Donkey Sanctuary discovered that a donkey slaughterhouse, Blue Coast Trading Ltd. in the town of Walewale, had received a permit and was about to reopen. Speaking to investigators, the Chinese manager of the facility said: "We have sorted out the paperwork and renewed the abattoir permit. As you can see, the foundations have been dug, the gravel and bricks have been delivered and the builders will be here tomorrow. We hope to open in the first or second week of May."<sup>36</sup>

Even where the trade and slaughter of donkeys is legal, The Donkey Sanctuary has a wealth of

evidence to show that national animal welfare, environmental protection and disease control laws are defied on a consistent basis.

The horrific evidence obtained at the Shinyanga slaughterhouse in Tanzania shows multiple infractions of national animal welfare and other legislation and yet, in July 2019, the facility was re-licenced until the end of 2019. The slaughterhouse has even been accused of blocking government officers from inspecting the facility and denying government orders.<sup>37</sup>

In July 2019, authorities in Côte d'Ivoire shut down a clandestine donkey slaughterhouse after a raid on the slaughterhouse uncovered 10 donkeys

awaiting slaughter, along with 25 kilograms of donkey meat. Fifteen donkey carcasses were also seized locally.<sup>38</sup>

To our knowledge, fines, when they are imposed, are often minimal. The US\$4.65 fine given to the Chinese manager of Botswana's Bo Chang slaughterhouse after animal cruelty charges, for example, does not represent an adequate deterrent.

Enforcement and veterinary agencies in several countries, including Brazil and Kenya, have told The Donkey Sanctuary that the trade has grown so rapidly in size and complexity that without new legislation, it is impossible for them to effectively police it.

The trade undermines actions taken by national governments to protect their national donkey herds. At an event in 2018 entitled 'Protecting Ethiopia's national donkey herd,' co-hosted by the Government of Ethiopia and The Donkey Sanctuary, an ejiao industry spokesperson stated that skins were sourced from Nigeria, Pakistan and Colombia. These were all countries that, at the time, had export bans.



### Case study: South Africa

The slaughter of donkeys, and export of their skins, is legal in South Africa but limited to 7,300 skins per year. In accordance with meat safety regulations, donkeys must be slaughtered in approved abattoirs. Two of the three operating slaughterhouses have been closed by authorities for failure to comply with regulations. The remaining slaughterhouse has a licence to process 20 donkeys a day.

Despite the annual limit on the export of donkey skins, a police investigation into export company Anatic Trading revealed that between July 2016 and May 2017, more than 15,000 donkey skins were traded. This number traded by just one company in an eight-month period was more than double the national export limit.<sup>39</sup>





### Case study: Tanzania

The Tanzanian Animal Welfare Act (2008) and the Animal Welfare (transportation) Regulations (2010) include protections for animals during transport and at the time of slaughter. In addition, laws such as the Animal Disease Act (2003) and the Hides, Skins and Leather Trade Act (2008) include provisions that specify how animals should be treated during transport, handling and slaughter.

Video and photographic evidence collected at Shinyanga slaughterhouse in January and May 2019, however, demonstrates widespread and blatant disregard of these laws.

Donkeys are seen arriving weak and injured, including one who died shortly after arrival. Footage shows donkeys being dragged off vehicles by their legs and being lowered from a significant height with a rope around their stomachs, despite requirements that animals should not be transported if they are weak or would suffer unduly for reasons such as illness or injury, and that they should be unloaded humanely, avoiding injury and suffering. In addition, animals that become ill during transport are entitled to veterinary care, which was unquestionably absent for the donkeys shown in the footage.

A large foetus is seen amongst donkey carcasses, indicating a violation of the duty not to grant livestock permits if an animal is likely to give birth during transport. It is also evidence of a breach of the prohibition on slaughtering a pregnant animal, where limited exceptions are unlikely to apply.

When pre-slaughter stunning is practiced, the stunning device should be applied to the correct head position and produce an immediate stun that lasts until death. Footage taken at Shinyanga slaughterhouse shows workers making several unsuccessful attempts to stun donkeys with hammers. The donkeys show extreme fear and distress as they are repeatedly bludgeoned. This horrific slaughter occurs in full view of other donkeys. Allowing waiting animals to witness slaughter goes against OIE guidelines and is possibly unlawful.

The ineffective and cruel stunning process suggests failure of the regulator, who is required to carry out periodic inspections of instruments used for slaughtering animals.

There is video and photographic evidence of donkeys showing outward signs of disease. Animals that are suspected of being, or who are, affected with a disease should be isolated and regulatory bodies notified. If these animals were not diseased but injured it would constitute a breach of transport regulations.

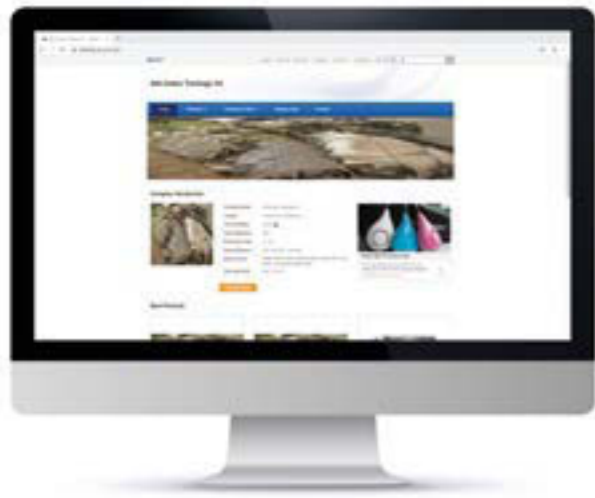
There is also evidence of poor waste and effluent management, in conflict with national requirements.

Despite this evidence having been presented in person by The Donkey Sanctuary to authorities there has, to date, been no known enforcement action taken. Most disappointingly of all, and despite the assurances we were given, the slaughterhouse was reissued with a licence to operate in July 2019.



## LINKS TO OTHER CRIMINALITY

There is growing evidence of the links between the illegal donkey skin trade and other types of criminality which destabilise economic and social security in vulnerable countries.



Investigations carried out by The Donkey Sanctuary have established that many traders offering donkey skins for sale on online platforms are also offering prohibited wildlife products including ivory, pangolin scales, rhinoceros horns and tiger skins. The international trade in these wildlife products is prohibited under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the close link the donkey skin trade has with this illegal activity demonstrates complete disregard for international regulations as well as national law.

Media reports have also linked the global skin trade with drug cartels in South America<sup>40</sup> and terrorism in Afghanistan.<sup>41</sup>



### Case study – South Africa

A 2017 National Geographic investigation found links between the illegal wildlife trade and the donkey skin trade in South Africa. Ockie Fourie, a captain with the Stock Theft Unit of the South African Police Service, stated: “Aside from the animal cruelty issues, we’re concerned that these skins could be used to hide other goods.”<sup>42</sup> A raid on a farm near Johannesburg in May 2017 uncovered 800 donkey skins, among which the bloody skins of seven tigers had been hidden.

It also uncovered links between the skin trade and the illegal trade in abalone, pictured below (a valuable shellfish which is highly prized in Asian restaurants). Speaking to a former trader, it was found that abalone buyers are now entering the donkey skin trade. One trader said: “An abalone buyer I know started buying skins last year. 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.”



## BIOSECURITY

The largely unregulated and often illegal international trade in donkeys and their skins creates a significant biosecurity risk for all countries that donkeys, and their products, are transported through. The spread of disease to the global donkey population, to other animals and to humans is a major threat which demands urgent action.

Donkeys are a silent carrier of many diseases: they often don't show signs of ill health and this makes discrimination between infected and healthy animals difficult without appropriate tests. These tests are rarely conducted on donkeys and therefore they remain undiagnosed as they travel across borders. This large-scale movement of donkeys, often illegally and when they are under significant stress, poses an infection risk to all animals in the nearby environment. Donkeys owned by vulnerable communities along trade routes are at risk of being infected with diseases carried by donkeys 'passing through', not only by direct contact but also via a bite from an infected carrier vector such as a tsetse fly.

The mixing of different populations of donkeys that occurs due to this transport is likely to result in the spread of disease into native populations. Disease will be carried with an affected donkey and the stress and poor health resulting from travelling long distances makes the donkey more susceptible to infection and often death. The deaths of donkeys in communities will have a devastating impact on livelihoods.

In January 2019, reports of disease in donkeys, resulting in large numbers of deaths, came from across West Africa. Nigeria reported 2929 cases of equine influenza in the period between 7 January and 5 February. Almost 270 of these donkeys died and in some cases the mortality rate of infected donkeys was almost 40 percent. While the precise source of the outbreak is unknown, it is suspected to be due to the 'illegal movement of animals' largely sourced from a neighbouring country.<sup>43</sup> Other countries told of a variety of symptoms and high mortality rates, but the causative disease in these countries remained undiagnosed. Reports indicate that over 60,000 donkeys died across West Africa during the Northern Hemisphere spring of 2019. These deaths may not have been a direct result of the skin trade, however they appear to have occurred along known live trade routes for donkeys. Such large losses demonstrate the potential for devastation to donkey populations as a result of disease spread and highlight the risks associated with movements of live animals across borders.

The indiscriminate slaughter of donkeys without regard for their health status, and the unhygienic conditions in which they are slaughtered and their skins processed, results in a high risk that skins intended for ejiao production may be contaminated with disease-causing agents. This contamination may be due the slaughter of an infected animal or through contamination during handling and processing.

Inadequate treatment of skins increases the risk that any infectious agents will remain, and infected vectors, such as insects, may also be present on the product.

As skins cross borders, the vulnerability of all equine populations must be considered, including those in the country of destination. China has a flourishing sports horse and racing industry which may be at risk from infectious agents transmitted by the trade in donkeys and their products. Outbreaks of African horse sickness, glanders, strangles or equine influenza could be devastating to this valuable industry.

Donkey farms within China are also at risk from the transmission of disease. The introduction of infection to a large herd of intensively farmed donkeys could result in an escalation of disease due to both the close contact between donkeys and the difficulty of identifying early disease.

Skins may also become contaminated with infectious agents which cause disease in other species. Left to dry in the sun on dirt tracks in countries where African swine fever is endemic, skins could easily become contaminated.

The global trade in donkey skins also poses a risk to people, and this threat must not be ignored. Many of the diseases carried by donkeys are zoonotic, meaning that they can be transferred to humans. This transfer can occur during the handling and slaughter of donkeys, as well as during subsequent skinning and processing. Rarely are appropriate biosecurity measures or hygiene equipment and procedures in place during these processes, leaving people highly vulnerable to contracting deadly diseases such as anthrax, rabies and glanders, as well as many other infectious

diseases such as brucellosis, dermatomycosis (ringworm) and vesicular stomatitis.

It is sometimes argued that legally opening slaughterhouses can be a means of controlling risks such as spread of disease. However, they do not necessarily reduce the risk of disease spread as ante-mortem inspections may not be carried out or inspectors may miss sub-clinical or 'silent' diseases. Reducing risk also depends on hygienic measures within the slaughterhouse, strict biosecurity, full traceability and effective treatment of products. This is known not to exist in some of the slaughterhouses that have been built to supply the skin trade and suspected not to be practised effectively in others.

Furthermore, the opening of a slaughterhouse attracts the trade of donkeys from large catchment areas. This results in donkeys, often with unknown health status, being transported within countries and across national borders to reach the slaughterhouse, thus increasing the probability of sourcing diseased donkeys and the risk of disease spread.

Improved biosecurity and better understanding of the epidemiology of diseases will help guard against the spread of disease. The International Coalition for Working Equids, an alliance between Brooke, The Donkey Sanctuary, SPANA and World Horse Welfare, has produced a series of educational materials based on best practice biosecurity procedures. These materials are offered to countries that are experiencing disease spread in their equine populations, particularly when diseases are spreading across national borders and could have a devastating impact on communities who rely on donkeys for their livelihoods.

But, while improved biosecurity measures will help, the only way to truly reduce the risk of disease spread is to ensure that the movement of live donkeys and their products are subject to strict controls.



### Mali case study

Mali has a high number of working donkeys and was one of the first to take a stand against the skin trade by stopping the slaughter of donkeys. Despite this, donkeys are still being targeted by the trade due to the relative ease of smuggling them out of the country. Donkeys are stolen from communities before being walked into neighbouring countries, including Burkina Faso to the south and Niger to the east. They travel across vast borders that are often just a line in the sand with no border control except on the busy main points of entry, which are easily avoided.

SPANAs Mali country Director, Dr Amadou Doumbia, said: "At just one of Mali's big animal markets, 400 donkeys are brought for export every week. There are five other similarly sized markets in Mali. Donkeys are all bought for the skin trade and sometimes for meat. But this is not sustainable every week, it used to be maybe 100 to 150 before. People who go to the market to buy a working donkey can't do so, as they've already been sold."<sup>44</sup>

According to Dr Doumbia, the donkeys are sourced from the border of Mali and Burkina Faso, from villages including Fangasso and Yasso which are situated close to the border. "The traders get donkeys there and can cross the border very easily with a group of 15 to 25 donkeys. That's just one way they take them," said Dr Doumbia. "There are only two or three checkpoints along the whole border, so the illegal trade continues. This year the trade is coming down little by little, because the donkey population itself is decreased," he said.

Donkeys are walked over multiple days through trade 'corridors' from land locked countries in the interior to countries such as Nigeria, Ghana and Côte d'Ivoire, where they are finally slaughtered. Here slaughterhouses can process large numbers of donkeys and their proximity to the coast enables easy shipping to China.

Many countries along this trade route, including Ghana and Nigeria, have policies preventing the slaughter of donkeys for the skin trade but, as is so often the case in the global skin trade, these laws are simply not enforced.



## A LACK OF TRACEABILITY

The often illegal and unregulated nature of the global skin trade means there is little traceability and minimal accountability for the regulations that are normally applied to ensure the safety of food and health products globally. Donkeys are at risk of both contracting and spreading diseases during their, (often long), journeys to slaughter and are rarely subject to ante-mortem or post-mortem inspection to determine their health status. Hygiene during the slaughter of donkeys and the processing of their skins is poor, sometimes to the point of being non-existent. The preservation and storage of skins is unlikely to be completely effective in controlling harmful diseases and substances. It is also, in most cases, not compliant with food safety regulations.

The ease with which ejiao products may be contaminated by compounds dangerous to human health is alarming. The risk of contamination is unsurprising when viewed in the context of the often unregulated, unhygienic and unethical way in which skins are sourced.



## OPPOSITION TO THE TRADE

There is growing opposition to the global trade in donkey skins and an ever-increasing number of countries that have been targeted by the trade are taking a stand against it. This number currently stands at 18 across three continents, and their calls for a halt to the trade are echoed by a growing number of international bodies who have realised the disastrous effects of the trade.

- The World Veterinary Association (WVA), the world's largest veterinary body, called for the trade to be halted until "...the impact of the trade can be assessed and shown to be both humane for donkeys and sustainable for the communities that depend on them. Governments and local authorities should support affected communities by preventing the decimation of donkeys through protection from legal and illegal trade." (WVA 2018)
- In a joint statement the American Veterinary Medical Association (AVMA) and the American Association of Equine Practitioners (AAEP) described the trade as an "inhumane industry that harms communities and threatens the species worldwide." (AVMA & AAEP 2018)<sup>45</sup>
- UN Environment stated: "The unsustainable extraction of a resource, whether it's donkeys, plants, trees or minerals, can have adverse effects on the environment and communities in distant lands. In the case of donkeys, a valuable mode of all-weather, carbon neutral transport is removed from those most in need of transport in remote rural settings." (UN Environment 2018)
- OIE said that the trade in donkey products "has recently increased, causing major impacts on the rural livelihoods, donkey populations, health and welfare, and the environment worldwide." (Dr Matthew Stone, Deputy Director General, OIE).
- In December 2017, eBay banned the sale of ejiao products on its site due to unverifiable claims about its efficacy being made by sellers.
- At an Economic Community of West African States (ECOWAS) workshop in Abuja, Nigeria, on 23 September 2016, the Directors of Veterinary Services (DVS) for 14 of the 15 ECOWAS countries (Gambia was not present) agreed to take actions to stop the slaughter of donkeys and the export of donkey meat, hides and skin, "as the donkey is becoming an endangered species."<sup>46</sup> The meeting was also attended by representatives of the African Union Bureau for Animal Resources (AU-IBAR), OIE, FAO, as well as the United States Department of Agriculture and Animal and Plant Health Inspection Service (USDA-APHIS).
- The following actions have been taken by ECOWAS countries:
  - Burkina Faso banned donkey slaughter in August 2016 citing "overexploitation of the species" and the need to ensure sustainable donkey numbers.<sup>47</sup> This came after inhabitants of the village of Balolé, angered by the odours and pollution of the air, soil and water due to the slaughter of donkeys, ransacked a slaughterhouse run by a consortium of French and Chinese businessmen.<sup>48</sup>
- The Gambia: In February 2017, the Gambian Department of Livestock Services (DLS) released a joint statement with the Gambian Tourist Board, the Gambia Horse and Donkey Trust and other animal welfare organisations that: "The DLS does not in any way condone this practice [the slaughter of donkeys for their hides and meat] and therefore requests that anyone who has knowledge of any donkey slaughter to report immediately to the DLS or the nearest police station."<sup>49</sup>
- Ghana: The Ghana Veterinary Services Directorate banned the slaughter of donkeys and the export of their skins in January 2017. "The Ghana Veterinary Services Directorate has observed, with alarm, a sharp decrease in the number of donkeys, especially in the northern parts of the county. At this rate the population of donkeys is likely to be depleted in two to three years. The Veterinary Services has therefore decided to ban, with immediate effect, the indiscriminate slaughter of donkeys and the export of their skins." (Dr Kinsley Micky Aryee, Ghana Veterinary Services Directorate, 17 January 2017).
- Mali: The regular discovery of clandestine slaughter became increasingly concerning and, in late 2016, the Ministry of Livestock took the decision to prohibit the slaughter of donkeys.<sup>50</sup>
- Niger 'strictly prohibited' the export of donkey meat and skin in 2016 by order of the Ministry of Livestock, Interior and Trade and the Ministry of Finance, a government official stating that "if the export continues the animals will be decimated."<sup>51</sup>
- Nigeria: A bill that would prohibit the killing and exportation of donkeys, and donkey carcasses and derivatives, out of Nigeria has overwhelming support from parliamentarians, the Ministry of Agriculture, government departments and officials, including the Director of Veterinary Services. "We're fully in support of this bill because we have observed that, if care is not taken, donkeys would go into extinction. We don't want to lose them." (Dr O. Alabi, Ministry of Agriculture, Nigeria, May 2019).<sup>52</sup>
- Senegal: In April 2016, the Government of Senegal introduced a by-law to regulate donkey slaughter and forbid export of donkey meat and hides.<sup>53</sup>
- The Botswanan Government stopped issuing export licences related to donkeys and their products, urging donkey owners to stay vigilant against donkey theft and illegal trade. "The Ministry of Agricultural Development and Food Security has noted with concern the indiscriminate and cruel slaughter of donkeys for their hides, which are exported to lucrative markets in Asia. The Ministry urges farmers to stay vigilant." (Ministry of Agricultural Development and Food Security, 27 June 2017). Despite these concerns, the government has re-licenced a donkey slaughterhouse in Francistown.
- The slaughter of donkeys in Bahia, Brazil, was suspended after 750 donkeys were found dead and starving, awaiting slaughter. "The State of Bahia has a record of serious zoonoses in equine and bovine herds and, occasionally, epidemic outbreaks. There is a history of lack of supervision and commitment to protecting the herd, thus affecting the image of our people, the quality of our herd, and an undeniable – and legitimate – devaluation of our identity and economy," said Judge Arali Maciel Duarte, 1st Federal Court, Brazil, December 2018.<sup>54</sup> The injunction was overturned in September 2019.<sup>55</sup>



- Chad: In July 2017, the police uncovered a donkey trafficking network after two shipping containers filled with almost 300 donkeys, many dead or dying from asphyxia, were recovered in Etena. forty more animals had already been skinned on site.<sup>56</sup> The Director of Veterinary Services confirmed that the government attaches great importance to 'eradicating' the trade and had set up a committee to tackle the rise in incidents. (July 2017)
- Colombia: The Government stopped the export of donkey skins following reports of donkeys being skinned alive, transported without a license, health risks and stolen donkeys.<sup>57</sup>
- Ethiopia: Authorities ordered the closure of two slaughterhouses in 2017, stating no additional slaughterhouses would be approved. The Ethiopian Investment Commission said: "We don't allow such investments anymore. They are not in line with societal values and culture."<sup>58</sup>
- Pakistan: In early 2019, the Livestock Development division of Khyber Pakhtunkhwa Province announced plans to 'farm' and export 80,000 donkey hides to China within three years.<sup>59</sup> The plans were shelved due to concerns about donkey meat entering the food chain.<sup>60</sup> In September 2019, however, plans to export donkeys once again received support.<sup>61</sup>
- Namibia: Applications for two slaughterhouses in Outjo and Okahandja municipalities were blocked after legally required environmental impact assessments reported that there would be 'serious long-term socio-economic impacts', particularly on women and children in poor communities. The assessment concluded that it 'would be negligent to recommend that the project receive approval until more accurate data had been obtained.'<sup>62</sup> The applications for both slaughterhouses were withdrawn.
- Sudan: The Director of Veterinary Services confirmed in September 2018 that Sudan's



Donkey skin trade protesters take to the streets in Brazil

animal welfare legislations prohibit donkey slaughterhouses, and community, religions and culture in Sudan all support that prohibition.<sup>63</sup>

- South Sudan: The Director of Veterinary Services confirmed in February 2019 that South Sudan stands against the trade and will not engage in the slaughter or export of donkeys for their skins.<sup>64</sup>
- The Government of Tanzania banned the trade and closed abattoirs in 2017, citing the need to "save the animals from extinction, taking into account that in recent years the pace at which the donkeys are slaughtered does not correspond with the number available

in the country." (Charles Tizeba, Minister for Agriculture 2017). A change in Ministry of Agriculture leadership meant that the slaughterhouses were subsequently reopened in 2018.<sup>65</sup>

- The Government of Uganda banned the sale of donkeys for slaughter, stating that the fast growing skin trade has "negative consequences on poor households and the women and youth that depend on the donkey for transporting water, firewood, construction materials...in the rural areas of North Eastern Uganda, where the terrain is inaccessible by other modes of transportation. These measures are intended

to protect and preserve the donkey for the welfare of the communities that depend on it," (Ugandan Ministry of Agriculture, Animal Industry and Fisheries, 18 August 2017).<sup>66</sup>

- In Zimbabwe the Director of Veterinary Services banned the registration of all donkey slaughterhouses, citing the anxiety, acrimony and public outcry in response to the construction of a donkey abattoir, in Bulawayo. "The said donkey abattoir or any other for that matter, will not be registered to operate in Zimbabwe and no donkey is ever going to be slaughtered at any abattoir", said Dr J. Nyika, Director of Veterinary Services, Zimbabwe.<sup>67</sup>



## FARMING

As competition for the dwindling supply of donkeys intensifies, farming is increasingly viewed as a solution by which a regular supply of skins can be secured. Donkeys are also farmed for meat and milk products. Significant investment has been made in donkey farms in China, and donkey farms have been considered in Africa, Asia, Australia and South America.

The Donkey Sanctuary has been invited onto donkey farms in China and has worked collaboratively with some, measuring health and welfare and developing an understanding of farming. This enables us to offer support and provide advice on management and conditions essential to be able to farm this species, which is essentially an animal evolved to exist in small groups, in a way which could reduce any welfare concerns.

While good welfare practices can be introduced to donkey farms, the species has complex needs and lengthy reproduction cycles and farming them requires a significant investment of both time and money. In too many cases, farming of donkeys is detrimental to the welfare of a species which has evolved to run in small groups.

If donkey farming practices mirror those employed for other livestock species, the threat of genetic modifications and selective breeding for high production yields must be considered. Genetic alterations or selective breeding may lead to donkeys being bred with inherent weaknesses and defects, and these weaknesses and defects being

accepted as long as the production of skin, milk, meat or by-products is improved. These donkeys may never be able to live a life without suffering and will pass on such traits to their offspring, leading to the suffering of future generations.

Evidence suggests it could take 20 years or more to reach the number of donkeys required by the ejiao industry. Donkey farming does not represent a quick return on investment, nor is it a solution to the currently dwindling supply of donkeys.

Modelling developed by the University of Reading enables prediction of production levels, although, as there is limited knowledge of donkey farming, many assumptions have been made in the application of this modelling and it can therefore only be an indicator.

Based on this highly optimistic model, which assumes excellent welfare, a foal born to a breeding female every 17 months and only one percent mortality, a farming system with an initial herd of 200,000 female donkeys would take 15 years to supply 1.2 million skins. This figure

represents only one quarter of the approximately 4.8 million skins needed annually to sustain the industry. Establishing a farming system capable of supplying the full 4.8 million skins required could take well in excess of 20 years.

This modelling shows that a herd size of 4.8 million donkeys is required to produce 1.2 million skins annually. Given this, it is anticipated that over 19 million donkeys would be required to supply the full 4.8 million skins needed by the industry annually.

This modelling makes clear that many years must be dedicated to building farms capable of meeting demand and that promises of a quick return are unsubstantiated.

A business plan prepared for Tanzania's Dodoma slaughterhouse, and viewed by The Donkey Sanctuary, proposed a US\$3.2 million investment over four years to grow a donkey herd from 900 to 1,719 donkeys, an increase of only 819. An investment of US\$3.2 million to increase herd size by 819 equates to an investment of nearly US\$4,000 per animal. The final herd size of 1,719 donkeys would only satisfy the capacity of the slaughterhouse for less than three days.<sup>68</sup>

There is no mention in the business plan of how the company would source the remaining donkeys required to operate their slaughterhouse during the four-year period.

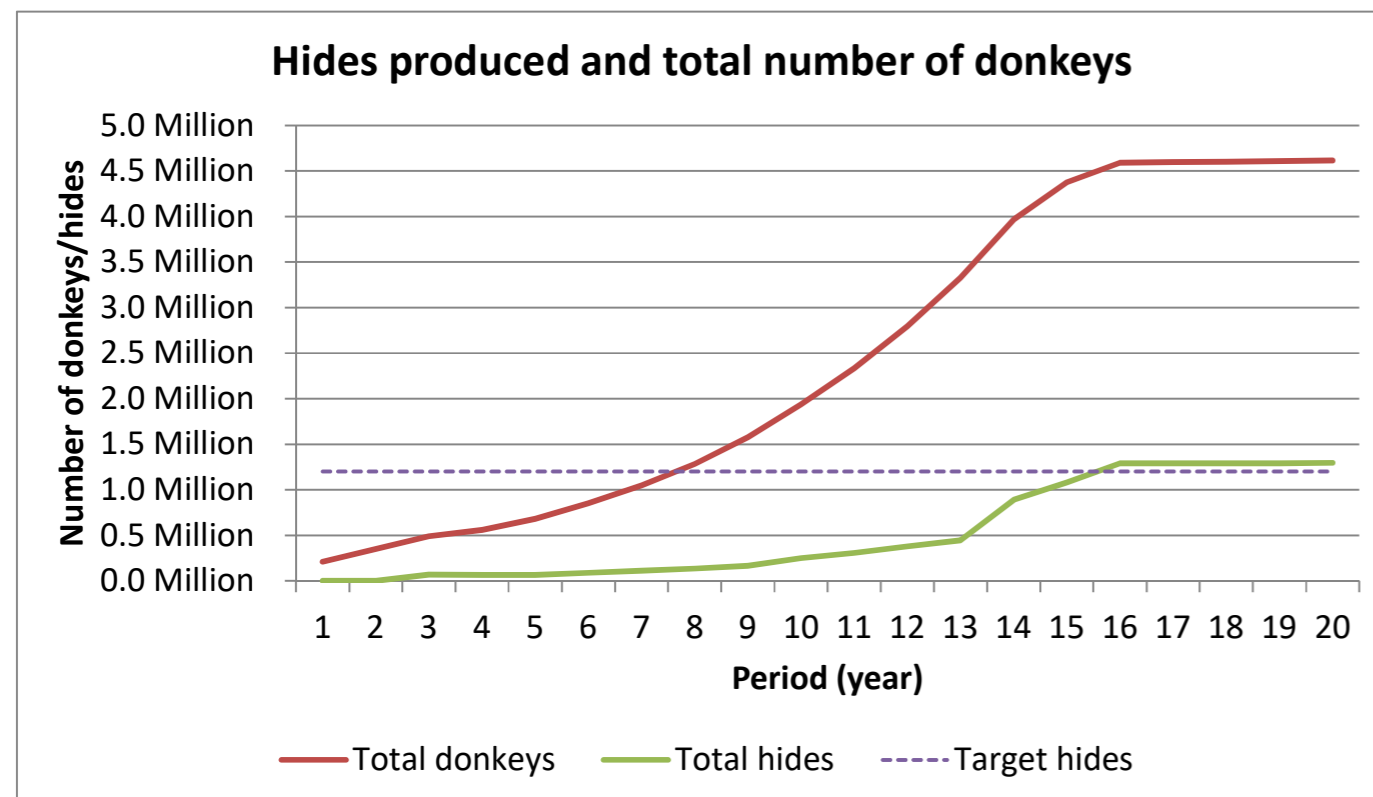
A plan for the Shinyanga slaughterhouse, also in Tanzania, showed a similarly unprofitable model. It proposed a US\$3.7 million investment over four

years to increase an initial stock of 296 donkeys to a total of 683. This increase of only 387 donkeys, less than two days of slaughterhouse capacity, would represent an average cost of US\$9,650 per donkey.<sup>69</sup>

The significant investment of both time and money outlined in these proposals clearly represents an unprofitable approach. For these slaughterhouses to obtain enough donkeys to meet their slaughter capacity, and to make a profit, they would be forced to source donkeys from Tanzania's national herd. A herd that would, if slaughter continues at recent rates, be all but eradicated before the end of these four-year projects.

While these business plans are plainly unrealistic and unprofitable, the greater danger posed by the presence of farms is the risk that these farms act as a cover for an often-illegal offtake and therefore impact on the national herd.

The complexities and inherent risks associated with donkey farming were recognised by Dr Sahelu, Special Adviser to Ethiopia's Minister of Agriculture, when speaking at the 2018 *Protecting Ethiopia's National Donkey Herd conference*, co-hosted by the Government of Ethiopia and The Donkey Sanctuary. "It may be some time before plans for large-scale donkey farms in Ethiopia become sufficiently productive to realise their economic potential, and so provide the reassurance that offtake for the skin trade will not be drawn from our national herd," said Dr Sahelu. "We must avoid building hope and expectations about seams of gold that exist only in the minds of their prospectors."



Time period taken to reach required productivity levels (University of Reading)



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## WHAT WE ARE DOING

■ The Donkey Sanctuary works to transform the quality of life for donkeys worldwide.

We are an international animal welfare charity that reaches into over 40 countries worldwide and works for a world where donkeys and mules live free from suffering, and their contribution to humanity is fully valued. We will achieve this by transforming the quality of life for donkeys, mules and people worldwide through greater understanding, collaboration and support, and by promoting lasting, mutually life-enhancing relationships.

We are global advocates for donkeys. We work to influence policy and legislation and to ensure that legislation is enforced. By seeking structural improvements in donkey welfare, we can have a long-term impact on donkey welfare globally.

We have representation at forums such as the African Union's InterAfrican Bureau for Animal Resources (AU-IBAR) and we work with governments to influence policy and legislation, working with the OIE, the World Bank, the United Nation's FAO, the International Fund for Agricultural Development (IFAD) and the European Union.

We are recognized on the world stage as leaders in equine welfare and currently have nearly 7,000 donkeys and mules in our care.

We work with communities and national governments to stop the disastrous impact the skin trade is having on donkey populations, donkey welfare and the people who depend on donkeys for their livelihoods.

- We are working closely with the Government of Ethiopia to safeguard their national herd against industry plans to establish a donkey skin trade in the country. In close collaboration with The Donkey Sanctuary, a government-backed national conference focussing on protecting the national herd took place in November 2018. A technical working group has been established to create a national equine development plan. Meanwhile, the trade remains suspended.
- We are supporting parliamentarians in Nigeria who, inspired by the stand being taken by other countries, have introduced a bill to ban donkey slaughter for the trade.



The Donkey Sanctuary visits donkey-owning communities in Kenya

- We are partnering with community-based organisations in affected countries, such as Mali and Tanzania, to raise awareness of the risks to working donkeys and livelihoods, to trial innovative ways of keeping donkeys safe from the illegal trade and to champion the need for greater action to defend local and national herds.
- Brazilian authorities requested that we supply the expert evidence that will be used by prosecutors in the animal cruelty case against the Chinese company who operated the donkey holding facility where hundreds of donkeys were found starving, and many dead.
- We give a voice to those donkey-dependent communities and individuals in countries such as Kenya, Tanzania and Ethiopia whose own pleas for help go unheard or need to be amplified.
- Working with the ICWE alliance we have produced educational materials based on best-practice biosecurity procedures. These are offered to countries that are experiencing disease spread in their equine populations, particularly when diseases are spreading across national borders and could have a devastating impact on communities who rely on donkeys.

We also have an extensive and ongoing programme of global investigation and research which shines a spotlight on the impacts of the trade. We have exposed international donkey

trafficking networks and links between the trade and other types of criminality, and the unwillingness of traders to comply with legislation to protect both animals and people. When laws are broken and animal welfare severely compromised, we call on authorities to act. Investigations commissioned or undertaken by The Donkey Sanctuary have taken place in Botswana, Cameroon, Côte d'Ivoire, Zimbabwe, South Africa, Namibia, Kenya, Tanzania, Ethiopia, Ghana, Mali, Burkina Faso, Brazil and Mexico.

In 2017, we contacted eBay, Amazon and Alibaba asking them to stop the sale of ejiao. eBay responded positively, saying that most claims being made about the medicinal benefits of ejiao were unverified and that it would no longer allow it to be sold. Amazon declined to stop selling ejiao and Alibaba did not reply to our communications.

Our initial Under the Skin report was translated into nine languages and was instrumental in increasing awareness of the trade and its global impact. Since that time, we have continued to raise the profile of this issue with national governments and the international community.

Donkeys are being farmed in China in increasing numbers not only to supply the ejiao industry, but also the meat industry and the growing market for donkey milk and milk products.

The Donkey Sanctuary and World Horse Welfare have formed a ground breaking partnership with China's International Cooperation Committee for Animal Welfare (ICCAW) and the China Horse Industry Association (CHIA), and are working with them to develop and promote better welfare and knowledge of donkey clinical care and husbandry. We are offering advice and training on donkey-specific health and welfare to increase understanding among stakeholders of the requirements of donkeys. We have been invited onto farms and have offered educational material, and we will also be working with universities and the farming industry to facilitate training for handlers, owners and animal health care professionals.

The Donkey Sanctuary, along with Brooke, SPANA and World Horse Welfare, are members of the International Coalition for Working Equids (ICWE). ICWE was established to ensure a united voice on matters relating to equids when engaging with the OIE. It worked to secure an international agreement on working equid welfare standards, and the subsequent training and implementation of those standards. ICWE has since become the leading voice on equids globally. It engages with UN member states and UN agencies, including the International Fund for Agricultural Development (IFAD), the Food and Agriculture Organisation (FAO) and bodies such as the World Bank on the



### Case study – Donkey Defend, Mali

In the Segou region of Mali, where over 95 percent of the rural population use equines to support their livelihoods, communities were losing over 50 donkeys every month to theft. Carcasses of these donkeys were often later found in the field, without their skins.

Supported by The Donkey Sanctuary, ARAF Plateau Dogon, a community-led organisation focussed on protecting livelihoods and empowering women, formed patrols to protect their donkeys from theft. In addition to carrying out patrols day and night, the group speak with villages about the need to remain vigilant to the risk of donkey theft. ARAF Plateau Dogon initially worked with 52 villages: this number has now grown to over 150.

The number of donkeys stolen has now dropped to zero. However, the patrols discovered complex and extensive donkey trafficking networks with thousands of donkeys being trafficked across borders for the trade.

importance of the welfare of working animals in achieving the Sustainable Development Goals.

On specific issues, such as the trade in donkey skins, ICWE partners cooperate to ensure as many stakeholders as possible are aware of the threats facing donkeys and the remedies needed to protect them. The coalition has also produced a series of educational materials based on best practice biosecurity procedures. These materials are offered to countries that are experiencing disease spread in their equine populations, particularly when diseases are spreading across national borders and could have a devastating impact on communities who rely on donkeys for their livelihoods.



## A HUMANE AND SUSTAINABLE FUTURE

As the crisis facing donkeys continues, it is more important than ever that investment is made into humane and sustainable solutions, where the demand for ejiao is met without compromising the welfare of donkeys, the survival of communities or the health of people and the environment.

Huge strides are being taken by the cellular agriculture industry in China and around the world. Ground breaking advances in the production of animal collagen set an encouraging precedent and may provide a promising option for the future of ejiao, with artificially grown, donkey-derived collagen, or even skin grown in laboratories, now a realistic prospect. In the case of the collagen, the technology is already in place.

Cellular agriculture is already being explored by some ejiao producers and, if this solution was realised, it could provide the industry with a regular, controlled and hygienic supply of raw materials, without compromising the welfare of donkeys, the economic viability of communities and the health of people and the environment.



## RECOMMENDATIONS

1. That the ejiao industry cuts links with the global skin trade and supports national governments in their efforts to protect their national herds.
2. That the ejiao industry accelerates moves towards more sustainable sources of raw materials, specifically in the field of cellular agriculture.
3. That the Chinese Government suspends the import of donkeys and their products until both can be proven to be humane, sustainable and safe.
4. That national governments take immediate steps to stop the trade in donkey skins.

Until such time as there is an enforced suspension in place:

- Governments instruct enforcement agencies to apply and enforce existing legislation, including animal welfare, where it is currently being ignored by some operators in the trade.
  - Governments take urgent steps to protect donkeys in order to safeguard livelihoods, and access to water, education and rural economic development, in donkey-dependent communities.
  - Governments and the global veterinary community take urgent action to mitigate against the risk of global disease spread and the biosecurity threat posed to both livestock and people by the largely unregulated trade in donkeys and their skins.
  - National governments and the international community act to address the ongoing environmental impact and degradation caused by the trade, including the pollution of water and land.
5. That the trade in donkey skins does not resume until governments and the ejiao industry can prove that the trade in skins is humane, sustainable and safe.
  6. That companies that either sell ejiao products with unverified claims about their efficacy, or which provide a platform for in-country traders offering skins for sale, follow the lead taken by eBay and Gumtree and suspend all sales of ejiao and/or all listings of skins and hides.
  7. That national governments prioritise collecting and publishing donkey and mule census data in line with other agricultural animals.



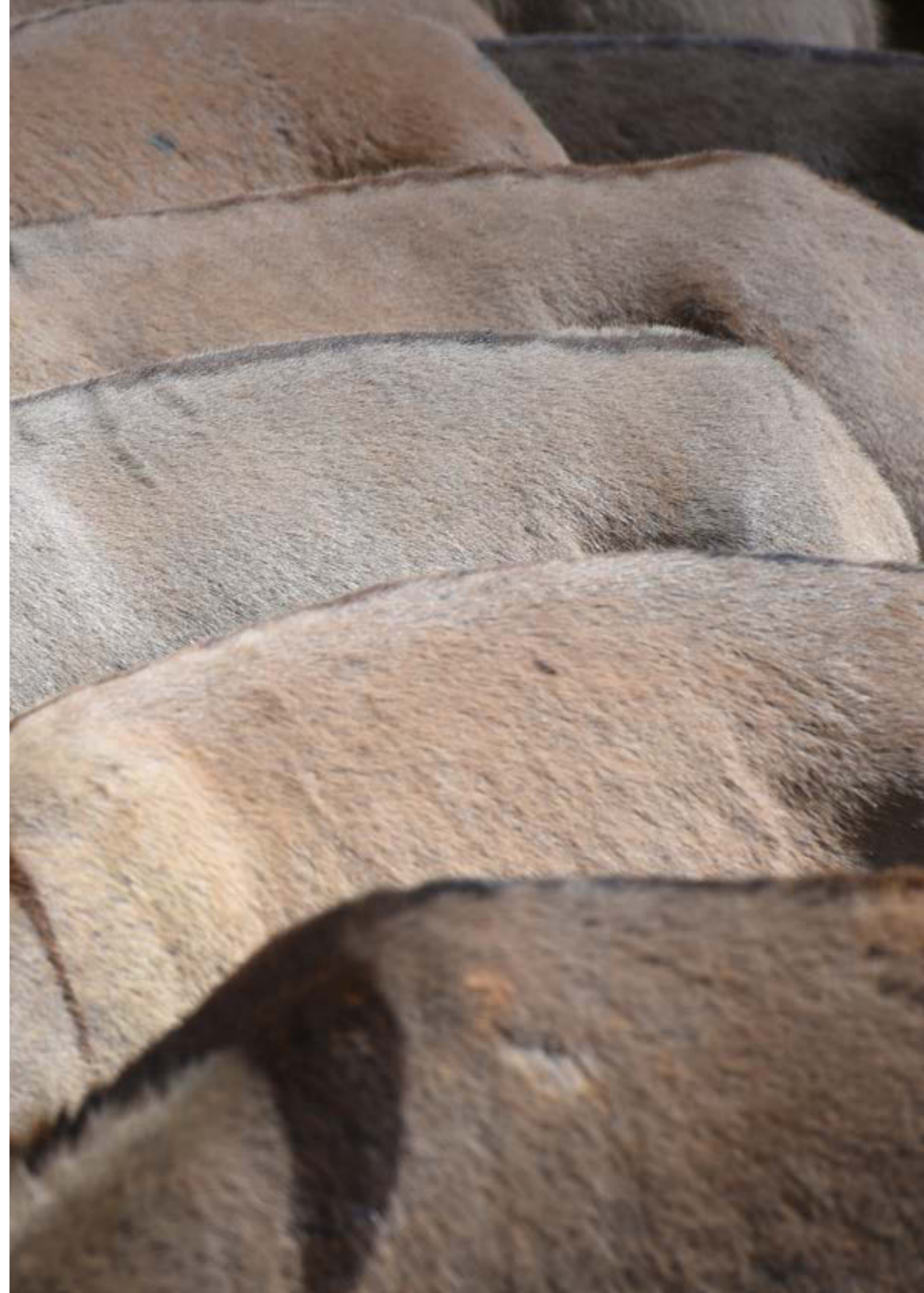
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**“TIME IS RUNNING OUT AND WE  
MUST ACT NOW TO SAVE THESE  
INCREDIBLE ANIMALS”**

*Mike Baker  
CEO, 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).

## SUPPORTED BY:



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