

# COMBATTING THE DONKEY SKIN TRADE IN AVIATION



The donkey skin trade poses a significant threat to global health and security. There are crucial steps the aviation sector can take to mitigate these risks, and safeguard legal and economic interests.

## OVERVIEW



### Donkey skin trade and demand:

Around six million donkeys are slaughtered annually for their skins to produce traditional medicine and remedies<sup>1</sup>.



**Impact:** This trade has severe socio-economic consequences, undermining local livelihoods and hindering countries' efforts to achieve the 2030 Sustainable Development Goals (SDGs), as well as contributing to local donkey population decline.



**Transport:** Although more than 90 percent of illegal wildlife trade occurs via maritime routes, air cargo is also used to transport donkey skins. Aviation stakeholders, including airlines and air cargo operators, play a vital role in combatting this trade by preventing, detecting and reporting illegal activity, as they can be unwittingly exploited by traffickers<sup>2</sup>.



**Crime convergence:** Donkey skins are often transported alongside other Convention on International Trade in Endangered Species (CITES)-listed wildlife species and products. The networks involved in this trade are frequently linked to other forms of transnational organised crime, such as drug trafficking<sup>4</sup>.

## RISKS FOR AVIATION PROVIDERS:

**Reputational:** Airlines face reputational damage by transporting illicit products and through association with seizure announcements.



**Legal:** Airlines and freight companies face fines or prosecution 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:** Trafficked wildlife pose major health and safety risks to aviation sector employees and consumers. Wildlife, including products and derivatives, may carry diseases that can transfer from animals to humans (zoonotic diseases). 60 percent of emerging diseases originate from animals, and 72 percent specifically from wildlife (including Covid-19, Ebola, SARS, and MERS)<sup>3</sup>.

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

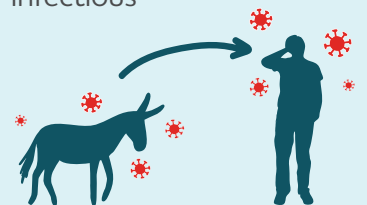


## BIOSECURITY



Smuggled donkey skins pose a significant biosecurity risk, due to poor regulation, a lack of traceability and prevalence of illegal activity. Skins may carry pathogens, parasites or bacteria, risking zoonotic disease transmission and the spread of infectious diseases to other equine populations and livestock.

Trafficking skins by air is a serious and immediate threat to global public health. Short travel time, diverse flight routes and the increasing prevalence of air travel, mean zoonotic diseases can spread rapidly between countries in a short timeframe.

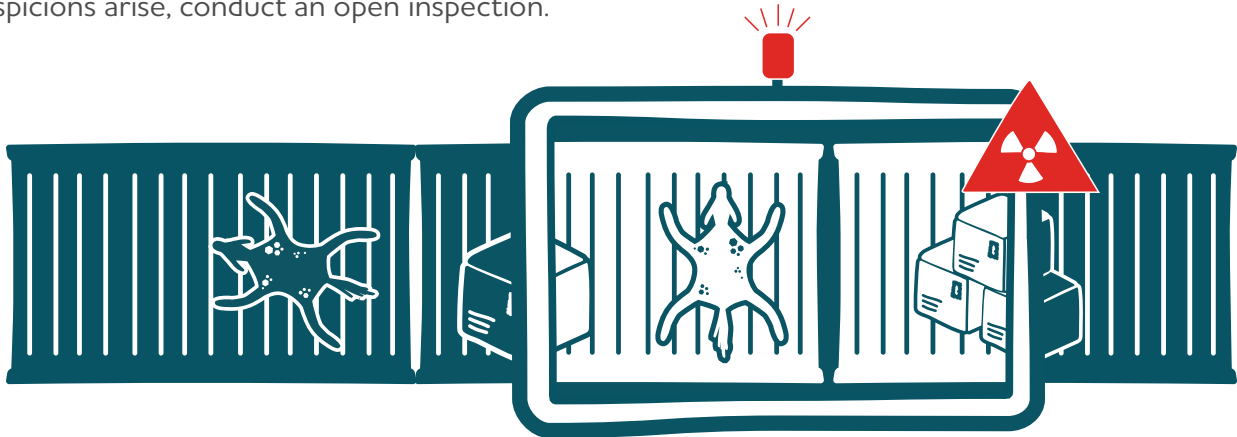


## RED FLAG INDICATORS

The following red flag indicators are based on known trafficking routes and concealment methods.

### EXPLOITATION:

**Concealment:** Donkey skins may be concealed with legal goods like leather or textiles, or with illegal products or CITES-listed species. Multi-view x-ray scanners can identify hidden donkey skins and parts. If suspicions arise, conduct an open inspection.



**No specific World Customs Harmonised System (HS) code:** There is no dedicated World Customs Organization (WCO) HS Code for donkey skins, creating difficulties for cargo identification. Donkey skins fall under HS Code 410120, which broadly covers all equine and bovine-derived skins.

**Keywords:** Misspelled keywords are often deliberately used to avoid detection, eg. 'donkey hidesea'. Traffickers may use other misleading terms such as 'ejiao product', 'equine hides' or 'animal-based gelatine' to evade detection.

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

**Forged/altered permits and documents:** Traffickers may use falsified or tampered permits and shipping documents to misrepresent the origin, legality or content of shipments.



## QUESTIONS WHEN ASSESSING NEW OR EXISTING CLIENTS

### Shipper/consignee details:

- Is the shipper/consignee information accurate? Is the shipper a registered business entity?



### Cargo and documentation:

- Are actual weights different from the air waybill or packing lists?
- Does the shipment's appearance match the description in documentation?
- Are commodity descriptions dubious, vague or misleading?
- Are the documents originals or copies?
- Are there spelling mistakes or inconsistencies?

### Air cargo routes:

- Does the shipment routing look illogical for the commodity being transported?



## GUIDELINES AND RECOMMENDATIONS

Global aviation 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 the globally protected CITES Appendix I critically endangered African wild ass (*Equus africanus*).

The International Air Transport Association (IATA) provides specific guidance on combatting illegal wildlife trade, offering best practices and resources for the aviation industry. Additionally, IATA has developed an environmental management system that includes a dedicated wildlife module, based on the Buckingham Palace Declaration, to help address illegal wildlife trafficking and transnational organised crime.

### ASSESSING, DETECTING AND REPORTING

Recommendations for the aviation sector:



#### Implement:

- A **No Donkey Skins Carriage Policy** as part of the airlines' cargo policies.
- **Digital documentation** to facilitate in-depth assessments for falsified information, exercising added caution especially along high risk routes.
- **IATA's guidance** on combatting illegal wildlife trade in aviation and its environmental management system – IATA Environmental Assessment (IEnvA), including the wildlife module.
- **WCO best practices** including implementing system solutions for automated risk profiling of high-risk shippers, commodities and routing to assist in identifying and scrutinising possible trafficking attempts.
- **X-ray screening methods** as key cargo-screening processes, alongside multi-view scanning systems for detecting organic materials like donkey skins. Open inspections where suspicious images are detected on x-ray screening.
- A **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 cargo risk profiling systems. Utilise intelligence alerts from organisations such as United for Wildlife.



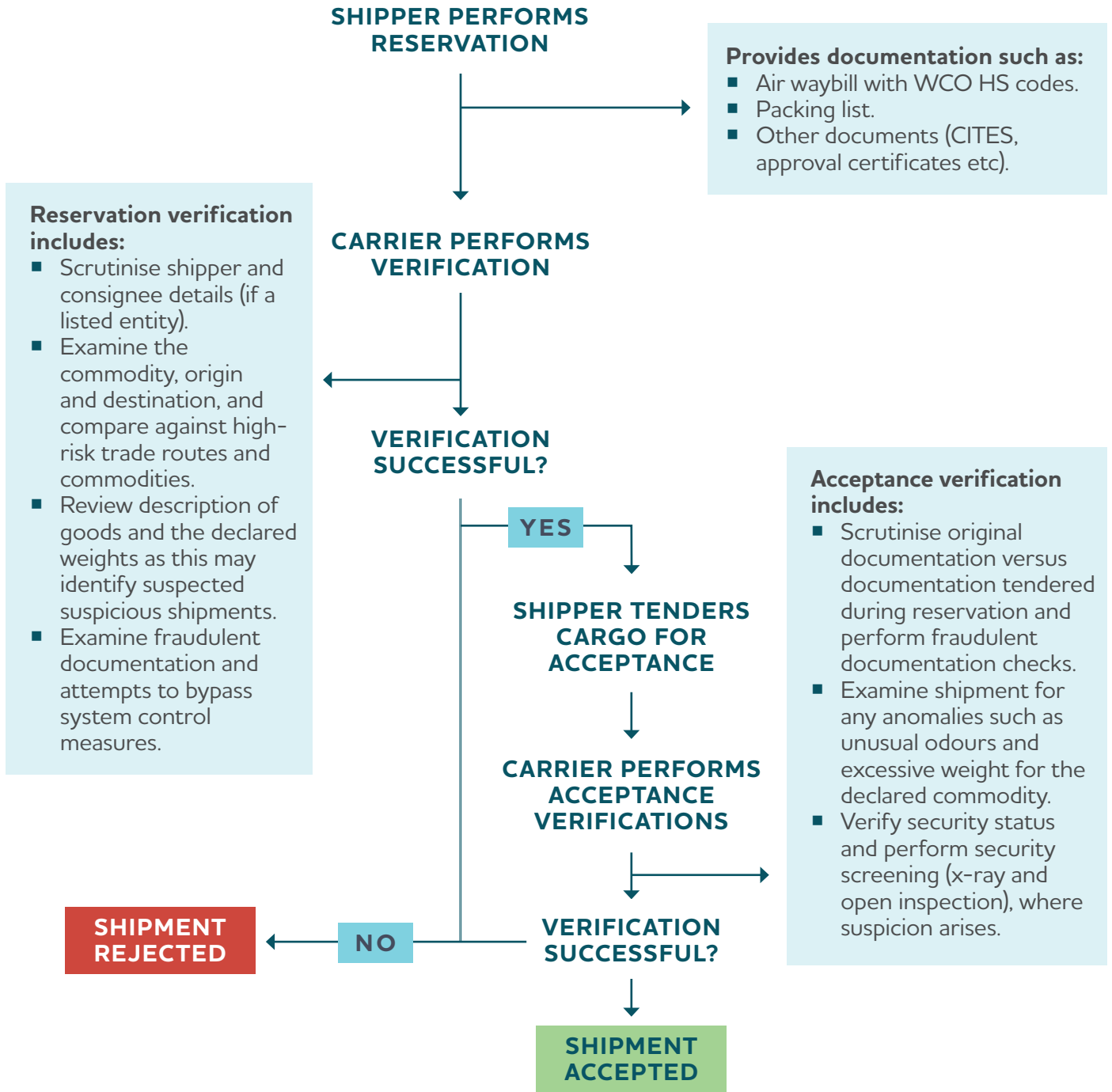
#### Encourage:

- **Mandatory WCO HS codes** on air waybills for more accurate cargo identification.
- **Detailed verification of shipments**, from booking to loading, to identify potential red flags such as unusual routes, altered documents or last-minute changes in shipping instructions.
- **Track-and-trace solutions like blockchain** for real-time monitoring of cargo to detect irregularities.
- **Inter-agency collaboration**, both cross-sectoral and internationally, for enhanced intelligence 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:

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



1. The Donkey Sanctuary (2024), *Donkeys in Global Trade: Wildlife Crime, Welfare, Biosecurity and the Impact on Women*.  
 2. United Nations Office for Drugs and Crime (2012), *World Drug Report 2012*. Available from: (unodc.org); Zavagli M. (2021), *Red Flag Indicators: for wildlife and timber trafficking in containerized sea cargo* - *Wildlife Trade Report* from TRAFFIC.  
 3. 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].  
 4. The Donkey Sanctuary (2022), *The Global Trade in Donkey Skins: A Ticking Time Bomb - The Donkey Skin Trade as a Trojan Horse for Wildlife Trafficking*.