



THE DONKEY SANCTUARY

# COMBATting THE DONKEY SKIN TRADE

To address the global transport of donkey skins, the transport sector must be aware of the impacts, risks, red flags, trading routes and guidelines associated with the donkey skin trade.

## OVERVIEW



**Donkeys:** Approximately 4.8 million donkeys are slaughtered for their skins annually for *ejiao* (eh-gee-yow), a traditional Chinese remedy.



**Demand:** Growing demand for *ejiao* fuels the global trade of donkey skins.



**Impact:** Millions of donkeys are slaughtered for their skins every year, negatively affecting socio-economic development, local livelihoods and countries' ability to achieve the 2030 Sustainable Development Goals (SDGs).



**Transport:** Containerised cargo is the dominant transport method for donkey skins. Over 90 percent of illegal wildlife trade occurs via maritime routes, and less than 2 percent of containers are inspected<sup>1</sup>. Although maritime companies may be unwittingly exploited by donkey skin traders, they also play a crucial role in preventing, detecting and reporting donkey skin trade activity.



**Crime convergence:** Donkey skins are often shipped with other CITES listed wildlife and/or products. These transnational organised crime networks are also often linked to other illegal activities eg drugs.



## RISKS FOR TRANSPORT PROVIDERS:

**Reputational:** Companies may face reputational damage by carrying illicit products and through association with seizure announcements.

**Legal:** Shipping companies could be fined or prosecuted for failing to take adequate measures to prevent the transport of protected animal products and illicit cargo.

**Economic:** Reputational and legal issues can adversely impact customer trust, leading to a downturn in business.

**Health and safety:** Smuggled wildlife and inadequately processed donkey skins pose a disease risk. Sixty percent of emerging diseases originate from animals and 72 percent from wildlife specifically (inc. Covid-19, Ebola, SARS and MERS)<sup>2</sup>.

**Security:** Criminals exploit supply chain weaknesses, posing security risks.



## BIOSECURITY

Equine trade is the leading factor in the global spread of equine infectious disease. The global trade in donkey skins presents an often unrecognised biosecurity hazard due to poor regulation, a lack of traceability and prevalence of illegal activity. It could contribute to the spread of infectious disease to equine populations, livestock and people.



1. United Nations Office on Drugs and Crime (2012) World Drug Report 2012. Available from: World Drug Report 2012 (unodc.org).  
Zavagli M. (2021) Red Flag Indicators: for wildlife and timber trafficking in containerized sea cargo. Available from: Red Flag Indicators: for wildlife and timber trafficking in containerized sea cargo - Wildlife Trade Report from TRAFFIC  
2. World Health Organisation (2010) Asia Pacific strategy for emerging diseases. Available from: iris.who.int/bitstream/handle/10665/207661/9789290615040\_eng.pdf [Accessed 12th January 2024].

## RED FLAG INDICATORS

Here is an overview of some red flag indicators for donkey skins trafficking including known trafficking routes and concealment methods.

### EXPLOITATION:

**Concealment:** Illegal wildlife products hidden/mixed with other commodities/look-a-like products eg tiger skins.

#### Concealment methods:



Hidden inside modified container compartments



Hidden among large quantities of legal product

**No specific HS code:** There is no dedicated World Customs Organization Harmonized Systems Code for donkey skins, creating difficulties for cargo identification. Donkey skins fall under HS Code 410120 that covers all equine- and bovine-derived skins.



Equine



Bovine



Salted asinine and donkey skins



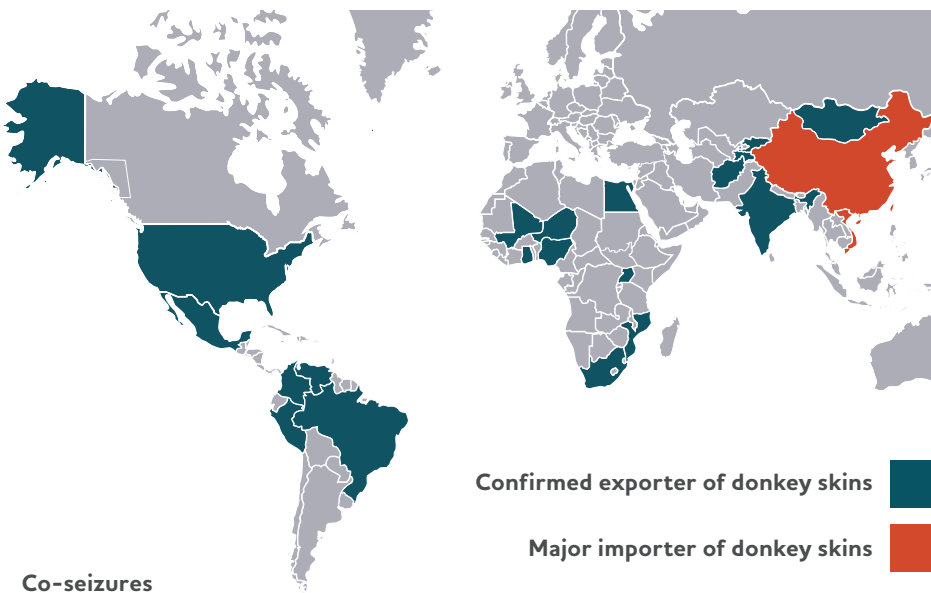
Dried donkey skins

**Keywords:** Misspelt keywords are often deliberately used to avoid detection eg *donkey hidesea*.

**Inadequate descriptions:** Traders often provide false or ambiguous descriptions on cargo containing donkey skins, or no descriptions at all.

### Forged/altered permits and documents

## EXPORTERS AND IMPORTERS OF DONKEY SKINS



#### Co-seizures



## QUESTIONS WHEN ASSESSING NEW OR EXISTING CLIENTS



### Shipper/consignee details:

- Is the shipper/consignee information false?
- Is the shipper a registered business entity?
- Does the company have a web presence, a registered business address or multiple businesses at the same address (possible shell company indicator)?



### Cargo and documentation:

- Are actual weights different from the bill of lading or packing lists?
- Does the shipment's appearance match the description in documentation?
- Are commodity descriptions dubious, vague or misleading?
- Does the cargo's value align with its description and size in the bill of lading?
- Are the documents originals or copies?
- Are there spelling mistakes or inconsistencies?



### Shipping routes:

- Are there excessive transit stops instead of direct routes?
- Was the shipping altered after the ship left port or the bill of lading switched (possible signs of illicit activities or evasion)?

## GUIDELINES AND RECOMMENDATIONS FOR THE TRANSPORT SECTOR

The global shipping industry plays a pivotal role in the donkey skin trade, which often converges with the illicit wildlife trade and other contraband products. Domesticated donkeys are closely related to globally protected CITES Appendix 1 critically endangered African wild ass (*Equus africanus*).

The IMO's *Guidelines for the Prevention and Suppression of Wildlife Smuggling on Ships* (FAL.5/Circ.50) help to combat illegal wildlife trade and transnational organised crime.

### ASSESSING, DETECTING AND REPORTING

Recommendations for the shipping sector:

#### Implement:

- **No Donkey Skins Carriage Policy** following the *No Shark Fin Carriage Policy* initiated by WWF-Hong Kong.
- **Digital documentation** such as eCITES, for faster, more efficient transport processes.
- **IMO** implemented the *Guidelines for the prevention and suppression of the smuggling of wildlife on ships engaged in international maritime traffic* (FAL.5/Circ.50) to combat illegal wildlife trade.
- **WCO best practices** including the SAFE Framework of Standards for global trade security and the Cargo Targeting System (CTS) for automated risk profiling.
- **Zero tolerance** policy against illicit wildlife trade and corrupt behaviour.

#### Perform:

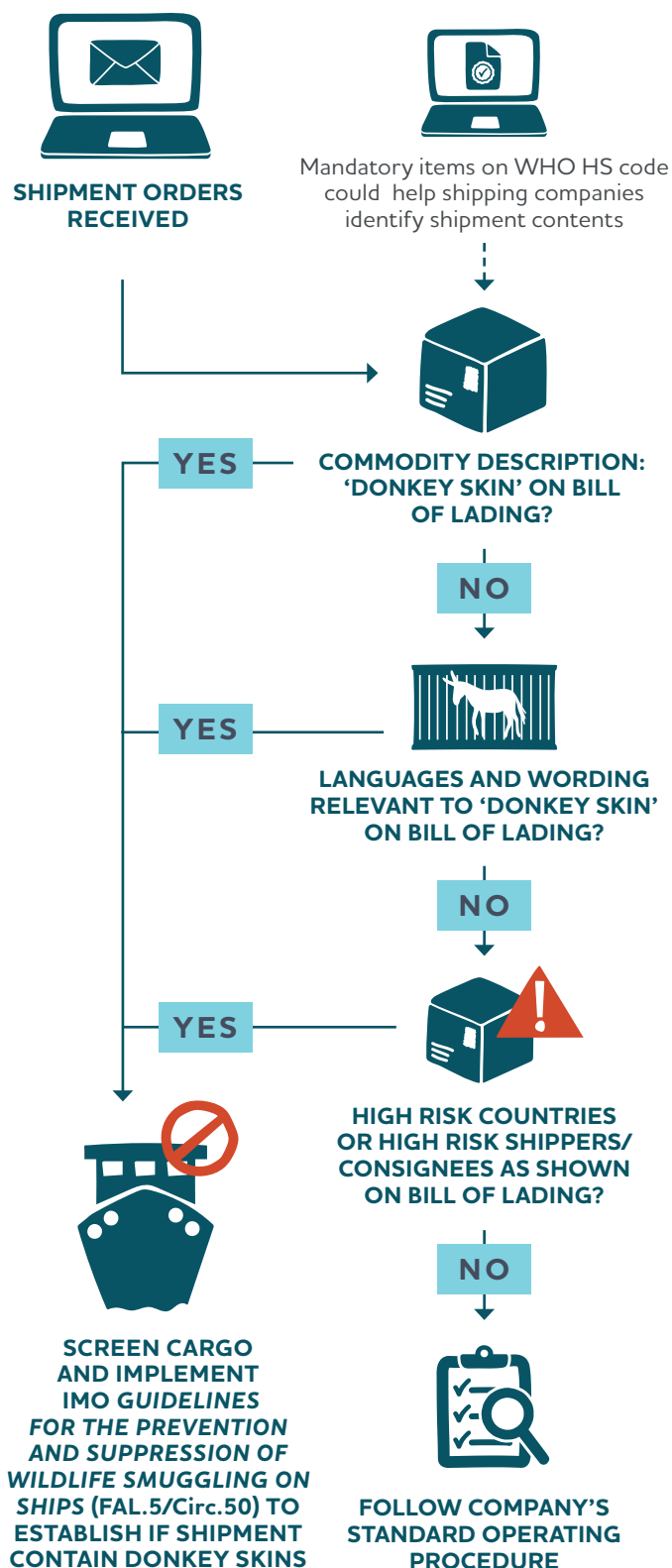
- **Due diligence** on customers, shippers and consignees, maintaining a red flag list for fraudulent parties.
- **Risk assessments** to identify high-risk countries, trade routes and the cargo risk profiling system.

#### Encourage:

- **Mandatory WCO HS Codes** on bill of lading for more accurate cargo identification.
- **Inter-agency collaboration**, both cross-sectoral and internationally, for enhanced intel sharing with law enforcement and civil societies.
- **Staff training and awareness** of the organisation's policies, trends in trafficking, concealment methods and red flag indicators.

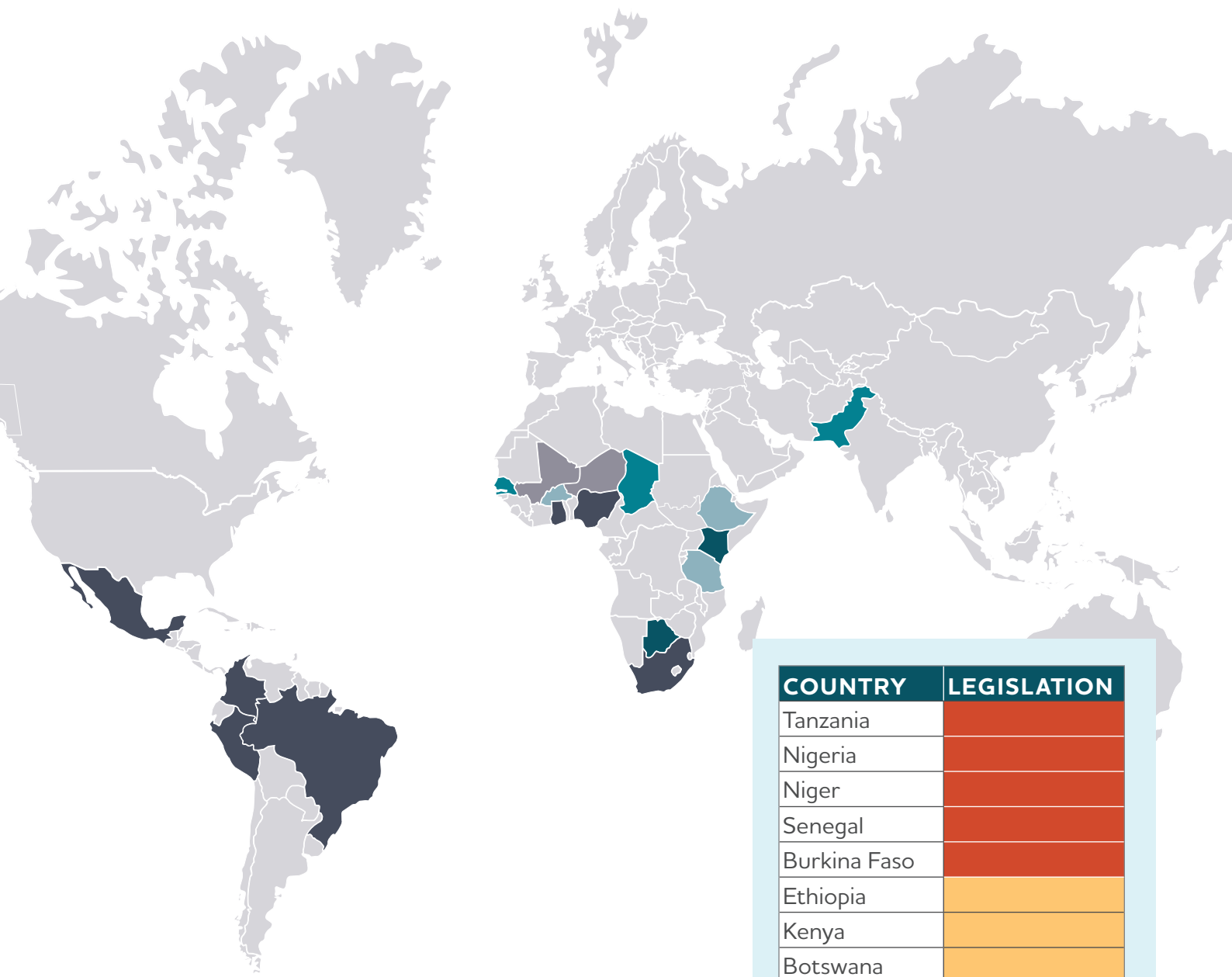
#### Join:

- **United for Wildlife network** and sign the **Buckingham Palace Declaration**.



SUSPECTED AND CONFIRMED TRADE ACROSS THE WORLD

Suspected (Live)
  Suspected (Skins)
  Confirmed (Live)
  Confirmed (Skins)
  Unconfirmed



COUNTRY	LEGISLATION
Tanzania	
Nigeria	
Niger	
Senegal	
Burkina Faso	
Ethiopia	
Kenya	
Botswana	
Ghana	
Mali	
Chad	
Brazil	
Colombia	
South Africa	
Mexico	
Pakistan	

- Indicating that it is illegal in this country to export donkey skins.
- Indicating that a country has taken a stance or expressed opposition to the trade but has not got firm legislation in place yet.
- Indicating that a country allows the trade to legally operate.