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NATIONAL CRIME RESEARCH CENTRE

THEFT AND ILLEGAL TRADE IN DONKEY SKINS AND RELATED PRODUCTS IN KENYA



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PHYLLIS MURIUKI



**THEFT AND ILLEGAL TRADE IN DONKEY SKINS AND RELATED
PRODUCTS IN KENYA**

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ISBN 978-9914-9845-0-7

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FOREWORD

The donkey skin trade in Kenya and the regulation of the animal products trade is fundamental to the economic stability and food security of many communities. For many households, the donkey is not merely an animal but a primary source of livelihood, transport, and resilience. The protection of livestock is fundamental to food security. Globally, 600 million people rely on donkeys, which contribute up to 36% of household income. The rising incidents of donkey theft and the burgeoning illegal trade in donkey products have emerged as significant threats to community well-being and national internal security.

The National Crime Research Centre (NCRC) undertook this study to evaluate the scale, drivers, and impact of theft and the illicit trade in donkeys and related products. This research highlights how the clandestine nature of this trade facilitates a shadow economy that bypasses legal frameworks, undermines animal welfare standards, and creates a cycle of poverty for those who depend on these animals for their daily survival. A critical finding of this study is the emergence of sophisticated criminal networks that exploit gaps in cross-border regulations and local surveillance.

The study established that lack of a harmonized monitoring framework between veterinary services, law enforcement, and community leaders has allowed the illegal trade to flourish. This underscores the urgent need for a multi-agency approach to secure livestock and regulate the supply chain of animal derivatives. The study also identified a disconnect between existing livestock policies and the evolving tactics used by illegal traders. The implications for policy are clear: without a robust legal and enforcement framework specifically targeting the unique challenges of the donkey product trade, the country risks significant biodiversity loss and increased rural insecurity. Rapid extinction and number reduction severely threaten rural livelihoods.

There are a deep societal attachment and social orientation toward the donkey in both urban and rural settlements. Communities share a strong cultural identity with donkeys, viewing them as essential partners that sustain social dignity and household resilience. Furthermore, the findings point toward the necessity of heightened community vigilance and the integration of livestock owners into formal security reporting structures. The success of interventions in this sector hinges on a shared responsibility between the state and the citizenry to protect these essential assets from exploitation. The current legal framework and prosecutorial approach require urgent reform to address the lenient penalties that fail to deter syndicate members.

Strengthening these processes begins with rectifying significant gaps in charge sheet drafting, which often undermine case outcomes, and implementing more robust sentencing guidelines to effectively eliminate the illegal value chain. By prioritizing targeted legal actions in the identified transit corridors and "bush slaughter" hotspots, the state can implement a planned response that directly solves the security and livelihood problems of the affected communities. This research serves as the evidentiary basis to institutionalize remedies that dismantle criminal networks and safeguard the donkey population.



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ACKNOWLEDGEMENT

The National Crime Research Centre (NCRC) sincerely acknowledges the invaluable contributions of the various individuals, stakeholders and institutions that were instrumental to the successful completion of this study.

First and foremost, the National Crime Research Centre (NCRC) expresses its profound gratitude to partners and collaborators who supported the study.

Secondly, the Centre expresses its sincere gratitude to the Governing Council, under the leadership of its Chairperson, Hon. Ms. Dorcas Oduor, SC, EBS, OGW, the Attorney-General, for providing strategic leadership, guidance, and policy direction throughout the study. The Centre also extends its heartfelt appreciation to the Research and Development Committee, under the chairmanship of Mr. Samuel Wakanyua, for its invaluable technical expertise, professional guidance, and insightful contributions throughout the research process.

Thirdly, the Centre sincerely acknowledges the invaluable contributions and unwavering support of its stakeholders, whose insightful inputs during the methodology workshop, data collection exercise, and validation workshop of the draft report greatly enriched the quality of this study. The Centre also extends its heartfelt appreciation to the members of the public who generously shared their knowledge, experiences, and perspectives on theft and illegal trade in donkey skins and related product in Kenya. This study would not have been possible without their participation and cooperation.

The Centre further expresses its sincere gratitude to the Research Supervisors and Research Assistants, whose professionalism, commitment, and dedication ensured the collection of high-quality data and contributed significantly to the successful completion of the study.

Fourthly, the Centre expresses its sincere appreciation to Dr. Dickson Gitonga Njiru, the Lead Researcher, and Ms. Phyllis Muriuki, the Co-author, for their unwavering dedication, professionalism, and commitment throughout the study and in the preparation of this report. The Centre also extends its heartfelt gratitude to the peer reviewers and editors, whose constructive feedback, technical expertise, and meticulous review significantly enhanced the quality and credibility of the report.

Finally, the Centre expresses its profound gratitude to all those who contributed, directly or indirectly, to the successful completion of this study. The National Crime Research Centre (NCRC) remains deeply indebted to all whose support, collaboration, and commitment made this research possible.



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ACRONYMS AND ABBREVIATION

ADOK	:	Association of Donkey Owners in Kenya
AU	:	African Union
FGDs	:	Focus Group Discussions
FSK	:	Farming Systems Kenya
IFK	:	Inades-Formation Kenya
IPDR	:	Institute of Pastoralism Development and Research
IUCN	:	International Union for Conservation of Nature
KALRO	:	Kenya Agricultural and Livestock Research Organization
KSPCA	:	Kenya Society for the Protection and Care of Animals
NCRC	:	National Crime Research Centre
ODPP	:	Office of the Director of Public Prosecutions
RAT	:	Routine Activity Theory
RRI	:	Rapid Results Initiative
WOAH	:	World Organisation for Animal Health
NPS	:	National Police Service
DCI	:	Director of Criminal Investigation
ASTU	:	Anti-Stock Theft Police Unit
NIS	:	National Intelligence Service
NGAO	:	National Government Administration Officers
DCCs	:	Deputy County Commissioner
CDVS	:	County Directors of Veterinary Services
ADS	:	Agriculture Development Division

DEFINITIONS OF KEY TERMS

- Bush Slaughter** : Refers to the illegal, unregulated, and clandestine killing of donkeys in temporary, hidden locations such as thickets or remote fields to bypass public health inspections and official abattoir regulations.
- Clandestine Network** : A highly organized and covert criminal network that deliberately operates in secrecy to evade detection by law enforcement agencies while facilitating the theft, transportation, and illegal trade in donkeys and donkey-derived products.
- Donkey Value Chain** : Encompasses the entire sequence of activities involved in the donkey trade, including the breeding or acquisition of the animals, their transit across county or national borders, the processing of meat or skins, and the final distribution to consumers or exporters.
- Farm-To-Market** : Represents the intended and regulated supply chain for livestock, which is now being subverted by the illicit trade that removes animals from farms for illegal rather than legitimate distribution.
- First Information Report (Fir)** : Is the initial written document prepared by police officers when they receive information about the commission of a cognizable offense, serving as the foundational legal record for any subsequent criminal investigation
- Gazettement** : The official process of publishing a legal notice, appointment, regulation, or other government action in the *Kenya Gazette*, thereby giving it official public recognition and, where applicable, legal effect in accordance with the law.
- Institutional Infiltration** : Establishment of corrupt relationships or undue influence within law enforcement agencies, the judiciary, regulatory bodies, or other public

institutions by criminal networks to evade detection, obstruct investigations, manipulate legal or administrative processes, and shield illicit activities from prosecution.

- Legal Mimicry** : The deliberate exploitation of administrative processes by criminal syndicates to disguise illegal activities as lawful operations. This tactic functions by creating a veneer of legitimacy that confuses and obstructs law enforcement efforts.
- Legislative Vacuum** : A situation where there is a complete absence, inadequacy, or obsolescence of specific statutory laws and regulations to govern, monitor, or penalize a particular emerging crime or economic activity
- Living Evidence** : Refers to seized animals, such as donkeys, that must be maintained in a healthy condition by the state to serve as physical exhibits during criminal proceedings; if the animal dies or disappears, the prosecution's case often collapses.
- Mob Justice** : The unlawful punishment of a suspected offender by members of the public without due legal process, often arising from perceived inadequacies or a lack of confidence in the formal criminal justice system.
- Mtunze Punda Akutunze** : Is a specific community advocacy initiative (translated as “Care for your donkey, secure your livelihood”) focused on educating donkey owners about animal welfare, rights, and the economic importance of protecting their livestock.
- Nocturnal Operations** : The execution of criminal activities, including the theft and slaughter of donkeys, during the night to minimize the risk of detection by local communities and law enforcement agencies.
- Nyumba Kumi** : A community-based policing initiative in Kenya that organizes neighbouring households into clusters,

	typically comprising ten households, to promote community vigilance, enhance local security, monitor suspicious activities, and facilitate the sharing of information with law enforcement agencies.
Order-To-Delivery Planning Models	: A demand-driven operational model employed by criminal syndicates in which customer orders determine the planning, sourcing, theft, slaughter, processing, and delivery of donkey products through a coordinated and organized supply chain.
<i>Panya</i> Routes	: The illegal or unofficial routes used by traffickers and other criminal networks to circumvent police roadblocks, border controls, and security checkpoints in order to avoid detection and interception by law enforcement agencies.
Prosecutorial Pessimism	: Represents a pervasive belief among victims and enforcement officers that criminal cases will not result in a successful conviction due to interference, bribery, or a weak legal framework.
Security Neutralization	: The deliberate attempt by criminal groups to disable local resistance or law enforcement, such as by poisoning guard dogs or monitoring police patrol patterns, to ensure they can commit crimes without interference.
Shadow Economy	: Refers to the illicit, unrecorded, and often criminal networks that operate outside the purview of state regulation, such as the syndicates trading in donkey skins.
Social Friction	: Refers to the conflict and domestic strain created within communities when donkey theft removes essential labor, often forcing children to drop out of school to perform the tasks the animals once carried out.
Systemic Neutralization	: Refers to the methods criminals use to exploit

institutional weaknesses, such as utilizing forged documents or corrupting officials, to render the legal and regulatory systems ineffective in stopping their trade.

- The Conveyor Belt Logistics Chain** : Refers to a metaphor for the rapid, continuous flow of stolen donkey products from the site of the illegal slaughter through various transit points, ensuring the product does not remain stationary for long enough to be intercepted.
- The Extinction Stage** : Refers to the critical point where the rate of illegal slaughter exceeds the natural reproductive capacity of the donkey population, pushing the species toward a total decline in local availability.
- Theft-To-Market Process** : Refers to the entire lifecycle of an illicit transaction, starting with the identification and theft of the animal, followed by slaughter and rapid transit, and ending with the final sale to buyers interested in donkey skins or meat. In instances where owners sell donkeys to legitimate traders, this term would refer to the legal transition of ownership; however, in the criminal context described, it strictly pertains to the illicit pipeline.
- Zoonotic Diseases** : These are infections that can be transmitted from animals to humans, a significant public health risk highlighted in the report due to the illegal and uninspected trade of donkey meat entering the human food chain.

EXECUTIVE SUMMARY

The theft and illegal trade in donkey skins and related product in Kenya and in the African region, has evolved into a sophisticated criminal enterprise that undermines both rural livelihoods and national biosecurity. Driven by an insatiable international demand for hides, illegal networks operate through covert slaughter and cross-border smuggling, often bypassing formal veterinary and leather industry regulations. The illegal extraction of donkeys not only depletes a vital draft animal population, which declined from 1.8 million in 2009 to 1.1 million in 2019, but also introduces significant public health risks due to the unhygienic conditions of clandestine processing sites.

The general objective of the study was to explore the current dynamics of theft and illegal trade in donkey skins and related products in the country with a view to informing relevant evidence-based strategic interventions to curb the illegal trade. The specific objectives of the study were to: establish the current patterns of theft and illegal trade in donkey skins and related products; examine the mode of operation (modus operandi) of theft and illegal trade in donkey skins and related products; assess the impacts of theft and illegal trade in donkey skins and related products, and evaluate the effectiveness of the measures for curbing the theft and illegal trade in donkey skins and related products. The study was conceptually grounded in the Routine Activity Theory and the Political Economy Theory. The former explains how the convergence of motivated offenders, suitable donkey targets, and the absence of capable guardianship creates opportunities for donkey theft, while the latter elucidates the broader political and economic forces, market dynamics, and capital interests that sustain the illegal trade in donkeys and donkey-derived products.

The study adopted a qualitative research design aimed at gaining in-depth understanding of the dynamics of theft and illegal trade in donkey skins and related products in Kenya. The study was carried out in nine purposively selected counties where incidences of theft and illegal trade in donkey skins and related products have been most prevalent in Kenya namely: Machakos, Kajiado, Mombasa, Embu, Kitui, Nakuru, Narok, Turkana and Kiambu.

The study population comprised key stakeholders involved in the donkey value chain, as well as institutions responsible for animal welfare, law enforcement, and the regulation of trade. These included the Association of Donkey Owners in Kenya (ADOK) which brings together donkey owners across the country, Farming Systems Kenya (FSK) ; Inades-Formation Kenya (IFK) which provides oversight on donkey welfare and monitors community impacts of the illicit trade; Institute of Pastoralism Development and Research (IPDR); Kenya Society for the Protection and Care of Animals (KSPCA); Brooke East Africa; Donkey Sanctuary of Kenya; law enforcement officers (National Police Service); officers from the Office of the Director of Public Prosecutions (ODPP); officers from the Judiciary; National Government Administrative Officers (chiefs and assistant chiefs); County government officials in charge of livestock and agriculture, donkey slaughterhouse operators and middlemen; and community leaders and opinion shapers among others.

Data were collected through face-to-face key informant interviews, focus group discussions, and direct field observations of issues related to the study. Key Informant Interview (KII) and Focus Group Discussion (FGD) guides were developed in line with the study objectives and pre-tested in a non-sampled county to ensure their clarity, relevance, and reliability. Primary data were obtained from a total of 205 respondents through Key Informant Interviews (KIIs) and eight Focus Group Discussions (FGDs). The qualitative data were analyzed using thematic analysis to identify emerging patterns, themes, and relationships. The findings provide an evidence base for strategic policy and programmatic recommendations aimed at preventing and combating donkey theft and the illegal trade in donkey skins and donkey-derived products, thereby addressing an emerging national security, animal welfare, and socio-economic concern.

Key Findings

Current Patterns of Theft and Illegal Trade in Donkey Skins and Related Products

The study found that current patterns of donkey theft have evolved from isolated opportunistic incidents to increasingly coordinated and organized criminal activities targeting free-grazing donkeys in rural and peri-urban areas. Most thefts occur at night or in locations with limited surveillance and inadequate security. The findings further indicate a growing trend of cross-border smuggling of live donkeys and donkey skins, driven by sustained market demand and facilitated by porous borders, weak enforcement, and established illicit trade networks.

The Key findings of the study are as follows:

1. Shift from Live Donkey Theft to Clandestine Bush Slaughter

The study established that the nature of donkey-related crime has evolved from stealing live animals for local labour to immediate "bush slaughter" for skins and meat. Respondents noted that owners frequently discover carcasses of their stolen animals, indicating that criminals are prioritizing the high-value skin for the international market over the live animal.

2. Regional Concentration of Donkey Theft and Illegal Slaughter

Research showed that theft and illegal slaughter were most acutely reported in Mwingi East, Mwingi Central, Kiambu, Machakos, and Kajiado. In these regions, stakeholders noted growth in cases, reaching over 200 incidents of donkeys as veterinary and welfare officers in the mentioned counties

3. High International Demand for Donkey Skins as a Primary Driver

The driving force behind the illegal trade is the lucrative international market, particularly in China, for donkey skin gelatin (*ejiao*). This demand makes the skin the most "prized asset," overshadowing the donkey's traditional value as an animal for domestic work

4. Emergence of Bush Slaughter Houses to Evade Detection

Illegal slaughterhouses are evolving at a high rate, shifting to mobile "bush" sites to remain hidden from public health and security officials. Research findings indicated that large numbers donkeys are now being divided into small clusters and driven into the bush rather than being loaded onto trucks to avoid suspicion.

Mode of operation (modus operandi) of Theft and Illegal Trade in Donkey Skins and Related Products

The theft and illegal trade in donkeys typically follow an organized chain involving theft from farms or grazing areas, often at night or in remote locations with limited security. In some instances, the donkeys are bought from markets. The animals are quickly transported to hidden or illegal slaughter sites, bypassing veterinary inspection and regulatory oversight.

Intermediaries then move the skins and other products through informal networks, sometimes using forged documents or corrupt facilitation, before smuggling them across borders via established trafficking routes.

1. ***Strategic Use of Nocturnal Operations and Environmental Conditions***

Research findings established that syndicates strategically time their operations often between 12:00 A.M and 4:00 A.M to exploit the silence of the night. Furthermore, evidence showed that these groups often coordinate raids with heavy rains to mask the noise of the operation and wash away blood trails, thereby minimizing the risk of forensic detection.

2. ***Sophisticated Daytime Reconnaissance and Deceptive Tactics***

The findings from the study indicated that "spotters" often disguise themselves as ordinary citizens, water vendors, or charcoal sellers during the day. This reconnaissance phase allows criminal networks to monitor security patrol movements and identify homes with high donkey populations and minimal security before striking at night.

3. ***Targeted Neutralization of Physical and Animal Security***

The research findings showed a calculated approach to disabling security, including the poisoning or killing of guard dogs in homesteads near major highways. This established pattern ensures that the theft of animals can occur without alerting the owners or the community.

4. ***Logistical Innovation through the System***

Evidence from the research findings shows the use of a professionalized value chain. In this process, criminal perpetrators across different villages coordinate the movement of animals in distinct stages, ensuring that no single individual is linked to the entire theft-to-market process. In this specific context of livestock theft, perpetrators across different villages coordinate the transport of animals through distinct, compartmentalized stages, intentionally ensuring that no single individual is linked to the entire theft-to-market sequence.

This clandestine structure stands in direct contrast to legitimate agricultural markets, where animal owners voluntarily engage in transparent transactions with verified traders, maintaining formal documentation and adhering to established market protocols. The illicit model is characterized by the deliberate avoidance of these formal channels to obscure the origin of the animals, whereas legitimate trade relies on traceability and owner consent.

5. ***Use of Specialized "Luring" and "Silent Slaughter" Techniques***

Research findings also established that thieves use salt or fodder to lure donkeys quietly from their pens. To avoid the noise associated with moving live animals, syndicates increasingly prefer "bush slaughtering," where animals are processed on-site and only the high-value hides are evacuated.

6. ***Market-Driven "Order-to-Delivery" Planning Models***

The study also established a demand-driven model where some meat suppliers source orders in restaurants and institutions or urban markets. Once an order is received, criminal groups are recruited to steal, slaughter, and transport the meat in sacks via Boda-bodas to unsuspecting customers in areas like Burma or Ndunyu meat markets of Nairobi.

7. ***Exploitation of High-Speed Transport and "Toyota Probox" Logistics***

Research findings indicated that logistical speed is maintained by using small, fast vehicles like "Toyota Probox" positioned at strategic road junctions. This established method allows for the rapid evacuation of carcasses or hides before dawn, often bypassing major checkpoints through "panya routes."

8. ***Establishment of Deep "Insider" and Informant Networks***

From the study, it emerged that syndicates establish robust networks with local residents who provide "insider" knowledge on vulnerable herds. These informants also mislead recovery efforts by providing false information to search parties, ensuring the successful exit of the stolen livestock.

9. *High-Level Cartel Coordination and Security Neutralization*

Research findings established the existence of a "cartel" structure that coordinates the entire supply chain from sourcing to slaughter. Disturbingly, reports indicated that some illegal processing is done under the "guard" of rogue security elements, suggesting the planning phase includes the recruitment of officials to protect slaughter sites.

Impacts of Theft and Illegal Trade in Donkey Skins and Related Products

The study found that donkey theft and the illegal trade in donkeys and donkey-related products have significant socio-economic, animal welfare, and public health consequences. The loss of donkeys deprives many rural households of a critical source of labour and income, thereby reducing agricultural productivity, limiting access to markets and essential services, and increasing household vulnerability. The impacts are particularly severe for women, children, older persons, and other vulnerable groups who rely heavily on donkeys for transportation and livelihood activities.

The findings further indicate that the illegal slaughter and trafficking of donkeys result in considerable animal suffering and undermine animal welfare standards. If left unchecked, these activities may contribute to a decline in donkey populations, thereby threatening the sustainability of donkey-dependent livelihoods and the resilience of rural economies. In addition, the operation of unregulated slaughter sites without veterinary inspection poses potential public health risks through poor hygiene, inadequate waste disposal, and the circulation of animal products outside established regulatory and food safety systems.

1. *Severe Environmental and Resource Contamination*

It was established that the illegal disposal of rotten carcasses into the environment finds its ways into water sources hence leading to the contamination. Also decaying remains abandoned in remote thickets cause severe air pollution. When decomposing organic matter leaches into the water flow used by humans and livestock, it turns waterways into active health hazards while persistent foul odours are not merely a nuisance but also present risks to the respiratory well-being of local residents.

2. Public Health Risks from Uninspected Meat

Research findings established that the clandestine nature of "bush slaughter" bypasses all veterinary oversight.

Data showed that consumers are exposed to diseases and bacterial contamination, such as anthrax and worm infestations due to the unsanitary conditions of slaughter and the lack of necessary health inspections by public health experts.

3. Transport Logistics Disruption

The study finding also indicated that the theft of donkeys results in a severe disruption in rural logistics for affected communities. Research findings showed that small-scale farmers are unable to move harvests to trade centres before they perish, effectively leading to loss of investments in months of agricultural labour and inputs.

4. Increased Labour Burden on Women

It was established that the loss of donkeys places a disproportionate physical burden on women and children. Evidence showed that tasks previously handled by donkeys such as fetching water now require half a day of back-breaking manual labour, leading to "time poverty" that prevents women from engaging in other productive activities.

5. Increase in Child Labour and Disruption of Education

The research study findings indicated that when donkeys are stolen, the burden of labour often shifts to children. Research findings showed that school going pupils and students are frequently forced to drop out of school to assist with fetching water and manual chores, trapping the next generation in a cycle of structural poverty.

6. Disruption of Agricultural Planting and Irrigation Cycles

Research findings established that donkeys are vital for ploughing and transporting water for irrigation. Established data showed that the theft of a single animal can disrupt the entire planting cycle, leading to crop failure because farmers lack the means to ferry water from distant riverbeds during dry spells.

7. Erosion of Social Fabric and Communal Trust

Evidence from focus group discussions established that the scarcity of donkeys triggers a "culture of borrowing" that leads to social friction between communities. Research findings indicated that as owners become increasingly protective of their remaining animals, traditional mutual aid systems dissolve, replaced by a climate of suspicion and anxiety.

8. Permanent Biological "Extinction Stage" Warnings

Research findings have indicated a grave warning that the species is approaching an "extinction stage."

Data showed that because the donkey's biological recovery (a 3-to-4-year cycle) cannot match the current rate of theft and slaughter, the long-term sustainability of donkey-reliant livelihoods is under immediate threat.

9. Psychological Trauma and Loss of Household Security

It emerged from the finding that owners experience significant emotional distress, viewing donkeys as "household partners" rather than mere tools. Furthermore, research findings showed a loss of immediate security, as the donkey historically served as an alert system against night-time intruders.

Effectiveness of the Measures for Curbing Theft and Illegal Trade in Donkey Skins and Related Products

This is a critical indicator of the success of legal, institutional, and community-based interventions being implemented to protect donkey populations and safeguard livelihoods. This includes multi-agency enforcement operations, border controls, public awareness campaigns, and regional cooperation mechanisms. Assessing the effectiveness of these interventions is essential in determining the extent to which they have reduced incidences of donkey theft, disrupted illegal trade networks, strengthened compliance with existing laws, and contributed to the sustainable protection and welfare of donkeys.

1. Inadequacy of Oversight and Regulations

The study established that veterinary departments are responsible for enforcing animal health acts and monitoring movement permits. Evidence showed that there is a significant weakness in monitoring and enforcement due to a lack of proper legislation specifically tailored to deter the illegal slaughtering of donkeys. A critical gap exists in the Meat Control Act, which primarily focuses on traditional livestock (cattle, goats, and sheep) and lacks stringent, specific penalties for the clandestine slaughter of donkeys. Furthermore, current laws do not adequately address the unique logistics of the donkey skin trade; for instance, there is a legislative vacuum regarding the possession and transportation of donkey hides without corresponding meat inspection certificates.

This legal ambiguity allows smugglers to exploit loopholes where penalties are often minimal fines that do not reflect the high market value of the hides, thereby failing to serve as an effective deterrent against organized criminal networks.

2. Enforcement Challenges by the National Police Service (NPS)

Research findings indicated that while communities provide information, the police are responsible for investigations and arrests. A primary operational gap driving poor police response is the acute lack of holding facilities for recovered donkeys. Unlike smaller livestock, donkeys require significant space and resources for maintenance during the duration of a case; consequently, police are often reluctant to respond to reports because they cannot secure the "exhibit" (the live animal) without incurring logistical burdens they are not equipped to handle.

Furthermore, the research established that the current legal framework contributes to this inaction. While the theft of a donkey is a crime, the act of unauthorized slaughter is often treated as a regulatory or veterinary infraction rather than a high-priority punishable criminal offense under the Penal Code.-

3. Centralized Coordination from Chiefs

The study established that National Government Administration Officers provides the essential high-level coordination required for integrated security operations. Data indicated that this coordination is critical for mobilizing response support from the police and technical departments and frontline defence via the "Nyumba Kumi" for

early-warning to create a unified front against illegal operations.

4. Prosecution gaps and the Push for Deterrent Sentencing

Research findings established that the primary challenge with prosecution is reliance on outdated animal welfare laws that are scattered across several statutes.

For example, the Prevention of Cruelty to Animal Act (Cap.360) (1962), the Animal Diseases Act (Cap 364) and Animal Disease Rules, 1968 that regulate animal movements, import/export and disease outbreak response. The Penal Code (Cap 63) Laws of Kenya Section, 289 criminalizes the killing of an animal with intent to steal the carcass or skin.

However, these aging laws contain loopholes that limit real protection for animals. At the core, there is lack of specific sentencing guidelines that categorize donkey theft and illegal slaughter as "economic crimes" or "threats to national biosecurity". Without such a framework, magistrates typically rely on general stock theft laws, which may result in non-custodial sentences or small fines that the criminal networks view as a minor cost of doing business. Therefore, the push for deterrent sentencing is not just about the final punishment, but about addressing the systemic reluctance to prosecute and the absence of a legal mandate that compels the court to issue penalties reflecting the actual socio-economic damage caused by the trade.

Key Recommendations

To strengthen the prevention, and enforcement of measures on theft and the illegal trade in donkeys and related products, the study makes the following recommendations addressed to specific state and non-state actors:

1. The Ministry of Agriculture & Livestock Development): /Directorate of Veterinary Services/County Government Veterinary Services) should ensure the following:

- i. Enact a comprehensive Donkey Protection Law to strengthen donkey welfare, regulate the donkey value chain, promote sustainable reproduction, and establish specific offences and penalties.
- ii. Declare donkeys a threatened livestock species and fully domesticate and enforce the African Union moratorium on donkey slaughter for skins, including revoking illegal slaughter operations and strengthening regulatory oversight.

- iii. Implement a national donkey identification and traceability system, strengthen livestock movement controls through verified certificates of origin, and support enforcement with holding grounds, rescue centres, and veterinary services for recovered donkeys.
- iv. Promote sustainable donkey-based livelihoods, including milk and other non-extractive value chains.
- v. Strengthen cross-border collaboration through the East African Community (EAC) and partnerships with wildlife authorities to combat links between donkey trafficking, wildlife crime, and bushmeat trade.
- vi. Standardize and digitize livestock movement permits and dispatch notes, including a mandatory no-objection clearance system for inter-county donkey movements to prevent document fraud and illegal transport.
- vii. Strengthen routine and unannounced inspections of meat processing facilities and hide and skin collection centres to improve compliance, traceability, and detection of illegal donkey products.

2. The National Government (Ministry of Interior & National Administration); National Police Service (NPS) & Directorate of Criminal Investigations (DCI) should undertake the following measures: -

- i. Domesticate and implement the Rapid Response Initiative (RRI) model in collaboration with the Ministries responsible for Livestock and Public Health to strengthen coordinated prevention and response to donkey theft and illegal slaughter.
- ii. Recognize donkey theft and bush slaughter as emerging forms of organized crime by recording donkey theft alongside cattle rustling statistics and prioritizing reporting, investigation, and response at all police stations.
- iii. Strengthen intelligence-led, multi-agency enforcement by enhancing coordination between the NPS, DCI, and Veterinary Services, targeting criminal syndicates across the entire illegal trade chain rather than only low-level offenders.
- iv. Intensify public awareness on donkey protection and welfare through village barazas, community policing forums, and security meetings.

- v. Strengthen anti-corruption and accountability measures at transit checkpoints through enhanced oversight, digital surveillance, and internal integrity systems to prevent collusion and the illegal movement of donkeys.

3. The Office of the Director of Public Prosecutions (ODPP) & Judiciary should undertake the following measures: -

- i. Build the capacity of prosecutors and judicial officers on livestock-related offences and the applicable legal framework to ensure effective prosecution and the imposition of appropriate deterrent penalties.
- ii. Apply maximum statutory penalties, asset forfeiture, and asset recovery measures to remove the financial incentives for donkey theft and the illegal skin trade.
- iii. Strengthen community awareness on donkey protection and welfare through the Court User Committees (CUCs) and other public outreach initiatives.

4. The Kenya Revenue Authority (Customs) & Border Control Agencies should undertake the following measures: -

- i. Strengthen inspection and verification of animal products at all import and export points through mandatory declarations and inter-agency collaboration to prevent the laundering of donkey skins through legitimate trade channels.
- ii. Enhance border surveillance and intelligence sharing with neighbouring countries and relevant enforcement agencies to disrupt cross-border donkey theft and illegal trade networks.
- iii. In line with the national moratorium on donkey slaughter for skins, review Kenya's export classification and remove donkeys and donkey products as export commodities to eliminate opportunities for illegal trade through formal export channels.

5. The Civil Society Organizations should undertake the following measures:

- i. Strengthen grassroots awareness on responsible donkey ownership, welfare-based management, natural reproduction, and donkey security.

- ii. Promote community policing, rapid reporting mechanisms, and collaboration with local leaders and the National Police Service to prevent donkey theft and illegal trade.

CHAPTER ONE: INTRODUCTION

1.1 Introduction

Donkeys were domesticated in Africa over 7,000 years ago when ancient herders in Kenya and the Horn of Africa began taming wild African asses. The donkey has historically served as the "beast of burden" for millions of rural Kenyans, providing essential water transport and agricultural support and employment to users. However, the status of use of the donkey shifted dramatically in 1999 when Kenya issued a Legal Notice 146 declaring donkeys as a food animal and further in 2016 when the Government of Kenya licensed slaughter for donkeys. The legal notices introduced donkeys to a new value chain. Consequently, this led to the licensing of four export slaughterhouses, which slaughtered more than 1,000 donkeys per day (KALRO, 2019). The surge in demand triggered a substantial increase in theft and cross-border smuggling of donkeys to meet the demand for the skins which are used for the production of *ejiao*. By the time the government moved to ban commercial slaughter of donkeys in 2020 to protect dwindling national herds, a sophisticated illicit infrastructure for the sourcing and supply of donkey skins had already taken root. Notably, the 2020 moratorium on donkey slaughter in Kenya did not ban the export of donkey skins.

The transition of donkey-related commercial activity into a clandestine shadow economy is marked by a surge in organized criminality, characterized by the systematic theft of equines to satisfy the illicit demand for skins and meat. Reports indicate that despite the 2020 moratorium on donkey slaughter, the trade has escalated into a highly lucrative enterprise driven by the demand for *ejiao*, a traditional medicine product derived from donkey hides. This black market is fuelled by well-coordinated syndicates that employ sophisticated tactics, including the use of unregulated slaughter sites located in remote bushlands and private residences, far from official oversight. The persistence of these thefts demonstrates that criminal networks have effectively bypassed formal supply chains, evolving into a resilient ecosystem of smuggling and corruption that renders conventional enforcement strategies insufficient. Consequently, the failure of past interventions necessitates a shift toward a robust, multi-agency approach to address the ongoing threats to Kenya's rural security. This study addresses these critical gaps by critically examining the evolving dynamics of donkey theft and the specific impediments to protecting equine populations within the context of Kenya's current legal and security infrastructure.

Following the 2020 moratorium on commercial donkey slaughter, the nature of the problem shifted from a legally regulated commercial enterprise to a clandestine and highly organized illicit economy. Rather than eliminating demand, the ban appears to have displaced the trade into an underground network dominated by criminal syndicates operating through covert transit corridors, illegal slaughter sites concealed in bushes and private residences, and sophisticated livestock smuggling operations.

The continued prevalence of donkey theft despite the ban suggests that criminal networks have adapted by abandoning formal supply chains in favor of decentralized and concealed systems that exploit regulatory weaknesses, corruption, and limited enforcement capacity. This transformation demonstrates that donkey theft is no longer merely a livestock crime but a complex transnational criminal enterprise with significant implications for rural livelihoods, public health, animal welfare, and national security. Understanding this evolving context is essential for explaining why previous interventions have achieved only limited success and why an integrated, multi-agency response involving law enforcement, veterinary services, local communities, and the criminal justice system has become imperative. Against this backdrop, the present study sought to address existing knowledge gaps by examining the dynamics of donkey theft and the institutional, legal, and operational challenges that impede the protection of Kenya's equine population within the country's contemporary legal and security framework

1.2 Background to the Study

The agricultural sector in many developing nations relies heavily on donkeys as indispensable assets for rural transportation and socio-economic stability. However, the integrity of this sector is increasingly compromised by an evolving criminal landscape that threatens the sustainability of donkey populations and the livelihoods of those who depend on them.

1.2.1 Global Context of Theft and Illegal Trade in Donkey Skins and Related Products

The theft and illegal trade in donkey skins and related products have emerged as a pressing transnational crisis, primarily driven by the surging global demand for *ejiao*, a traditional Chinese health and beauty product derived from donkey skin glue (Brooke, 2020; Carder et al., 2019). The commodification of donkeys and their products have transformed donkeys from essential livelihood assets into high-value commodities, creating a demand that far outpaces the natural reproduction rates of equid populations (The Donkey Sanctuary, 2022). Consequently, organized criminal networks have moved to exploit this supply gap, targeting vulnerable herds across Africa, Asia, and Eastern Europe by exploiting weak regulatory frameworks and informal trading systems (Fesseha & Matios, 2020; European Commission, 2022).

In regions such as Pakistan, India, and parts of the Balkans, large-scale clandestine slaughter and theft networks have flourished, often operating with relative impunity due to poor traceability systems and porous borders (Bennett & Pfuderer, 2020; Interpol, 2021). Criminal syndicates exploit loopholes in livestock movement documentation to traffic hides through transnational supply chains that frequently converge with other illegal economies, such as the trade in ivory and pangolin scales (Su et al., 2022; Williams, 2001). The illicit trade not only depletes local populations but also threatens rural socio-economic stability, as smallholder farmers lose the primary source of labour required for agriculture, water access, and transport (Brooke, 2021).

Beyond economic and welfare concerns, the global donkey trade poses significant environmental and biosecurity risks. Clandestine slaughtering often occurs in unhygienic environments, leading to water contamination from improper carcass disposal and the potential entry of uninspected products into human food chains (International Union for Conservation of Nature [IUCN], 2022; World Organization for Animal Health [WOAH], 2023). These interconnected threats to public health and biodiversity have prompted calls from global institutions for harmonized international trade restrictions and strengthened enforcement mechanisms to disrupt the illicit networks driving this global crisis (WOAH, 2023).

1.2.2 African Context of Theft and Illegal Trade in Donkey Skins and Related Product

Across Africa, theft and the illegal trade in donkey skins and related products have become a pervasive and rapidly expanding problem, affecting regions in the north, south, west, and east of the continent (The Donkey Sanctuary, 2025). This surge in illicit activity is fundamentally driven by the escalating global demand for *ejiao*, a traditional Chinese medicine and cosmetic product, which has transformed donkeys from essential livelihood assets into high-value targets for criminal syndicates (Oduori, 2025). The growing global demand for donkey skins, driven largely by the production of *ejiao*, a traditional Chinese medicinal product, has led to a surge in illegal trade networks targeting African donkey populations (Brooke, 2020; The Donkey Sanctuary, 2022). In West Africa, countries such as Nigeria, Burkina Faso, and Niger have reported significant declines in donkey populations due to widespread theft, unregulated slaughter, and cross-border theft of hides to Asian markets (IUCN, 2022). Many rural communities in these regions depend on donkeys for transport, water collection, and agricultural work, making the loss of these animals a direct threat to household livelihoods and local economies (Fesseha and Matios, 2020). Similarly, in Eastern Africa, Ethiopia and Tanzania have experienced rampant donkey theft and the emergence of illegal slaughterhouses supplying the international skin trade, often operating in contravention of existing livestock and animal welfare laws (Carder et al., 2019).

In Northern Africa, particularly in Egypt, the illicit trade in donkey hides has expanded despite national bans on slaughter and export which is driven largely by lucrative black-market demand and the involvement of organized criminal groups (Interpol, 2021). Reports indicate that thousands of donkeys have been illegally slaughtered in rural areas, their hides smuggled through regional routes that connect North Africa to global export hubs (Brooke, 2021). In Southern Africa, countries such as Botswana and South Africa have also faced challenges associated with the donkey skin trade, where donkey theft has risen sharply, undermining animal welfare and public health standards (Fesseha and Matios, 2020). In Botswana, the trade led to community unrest and policy restrictions after mass donkey killings were discovered near slaughter facilities, highlighting the tension between economic opportunity and animal protection (The Donkey Sanctuary, 2022).

Meanwhile, South Africa has struggled with illegal slaughter operations and unlicensed hide exports, despite efforts by authorities to regulate the trade through stricter inspection and licensing regimes (WOAH, 2023).

The cross-regional nature of donkey theft in Africa reflects the increasing sophistication of transnational criminal networks that exploit porous borders, weak regulatory systems, and limited enforcement capacity (Interpol, 2021; Williams, 2001). Donkey skins are often transported covertly across multiple countries before reaching ports of export, making detection and prosecution difficult. This illegal trade has not only decimated donkey populations but also destabilized rural economies, increased poverty levels, and contributed to environmental degradation due to unregulated slaughter and waste disposal (Fesseha and Matios, 2020). African governments and regional bodies such as the African Union have begun to recognize the threat posed by this trade, initiating policy interventions including national bans, trade suspensions, and awareness campaigns (Brooke, 2021).

In response to the escalating problem across Africa, the 37th Ordinary Session of the African Union Assembly of Heads of State had in February, 2024, ratified a ban on slaughter of donkeys for their skin. In June 2025, the Pan African Donkey Conference (PADCo-2) organized by the Africa Union-Inter African Bureau for Animal Resources (AU-IBAR) in Abidjan, Ivory Coast, adopted the Abidjan Declaration supporting a ban on donkey skin trade. In addition to the indefinite ban on donkey slaughter for their skins, the common position of the Abidjan Declaration also called for the revocation of licenses for slaughter of donkeys for their skin, harmonization of laws across various countries to ensure effective control of the illegal trade and also cooperation on the sustainable management of donkeys and donkey welfare (Africa Union-InterAfrican Bureau for Animal Resources, n.d; Kizito, 2025).

However, enforcement remains inconsistent, and illegal activities persist through clandestine operations that adapt to new restrictions. The situation underscores the urgent need for coordinated continental action to harmonize legislation, strengthen border controls, and develop sustainable policies that balance animal welfare, economic development, and rural livelihoods.

1.2.3 Kenyan Context of Theft and illegal trade in donkey skins and related products

In Kenya, the theft and illegal trade in donkey skins and related products have emerged as a significant criminal and socio-economic problem, posing severe challenges to animal welfare, rural livelihoods, and national security. Reports from multi-agency security teams and investigative media have documented a disturbing reality where organized criminal networks systematically kill donkeys and sell the meat, often disguised as beef, to unsuspecting consumers in Nairobi and other metropolitan areas, while the skins are trafficked for export (Muturi, 2024). Recent research indicates that these illicit activities are driven by the lucrative global *ejiao* market, which incentivizes food fraud and exploits regulatory gaps such as the lack of integrated livestock movement tracking (Onyango, 2023). Consequently, the persistence of these underground slaughter operations, despite intermittent crackdowns, highlights a critical failure in the current regulatory framework to protect both the equine population and public health (Wanjiku, 2025).

As a result, donkeys are increasingly targeted by organized criminal networks operating across borders, exploiting weak regulatory frameworks, informal trading systems, and limited law enforcement capacity (Fesseha and Matios, 2020). Legal Notice No. 146 dated 26 August 1999, signed by the then Minister for Agriculture, declared asses (donkeys) as animals to which the Meat Control Act, Cap. 356 applies, thereby designating donkeys as food animals.

Donkeys are an essential component of Kenya's rural economy, providing affordable transport for goods, water, and agricultural produce, especially in arid and semi-arid regions (Goodrum, Theuri, Mutua and Carder, 2022; KALRO, 2019). However, the commercialization of donkey meat and skins, primarily for export markets, has drastically altered the dynamics of donkey ownership and use. The rise of the donkey skin trade between 2016 and 2019 fuelled by global demand for *ejiao* led to a surge in donkey slaughter and theft across the country (Carder et al., 2019). Reports from Brooke East Africa and KALRO revealed that during this period, Kenya's donkey population declined rapidly (from 1.8 million in 2009 to 1.1million in 2019), with estimates suggesting that up to 10% of donkeys slaughtered were pregnant (Brooke, 2020; The Star, 2024).

This decimation threatened the sustainability of the species and undermined the livelihoods of thousands of smallholder farmers and trader's dependent on donkeys for daily economic activities.

The problem of theft of donkeys and illegal trade in donkey products was exacerbated by the establishment of four licensed donkey slaughterhouses, Goldox Kenya Ltd located in Mogotio, Baringo County; Star Brilliant Ltd located in Naivasha, Nakuru County; Silzha Ltd located in Lodwar, Turkana County; and Fuhai Machakos Trading Co. Ltd located in Kithyoko, Machakos County, between 2016 and 2018. The operationalization of these slaughterhouses coincided with an increasing trend in reports of donkey theft. Cases were commonly reported by households in donkey-keeping areas to area chiefs and the police and were also widely covered in media reports across the country (KALRO, 2019).

On 23rd July 2019, Kenya and China signed a five-year Protocol between the General Administration of Customs of the People's Republic of China and the Ministry of Agriculture, Livestock, Fisheries and Irrigation of the Republic of Kenya for the processing of donkey hides and skins from Kenya to China. The protocol established a series of operational conditions governing the trade and imposed several self-regulatory obligations on the Kenyan authorities. Article 2 provided that Kenya confirmed it was free from African Horse Sickness and Vesicular Stomatitis in accordance with the OIE Terrestrial Animal Health Code. It further stipulated that should any of these diseases occur, Kenya would promptly notify China and immediately suspend exports of donkey hides and skins to China. Article 3 required Kenya to confirm that no anthrax cases had been reported within a radius of at least 60 km from the slaughterhouses, processing plants and ports of embarkation during the preceding six months. Article 4(1) further required that animals whose hides and skins were destined for export be healthy animals born, raised and slaughtered in Kenya.

Although these facilities were licensed, investigations revealed that on 19th November 2019, the State Department for Livestock, through the Directorate of Veterinary Services, issued a directive on the sustainable consumptive utilization of donkeys.

Renewal of annual licenses for 2021 was to be conditional upon implementation of a functional production strategy, including working with properly identified producers and contract farmers. Slaughterhouses were also directed not to slaughter visibly pregnant donkeys and to limit slaughter to 100 donkeys per day. Media reports and government inquiries indicated that many stolen donkeys were being slaughtered clandestinely in bush locations, with their carcasses deboned and hides sold to traders for export (Brooke, 2021). In response to mounting public concern, on 24th February 2020, the Cabinet Secretary for Agriculture, Livestock, Fisheries and Cooperatives, having consulted and obtained concurrence from the National Development Implementation and Communication Cabinet Committee (NDICCC), announced a ban on donkey slaughter in Kenya. The statement cited protests by the Association of Donkey Owners in Kenya arising from dwindling donkey populations occasioned by rampant theft and organized syndicates.

Subsequently, on 20th April 2020, Legal Notice No. 63 was issued that revoked the designation of Star Brilliant (EPZ) Limited, Goldox (K) Limited, Silzha Limited and Fuhai Machakos Trading Company Limited as export slaughterhouses. The legal notice was however challenged successfully through judicial review proceedings, and on 5th May 2021 the court delivered judgment quashing Legal Notice No. 63 (High Court of Kenya, 2021). Despite the government's stance against reopening the trade, however, illegal slaughter and theft have persisted, often involving sophisticated criminal networks with links to other forms of wildlife and livestock crime, including ivory smuggling, pangolin scale trade, and cattle rustling (NCRC, 2018, 2024).

In April 2024, the Kenyan government launched a Rapid Results Initiative (RRI) to intensify enforcement against illegal donkey slaughter and theft. The initiative sought to coordinate the efforts of multiple state and non-state actors to curb the spread of illegal operations and safeguard food safety. However, preliminary assessments suggest that despite the RRI's efforts, illegal activities have adapted through more covert means, shifting slaughter operations to hidden locations and expanding smuggling routes through border counties. Reports further document cases of donkey theft in counties such as Machakos, Nakuru, Narok, Kajiado, Turkana, and Kiambu, while Nairobi remains a key market for uninspected donkey meat.

For instance, Nairobi has been established as the biggest market for illegal donkey meat followed by Nakuru and Kiambu counties (Brooke, 2025; Keya-Shikuku, 2024; NCRC, 2018; The Star, 2024).

The persistence of these crimes reflects systemic failures in the regulatory oversight and protection of equines, inadequate enforcement capacity, and possible collusion among rogue security and administrative officials. This indicates that existing legal frameworks and animal management protocols are not robust to counter organized syndicates, leaving donkey populations vulnerable to exploitation. Furthermore, the lack of a coordinated government response to track and verify donkey ownership across counties has created a vacuum that criminal networks effectively navigate through bribery or administrative negligence. As such, the current experience underscores the urgent need for integrated responses, community sensitization, and stakeholder cooperation to combat the theft of donkeys and their products.

Across Africa, the issue of donkey slaughter especially for the skin trade has been a major discussion in animal discourse. In 2022, the Pan-African Donkey Conference held in Tanzania adopted the *Dar es Salaam Declaration on Donkeys: Now and in the Future*. The Declaration informed the report of the Fifth Ordinary Session of the Specialized Technical Committee on Agriculture, Rural Development, Water and Environment (EX.CL/1471(XLIV)). The Committee's recommendations were subsequently adopted through an Executive Council Decision during the Forty-Fourth Ordinary Session held in Addis Ababa, Ethiopia, in February 2024 (EX.CL/Dec.1233–1264(XLIV)).

Africa, under the leadership of AU-IBAR, convened a continental meeting in Abidjan, Côte d'Ivoire, in June 2025 to further deliberate on the growing concerns surrounding donkey slaughter and the skin trade. The meeting culminated in the adoption of the Pan-African Strategy for the Preservation of Donkey Species in Africa 2026–2035. The Strategy seeks, among other objectives, to secure and strengthen Member States' commitment to protecting donkeys against illegal slaughter and to safeguard the sustainable livelihoods of donkey-dependent communities across Africa. It further provides a continental framework for coordinated action aimed at conserving donkey populations and addressing the socio-economic and environmental impacts associated with the illicit donkey skin trade.

In December 2024, the East African Legislative Assembly (EALA) adopted a motion and regulatory resolution calling for strengthened regional action on donkey protection and the regulation of the donkey skin trade. The motion underscored the need for Partner States to harmonize legislation, enhance enforcement against illegal slaughter, and safeguard dwindling donkey populations across the East African Community.

Despite these efforts, rising cases of bush slaughter of donkeys for skins and meat continue to place additional pressure on already depleted donkey populations. Kenyan laws prohibit the slaughter of animals by unauthorized persons, the sale of uninspected meat, the transportation of meat in unlicensed containers and the inhumane killing of animals. Nevertheless, criminal gangs involved in donkey bush slaughter continue to engage in these unlawful activities.

1.3 Problem Statement

The problem of theft and illegal trade in donkeys and related products has become a growing national concern in Kenya, threatening animal welfare, rural livelihoods, and public health while undermining national security and economic stability. Despite the critical role donkeys play in rural transport, agriculture, and income generation, their populations have drastically declined in recent years (from 1.8 million in 2009 to 1.1million in 2019) due to illegal slaughter and cross-border theft driven by global demand for donkey skins. Although the Government of Kenya had imposed a ban on commercial donkey slaughter in 2020 and launched the Rapid Results Initiative (RRI) in 2024 to curb illegal trade, the problem persists and has become increasingly sophisticated. Reports continue to document cases of donkey theft, clandestine slaughter operations, and smuggling networks with links to organized criminal groups involved in wildlife and livestock theft.

The illicit trade has had devastating socio-economic and environmental impacts. Rural households that rely on donkeys for transportation and agricultural support have suffered significant income losses, while communities face disruptions to food security and local economies. Furthermore, unregulated slaughter and the sale of uninspected donkey meat pose serious public health risks, as illegal operators bypass veterinary inspection systems.

The persistence of these activities, despite enforcement interventions, suggests the existence of entrenched criminal networks, weak regulatory enforcement, and possible complicity among local and national actors. Moreover, the evolving nature, scope, mode of operation and impacts of this problem, as well as the effectiveness of government interventions remain unclear.

Awareness of the donkey skin trade as a conduit for broader illegal wildlife trafficking is increasing. A 2021 TRAFFIC report classified donkey skins as a “red flag” commodity alongside high-value illegally traded wildlife products such as elephant ivory and rhinoceroses’ horn. Recent large-scale seizures of donkey skins further indicate convergence between donkey skin trafficking and wider illegal wildlife trade networks. Similarly, in April 2020, Hong Kong Customs intercepted a significant shipment of donkey skins alongside 0.5 tonnes of sea cucumbers, 2 kg of fish maws, and one tonne of dried shark fins originating from Egypt and likely sourced illegally from the Mediterranean (Zavagli, 2021). Further, given the close taxonomic relationship between donkeys and zebras as equids in Kenya, and the documented vulnerability of zebras to bushmeat hunting, this converging illicit trade patterns heighten concerns over potential cross-over risks between donkey and zebra bush slaughter within shared illegal supply networks.

It is against this background that this study sought to explore the current dynamics of theft in donkeys and illicit trade in donkey products in the country in order to propose evidence-based strategic policy and programmatic recommendations to curb this emerging national concern.

1.4 Objectives of the Study

1.4.1 General Objective

The general objective was to explore the current dynamics of theft and illegal trade in donkeys and donkey related products in the country with a view to informing relevant evidence-based strategic interventions to curb this menace.

1.4.2 Specific Objectives

The specific objectives were to:

- i. Establish the current patterns of theft and illegal trade in donkey skins and related products in Kenya.
- ii. Examine the mode of operation (modus operandi) of theft and illegal trade in donkey skins and related products in Kenya.
- iii. To assess the impacts of theft and illegal trade in donkey skins and related products in Kenya.
- iv. Evaluate the effectiveness of the measures for curbing the theft and illegal trade in donkey skins and related products in Kenya.

1.5 Justification of the Study

It is evident that several interventions have been instituted by the Government of Kenya and stakeholders to address theft and illegal trade in donkeys and related products. The measures include enactment of the 2024 Dar es Salaam moratorium declaration on commercial donkey slaughter, the Rapid Results Initiative (RRI) of 2024, and the enforcement of livestock movement regulations. These local interventions are consistent with the Africa regional interventions such as the ratification of ban on slaughter of donkeys for their skin during the 37th Ordinary Session of the African Union Assembly of Heads of State in February, 2024, which called for an African common position and moratorium on the exploitation of the donkey through slaughter and illegal trade in their skin. The June 2025 AU-IBAR-led Abidjan Declaration not only adopted a Pan-African strategy for the conservation and sustainable management of donkeys but also revoked licenses permitting the slaughter of donkeys for their skins, harmonized relevant legislation across African countries, strengthened regional cooperation in donkey welfare and conservation, and promoted sustainable donkey management practices. These continental policy commitments were further reinforced in December 2025 when the East African Legislative Assembly (EALA) debated and adopted a motion urging the Council of Ministers and Partner States to develop a regional policy and legal framework for the protection of donkeys and the regulation of the donkey skin trade. However, the continued reports of illegal slaughter, clandestine cross-border trade, and rising cases of theft point to persistent gaps and weaknesses in these mitigation strategies and government commitments.

The growing sophistication of criminal networks, coupled with inadequate surveillance, weak community awareness, and economic vulnerabilities among rural populations, raises critical questions about the adequacy and effectiveness of the existing interventions. It therefore became necessary to critically examine the current responses to determine their effectiveness and alignment with the evolving realities of the menace.

While donkey-related crimes have gained attention globally and regionally, there are limited researches in Kenya that have systematically examined the nexus between theft and mitigation measures in the context of national security, livelihoods, and law enforcement. The available literature often provides general discussions on animal welfare or livestock trade but rarely addresses the criminal dimensions and enforcement challenges unique to Kenya. This study therefore sought to unpack the criminal elements in donkey skin trade, and generate evidence-based insights into the evolving nature, scope, mode of operation and impacts of donkey theft. The findings are expected to contribute to the growing body of knowledge on livestock-related crimes, and inform policymakers, law enforcement agencies, and development practitioners in initiating targeted interventions to safeguard livelihoods and promote sustainable donkey animal resource management in Kenya.

1.6 Scope and Delimitations of the Study

This study was strictly confined to investigating the patterns and impacts of donkey theft and the illicit trade on donkey products within the geographical boundaries of Nairobi, Machakos, Kajiado, Narok, Nakuru, Turkana, Kiambu, and Mombasa counties. These areas were selected because they represent critical transit nodes, slaughter hotspots, or consumption hubs within the domestic illicit trade network. The study was a qualitative exploration of four thematic areas: the evolving patterns of donkey theft, the *modus operandi* of criminal syndicates, the socio-economic and security impacts on affected households, and the perceived effectiveness of current multi-agency protective measures.

To maintain a focused inquiry, the study excluded several related dimensions of the donkey trade. For instance, while illegal slaughter is central to the problem, the research did not assess the clinical health risks or veterinary consequences associated with the consumption of uninspected meat.

The study did not also explore the linkage between the menace and trade in wildlife bushmeat. By setting these boundaries, the study ensured a deep, localized analysis of the security and livelihood vulnerabilities specific to the most affected Kenyan communities.

1.7 Theoretical Framework of the Study

The study was grounded in the Routine Activity Theory (RAT), developed by Cohen and Felson (1979) and Political Economy Theory by Adam Smith (1776) and Karl Marx (1867). Routine Activity Theory posits that crime occurs when three elements converge in time and space: a motivated offender, a suitable target, and the absence of a capable guardian. According to RAT, criminal opportunities emerge not merely from offender motivation, but from everyday patterns of routine activities that shape when and where potential victims and offenders intersect (Felson, 1994). This framework has been widely applied to explain property and transnational crimes, including wildlife theft, livestock theft, and organized illegal trade, where opportunities arise from poor guardianship, market demand, and resource accessibility (Moreto & Lemieux, 2015).

In the context of theft and illegal trade in donkey skins and related products in the country, the theory's propositions offered a useful analytical lens. The *motivated offenders* are individuals or organized groups driven by economic incentives linked to the growing global demand for donkey hides and meat as advanced by Smith (1776) in the political economic theory that economic prosperity is driven by free markets and division of labour. The *suitable targets* are donkeys, often left unguarded in rural or peri-urban settings, making them vulnerable to theft. The absence of capable guardianship is evident in weak enforcement mechanisms, inadequate surveillance in rural communities, lenient penalties provided for in law and limited implementation of animal protection laws (Lindsey, Allan, Brehony, Dickman, Robson, Begg and Tyrrell, 2020). Furthermore, the global demand for *ejiao* creates a lucrative transnational black market that incentivizes theft networks (Kara, 2018). Political economy theory, therefore, helps to explain how the convergence of economic opportunity, inadequate protection, and poor governance structures sustains the theft of donkeys and their products in Kenya.

CHAPTER TWO: METHODOLOGY

2.1 Introduction

This chapter outlines the methodological framework that guided the study. It describes the research design adopted, the procedures used in sampling the study counties and respondents, and the methods and instruments employed for data collection, management, and analysis. The chapter further explains the techniques used to ensure quality and integrity of data. It concludes by discussing the ethical principles and procedures that were observed throughout the study.

2.2 Research Design

The study adopted a qualitative research design aimed at gaining in-depth understanding of the dynamics of theft and illegal trade in donkeys and related products in Kenya. The qualitative design was deemed appropriate as it enabled the exploration of perceptions, experiences, and practices of diverse actors involved in or affected by the vice, including donkey owners, traders, transporters, butchery operators, enforcement officers, and community leaders. Additional data was generated through desktop review and analysis of relevant literature, policy documents, media reports, legal instruments, and institutional records.

2.3 Sampling of Study Areas and Sample Determination

2.3.1 Study Areas

The study was conducted in selected counties in Kenya that have been identified as major hotspots for donkey theft and illegal trade in donkeys and donkey products. The selected counties were Machakos, Kajiado, Mombasa, Embu, Kitui, Nakuru, Narok, Turkana, and Kiambu. These counties have had consistent reports of donkey theft, illegal slaughter, trafficking, and illegal trade in donkey hides and meat thus were appropriate for study.

The counties have strategic roles in the illegal market donkey value chain. For instance, Nairobi, Nakuru, and Kiambu constitute major urban consumption markets where illicit donkey meat has reportedly been distributed and sold through informal channels.

Narok and Kajiado host some of the largest donkey populations in Kenya, as evidenced by the 2009 and 2019 national livestock censuses, making them particularly vulnerable to large-scale theft. Owing to their proximity to the Kenya–Tanzania border, these counties also serve as important transit corridors for cross-border trafficking of stolen donkeys and donkey products. Mombasa, as Kenya's principal seaport, provides a critical export gateway through which donkey hides have historically been shipped to international markets.

The study population comprised key stakeholders involved in the donkey value chain, as well as institutions responsible for animal welfare, law enforcement, and the regulation of trade. These included the Association of Donkey Owners in Kenya (ADOK) which brings together donkey owners across the country, Farming Systems Kenya (FSK) ; Inades-Formation Kenya (IFK) which provides oversight on donkey welfare and monitors community impacts of the illicit trade; Institute of Pastoralism Development and Research (IPDR); Kenya Society for the Protection and Care of Animals (KSPCA); Brooke East Africa; Donkey Sanctuary of Kenya; law enforcement officers (National Police Service); officers from the Office of the Director of Public Prosecutions (ODPP); officers from the Judiciary; National Government Administrative Officers (chiefs and assistant chiefs); County government officials in charge of livestock and agriculture, donkey slaughterhouse operators and middlemen, community leaders and opinion shapers.

During the period of the study, several arrests were made within the study area, providing an unplanned opportunity to observe the enforcement and implementation of the law. The findings arising from these events were documented and incorporated into the study.

Table 1: Sub-Counties Visited for Data Collection

County	Sub-county
Machakos	❖ Machakos Town ❖ Mavoko ❖ Masinga (Kithyoko) ❖ Kithyoko ❖ Masinga (Kanyonyoo)
Kajiado	❖ Kajiado Central ❖ Kajiado West ❖ Kajiado West (Kiserian) ❖ Oloililai (Namanga) ❖ Kajiado West (Ololoitikoshi)
Mombasa	❖ Nyali ❖ Mvita ❖ Changamwe ❖ Mvita (Kilindini Port)
Kitui	❖ Mwingi Central ❖ Mwingi East ❖ Kitui Central
Embu	❖ Mbeere South ❖ Mwea
Nakuru	❖ Njoro ❖ Nakuru West ❖ Nakuru East ❖ Naivasha & Mai Mahiu ❖ Subukia
Narok	❖ Narok North ❖ Narok Central ❖ Narok East & Mulot
Turkana	❖ Turkana West ❖ Turkana Central
Kiambu	❖ Kikuyu ❖ Ndeiya ❖ Limuru

Data source: Study Fieldwork (2026)

2.3.2 Sample Size Determination

Purposive sampling technique was employed to identify information-rich participants who are knowledgeable about theft and illegal trade in donkeys and related products.

This method was preferred because it allowed selection of respondents based on their involvement, experience, and expertise related to the subject matter (Patton, 2015).

To capture community-level perspectives, Focus Group Discussions (FGDs) were organized with male and female donkey owners and users, with one FGD carried out per county. The sample size was determined by the principle of data saturation, whereby reaching out to new participants was stopped when additional interviews yielded no new information (Guest, Bunce and Johnson, 2006).

Table 2: Key Informant Respondents Category

Key Informant Respondents Category	
Law Enforcement & Security	National Police Service (NPS), DCI, Anti-Stock Theft Police Unit (ASTU), and the National Intelligence Service (NIS)
Administration	National Government Administration Officers (NGAO) including County Commissioners, DCCs, Chiefs, Assistant Chiefs, and <i>Nyumba Kumi</i> elders
Legal & Judiciary	ODPP prosecutors, Magistrates, and Advocates
Technical & Veterinary	County Directors of Veterinary Services (CDVS), Public Health Officers, Kenya Agricultural and Livestock Research Organization (KALRO).
Civil Society & Non-Governmental Organizations	Farming Systems Kenya (FSK), Kenya Society for Protection & Care of Animals (KSPCA), INADES-Formation Kenya, Agriculture Development Division (ADS), and Community Based Organization, Brooke East Africa, Donkey Sanctuary of Kenya
Community Stakeholders	Focused Group Discussions (FGDs) with donkey owners, the Association of Donkey Owners (ADOK), victims of donkey theft, and donkey traders.

Data Source: Feld survey (2026)

The information presented in Table 3 demonstrates the broad geographical and institutional coverage of the study, with a total of 204 respondents drawn from nine counties.

The distribution of respondents reflects a deliberate multi-sectoral sampling strategy that captured perspectives from a wide range of stakeholders involved in or affected by theft and the illegal trade in donkey skins and related products. These included national and county government agencies, the National Government Administration Officers (NGAO), law enforcement and criminal justice institutions, veterinary and livestock officers, community leaders, civil society actors, donkey owners, traders, transporters, and participants in Focus Group Discussions (FGDs). This diversity of respondents enhanced the richness of the qualitative data by facilitating triangulation of perspectives across different levels of governance, enforcement, and community engagement, thereby strengthening the credibility and comprehensiveness of the study findings. Notably, the study achieved near gender parity among participants in the community-level discussions, comprising 52 male and 49 female participants. The balanced representation ensured that the socio-economic implications of theft and the illegal trade in donkey skins and related products were examined from both male and female perspectives. In addition, the inclusion of specialized technical officers and civil society organizations provided a robust framework for validating field observations against professional and legal standards.

Table 3: Total Sample (N)

County	NPS		DCI /NIS		Judiciary /ODPP		Admini stration (NGAO)		Techn ical/ Vet		CSOs/ NGOs		Trade rs		FGDs		Total		
By Sex	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	T
Machakos	2	0	1	0	0	0	5	1	1	1	2	0	2	0	5	1 2	18	14	32
Kajiado	0	2	0	0	0	1	3	2	3	2	2	0	2	0	10	3	20	10	30
Mombasa	0	0	1	1	0	0	1	1	1	0	1	0	0	0	0	0	4	2	6
Kitui	3	0	0	0	1	2	1	2	1	2	0	0	0	1	7	3	12	10	22
Embu	3	0	1	0	0	0	4	0	1	0	1	0	2	0	9	3	21	3	24

County	NPS		DCI /NIS		Judiciary /ODPP		Admini stration (NGAO)		Techn ical/ Vet		CSOs/ NGOs		Trade rs		FGDs		Total		
Nakuru	2	0	0	0	0	0	2	1	1	0	1	1	2	0	1	1 0	9	12	21
Narok	0	0	0	0	0	2	4	0	1	0	1	1	1	1	5	9	12	13	25
Turkana	1	0	1	0	2	0	4	0	1	0	1	0	0	0	7	5	17	5	22
Kiambu	1	1	0	0	0	1	3	2	1	1	0	0	0	0	8	4	13	9	22
Total	12	3	5	1	3	6	26	9	11	6	9	2	9	2	52	4 9	12 6	78	205

Data source: Field survey (2026).

2.4 Data Collection Methods and Tools

2.4.1 Sources of Data

The study utilized both primary and secondary data sources. Primary data was obtained directly from respondents through key informant interviews and FGDs while secondary data were derived from government reports, policy documents, other studies, media reports, and records from animal welfare organizations and enforcement agencies. This triangulation ensured comparison of information from diverse sources, thus the study minimized bias, and enhanced the reliability of the conclusions.

2.4.2 Data Collection Methods

The study utilized qualitative data collection techniques. These were face-to-face interviews with the key informants and focus group discussions. With the consent of the participants, the discussions and interviews were audio recorded and captured in field notebooks. Eight Focus group discussions were conducted with male and female donkey owners plus the users.

2.4.3 Data Collection Tools

Key informant and focus group discussion guides were used in collecting data from the key informants and focus group discussants respectively. These tools were developed in line with the study objectives and pre-tested in a non-sampled county to ensure clarity, relevance, and reliability. The pre-testing of the research instruments was conducted in Nairobi County due to its unique status as the central hub of the donkey trade value chain. The tools were translated into Kiswahili where necessary to facilitate comprehension.

2.4.4 Methodology Workshop

A methodology workshop bringing together subject matter experts was convened to test the quality of the approach and validity of the tools before the study was rolled out. The workshop served as a critical mechanism for ensuring both the face validity and content reliability of the research instruments.

2.4.5 Methods of Data Analysis

The qualitative data were analysed using thematic analysis guided by the six-phase framework developed by Virginia Braun and Victoria Clarke (2006). This analytical approach was selected because it provides a systematic and flexible method for identifying, analysing, and interpreting patterns of meanings within a qualitative data while remaining closely aligned with the study objectives.

The analysis commenced with data familiarization, during which the researcher repeatedly read the interview and Focus Group Discussion (FGD) transcripts to gain an in-depth understanding of the data and identify preliminary ideas. This was followed by systematic generation of initial codes through the identification and labelling of recurring words, phrases, concepts, and patterns relating to donkey theft, the illegal trade in donkey products, the actors involved, drivers of the trade, enforcement challenges, and its socio-economic impacts.

The coded data were then examined to identify meaningful relationships, and subsequently organized into broader themes and sub-themes corresponding to the objectives of the study. The preliminary themes were reviewed and refined by comparing them against the coded extracts and the complete dataset to ensure internal coherence, consistency, and distinctiveness. Each theme was then clearly defined and named to accurately reflect its central organizing concept and analytical significance.

The final stage involved synthesizing and interpreting the findings by integrating the identified themes with illustrative verbatim quotations from the participants, relevant empirical literature, policy documents, and the theoretical framework underpinning the study. This iterative process facilitated the generation of rich, credible, and contextually grounded interpretations of the dynamics of theft and the illegal trade in donkey skins and related products in Kenya.

2.5 Ethical Considerations

The study was conducted in accordance with the established ethical principles governing social science research. Prior to data collection, approval was obtained from the relevant authorities, and all participants were informed about the purpose, scope, and voluntary nature of the study before providing informed consent.

Participants were also made aware of their right to withdraw from the study at any stage without any consequences. To protect their privacy, confidentiality and anonymity were maintained through the use of pseudonyms and the exclusion of identifying information from transcripts and reports. Throughout the research process, cultural sensitivity was observed by respecting local norms, values, and customs, while all sensitive information was handled with the highest level of discretion. Research data were securely stored to prevent unauthorized access. Data collection was conducted using appropriate language, professional conduct, and in culturally appropriate manner. In addition, all research assistants underwent comprehensive training to ensure they possessed the necessary knowledge, skills, and ethical competence to undertake the study professionally and consistently.

CHAPTER THREE: RESULTS AND DISCUSSIONS

3.1 Introduction

This chapter presents and discusses the findings of the study based on qualitative data generated through Key Informant Interviews (KIIs) and Focus Group Discussions (FGDs). The findings are organized and presented thematically in accordance with the study objectives and the analytical framework developed through thematic analysis. Each theme is supported by illustrative verbatim quotations from participants and interpreted in relation to relevant empirical literature, policy and legal frameworks, and the theoretical perspectives underpinning the study.

3.2 Current Patterns in Theft and the Illegal Trade in Donkey Skins and Related Products

3.2.1 Trends in Theft and the Illegal Trade in Donkey Skins and Related Products

The table below classifies the qualitative assessments of various stakeholders regarding the direction of theft and the illegal trade in donkey skins and related products in their respective areas. It is essential to emphasize that these data represent subjective perceptions rather than official administrative crime statistics, as no longitudinal police or veterinary datasets were synthesized for this specific categorization. These perceptions are categorized by the stakeholder's professional or community role to highlight the divergence in how "trends" are interpreted across different administrative levels.

Table 4: Classification of Stakeholder Perceptions on Theft and the Illegal Trade in Donkey Skins and Related Products

County	Sub-County / Division	Stakeholders Perceiving an Increase	Stakeholders Perceiving a Decrease
Kitui	Mwingi East	Assistant Chief, Area Chief, FGD Participants, Donkey Farmer	None reported
	Mwingi Central	Police Officer, Senior NGAO Representative	Probation Officer, Judiciary Officer
	Kitui Central	Veterinary Officer	None reported
Embu	Mbeere South	None reported	NPS Representative
	Mwea	Veterinary Officer, Chief	NPS Representative, Village Elder
	Makima	FGD Participants, ADS Representative	None reported
Machakos	Kithyoko	FGD Participants, ADOK Representative	NPS Representative
	Mavoko	NPS Representative	None reported
	Machakos Central	INADES-Formation Rep, ADS Representative	NGAO Representative, Nyumba Kumi Elder
Kajiado	Namanga	FGD Participants	None reported
	Kajiado West	Public Health Officer, Prosecution Officer, Senior Chief	NGAO Representative, Ewangatan Boy Child CBO
	Kajiado Central	None reported	Assistant Chief
Kiambu	Kikuyu / Highway	NPS Representative	None reported
	Kiambu General	Public Health Officer	FGD Participants

County	Sub-County/ Division	Stakeholders Perceiving an Increase	Stakeholders Perceiving a Decrease
Turkana	Turkana West / North	Institute of Pastoralism Representative	NGAO Representatives, NPS, Vet Officer
County	Sub-County / Division	Stakeholders Perceiving an Increase	Stakeholders Perceiving a Decrease
	Legal Jurisdiction	Office of the DPP (Focusing on existing caseloads)	None reported
Mombasa	Town/Coast	None reported	KSPCA Representative
Nakuru	Njoro, West, Naivasha, Subukia, Mai Mahiu, East	Farming Services Kenya Representative, Police Officer	Veterinary Officer, Chief
Narok	North, Central, East, Mulot	None reported	Public Prosecution Representative

Note. Data obtained from field survey (2026)

The geographical patterns evident in the table suggest a significant lack of consensus, likely driven by varying levels of regulatory enforcement and "black market" visibility. A black market, in this context, refers to the illicit, clandestine trade in donkey skins and meat that bypasses formal slaughterhouse inspection and licensing protocols. The data shows that in regions like Kitui and Machakos, community-level stakeholders and specialized advocacy groups (such as ADOK or ADS) consistently perceive an increase in activity, whereas administrative and judicial officials often report a decrease or stabilization. This discrepancy highlights a potential "enforcement gap," where illicit activities continue to operate in the periphery of formal oversight, leading to a divide between the experiences of rural communities and the formal records held by state actors.

According to the information obtained from the respondents in Mwingi East, Mwingi Central, and Machakos (Kithyoko/Mavoko) there are increased incidents while respondents in Turkana

and Mwea reported a decrease. Respondents attributed the decline in these two areas to enhanced security patrols.

Further, the results suggests that while high-intensity policing in specific sub-counties like Mwea has been successful, the overall regional trend remains on an upward trajectory as illegal businessmen contravene the laws requiring movement permits, animal welfare during transit, and the 2020 ban by exploiting porous national and county borders. At the national level, the proximity of counties like Kajiado and Narok to the Kenya-Tanzania border allows for the clandestine movement of donkeys and hides into and out of the country, bypassing formal customs and veterinary checkpoints. Documents presented in court following an arrest of suspects transporting donkey hides in Kitui showed that donkeys are sourced as far as Moroto in Uganda.

Simultaneously, the trade relies on porous inter-county borders, where weak coordination between neighbouring county governments enables traffickers to transport stolen animals from rural areas in Kitui or Machakos into urban meat markets in Nairobi and Kiambu. Several interceptions of lorries ferrying donkeys were reported in Kitui road heading to Machakos and onward to Nairobi. These internal administrative gaps allow for the rapid movement of illicit consignments, as enforcement often remains localized and fails to track the sophisticated logistics of organized criminal networks across county lines. The following section presents a qualitative analysis of direct testimonies gathered through Key Informant Interviews (KII) and FGD.

Organized Bush Slaughter and Theft Surge

Majority of administrative, technical, and community stakeholders reported a significant escalation in illicit activities, characterized by a shift toward organized, demand-driven "bush slaughter" and cross-border theft. According to an Assistant Chief in Mwingi East, *"the nature of the theft has Shifted from live theft of donkeys to Clandestine Bush Slaughter,"* the Area Chief confirmed receiving *"more reports of missing donkeys than ever before."* This was corroborated by veterinary officer in Mwingi Central, Kitui, and Mwea, who highlighted a rise in unregulated slaughter sites that *"pose a major challenge to our animal welfare and public health mandates."* Law enforcement, including a Police Officer in Mwingi Central, added that

“the movement of stolen donkeys is becoming a more frequent occurrence across our major transport corridors.”

These findings align with Kemei and Cherono (2024), who observed that policy prohibitions on commercial equine processing plants inadvertently catalysed unmonitored bush slaughter networks within remote areas. Conversely, these findings contrast with Gitonga and Nyabuto (2024), who previously characterized donkey offenses as low-velocity, petty livestock thefts intended exclusively for rural draft power or domestic farm labour. Ultimately, criminal syndicates exploit primary transport corridors to move skins and meat to urban markets, bypassing weak checkpoints and outdated transit legislation (Wambua & Tebe, 2026).

Illegal Slaughter Sites Mutate to Evade Detection

A veterinary officer from Naivasha Office that *“donkey theft and illegal slaughter remain at its peak,” with the trade in skins and illegal slaughter continuing unabated.* Highlighting a recent observation of 200 incidents of donkeys being divided into smaller clusters and "driven into the bush" rather than being loaded into vehicles. This indicates that slaughter sites are "mutating at a higher rate" to remain hidden.

This finding aligns with a 2023 report regarding the bush slaughter of donkeys in Kenya, which examined the risks associated with the trade and proposed potential mitigation strategies (Chebet & Mutua, 2023). The report emphasized the clandestine nature of these operations and highlighted the essential role of multi-agency security teams working in tandem with community surveillance networks. Furthermore, the findings document various interceptions of live donkeys and carcasses at illicit sites, providing evidence of how these cases transition from the scene of the crime into the formal judicial process.

According to a participant in a FGD comprising of the donkey owners conducted in Njoro town, *“donkey theft has been on the increase tread for the last two years,”* he mentioned a case of three donkeys which were stolen and never recovered. A Police Officer at Mai Mahiu Police Station in Nakuru County reported that, *“the situation regarding donkey theft and illegal slaughter is reducing, that there has been only one case of theft reported in the locality within the last two years.”*

These findings align with Chege and Ndung'u (2025), who observed that state-enforced commercial restrictions on equine processing infrastructure inadvertently pushed clandestine supply chains into decentralized, open-air processing hotspots to satisfy ongoing underground market networks. Conversely, these findings contrast with Ndiwa and Kiprop (2023), who historically framed donkey production patterns and security trends as localized, low-velocity issues managed within static livestock markets. Ultimately, the high valuation of hides on the international market ensures that syndicates actively evolve their transport practices, utilizing flexible logistics lines that can quickly bypass localized highway inspections and minimize official criminal detection (Ochieng, 2024).

Geographic Vulnerability: The Role of Major Highways in Transnational Donkey Theft

Evidence gathered from Machakos and Kajiado counties highlights the strategic exploitation of major infrastructure in the illicit trade. Public Health and Police Officers identified the Garissa Highway and the Mombasa–Nairobi Highway as high-frequency transit routes, noting that *they “cannot go an entire month without seizing a consignment of donkey meat.”* In Namanga, a FGD participant described a transition to a *“structured, cross-border criminal enterprise”* involving animals stolen and sourced from Tanzania where slaughtering of donkeys take place. This sense of crisis was echoed by donkey owners in Kithyoko, who reached a unanimous consensus that the problem has *“increased significantly over the last two years”* and has reached the level of a *“documented crisis.”* Similarly, the Institute of Pastoralism Development and Research in Turkana provided an alarming statistic, showing cases growing *“steadily to over 200 cases by January 2025.”*

Documents reviewed revealed that a private limited company, Yogde International Trade Co. Ltd, incorporated on 2nd October 2024, was operating in Kithyoko. On 17th October 2024, the company applied to the Director of Veterinary Services for an import/export permit, which was subsequently issued on 27th November 2024 following an inspection. However, after an exposé by Citizen TV titled Donkey Beef (https://www.youtube.com/watch?v=Uw8RG_tXqXI), which was aired on 8th December 2024, the government revoked the facility's licence on 11th December 2024 for breaching the conditions of the permit.

Investigations established that the facility had been collecting and storing donkey skins rather than cattle skins, contrary to the terms under which the license had been granted. Despite this revocation, subsequent reports regarding the seizure of donkey skins in the area suggest that the facility continued to operate clandestinely.

Enhanced Enforcement Disrupts Illegal Markets

Several judicial and security officers reported a downward trend, often attributing the decline to enhanced enforcement and the disruption of legal markets. In Mwingi Central, a Probation Officer stated that *“the incidences of donkey theft have gone down”* based on fewer individuals entering the criminal justice system, a view supported by a Judiciary Officer who noted that *“formal legal records do not show a corresponding surge in prosecuted cases.”* In Embu and Mwea, National Police Service (NPS) representative reported a *“notable decrease”* and a *“downward trend,”* arguing that *“increased patrols and the strategic placement of checkpoints”* have successfully deterred offenders.

Community Vigilance and Collaboration Reduce Theft

Local community leaders in Mwea and Turkana observed a calmer environment. A Village Elder in Mwea affirmed that *“the disappearance of our donkeys is no longer the daily threat it once was”* due to youth vigilance and local security meetings. In Turkana, NGAO representatives and Veterinary officers noted a *“significant reduction within our borders,”* suggesting that criminal focus has shifted to other livestock like camels or moved across the border into Uganda and South Sudan. Additionally, the Kenya Society for the Protection and Care for Animals (KSPCA) reported *“no recorded incidents of theft”* in the coastal region, while a Nyumba Kumi Elder in Machakos noted an improved landscape due to *“better collaboration between security agencies and the community.”*

Rapid Results Initiative Reduces Illegal Slaughter

A representative from Farming Services Kenya reported that Nakuru County initially experienced an *“upsurge of donkey theft and this was occasioned by the traders who would go out and get donkeys and then go and transport them to the slaughterhouses.”* The informant further reported that following the official closure of these facilities, the situation escalated into *“bush slaughters whereby you wake up in the morning and you find that your donkey is slaughtered, the skin is not there.”* However, the respondent noted that since the implementation of the government’s 100-day Rapid Results Initiative, *“we were able to see a huge reduction, because at that time, we saw impounding of even vehicles, even carcasses, donkeys were also impounded in Lorries.”*

Business Rivalry Rather than Organized Trade

The representative of the Public Prosecutions in Narok indicated that there has not been a notable increase in illegal trading, though localized theft remains a concern:

"I have not come across any matters in terms of illegal trading, but what I can say is, I came across donkey theft which occurred because the owner did not leave it with sufficient security. This specific incident in Narok town appeared to be driven by business rivalry within the water vending sector rather than an increase in organized theft"

The Veterinary Officer in Narok County observed that donkey-related crimes have undergone a significant transformation following the shift in the legal status of the trade, noting a marked reduction in overt criminal activity:

"Activities are actually lessened, unlike previously when the trade was legal, whereby we used to have a lot of donkey activity going on trade. Currently, those thefts have actually subsided because we have very few incidences of donkey having been stolen at the community level"

Government Ban Shifts Theft from Mass Activity to Clandestine Methods

The participants in the Focus Group Discussions (FGDs) in Narok County provided a nuanced assessment of the trends in donkey theft which indicates a transition from high-visibility "mass theft" to more clandestine or commercialized procurement methods:

"Nowadays we have fewer cases unlike previous years, it can take several months before a case is reported. The community are very vigilant, though the perpetrators now operate in darkness and slaughter donkeys in the bushes near the rivers"



Figure 1: Donkey Skin Premises in Kithyoko -Machakos

Source: Photograph taken in March 2026 by the researcher during fieldwork in Kithyoko.

The visual evidence in Figure 1 reveals a Donkey Skin Premise in Kithyoko in Machakos which represents a critical node in the illegal export supply chain. The government had earlier revoked the facility's license on 11 December 2024 for breaching the conditions of the permit. Investigations established that the facility had been collecting and storing donkey skins rather than cattle skins. Unlike the temporary "bush slaughter" sites in remote fields, this indoor facility demonstrates a high level of industrial organization and permanence. The massive pile of dried hides signifies a systematic collection process where skins from multiple sub-counties are consolidated, processed, and stored in bulk. This confirms the DCC's earlier insights that enforcement is currently "toothless" against such well-capitalized enterprises, which clearly operate with established logistical networks and significant storage capacity.



Figure 2: Donkeys Returning from Grazing fields in Mwingi East, Nguni Area

Source: Photograph taken by the researcher in March 2026 during fieldwork in Kitui.

The visual evidence in Figure 2 depicts Donkeys left to graze on their own along the highways in Mwingi East. This scene serves as a critical illustration of the structural vulnerability that criminal syndicates exploit. As documented in the earlier testimonies of the Chief in Mwingi East, the practice of free-range grazing without constant human supervision creates a significant opportunity for theft. Because these animals are frequently found near transit corridors (highways), traffickers can quickly intercept and load them into vehicles with minimal detection, turning a communal grazing habit into a major security liability.



Figure 3: Donkeys Leaving Mullet Market in Narok

Source: Photograph taken by the researcher in March 2026 during fieldwork in Mullet.

The visual evidence in Figure 3 depicts Donkeys leaving Mullet Market in Narok, a scene that represents the primary point of entry for livestock into the regional supply chain. While this

image captures a seemingly legitimate commercial activity, it illustrates the critical monitoring challenge identified by a Police Officer at Mwingi Central. Because donkeys are moved in large, open herds by individuals who appear to be "innocent traders," it becomes difficult for security forces to distinguish between legal market transactions and the movement of stolen animals destined for bush slaughter.



Figure 4: Donkeys Carrying Luggage at Makima Division in Mwea Sub County -Embu.

Source: Photograph taken by the researcher in March 2026 during fieldwork in Kitui.

The visual evidence in Figure 4 depicts Donkeys carrying luggage at Makima Division, illustrating the animal's function as a primary mode of transport for heavy goods, such as timber and agricultural produce. This scene serves as a critical baseline for understanding the economic asset value described by technical officials. In many rural Kenyan households, a donkey is not merely livestock but a living engine that facilitates trade, water collection, and

fuel transport. The loss of a single animal to the skin-only trade represents a direct reduction in a family's productive capacity and a regression into manual labour which disproportionately affects women and the elderly.

3.2.2 Hotspots of Patterns in Theft and the Illegal Trade in Donkey Skins and Related Products

The following analysis details the specific geographical locations and transit corridors where most incidents of donkey theft have been recorded. The analysis presents the factors driving these incidents.

Table 5: Geographical Hotspots and Transit Corridors of Donkey Theft

County	Specific Area / Community / Hotspots	Primary Routes & Transit Corridors	Reason for Targeting & Vulnerability Factors
Kitui	Mwingi East, Kitui South (Githiakoo), Mwingi Central (Nguni), Kitui Town, Muguoto	Nuu–Tana River routes, Kamuongo–Mwingi–Garissa Highway, Kitui Town–Muguoto–Baringo, Garissa–Bangla routes	High donkey density for water hauling; porous boundaries and thickets used as "cooling zones"; Garissa-Bangla used to launder donkeys into legal trade.
Machakos	Kithyoko, Matungulu, Masinga, Mwala, Miatta, Katangi, Ikombe, Ngelani, Kinani (Riverside)	Machakos–Kitui–Nairobi corridor, Kithyoko–Thatha–Kiritiri, Ngutani–Nzaui–Kikuyu, Kanyonyoo–Kitui route	Historical slaughterhouse infrastructure in Kithyoko; sewage plant odors in Kinani mask slaughter; lack of fencing in Masinga ASAL zones.
Mwea (Embu)	Makima Division, Karaba, Masinga-Bondoni, Mbonzuki, Bondoni, Gikuru	Makima–Masinga road, Makima–Karaba–Makutano road, Masinga–Bondoni, Mbonzuki–Karaba, Kirinyaga–Gikuru bypass	Strategic source and consolidation points; multiple entry/exit points allow syndicates to bypass police surveillance.
Kajiado	Namanga, Bisil, Kiserian, Ngong Town, Ewaso Kedong, Oloikerien, Olchoro Onyore, Kikonyoki Ward, Ereteti, Olooltepes, Oloitikoshi,	Lemeuo–Kentraco–Maili Tisa–Bisil, Meto–Ngatataek–Bisil, Bisil–Oloiyeangalani–Olooltepes, Namanga–Meto–	Proximity to Tanzania border (Soko la mbuzi, Mailitisa); Bisil serves as a hub for international transit to Ethiopia and Congo.

County	Specific Area / Community / Hotspots	Primary Routes & Transit Corridors	Reason for Targeting & Vulnerability Factors
	Lemeiywo, Meto, Longosua	Longosua, Kiserian–Ngong	
Kiambu	Ndeiya, Limuru, Kikuyu (Kari area), Ndonyo, Githunguri, Baraniki	Kipipiri–Kari route, Ndonyo–Burma (Nairobi) route, Embu–Nairobi and Kirinyaga–Kenol roads	Proximity to high-demand Nairobi markets; expansive, unmonitored land in Kari and Ndeiya allows for clandestine slaughter.
Turkana	Oropoi, Nawountos, Kakuma, Kaitwar, Kibish	Kibish–Kakuma–Kaitwar corridor, Turkana–Isiolo–Samburu internal borders, Uganda/South Sudan international borders	Porous international borders; stolen donkeys are moved to Moroto (Uganda) for slaughter and hide smuggling.
Nakuru	Magumu (Fly-over), Kedong, Ndeia, Naivasha (Star Brilliance), Kisamis, Subukia (Kabati) Njoro, Bahati	Tanzania–Kajiado cross-border route, Shampole–Ibisil–Kedong axis, Magumu–Limuru–Kedong route, Bomet–Narok transit axis, Nyandarua–Kiambu extraction path, Nyahururu - Teseshima and Maili Tisa	Strategic border entry at Shampole; vast, secluded terrain in Kedong and Ndeia providing "natural intelligence" against enforcement; proximity to terminal Nairobi markets; and exploitation of "underground" infrastructure.
Narok	Majengo, Narok town, Baringo, Mulot ,Narok South Weta, Msiaben, Ntulele, and Susua, Naivasha"	Mulot - Narok South Weta, - Msiaben, Ntulele, and Susua, - Naivasha"	

Source: Data obtained from field survey (2026)

The findings of this research revealed that theft syndicates strategically select areas based on functional utility and logistical ease. In counties like Kitui and Machakos, criminal activity is concentrated due to the high density of donkeys resulting from the community's heavy reliance on them for water and transport. Similarly, Kajiado and Turkana are targeted because they possess a large supply of donkeys for the same reasons, though their vulnerability is further compounded by geographical permeability.

In these border regions, proximity to Tanzania and Uganda facilitates a steady supply of animals and provides porous escape routes that allow organized networks to move stolen livestock across international boundaries, effectively bypassing local law enforcement.

Furthermore, the transition from rural extraction points to urban distribution hubs is facilitated by major infrastructure, such as the Garissa-Nairobi and Machakos-Nairobi highways. These "high-speed corridors" allow criminals to move livestock rapidly under the cover of night, often reaching terminal markets or illegal slaughter sites in Kiambu and Nairobi before local authorities can be alerted.

3.2.3 Periods, Seasons, Circumstances and Conditions When Patterns in Theft and the Illegal Trade in Donkey Skins and Related Products Incidents Tend to Rise

The following analysis examines the temporal and environmental factors that influence the frequency of donkey theft. The synthesis highlights how criminal syndicates synchronize their activities with climatic shifts, such as the dry and rainy seasons, as well as socio-economic cycles like festive periods and the academic calendar.

Table 6: Seasonal Patterns and Environmental Triggers of Donkey Theft

County/subcounty	Peak Period / Season	Driving Factors & Environmental Triggers	Tactical Advantage for Syndicates
Kitui (Mwingi East, Central, Town)	Dry Season & Festive Periods (Dec)	Water scarcity forces donkeys to graze far from homes; economic strain of school fees/holidays.	Use of dry riverbeds for silent movement; reduced visibility of herds under direct owner watch.
Machakos (Kithyoko, Matungulu)	Dry Season, July, & Nov-Dec	Minimal farming activity leaves youth idle; extreme demand for meat during end-of-year celebrations.	Economic hardship pushes marginalized individuals into trade; coordinated slaughter with "market committees."
Embu (Mwea, Makima)	Dry Season (Receding water)	Correlation between low water levels and theft frequency; persistent inelastic demand for products.	Dry ground allows for the rapid movement of transit vehicles toward Nairobi.
Kajiado (Kajiado West, Namanga)	Rainy Season & December	High festive demand; global hide demand (Chinese medicine); consistent pull from Nairobi meat markets.	Rain provides a natural "cloak" (muffled noise/low visibility); administrative oversight is stretched thin in Dec.
Turkana (Oropoi, Lodwar, Kibish)	Dry Season, Nov, March-April	Migration toward Uganda borders for pasture; "Todong Lore" youth initiation ceremonies.	Weakened state of donkeys makes them easier to round up; distance from homesteads reduces protection.

County/subcounty	Peak Period / Season	Driving Factors & Environmental Triggers	Tactical Advantage for Syndicates
Nakuru(Njoro Nakuru West Naivasha Subukia & Mai Mahiu Nakuru East)	Non-seasonal / Continuous, periods of media/civil society silence, November/December (Festive lead-up) Rainy season	Absence of public outcry or monitoring; availability of donkeys; and opportunistic "strikes" when enforcement or civil society attention wanes.	High global demand for skins as the primary driver; opportunistic slaughtering "whenever available"; and the exploitation of festive seasons to move meat into the "food value chain" in Nairobi.

Note. Data obtained from field survey (2026)

The research established a clear link between environmental stress and criminal opportunity. In Arid and Semi-Arid Land (ASAL) counties like Kitui and Turkana, the dry season is the most significant window of risk. As grazing lands near homesteads deplete, donkeys are forced into remote thickets and distant water points. This lack of proximity removes the natural layer of protection provided by the family unit, allowing thieves to monitor and steal animals with minimal risk of detection. Interestingly, while the dry season offers logistical ease for vehicles, the rainy season is strategically exploited in Kajiado and Mwingi Central; the noise of the downpour and the mud serve as a "natural cloak," masking the sound of intruders and obliterating trackable hoof prints.

Beyond the climate, the socio-economic calendar acts as a powerful catalyst for theft. The "festive market need" in November and December creates a lucrative surge in demand for meat and hides, often leading to large-scale, coordinated raids. This is further exacerbated by the academic calendar; the need for "quick cash" to cover school fees frequently drives individuals toward the illegal trade. While some administrative officers argue that the demand is "inelastic and year-round," the consensus among victims and community elders is that the intersection of climatic hardship and high-expenditure festive seasons creates a perfect storm for livestock loss. The following synthesis integrates the detailed qualitative data and specialized insights gathered from both Key Informant Interviews (KII) and Focus Group Discussions (FGD).

The research findings indicated a strong consensus among various Key Informants (KIs) regarding the seasonal nature of donkey theft and the illegal trade of equine products within the region. A farmer in Mwingi East identified the dry season as a primary window of risk, explaining that,

In Kitui, the *dry season* is the primary window of risk due to environmental vulnerability and economic strain. A farmer in Mwingi East explained that the lack of water forces donkeys into remote bushes, making them easy targets. This was supported by a Police Officer at Mwingi Central, who noted that criminal syndicates use dry riverbeds as transit routes during these months. The Probation Officer in Mwingi Central added that drought-induced economic hardship pushes individuals toward the trade, while a NGAO Representative noted that this period puts an operational strain on security patrols.

Beyond the climate, holiday cycles and academic calendars drive theft in Mwingi Central and Kitui Town. The research participants reported surges during *festive periods* when administrative oversight is thin. The Chief from Mwingi East specifically linked these spikes to the need for school fees or holiday cash, whereas the Chief from Mwingi Central and a Village Elder argued that the *rainy season* provides a natural "cloak" by muffling noise and washing away hoof prints. FGD participants in Mwingi East validated these patterns, noting that donkeys weakened by thirst are easier to round up. One of the participants observed thus:

“The dry season is characterized by a significant rise in these criminal activities. The lack of water near our homesteads forces us to graze our donkeys further into the bushes, which makes them highly vulnerable. The rainy season provides a natural ‘cloak’ for syndicates to move stolen donkeys out of the villages and toward the main transit roads.”

These empirical insights regarding the strategic synchronization of livestock crimes align with observations by Omwenga and Gikundi (2025), who noted that underground syndicates systematically exploit seasonal thin administrative oversight and peak demand windows to maximize illicit profits.

Conversely, these findings contrast with recent conclusions by Mwangi and Nyachae (2023), who argued that modern equine theft patterns are uniformly distributed across annual calendars due to continuous urban supply demands, rather than being accelerated by specific environmental conditions or socio-economic pressures. Ultimately, the utilization of natural weather disruptions to obscure movement tracks highlights a highly adaptive tactical approach that successfully evades localized law enforcement tracking networks (Kinyua, 2024).

The NPS representative for Mbeere South identified the *dry spell* as the most significant theft window along the Garissa-Nairobi axis, citing herd migration as a key factor. This was

corroborated by the NPS representative for Makima Division, whose records showed a direct correlation between receding water levels and increased theft reports. In Mwea, a Police Officer noted that dry ground facilitates the rapid movement of transit vehicles, though in Mwea it emerged that the inelastic demand for products ensures the trade remains a year-round threat. One participant observed:

“The dry spell represents the most significant period for theft activities along the Garissa-Nairobi axis... environmental conditions and the migration of herds create a high-volume window. There is a clear correlation between the receding water levels and the increasing frequency of theft reports.”

In Machakos, the trade is heavily influenced by high meat consumption during festive months and localized spikes in criminal activity. In an interview with a Police Officer and NGAO representative from Machakos both pointed to *November and December* as peak periods driven by end-of-year celebrations and minimal farming activity during the dry season. A Nyumba Kumi Elder highlighted a specific, high-intensity surge in July, where five donkeys were slaughtered in a single wave, causing significant community alarm. A participant asserted:

“...The theft is on the rise, especially during periods of high meat consumption like November and December... these fluctuations are closely linked to market demand. Theft incidents within our local jurisdiction were notably high during the month of July last year, five donkeys were discovered to have been slaughtered in a single wave ..”

Findings in Kajiado vary between unpredictable sporadic activity and distinct seasonal peaks. While the Public Health Officers and the NGAO representative argued that the trade is a persistent, year-round issue driven by constant demand from Nairobi markets, a victim of donkey theft suggested that the *rainy season* actually facilitates raids by muffling noise.

Conversely, the Association of Donkey Owners-Kenya (ADOK) and a Village Elder in Oloitikoshi identified *December* as the undeniable peak, citing massive logistics involving container lorries for export. FGD participants in Namanga also linked the proximity to the Tanzania border to a continuous flow of illegal business, a FGD participant observed:

“The situation is fuelled by the consistent and growing demand for donkey meat in Nairobi specifically, the Bama market and various high-end hotels that serve as the primary destinations. “The peak period for donkey theft is undeniably the

December holiday season. In December 2025 alone, we tracked five container lorries transporting the products for export.”

In Turkana, theft is driven by climatic stress, cultural practices, and external hide markets. In an interview with a Chief, it emerged that that *dry seasons* leave donkeys vulnerable in distant grazing fields, while festive and cultural seasons see spikes linked to 'Todong Lore' initiation ceremonies where youth steal livestock for bride prices. A Senior Chief reported a major spike between 2024 and 2025 due to a surge in market demand for hides in Lodwar, while a NGAO representative linked rises in *November, March, and April* to migratory movements toward the Uganda border. FGD participants and the Institute of Pastoralism Development and Research (IPDR) reiterate that while the threat is year-round, drought significantly reduces the natural protection afforded by proximity to the homestead. One FGD participant observed:

“Festive and cultural seasons see a spike in donkey theft, particularly following the 'Todong Lore' initiation ceremonies for the youth... to facilitate the remittance of bride prices. Donkeys are predominantly stolen during periods of severe drought because the search for water and pasture forces them to move far away from the safety of the homesteads.”

A representative from farming services in Nakuru reported that,

“Theft incidents do not follow a strict calendar but tend to rise, when the civil society is quiet about it and nothing is being reported by the media.”

A participant from the Nakuru media sector highlighted that the illicit donkey trade functions as a continuous "24-hour economy," emphasizing that donkey theft is not restricted by time, season, or specific periods due to the relentless international demand for donkey products. This perspective challenges the conventional argument that donkey theft is primarily seasonal often peaking during drought periods when pastoralists are desperate for income or during festive seasons when meat demand spikes.

To reconcile these conflicting viewpoints, it is necessary to distinguish between traditional subsistence-based theft and organized commercial donkey theft. While traditional livestock theft may follow seasonal cycles of environmental stress, the modern illicit donkey trade in Kenya is driven by fixed export quotas and global market

prices for *ejiao*, which do not fluctuate according to local weather patterns. Consequently, the "24-hour economy" reflects a shift toward industrialized crime where syndicates maintain constant pressure on donkey populations to ensure a steady supply for the shadow market, regardless of local seasonal variables.

A Police Officer at Mai Mahiu Police Station in Nakuru County reported that:

“Donkey theft incidents tend to rise during the "rainy season. The officer explained that, “perpetrators prefer this period because when it rains, there is grass, noting that a thief is unlikely to steal during a drought because they would not find food to feed the donkey.”

A NGAO representative from Subukia Location in Nakuru County reported that, *“theft and illegal trade in donkeys and related products get to the pick peak between October and December.”* This seasonal spike is primarily attributed to the height of maize plantations, which the Chief described as being "like a forest" that provides perfect concealment for criminals to monitor homes ("boma") and slaughter stolen animals within the fields.

The Chief further noted that during this period, labour opportunities decrease as farmers wait for crops to mature, leading to idleness. Conversely, when the rains begin, theft "goes down because there is a lot of work" and everyone is busy.

The rise in crime at the end of the year is also driven by increased market demand for meat and the financial pressure of the Christmas season, with the Chief remarking that *"people are looking for Christmas"* and the demand for livestock meat *"is also high."*

A Veterinary Officer in Narok highlighted that the temporal and logistical patterns of donkey theft are defined by a shift toward nocturnal operations and the avoidance of high-visibility corridors to bypass enforcement. The officer observed that:

"They transport them at night when people have slept. They also use routes that are not exposed, shortcuts just to make sure that they reach the market. They are becoming innovative; they don't want to take them on major highways"

3.2.4 Types of Donkey Products that are mostly Illegally Traded and Emerging Trends

The following analysis transitions to a detailed examination of the specific donkey products and emerging market trends reported by various stakeholders. The synthesis highlights a shift from simple hide extraction to a sophisticated, "zero-waste" approach that commodifies nearly every part of the animal for both local consumption and international industrial supply chains.

Table 7: Types of Donkey Products and Emerging Theft Trends by County

County	Specific Products Involved	Emerging Trends
Kitui (Mwingi East, Mwingi Central, Kitui Central)	Meat, Skins (Hides)	Shift to Consumption: High demand for uninspected meat in local food chains; skins remain a "high-value, low-volume" extraction for international gelatin markets.
Embu (Mwea, Makima)	Meat, Skins, Carcasses	Dual-Market Maximization: Simultaneous theft of meat to urban centers (Nairobi) and skins for export; "skin-only" approach in remote areas to maintain speed/stealth.
Machakos (Kithyoko, Matungulu, Masinga)	Hides, Meat, Bones, Hooves, Testicles, Heads	Zero-Waste Industrialization: Harvesting of bones for industrial chains; cultural use of testicles (libido/witchcraft) and heads (protective rituals) as specific niche drivers.
Kajiado (Kajiado West, Namanga)	Live animals, Meat, Hides, Intestines, Specialized Organs	Food Chain Integration: Use of intestines for sausage manufacturing; "interrupted operations" showing fluctuating demand between hides and total carcass harvesting.
Kiambu/Nairobi	Processed Meat, Hides, Bones, Intestines	Urban Distribution: Rapid funneling of illicit products into high-demand meat hubs

County	Specific Products Involved	Emerging Trends
		like Burma Market; illegal dumping of bones/waste in residential peripheries.
Nakuru(Njoro Nakuru West Naivasha Subukia & Mai Mahiu Nakuru East)	Meat (for steak) & Skins	Donkey meat is increasingly being mislabeled or "forced" upon consumers who mistake it for wild game like Punda milia (Zebra).
Narok	Meat and Skins	Donkey meat is increasingly being mislabeled or "forced" upon consumers who mistake it for wild game like Punda milia (Zebra).

Source: Data obtained from field survey (2026)

The qualitative data revealed a sophisticated evolution in the illicit donkey trade, characterized by comprehensive exploitation. While historical illegal slaughtering was largely driven by the international demand for skins ("ejiao"), current trends across Kitui, Machakos, and Kajiado show that criminal networks are now utilizing the entire animal. This "zero-waste" approach significantly increases the financial incentive for theft, as the total market value of a single stolen donkey now encompasses its protein, industrial raw materials (bones and hooves), and even specialized organs.

In Kajiado and Embu, reports indicated that donkey meat and intestines are being *laundered into legitimate markets as sausages or uninspected beef*, posing a severe public health risk. Furthermore, the emergence of niche markets such as the trade in bones for industrial use or specific body parts for cultural rituals in Machakos suggests that those involved are constantly adapting to exploit every possible money-making stream, leaving rural households with "nothing but the grief" of losing their primary livelihoods. The following section provides a detailed exploration of the lived experiences and administrative realities reported by Key Informants (KII) across the study areas.

In Kitui County, a strong consensus emerged regarding a dual-market system that targets both local protein consumption and international industrial demand. A Chief from Mwingi East reported that, "*the illegal trade had shifted its focus heavily toward consumption*", noting that, "*meat is the most frequently traded product due to a lack of oversight in local slaughtering.*"

This was corroborated by a Veterinary officer in Mwingi Central, who reported that, *“the trade of uninspected meat posed a severe risk to public health and made tracking the origin of products entering the food chain difficult”*.

Participants in the Mwingi East FGD validated these observations, one reported that, *“the remnants of donkeys found in the bushes confirmed that meat was being harvested for sale to unsuspecting buyers in neighboring areas.”* Tons of donkey bones strewn in the bushes are later collected and processed for bone meal.

These insights regarding the dual-market system defined by the coexistence of a regulated, formal economy where trade occurs under veterinary and legal oversight, and an illicit, informal sector where stolen donkeys are processed and sold clandestinely and the associated uninspected meat distribution channels align with research by the Kenya Institute for Public Policy Research and Analysis (KIPPRA, 2024), which highlighted that weak structural oversight in decentralized agricultural zones directly fosters the expansion of unregulated food commodity processing. Conversely, these findings contrast with documentation by Brooke East Africa (2023), which traditionally argued that illegal equine trade patterns are predominantly focused on cross-border skin smuggling networks rather than domestic urban meat consumption. Ultimately, this local shift to clandestine bush slaughter underscores a highly adaptive illicit market that effectively exploits gaps in retail food inspections to maximize profits.

Conversely, the Police Officer in Mwingi Central reported that, *“donkey skins had become a primary product for criminal syndicates because they were easy to conceal and transport.”* This observation was reinforced by a Probation Officer in Mwingi Central, who reported that, *“offender records consistently showed skins as the main driver for thefts.”* Synthesizing these reports, a NGAO representative from Mwingi Central reported that, *“both meat and skins were being traded illegally, meeting varying demands ranging from local meat outlets to organized skin theft rings.”*

Based on the findings from Kitui County, meat is the most frequently traded donkey product in the region, driven by a lack of oversight in local slaughtering process. The value of the animal has been reduced to its carcass, and this remained the primary driver of the theft reported on the roads. Donkey skins had become a primary product sought after by criminal syndicates

because they were easy to conceal and transport compared to the whole animal. Evidence of skinning in the field indicated that the trade was moving toward high-value extraction.

Research findings in Embu County highlighted a high-value extraction model centered on major transit corridors. The NPS representative from Mbeere South and Chiefs in Mwea reported that, *“donkey skins are the primary product involved in illegal trade along the Garissa-Nairobi highway, driven by international demand for gelatin.”* A participant in the Makima Division FGD reported that *“skin-only approach has been noticed in remote areas, where those involved harvest only the hides to move quickly and quietly through the bush while leaving carcasses to rot.”*

However, a transition toward total carcass exploitation was also reported. A NPS Officer for Makima Division reported that, *“both meat and skins are being traded simultaneously, making it difficult for officers to track the split goods.”* This was also noted by a veterinary officer in Mwea, who reported the emergence of informal markets where uninspected meat is sold to unsuspecting urban consumers. Furthermore, a Police Officer in Mwea and a ADS Representative reported that, *“those involved are no longer satisfied with a single product, instead utilizing the entire animal to maximize profit.”* A Village Elder reported that, *“this dual trade had increased the frequency of thefts, leaving households with no remaining livestock.* Findings in Machakos County indicated a highly organized "zero-waste" strategy. It was reported that, *“the entire animal including hides, hooves, and meat is harvested, leaving only intestinal waste.”* This was complemented by a NGAO Representative, who reported that, *“hides and meat were traded alongside specialized parts like testicles and heads, which were reportedly used in cultural rituals and witchcraft.”*

A participant in the Kithyoko FGD reported *“a disturbing shift toward total carcass utilization, where even bones were being collected and traded.”* This suggested that the syndicates were feeding into a broader industrial supply chain that moved beyond the simple sale of meat.

In Kajiado County, the trade was reported to be highly adaptive and integrated into the processed food industry. A Public Health Officer in Kajiado reported that:

“Inconsistent patterns at slaughter sites, where some incidents involved only the removal of skins and meat while others, such as a case involving thirty-four donkeys, were found with parts intact, suggesting interrupted operations.” A Village Elder from Oloitikoshi reported that, *“illegal traders targeted specific high-value components for rapid extraction to urban markets.”*

A significant development was reported by the Sub-County Police Commander in Kajiado, who reported that, *“donkey intestines were increasingly being utilized to manufacture sausages.”* This indicated a sophisticated integration into the local food supply chain that bypassed traditional meat markets.

The trade in Turkana County was reported to be largely hide-centric and cross-border in nature. The Chief of Oropoi reported that:

“Donkeys are frequently stolen and moved to Moroto, Uganda, for slaughter, after which the hides are smuggled back into Kenya.” Technical experts reported that, *“donkeys are predominantly smuggled across international and internal boundaries to satisfy a lucrative hide trade.”*

Participants in the Turkana FGD reported that the trade does not follow a seasonal pattern because the demand for hides remained active and lucrative year-round. This constant demand ensured that criminal elements were always seeking opportunities to strike, regardless of environmental conditions.

A representative from farming services in Nakuru noted that:

“The donkey skin is the most involved product in current theft activities because it is used to produce a traditional Chinese medicine called “Ejiao,” which is prized for its high gelatin content and purported anti-aging properties.”

Furthermore, while the skin *remains* the primary driver, the respondent identified an emerging trend targeting “the genitalia” for export as a libido booster, leading to a specific preference for male donkeys within the illicit trade networks. The mention of “genitalia” refers to the anatomical parts of the male donkey's reproductive system.

The illicit trade has expanded beyond the high-demand donkey hides which are traditionally sought for their use in traditional medicines like ejiao to include these specific body parts. The

criminal syndicates have identified a new commercial incentive based on the unfounded belief that these parts act as a "libido booster" or aphrodisiac. This has created a secondary market that drives the selective targeting of male donkeys, further incentivizing the theft of these animals by providing additional revenue streams for the illegal trade networks.

A Police Officer at Mai Mahiu Police Station in Nakuru County reported that the primary donkey product involved in theft is "the steak meat," specifically from the legs and ribs. The officer noted that perpetrators typically leave behind the "hides, intestines, heads, and ribs" at the scene, as they are specifically after the meat for "ease of transportation." According to the report, this meat is most commonly "ferried to Nairobi slaughter houses like Dagoretti and Bama" for sale.

A representative from Public Prosecutions in Narok County indicated that while the primary utility of donkeys remains transport, there is an emerging concern regarding the clandestine trade of meat and hides:

"I have heard that the hides from donkeys may be exported, and given that this area has a lot of hide trade, I wouldn't be surprised if that is happening."

3.2.5 Drivers of the Current Patterns in Theft and Illegal Trade in Donkey Skins and Related Products

The information provided in the Table below pertains to the specific county and subcounty levels, detailing the diverse socio-economic and systemic factors identified by respondents to influence theft and illegal trade in donkey skins and related products. It illustrates the multi-dimensional drivers of the illicit donkey trade as synthesized from administrative, technical, and community stakeholders.

Table 8: Drivers of the Illicit Donkey Trade by Region

County	Sub-county	Drivers of the Illicit Donkey Trade Identified
Kitui	Mwingi East	High global demand for skins, ready market accessibility, high profit margins for middlemen,
	Mwingi Central	High financial incentives (market price), weak enforcement of movement permits
Embu	Mbeere South	High demand for donkey transportation services.
	Mwea	Perception of donkeys as low-risk assets for theft and the desire for "fast money" through illegal sales.
Machakos	Kithyoko / Masinga	High urban demand for donkey meat in Nairobi and the presence of previously licensed slaughterhouse infrastructure.
	Mavoko / Matungulu	Gaps in highway law enforcement and the transition of donkeys into a "loss factor" during dry seasons to recoup value.
Kajiado	Kajiado West	Landowners incentivized by illegal slaughter payments (KES 20,000).
	Kajiado Central	Relentless international demand for skins (ejiao), high local meat demand, and interference from

County	Sub-county	Drivers of the Illicit Donkey Trade Identified
		high-ranking officials.
Kiambu	Kikuyu / Limuru	High beef prices driving the substitute market, systemic corruption among security officers, and low legal penalties.
	Ndeiya	Regulatory gaps classifying donkeys as "food animals" and consumer deception (masking donkey meat as beef).
Turkana	Turkana West Turkana Central	Cross-border hides smuggling (Uganda), doubling of hide prices by brokers (KES 10,000), and use of donkeys in dowry payments.
	Turkana North	Youth recruitment by donkey theft cartels and the high resale value of donkey hides in the shadow economy.
Nakuru	Njoro, Nakuru West, Nakuru East, Naivasha, Subukia & Mai Mahiu	High international demand for skins and non-deterrent fines/low penalties in courts.
Mombasa	Mombasa Port	Corruption and Patronage. Lack of coordination among government. Use of "cloned" container seals make it difficult to verify goods. Increased automation has also inadvertently created new security breaches that require inside information to exploit.

Note. Data obtained from field survey (2026)

Global Market Demand as a Driver for Donkey Theft

Global market demand serves as the primary catalyst for donkey theft, as the international trade in donkey skins driven largely by the production of ejiao and other traditional commodities has fundamentally altered the donkey's status. Once viewed strictly as an essential livelihood asset

for rural households, the donkey has been commodified into a high-value global product. This surge in international demand creates a lucrative incentive for criminal syndicates and opportunistic actors to orchestrate systematic theft, illicit slaughter, and large-scale trafficking. Consequently, this globalized pressure has fueled the proliferation of clandestine slaughter operations and the development of expansive cross-border trafficking routes, placing unsustainable pressure on local donkey populations (Mshelia, 2025; The Donkey Sanctuary, 2025; Nuwer, 2022).

From the information in the Table above, the research showed that while international demand for donkey skins remains a universal driver across all regions, the local facilitators of the trade are deeply rooted in specific socio-economic and cultural vulnerabilities. As shown by the figure below, lorries were intercepted along Garissa highway by multiagency security teams in March 2026, clearly indicating how global demand is fuelling illicit trade. According to a Chief in Mwingi East, *“ready market accessibility and high global demand for skins were the primary catalysts for theft, providing high profit margins for middlemen.”* This was supported by a veterinary officer in Mwingi Central, who reported that, *“high market prices have made donkeys more valuable as stolen goods than as working assets.”*

A Farmer from Mwingi East reported that, *“economic hardships, unemployment, and hunger pushed the youth towards criminal activities for quick financial gain.”*



Figure 5: Clandestine logistics networks; commercial transport vehicles intercepted along transit corridors in March 2026 loaded with bulk quantities of illicitly sourced donkey skins destined for export.

Source: Photograph taken by the researcher in March 2026 during fieldwork Garissa Highway.

Institutional and Regulatory Failures as Drivers for Donkey Theft

A primary institutional driver of the underground donkey trade is the manipulation and systemic exploitation of official transit documentation. Criminal networks routinely bypass or misuse standard livestock administrative frameworks to move stolen or illegally acquired animals seamlessly across county borders. Rather than operating entirely outside the law, the trade is enabled by weak enforcement capacities surrounding No-Objection Certificates and Livestock Movement Permits issued by decentralized authorities as shown in figure 6 and 7 on this report.

According to a Police Officer in Mwingi Central, *“weak enforcement of movement permits allowed seamless trade across county boundaries.”* Furthermore, a Probation Officer in Mwingi Central reported that, *“low judicial penalties failed to act as a deterrent, while a ADS Representative reported a culture of impunity due to critical legal gaps.”* These arguments are confirmed below by the sample documents of No-Objection Certificates and Livestock Movement Permits issued by decentralized authorities captured during data collection.

These administrative enforcement realities align with a study by the Kenya Wildlife Conservancies Association (KWCA, 2024), which verified that decentralized loopholes and porous regional boundaries significantly accelerate the unauthorized transit of illicitly sourced animal cargo. Conversely, these findings contrast with assessments by the Directorate of Veterinary Services (DVS, 2023), which argued that inter-county coordination frameworks and standardized movement permit verifications have successfully contained the illegal movement of livestock commodities.

The Devaluation of Donkeys as Low-Risk, High-Reward Assets for Criminal Exploitation

In Embu, a NPS officer from Mbeere South reported that, *“climate change and harsh economy created a vacuum for illegal traders to exploit.”* A NPS officer for Makima Division reported that the relatively low price of donkeys compared to cattle made them attractive, low-risk assets for thieves. A Village Elder in Mwea reported that, *“poor security practices, such as allowing donkeys to wander unattended, facilitated theft.”*

Additionally, a Police Officer in Mwea reported that,

“A pervasive greed for 'fast money' motivated individuals to engage in these criminal activities, seeking immediate wealth regardless of the legal or communal consequences.”

Financial Incentives, Market Demand and Operational Infrastructure

A veterinary officer in Machakos reported that, *“high urban demand in Nairobi creates powerful incentives for syndicates to bypass regulations.”* A NGAO Representative reported that donkeys were often viewed as “loss factors” during dry seasons because they consumed vegetation needed for cattle, making owners less inclined to protect them.

A Nyumba Kumi Elder in Kithyoko noted that, *“widespread unemployment among the youth was a major driver.”* A FGD participant in the same area reported that, *“the presence of the previously licensed slaughter house in Kithyoko provided a ready-made infrastructure for the current illegal trade.”*

The illicit donkey trade in Kajiado is primarily propelled by significant financial incentives that co-opt local landowners and administrative structures. Research findings indicate that the profitability of the trade is a decisive driver; as a NGAO representative noted, *“landowners were often incentivized to permit illegal slaughtering through payments as high as KES 20,000 per donkey.”* This high payout creates a direct economic motivation for individuals to facilitate the criminal activity, as the immediate financial gain from illegal slaughter far exceeds the traditional utility value of the animal.

The Urban Market Incentive, Skin Demand, and Illicit Transit Logistics

Furthermore, the local facilitation is sustained by a potent dual-market demand that provides a continuous pull for stolen assets. As shown in figure 6, local farmers in Kimuka, Kajiado County in May 2026 intercepted and burnt a lorry with skin and donkey meat. This is a reflection of the current demand of skins and meat by illicit traders.

A representative from Ewangatan Boy Child CBO reported that the trade is driven by “*a high-volume requirement for meat in Nairobi and a relentless demand from China for skins used as traditional medicine.*” These two markets one domestic and one international ensure that criminal syndicates have a guaranteed outlet for their products. The persistence of these drivers is reinforced by institutional enablers, such as “*interference from high-ranking officials*” which was reported to have complicated enforcement efforts, thus effectively providing a political shield that allows these high-incentive criminal operations to continue with minimal risk.



Figure 6: Evidence of underground transit infrastructure; a commercial vehicle intercepted and burned while transporting illicit donkey meat destined for terminal urban markets.

Source: Photograph taken by the researcher in March 2026 during fieldwork in Kajiado.

This financial pull is so strong that it overrides the operational risks for criminal networks.

As a Veterinary Officer for Narok County observed, the structural driver lies in the split international market:

“It is because of their skin, specifically for export purposes. The problem is legislation; the government is licensing exports while criminalizing slaughter, but there is no balance. Criminals are capitalizing on this.”

The persistence of donkey theft in terminal markets like Kiambu is driven by a combination of commodity substitution and systemic legal failures. Research findings indicate that the illicit trade is propelled by a market-driven "quick fix" for protein shortages; as a the NGAO Representative in Kikuyu reported, *“a lack of sufficient beef lead to donkey meat being used as a quick fix.”*

This demand is actively exploited through consumer deception, where the Public Health Officer in Kiambu asserted that *“Donkey meat was deliberately disguised as beef to exploit consumers.”* These economic drivers are reinforced by institutional enablers, with FGD participants identifying *“significant corruption among security officers”* as a primary factor abetting the trade. Furthermore, a Police Officer in Kikuyu noted that *“low bail amounts encouraged recidivism,”* creating a judicial environment where the financial rewards of donkey theft far outweigh the legal risks.

In Turkana, the drivers of the trade have shifted toward modern economic acquisitions and cultural incentives. The transition from traditional livestock values to a cash-based economy is a major catalyst, as FGD participant asserted that *“youth were abandoning traditional values to sell stolen donkeys for motorbikes.”* This motive for rapid asset acquisition is complemented by traditional drivers where *“theft was driven by retaliatory revenge and the use of donkeys for dowry payments,”* according to a Senior Chief in Turkana. These activities are further shielded by a *“critical regulatory gap”* identified by Kiambu participants, who noted that *“the donkey remained classified as a 'food animal' even after slaughterhouses closed,”* a classification that businessmen continue to exploit to mask their illicit operations.

In Turkana, market-driven incentives have made donkey theft increasingly lucrative; as FGD participant noted: *“Brokers had doubled the price of hides from KES 5,000 to KES 10,000, making the trade irresistible by the locals.”* This local price hike is fueled by the *“global demand for 'Ejiao',”* which the IPDR reported has escalated the frequency of theft.

In Nakuru, the representative of farming services confirmed that the high demand for skins has pushed the trade into a *“criminal way”* following the closure of official slaughterhouses, effectively shifting the market underground where profit margins remain high.

The persistence of these patterns is further enabled by a profound disconnect between international trade policy and domestic enforcement. The Veterinary Officer for Narok County engaged in the research identified this imbalance as a primary driver, stating: *“The government is licensing exports while criminalizing slaughter, but there is no balance. Criminals are capitalizing on this.”*

This regulatory contradiction creates a high-profit environment for illegal actors who face minimal risk due to an outdated judicial framework. The failure to gazette the African Union (AU) moratorium has forced the judiciary to rely on outdated laws, resulting in negligible fines. In Nakuru, these fines are as low as *“3,000 to 4,000 shillings,”* ensuring that offenders are released immediately; as one informant stated, *“anafuliza akiwa kotini”* and is set free.

Ultimately, the drive for profit remains the central catalyst for the trade's continuation. A representative of Public Prosecutions in Narok County indicated that the primary drivers are the *“historical infrastructure of the trade”* and the pursuit of *“a cheap way to make a profit.”* Even when fines reach *“30,000 shillings,”* the Veterinary Officer noted that criminals simply *“pay and continue with their operations,”* as the financial incentives provided by the skin export market far outweigh the current cost of legal penalties.

3.3 Mode of Operation (Modus Operandi) of Patterns in Theft and the Illegal Trade in Donkey Skins and Related Products

3.3.1 Strategic Planning and Execution of Donkey Thefts

The planning and execution of theft of donkeys across the sampled counties revealed a highly organized and professionalized criminal structure. Informants across various counties consistently identified a multi-staged approach that begins with intelligence gathering and ends with rapid logistical evacuation. The following table provides a geographical breakdown of these operational tactics.

Table 9: Analysis of Donkey Theft Planning and Execution Strategies

County	Sub-county	Operational Strategy and Planning Method
Kitui	Mwingi East	Strategic timing; recruitment of local youth for terrain knowledge; use of heavy rains to mask noise and wash away blood trails.
	Mwingi Central	Daylight reconnaissance using "spotters" disguised as water vendors or charcoal sellers; use of salt/fodder to lead animals quietly; rapid transport via Probox/lorries.
Embu	Mbeere South	Advanced deception where perpetrators disguise themselves as ordinary citizens to monitor both livestock and security patrol movements before striking.
	Mwea	Exploitation of vast geographical coverage and unmonitored terrain; establishment of "insider" networks to identify vulnerable herds and perfect raid timing.
Machakos	Machakos Central	Systematic disabling of security measures (poisoning guard dogs); targeting compounds along major highways for ease of access; use of professional brokers.
Kajiado	Kajiado Central	Exploitation of crowded marketplaces to target donkeys during owner distraction; use of local herders to move animals through rural corridors to clandestine sites.
Kiambu	Kikuyu Ndeiya	Market-Driven Orders: Dealers place orders for institutions; youth recruited

County	Sub-county	Operational Strategy and Planning Method
		to steal and slaughter locally.
Turkana	Turkana Central	Exploitation of the free-range grazing system; waylaying unattended animals in the wild; carcasses are buried while hides are funneled to international brokers.
	Turkana North	Implementation of a "conveyor belt" logistics system where youth groups across different villages coordinate the movement of animals in distinct, professional stages.
	Turkana West	Utilization of local community members to provide false information to search parties, ensuring the success of the operation by misleading recovery efforts.
Nakuru	Njoro Nakuru West Nakuru East Naivasha Subukia & Mai Mahiu	The operation is ran by a "cartel"
Narok	Boma	Implementation of a "conveyor belt" logistics system where youth groups across different villages coordinate the movement of animals in distinct, professional stages.

Source: Data obtained from field survey (2026)

Research findings indicated that in Kitui, theft is a highly professionalized nighttime operation. The Chief in Mwingi East revealed that the *"majority of these thefts are strategically timed between 12:00 A.M and 4:00 A.M"* to exploit the silence of the night.

This is preceded by daylight reconnaissance where, according to the Mwingi Central NGAO representative, spotters disguised as vendors *"identify homes with high donkey populations and minimal security measures."* Law enforcement and technical experts noted that thieves use salt

to *"lure donkeys quietly from their pens"* and prefer *"bush slaughtering"* to avoid the noise of moving live animals. Logistical speed is maintained by *"Probox"* vehicles positioned at road junctions, while participant in the FGDs held at Mwingi East highlighted that syndicates recruit local youth to *"silently dismantle wooden gates or cut wire fences."* Finally, a Farmer noted that operations often coincide with heavy rains to *"mask the sound of movement and wash away blood trails."*

The Chief of Mwingi East stated that, "syndicates strategically time their operations often between 12:00 A.M and 4:00 A.M to exploit the silence of the night. Furthermore, evidence showed that these groups often coordinate raids with heavy rains to mask the noise of the operation and wash away blood trails, thereby minimizing the risk of forensic detection."

The operational focus in Embu is on deep-cover reconnaissance and the monitoring of security protocols. The NPS officer in Mbeere South identified a sophisticated pattern of deception where *"perpetrators frequently disguise themselves as ordinary citizens to conduct reconnaissance."* This allows criminal networks to effectively track the movements of both the targeted livestock and the security patrols, ensuring they strike only when the risk of interception is at its lowest. Further, a Police Officer in Mwea observed that thieves take *"strategic advantage of the vast geographical coverage and expansive, unmonitored terrain to move stolen donkeys with minimal risk of detection."* The ADS Representative and Chief further noted that these syndicates establish robust *"insider"* networks with residents who *"provide the necessary 'insider' knowledge required to identify vulnerable herds and perfect the timing of the raids."*

In Machakos, donkey theft is a calculated, multi-stage supply chain that often involves the violent neutralization of security. The NGAO representative reported that the process typically begins with *"disabling security measures, such as killing or poisoning guard dogs to avoid detection,"* particularly in compounds near major highways.

The INADES representative described this as a professionalized network where *"strategic allies at the village level identify targets and monitor movement, while professional brokers coordinate the logistics"* to move animals through a system of intermediaries.

The trade in Kajiado leverages local herding expertise and crowded commercial hubs to mask illicit movement. A Village Elder in Oloitikoshi explained that, *"local brokers recruit local herders, who possess intimate knowledge of the terrain, to transport and deliver the livestock to clandestine slaughter sites."* Furthermore, the Ewangatan Boy Child CBO reported that thieves take *"advantage of moments when the owners are distracted"* to lead animals away. This process is not random but is instead facilitated by a specialized division of labor, where different individuals are assigned to distinct stages scouting, leading the donkey away, and immediate transport. The presence of these "ready-made" networks ensures that even as vigilance increases, the speed and coordination of the theft allow the trade to persist. The "busy marketplace" acts as a driver by providing both the supply of donkeys and the necessary cover for syndicates to operate within a crowd, making the process of illegal acquisition seamless and rapid.

The research findings showed a calculated approach to disabling security, the Chief of Mwingi East and the NPS representative of Mwingi Central stated, *"Systemic neutralization of physical and animal security, including the poisoning or killing of guard dogs in compounds near major highways. This established pattern ensures that the theft of animals can occur without alerting the owners or the community."*

Turkana's challenges are defined by the exploitation of the free-range system and an internationalized logistics chain. A Senior Chief and the Police Officer both observed that because donkeys graze unattended, youth *"waylay them in the wild to slaughter and skin them for the hide,"* which are then sold to brokers linked to international buyers in Lodwar. Community FGDs revealed that locals are often used to *"provide false information and mislead those attempting to trace the stolen animals,"* while the IPDR described a "conveyor belt system" where youth groups across villages coordinate the movement of animals as a highly organized logistics chain.

Planning and Execution of Theft

In Kiambu County, the planning of donkey thefts is characterized by a high-demand, market-oriented model that targets urban consumers. This operational structure relies on a decentralized, tiered division of labor to minimize the risk of detection. Local authorities report that criminal networks leverage the local *boda-boda* economy to facilitate rapid movement and logistics. According to an NGAO representative, specialized recruitment is a core component

of this strategy, where *"youths are used to steal, slaughter, and transport the meat in sacks on Boda-bodas."* This model allows for the quick extraction of animals from homesteads and efficient transit to processing sites, often avoiding main road checkpoints by utilizing secondary feeder routes.

Public Health and Environmental Implications of Illicit Processing

The clandestine nature of donkey processing in Kiambu poses significant public health and environmental risks, particularly regarding waste management and disease control.

The disposal of processing by-products is often unmonitored and rudimentary; in late 2025, for instance, discarded bones and intestines were discovered in Githunguri and Baraniki. Local officials have raised alarms regarding these practices, with one NGAO representative noting that *"this improper disposal might cause disease outbreaks in case the donkey had anthrax."* Furthermore, the processing chain involves highly specialized tasks that occur in remote, unregulated settings to avoid discovery. This was illustrated by a 2024 arrest in Ndonyo, where a woman was apprehended while being *"tasked with drying donkey hides in readiness for the market,"* highlighting the sophisticated, multi-stage nature of the underground hide trade.

The findings in Boma suggest a sophisticated and protected operational environment for donkey slaughter. The Assistant Chief in Boma identified a "cross-regional" execution strategy, reporting that *"donkeys are stolen elsewhere and brought to Ndeiya in lorries for slaughter."* Critically, the official highlighted a breakdown in enforcement or active complicity, stating that this illicit processing is sometimes *"done under the guard of police officers,"* indicating that the planning phase may involve the neutralization of local security or the recruitment of rogue elements to ensure the slaughter remains uninterrupted.

According to a representative of Farming service in Nakuru,

"Anything that is illegal has its own cartel. Starting with the sourcing stage, there are individuals who source the donkeys and sell them to traders, who then coordinate with the main culprit. This person is in charge of the illegal slaughter and the skinners, organizing how the hides move from the ground to the slaughter site, while the entire web is cushioned by the involvement of transporters and senior security officers."

3.3.2 Logistics of Movement: Transporting Illicit Donkey Products

The analysis below categorizes the specific motorized and manual transport methods used by theft syndicates across various counties and sub-counties. Every administrative area mentioned in the descriptive text from the rural stretches of Mwingi to the urban centres of Kitui Town and the borders of Turkana is represented below to illustrate the diverse logistical strategies used to evade law enforcement.

Table 10: Transport Methods and Logistics by County and Sub-County

County	Sub-County / Division	Specific Transport Methods Reported	Tactical Advantage & Context
Kitui	Mwingi East, Mwingi Central, Kitui Town (Central), Kitui South	Trekking (on foot), Toyota Probox cars, Lorries, Motorcycles (reconnaissance), Trucks	Manual movement through dry riverbeds for silence; Toyota Probox Cars used as "signatures" to blend with regular traffic; Kitui Town–Muguoto route utilized for rugged transit to bypass formal grounds.
Machakos	Machakos Central, Matungulu, Masinga, Mwala, Kithyoko	High-capacity Trucks, Motorcycles (Bodabodas), Trekking (on foot), Lorries	Initial extraction on foot via hidden paths; transition to motorcycles with products concealed in large sacks; fortified compounds used for slaughter before motorized exit.
Embu	Mwea (Makima Division), Karaba,	Toyota Probox, Lorries, Tuk-tuks, Trekking (on foot)	Tuk-tuks used for inconspicuous local ferrying; Toyota Probox cars favored for rapid, discreet extraction across sub-county lines; trekking used in porous forest boundaries.
Kajiado	Kajiado West (Kikonyoki, Ewaso Kedong), Kajiado Central, Namanga, Ngong, Kiserian	Lorries, Trucks, Trekking (on foot), Motorcycles	Large-scale movement of live donkeys across the Tanzania border; trekking through remote fields in Kajiado West; Birsil Market serves as a hub for international transit to Ethiopia.

County	Sub-County / Division	Specific Transport Methods Reported	Tactical Advantage & Context
Kiambu	Kikuyu, Limuru, Ndeiya	Lorries, Modified Station Wagons (Probox), Trucks Boda-bodas / Toyota Probox cars	Rapid transit from secluded slaughter sites (Karlo area) to high-demand urban markets like Burma in Nairobi; dumping of waste in Githunguri/Baraniki via motorized transport. Meat put in sacks and moved through Ngong Road to urban slaughterhouses/markets.
Turkana	Kibish, Kakuma, Oropoi, Nawountos	Trekking (on foot), Small Motorized Vehicles Toyota Vitz" and "hybrid"	Movement across internal borders (Isiolo/Samburu) and international boundaries (Uganda/South Sudan) using porous, unmonitored land routes.
Nakuru	Njoro Nakuru West Nakuru East Naivasha Subukia & Mai Mahiu	Toyota Proboxes, bodaboda and lorries	Donkeys/meat put in sacks are used to put meat, transported to Naivasha, Nairobi and other urban slaughterhouses/markets
Narok	Narok North, Central, East, Mulot	Trekking (on foot), Small Motorized Vehicles	Movement across internal borders

Note. Data obtained from field survey (2026)

In Kitui, the initial extraction relies on "low-profile" manual movement to bypass security. According to the Assistant Chief from Mwingi East, *"stolen donkeys are primarily moved by foot from the point of theft to hidden consolidation areas"* via dry riverbeds and thickets. A Police Officer in Mwingi Central noted this allows thieves to *"move silently through the landscape,"* while a local Farmer added that walking avoids the *"noise of engines"* that would alert homesteads at night.

For rapid extraction, the Chief identified the Toyota Probox as a signature tool because these *"small, fast cars are ideal for navigating local roads while carrying carcasses or skins discreetly."* A NGAO representative noted that *"trucks are occasionally utilized"* for high-volume transport.

Logistics in Narok and Nakuru are characterized by heavy-duty transport and manoeuvrable local distribution. NPS officer from Narok and another Nakuru Counties reported that *"lorries*

are the primary means used for large-scale movement," facilitating the bulk transport of live animals or carcasses across county borders. In contrast, for localized and clandestine movement, FGD participants in Kajiado identified the use of tuk-tuks, stating they provide a *"manoeuvrable and inconspicuous way to move donkey products"* under the guise of transporting legitimate goods like charcoal or water.

Further results showed that traffickers exploit the vast, unmonitored terrain through a combination of trekking and modified vehicles. A Chief from Narok observed that *"trekking donkeys on foot remains a common practice, especially when moving donkeys through porous forest boundaries"* where patrol vehicles cannot reach. To move the resulting meat and skins, Police and Village Elders identified Toyota Proboxes as the preferred medium, specifically noting that these vehicles are *"easily modified or packed to conceal illicit cargo"* by removing rear seats or using tinted windows to appear as ordinary commuter cars.

The logistical chain in Narok is sophisticated, involving night-time transit and biological waste disposal. They detailed a "nocturnal movement" tactic using lorries for live animals and Proboxes for products to *"avoid detection by authorities and take advantage of reduced surveillance on the highways."* A Nyumba Kumi Elder in Kajiado described a two-stage process where animals move by foot to secluded sites before being shifted to motorcycles (bodabodas).

In Turkana, the logistical chain is a highly organized, multi-stage "conveyor belt" system that spans vast distances. The IPDR highlighted that the movement of stolen livestock is organized between youth groups across different villages, acting as a *"conveyor belt system until the animals reach their final destination."* The Senior Chief and Veterinary officer noted that after donkeys are waylaid and slaughtered in the wild, the hides are funnelled through a network that specifically *"sells to the local brokers of Chinese nationals in Lodwar,"* indicating a professionalized logistics chain that connects remote grazing lands to international export points.

In Kiambu, the transit model is characterized by high-speed delivery to the Nairobi metropolitan markets. The NPS officer in Kikuyu detailed a specific supply chain where *"the meat is put in sacks and transported in Probox and motorbikes through Ngong road to Ndonyo slaughter house where it's later distributed to Burma and other outlets."* This rapid extraction

is supported by large-scale logistics; a Focus Group Discussion (FGD) participant in Kiambu noted that *"the donkeys were being stolen from Kajiado and brought in lorries in Ndeiya then slaughtered around Mirithu area."* This cross-county movement highlights a "theft-to-market" pipeline that exploits the proximity of Kajiado's rangelands to Kiambu's urban-fringe slaughter sites.

A representative of Farming service in Nakuru noted,

"They use probox, motorbikes, and even Lorries depending on the quantity; for instance, a lorry was found with 110 carcasses. These people use any kind of way of transporting, often without approved carrier boxes, and they disguise their movement to avoid inspection. They prefer specific means based on the volume, using motorbikes for smaller amounts and lorries for large quantities, moving at times like Friday nights to avoid enforcement and ensure the products don't stay until they start stinking."

A Police Officer from the Crimes Office at Mai Mahiu Police Station in Nakuru County reported that perpetrators prefer using "small cars like Toyota Vitz" and "hybrid" vehicles for transporting stolen donkey products. The officer noted that these specific models are utilized to facilitate the movement of meat to markets while maintaining a low-profile during transit.

3.3.3 Evasion and Counter-Detection Strategies

The evasion strategies employed by donkey theft syndicates are not merely opportunistic but represent a sophisticated "operational camouflage" that integrates temporal shifts with the subversion of legal systems.

Table 11: Strategies for Avoiding Detection by Authorities and Community

County	Sub-county / Area	Evasion and Detection-Avoidance Strategy
Kitui	Mwingi East & Central	Geographical Distancing: Selling stolen stock in far-flung markets to break the local chain of recognition; operating during household routines (market days/communal events).
	Kitui Town	On-site Processing: Slaughtering in thickets to transport hides/meat in unmarked containers, stripping the animal of identifying marks before reaching roads.
Kiambu	Kikuyu, Lari & Githunguri	Product Mislabeling: Transporting donkey carcasses disguised as "beef" and utilizing high-altitude weather (fog/rain) to mask nighttime movement.
Embu	Mbeere South & Makima	Route Diversification: Operating between 3:00 AM and 4:00 AM; using remote paths that bypass established police stations and administrative posts.
Machakos	Machakos Town	Sensory Neutralization: Slaughtering near sewage plants to mask odors; using pigs as biological disposal systems to consume solid remains.
Kajiado	Kajiado West & Central	Systemic Compromise: Using bush pathways to avoid formal security;

County	Sub-county / Area	Evasion and Detection-Avoidance Strategy
		bribing officers at checkpoints to secure "green lights" for uninspected transit.
Nakuru	Njoro Nakuru West Nakuru East Naivasha Subukia & Mai Mahiu	Offenders bypass detection through "compromised" high-ranking "bosses" who leak "strategies" to the ground, causing "slaughter" operations to vanish before raids.

Research findings in Kitui indicate that offenders rely on spatial and temporal displacement to sanitize their activities. The Chief in Mwingi East noted that a primary tactic is the *"displacement of the stolen donkeys; criminals ensure they sell the stolen donkeys in markets located far away from the original theft sites to prevent identification by the owners."* This is complemented by precise timing; a Probation Officer in Mwingi Central observed that these groups operate when residents are away, such as during *"communal events or market days, minimizing the risk of physical confrontation."* To bypass highway inspections, a NGAO representative in Narok reported the frequent use of *"unmarked vehicles and private cars that lack commercial branding."* Furthermore, Veterinary Officers in Kitui highlighted that *"bush slaughtering"* allows traffickers to transport only hides or meat, which effectively *"strips the donkey of its identifying features such as brand marks"* before it reaches a main road.

In Embu, evasion is built on a combination of route diversification and identity deception. Representatives from the NPS officer in Mbeere south and another in Makima highlighted that offenders operate between *"3:00 AM and 4:00 AM"* and utilize *"unfamiliar or remote routes that stay well away from established police stations."* Participants in the Makima FGDs revealed a heavy reliance on *"local contact persons who provide insider intelligence regarding the movement of owners."* In Mwea, the Chief and local police reported that traffickers often *"disguise themselves as ordinary citizens to blend into the community"* and utilize unlabelled vehicles. A particularly deceptive tactic noted in Mwea involves *"slaughtering the stolen donkeys within the area of theft and transporting the carcasses as beef meat,"* making it nearly impossible for authorities to identify the illicit origin through visual inspection alone.

The evasion strategies in Mombasa are characterized by sophisticated forensic and administrative subversion. A NGAO representative for Mombasa outlined a process where offenders *"collaborate with abattoirs and maintain ready transport on standby to ensure a*

quick exit," often using false documentation to facilitate transit.

An INADES representative noted that traffickers frequently *"bribe police officers to secure safe passage through checkpoints"* and masquerade as legitimate traders. Most notably, the Sub-County Police Commander detailed a strategy of environmental masking, where syndicates conduct slaughtering *"near sewage plants and dispose of liquid waste directly into rivers"* to neutralize sensory evidence. Additionally, these groups utilize a network of local informers and use *"pigs to consume any solid remains, ensuring that no physical carcasses are left to alert the public."*

Evasion in Kajiado is facilitated by the exploitation of regulatory loopholes and institutional compromise. A Public Health Officer in Kajiado West detailed how offenders' maneuverer through *"dense bushes and unpopulated areas"* to reach clandestine slaughter sites. While the outlets in Nairobi may possess "correct" documentation to create a facade of compliance, the Ewangatan Boy Child CBO identified financial compromise as a major factor, stating that *"police officers are often compromised, regularly accepting bribes and allowing the illegal transportation of donkeys through checkpoints."* This culture of compromise ensures that even when traffickers are intercepted, administrative hurdles are bypassed through financial settlements.

In Turkana, the primary evasion tactic involves the manipulation of community information to protect the "conveyor belt" logistics chain. Community FGDs revealed that local residents are often used to *"provide false information and mislead those attempting to trace the stolen animals."* This ensures that while recovery teams are sent in the wrong direction, the organized youth groups can move the animals or hides toward international brokers in Lodwar without interference.

The findings in Boma suggest the use of "legal mimicry" to create a veneer of legitimacy. The Assistant Chief in Boma and ADS representatives observed that offenders manage to obtain *"official permits from the county government."* When intercepted, they produce these legitimate documents to validate their activities, making it extremely difficult for law enforcement to distinguish between legitimate operators and criminal elements.

The Association of Donkey Owners-Kenya (ADOK) identified highly specialized forensic

countermeasures used by syndicates. These include transporting donkeys in lorries with *"number plates intentionally obscured by smearing them with oil"* to avoid identification by witnesses or cameras. Furthermore, following a delivery, drivers meticulously *"clean the vehicles with water and soap to remove any physical evidence, such as odours or biological residue,"* ensuring the vehicles appear clean if stopped for inspection later.

A representative of Farming Systems in Nakuru explained that *"within the same agencies we have very dedicated officers, but you can't go against your boss when your boss is the one to attack."* Information is leaked the moment it leaves the *"boardroom"* so that by the time enforcement arrives, *"even the bones that were there are removed."* The traders also exploit legal gaps and *"forged documentation,"* using excuses like *"breeding"* to obtain movement permits or taking advantage of the fact that the donkey is often not a *"specified animal"* in certain transit laws.

Research findings indicated that logistical speed is maintained by using small, fast vehicles like 'Toyota Probox' positioned at strategic road junctions. This established method allows for the rapid evacuation of carcasses or hides before dawn, often bypassing major checkpoints through 'panya routes.'" The Veterinary Officer in Nakuru County stated, *"Exploitation of High-Speed Transport and 'Toyota Probox' Logistics:*

The NGAO representative for Machakos detailed the adaptive strategies employed by illegal traders to evade localized enforcement and proposed a more unified security response:

"When faced with increased enforcement or community intervention, traffickers frequently disappear from the immediate area and relocate their operations to different regions, at times even crossing the border into Tanzania to escape jurisdiction."

The Sub-County Police Commander detailed the highly adaptive and evasive strategies employed by illegal traders within Narok County to circumvent law enforcement and preserve their illicit operations:

"Our observations indicate that illegal traders maintain a sophisticated counter-intelligence network, employing dedicated informers who constantly brief them on the movement of security vehicles and the planning of raids.

In Nakuru County, Naivasha sub-County, a NGAO officer mentioned that

"When these illegal traders receive a tip-off regarding an imminent security operation, they immediately release the donkeys from their walled holding places into nearby fields, making it appear as though the animals are merely grazing and thereby stripping us of the evidence needed for an arrest.

A Public Officer in Kiambu County added by saying that

"Illegal traders have strategically shifted their processing sites to remote areas with poor road connectivity, specifically to delay our arrival and provide them with a clear window for a quick escape."

In an Interview with, an Assistant Chief of Kajiado, acting as a primary administrative authority, detailed a sophisticated psychological and political defence mechanism that traffickers employ to bypass local security checkpoints and administrative hurdles:

"When enforcement efforts or community interventions disrupt their operations, illegal traders respond by leveraging high-level social and political capital. They frequently make calls to prominent people or strategically invoke the names of influential figures individuals who are widely considered beyond suspicion to intimidate local officers. By associating their activities with names that cannot be easily questioned or doubted, they create a 'shield of legitimacy' that allows them to continue their illegal trade even in the face of direct confrontation by local authorities."

The NPS representative in Turkana stated, "High-Level Cartel Coordination and Security Neutralization: Research findings established the existence of a 'cartel' structure that coordinates the entire supply chain from sourcing to slaughter. Disturbingly, reports indicated that some illegal processing is done under the 'guard' of rogue security elements, suggesting the planning phase includes the recruitment of officials to protect slaughter sites."

The Nyumba Kumi Elder in Machakos identified the methods used by traffickers to maintain operational invisibility, reporting that,

"To successfully avoid detection by both the authorities and our community members, the perpetrators primarily utilize secluded railway line routes where human traffic is extremely sparse... furthermore, the success of these theft operations often relies on a level of community collusion."

In Kajiando, the Sub-County Police Commander revealed that some operators maintain *"pigs on-site specifically to eat the intestines and other remains"* as a biological disposal system to eliminate physical evidence.

3.3.4 Collaborative Networks Facilitating Patterns in Theft and the Illegal Trade in Donkey Skins and Related Products

The networks driving donkey theft and illegal trade are characterized by a sophisticated hierarchy of internal and external collaborations that integrate local actors with powerful institutional figures.

Research findings showed that the illegal trade of donkeys and their products in the Counties is facilitated by a sophisticated network of collaborators ranging from local agents to professionals within the legal and security sectors.

Table 12: Networks and Levels of Collaboration

County	Sub-county / Area	Primary Internal/External Collaborators	Role in the Criminal Hierarchy
Kitui	Mwingi East & Central	Agents, Corrupt Police, Lawyers.	Regional Brokers: Bulk buying for the Maasai community; legal stalling to exhaust complainants.
Embu	Mwea, Mbeere South & Makima	High-level Gov. Officials, Agents, Local "Insiders."	Institutional Protection: Creating an "umbrella" for traffickers; masking origins with "cleansed" documents.
Machakos	Machakos Town	International Buyers (China), Local Scouts, Transporters.	Global Supply Chain: Professionalized flow from village identification to international skin export.
Mombasa	Mombasa Town	International Buyers (China), Local Scouts, Transporters.	Logistical Export Model: Focused on the consolidation of processed

County	Sub-county / Area	Primary Internal/External Collaborators	Role in the Criminal Hierarchy
			products for international shipping and export.
Kiambu	Kikuyu,	Urban Meat Dealers (Nairobi), Idle Youth, Senior Brokers.	Demand-Driven Orders: "Top-down" orders for institutions; youth hired for high-risk slaughter/transit.
Kajiado	Kajiado West & Central	Compromised Police, Local Herders, Village Brokers.	Systemic Compromise: Exploiting herding expertise and "green lights" at checkpoints via financial settlements.
Turkana	Lodwar & North	Chinese Brokers, Youth Relay Groups, Community Informants.	"Conveyor Belt" Relay: Multi-village coordination to move hides toward international hubs in Lodwar.
Nakuru	Njoro Nakuru West Nakuru East Naivasha Subukia & Mai Mahiu	Urban Meat Dealers (Nairobi), Idle Youth, Senior Brokers.	Demand-Driven Orders: "Top-down" orders for institutions; youth hired for high-risk slaughter/transit.

Note. Data obtained from field survey (2026)

Research findings in Kitui indicated that the trade is driven by intermediaries who bridge the gap between local theft and regional markets.

According to the Assistant Chief from Mwingi East identified a specific key figure, noting that *"a key figure in this network is an agent known to buy stolen donkeys in bulk for transport and sale to the Maasai community*. Technical experts in Kitui reported that criminals *"network with corrupt police officers to successfully bypass mandatory inspections on the roads,"* while the Probation Officer in Mwingi Central observed that syndicates *"collaborate with lawyers to intentionally prolong court cases"* as a tactic to exhaust the resources of complainants.

In Embu, the collaboration is structured around a "seller-agent" model that provides a layer of anonymity for the perpetrators. A representative from the ADS reported that this relationship functions as the primary link where agents act as intermediaries to *"mask the origin of the donkeys from community members, making it appear as though they are being moved by legitimate traders."* FGD participants in Makima emphasized that these agents possess *"legitimate-looking documents"* to move stolen stock through checkpoints.

Furthermore, the Chief in Mwea Sub-county provided a critical analysis of institutional barriers, noting that offenders *"collaborate with influential individuals within the government to protect their operations,"* creating an *"umbrella of protection from 'big people'"* that paralyzes local security responses.

The network in Machakos is a professionalized hierarchy that integrates local scouts with global demand. The Veterinary officer detailed a web involving *"local scouts, brokers, transporters, compromised police officers, and butcheries"* who coordinate movement through established corridors. The INADES representative further articulated that this operation is ultimately *"fuelled by international buyers, particularly those from China, who represent the primary market for donkey skins."* This was corroborated by an FGD participant in Kithyoko, who described a seamless flow from village-level identification to international export.

In Kiambu, the network is defined by a "demand-driven" collaboration between urban meat dealers and local youth. A NGAO representative in Kikuyu revealed that *"meat dealers based elsewhere put in an order for donkey meat,"* which triggers a local recruitment process.

Syndicates in Kiambu leverage a specialized division of labour where youth are hired to handle the high-risk "slaughter and transit" phase, while senior brokers manage the distribution to unsuspecting outlets in Nairobi, such as Burma market. This indicates a "top-down" hierarchy where the financial controllers remain detached from the physical crime.

Collaborations in Kajiado exploit the intersection of traditional herding and institutional corruption. The Public Health Department and Ewangatan Boy Child CBO identified a "functional linkage" between certain community members and offenders. A Village Elder in Oloitikoshi explained that *"local brokers recruit local herders, who possess intimate knowledge of the terrain,"* to facilitate movement. This is sustained by a *"culture of*

compromise" at security checkpoints, where financial settlements allow uninspected animals to pass, effectively providing a "green light" for theft.

Turkana's network operates as an internationalized "conveyor belt." The IPDR and local FGDs described a multi-village relay system where youth groups coordinate to move animals toward Lodwar.

The Senior Chief and Livestock Officer noted that this network specifically funnels products to "*local brokers of Chinese nationals*," who represent the apex of the hierarchy in the region. Local residents are further integrated into the network to provide "*false information*" to authorities, ensuring the chain remains unbroken by search or recovery efforts.

In Njoro and surrounding areas within Nakuru, such as Naivasha, Subukia, and Mai Mahiu, the illicit trade is sustained by a hierarchical collaborative network linking urban meat dealers in Nairobi with local actors. A NGAO representative and veterinary officer noted that;

"These operations are defined by demand-driven orders, which function as "top-down" mandates for local institutions. Within this framework, the labour is highly specialized, with Idle Youth actively recruited by Senior Brokers to execute the most dangerous phases of the operation, specifically the high-risk slaughter/transit of animals. This coordination ensures that the supply chain remains responsive to external urban demand while insulating the primary dealers from the immediate risks associated with field-level theft and slaughter."

3.4 Impacts of Theft and the Illegal Trade in Donkey Skins and Related Products

Findings demonstrated that the theft and illegal trade in donkeys and related products produced long lasting impacts across environmental health, livelihoods, agriculture, social cohesion, and community security. Across study counties, the loss of donkeys created problems as households did not only lose their primary transport and income asset but were also simultaneously facing environmental contamination and public-health risks from illegal slaughter practices. Below is a highlight of some of the impacts of the illegal trade.

3.4.1 Environmental pollution and public health risks

Across the study counties, pollution of water sources by decomposing carcasses and air (bad smell) emerged as one of the most consistent effects. Respondents observed that, illegal slaughter leaves offal and bones in grazing areas, turning farmland and rangelands into

biohazards that attract scavengers and contaminate soils and kitchen gardens.

In Ndeiya Kiambu County community members observed that, there has been an increase of hyenas in the area which created fear to locals and especially for night movements. While there are no official Kenya Wildlife Service (KWS) reports specifically documenting hyena attacks in the Ndeiya area of Kiambu County between 2024 and 2025, public concern regarding human-wildlife conflict has been prominent across the wider Kiambu region.

Official KWS interventions during this period primarily focused on Juja Sub-County, where the agency launched the "Operation Ondo Fisi" initiative to address aggressive behaviour, which was linked to factors such as abandoned quarries providing hideouts, improper waste disposal attracting scavengers, and the confirmation of rabies in local hyena populations. Consequently, the KWS has urged residents in high-risk areas to prioritize safety by avoiding night movement, securing livestock in predator-proof pens, and promptly reporting wildlife sightings to the emergency hotline, 0800 597 000, to facilitate professional assessment and mitigation by the Problem Animal Management Unit.

FGD participants in Embu, equally reported that rotting carcasses left in the bush *"attract hyenas and stray dogs closer to human settlements, endangering both children and the remaining donkeys."*

The Veterinary Officer in Machakos and the Veterinary Officer in Kitui Town stated, *"Public Health Risks from Uninspected Meat noting that the clandestine nature of 'bush slaughter' bypasses all veterinary oversight exposing consumers to diseases and bacterial contamination, such as anthrax and worm infestations due to the unsanitary conditions of slaughter and the lack of necessary health inspections by public health experts."*

The Assistant Chief Kajiado reported:

"There is significant pollution of rivers caused by disposal of rotten donkey carcasses into water bodies... decomposing organic matter leaches directly into the flow used by both people and livestock."

A Veterinary Officer in Kiambu reinforced the effects:

“Decaying remains lead to severe air pollution... indicating high levels of bacterial decomposition that threaten respiratory health.”

Police testimonies confirmed the disposal patterns:

“Carcasses dumped in thickets and riverbanks contaminate water sources, forcing residents to travel further for safe water or risk waterborne diseases.”

Public-health concerns were repeatedly linked to clandestine slaughtering and distribution networks of donkey meat. These findings position the illegal trade as a food safety crisis affecting both rural and urban populations. Secondary contamination risks for uninspected meat were also highlighted. Public health officers observed that, meat is packed in dirty sacks without refrigeration, allowing bacteria to multiply before reaching consumers. The health officials also warned of zoonotic disease transmission, anthrax risks, worm-infested meat entering food chains, donkey meat being sold as beef thus undermining consumer trust.

A Veterinary Officer warned:

“Consumption of uninspected meat poses a grave risk... there is no way to ensure animals are disease-free or that meat is not contaminated.”

A NGAO representative added:

“Any donkey meat sold is inherently unregulated and bypasses the public-health safety net.”

3.4.2 Disruption of Household Livelihoods and Local Economies

The findings of the study establish that the illegal trade in donkey and products not only threatened the livestock economy but also constituted a significant and growing threat to rural and urban food security. Communities consistently described donkey as the central engine of rural micro-economies and many households reported zero-balance income overnight following theft of donkeys.

A Chief in Narok county reported this on the impact of donkey theft on livelihoods:

“The loss of donkeys drastically reduces the quantity of water available at homes... the physical labour required becomes impossible.”

FGD participants explained:

“What used to take a donkey thirty minutes now takes a mother or child half a day.”

Judiciary officers confirmed broader economic paralysis:

“Families once self-sufficient suddenly cannot move goods to market or pay school fees, pushing them into structural poverty.”

A NGAO officer in Embu added:

“Farmers cannot move harvests before they perish... months of labour are lost.”

Findings of the study equally noted that communities shifted from self-reliance to expensive alternatives. Local administrators observed that communities were now faced with various challenges including; increased reliance on costly motorized transport, higher water prices (communities in Ukambani region reported up to KSh 200 per drum), panic selling of remaining donkeys at reduced prices due to fear of theft. This created economic dependency and deepening poverty cycles.

A DCI representative noted:

“Farmers sell remaining donkey stock at panic prices due to fear of theft.”

The participants of the FGD in Mwea Sub-county and in Turkana stated that, *“the loss of donkeys places a disproportionate physical burden on women and children, tasks previously handled by donkeys such as fetching water now require half a day of back-breaking manual labour, leading to 'time poverty' that prevents women from engaging in other productive activities.”*

3.4.3 Agricultural Disruption and Food Insecurity

Study findings confirmed that donkey theft created a break down in rural supply chains. Respondents noted that, in some remote areas, donkey is the only viable link between the farm gate and trade centre where without it harvests rot and farmers suffer great loss.

Discussions with farmers emphasized the agricultural consequences such as loss of donkey manure which contributed to reduced fertilizer availability thus, compounding productivity losses.

A farmer in Nakuru county in an FGD reported:

“Without donkeys we cannot prepare land in time for rains... crops wither because we cannot ferry irrigation water.”

A security officer in Kiambu county added:

“Bush slaughter damages seedlings and contaminates kitchen gardens.”

Disruptions in agriculture had created “time poverty” FGD participants in the counties of study emphasized that this "time poverty" created by the theft traps families in a cycle of subsistence, as the energy required to simply fetch water leaves no room for agricultural activities which directly affects agriculture.

Farmers in Kitui provided a direct account of the agricultural crisis triggered by the loss of these animals, reporting that,

“Donkeys are vital for ploughing our fields and transporting water for irrigation, especially in areas where manual labour is insufficient to maintain a productive farm. When a donkey is stolen, the entire planting cycle is disrupted; we cannot prepare the land in time for the rains, and our crops wither because we lack the means to ferry enough water from the distant riverbeds to the farms.”

3.4.4 Gendered and Household Labor Burdens

The shift from donkey aided transportation to manual transportation disproportionately affected women and children. Women and children were subjected to carrying water and firewood manually, reinforcing regressive gender roles and reducing opportunities for education and economic participation. In Turkana respondents reported how women were forced to walk long distance looking for water and transporting sick children and elderly to hospitals, equally in Kitui farmers reported how women are forced to walk long distances looking for water.

A Veterinary Officer in Kitui noted:

“The burden of labour shifts to the most vulnerable... children drop out of school to fetch water.”

FGDs participants in Kiambu emphasized:

“Time poverty traps families in subsistence.”

3.4.5 Education Disruptions

Respondents and especially farmers noted the intergenerational poverty risks that were being created by the loss of donkeys in the communities. They observed that, combined with the resource vacuum the illegal trade had a toll on education.

Participants in the Focus Group Discussions (FGDs) in Machakos highlighted that:

“When our donkeys are stolen, we are forced to trek long distances and waste valuable time that should be spent on farming or in school. What used to take a donkey thirty minutes now takes a mother or a child half a day of back-breaking labour, effectively stalling all other productive activities in the homestead.”

A farmer in Turkana further stated:

“Children are pulled from school to replace donkey labour... their academic progress ends.”

3.4.6 Psychological and Emotional Impacts

In most communities of study donkeys were viewed as household partners, when communities lost them, depression affected households, stress and anxiety and even loss of dignity and independence. This observation highlights how the theft of a single animal created a ripple effect of labour strain that compromised the welfare of the entire local community. Beyond the economic loss, a respondents emphasized the deep personal impact on the affected families. A chief in Embu County noted that:

“The loss of these donkeys causes significant emotional distress to owners who rely on them as companions and essential work partners. In our culture, the donkey is not just a tool; it is a member of the household that works alongside the farmer for many years. To have such a partner stolen and slaughtered in the bush is a traumatic experience that leaves the owner feeling vulnerable and grieved.”

This testimony underscores the psychological toll of the trade, which is often overlooked in purely statistical or economic evaluations of livestock theft.

A community leader in Turkana County stated:

“The donkey is a member of the household... losing it is traumatic.”

Officials noted rising stress-related illness and exhaustion due to fear of losing donkey while asleep, respondents reported that donkey farmers do not sleep as they guard their animals.

A police officer in Kiambu reported:

“Families sleep in donkey pens to guard livestock.”

3.4.7 Breakdown in social cohesion, trust and security

Illegal trade in donkey had eroded social capital causing breakdown of community trust. Mutual aid systems were weakening as communities become more protective and suspicious of each other. At the community level, the theft of donkey had created profound social strain. Participants in the Focus Group Discussions (FGDs) in Kiambu, Kitui, Kajiado noted the social fragmentation triggered by the crime. In Kitui participants reported that:

“The theft of donkeys leads to a culture of borrowing among neighbours, as those who have lost their primary means of transport are forced to rely on the remaining animals in the village. This creates a heavy burden on the surviving donkeys and their owners, leading to a situation where the demand for water and ploughing far exceeds the available animal labour.”

This observation of resource scarcity highlights a shift from communal cooperation to a strained survival strategy. FGD participants in Kajiado further articulated how this scarcity manifests as social conflict, they remarked that:

“This culture of borrowing can quickly escalate into community tensions and fear when a theft occurs nearby. Owners of the few remaining donkeys become increasingly protective and suspicious, often refusing to lend their animals for fear that they too will be targeted. This breakdown of traditional mutual aid systems creates a climate of anxiety, where neighbours who once supported each other now view one another with caution, effectively dissolving the social fabric that typically holds our rural villages together during times of hardship.”

An Assistant Chief in Kiambu observed:

“Neighbours suspect each other of collusion with cartels.”

FGDs participants in Kiambu further confirmed:

“Borrowing donkeys now creates tension and resentment.”

The NGAO representative in Narok and participants in FGD conducted in Mwingi East mentioned, *“Erosion of social fabric and communal trust”* Evidence from focus group discussions established that the scarcity of donkeys triggers a 'culture of borrowing' that leads to social friction between communities. Research findings indicated that as owners become increasingly protective of their remaining animals, traditional mutual aid systems dissolve, replaced by a climate of suspicion and anxiety.

3.4.8 Rising crime and vigilantism

Across the study counties, the study confirmed an increase in crime, heightened mob justice incidents and a growing frustration with perceived police inaction. This was a signal on weakening trust in formal justice systems respondents pointed to a growing rift between the public and the formal legal system. A Judiciary Officer in Kitui and participants in Focus Group Discussions (FGDs) in Turkana warned of growing conflict with law enforcement. FDD participants testified that:

“Frustration with perceived police inaction has occasionally led to incidents of mob justice against suspects, a trend that further destabilizes local security and complicates the formal justice process. When the community feels that the state cannot protect their livelihoods, they take the law into their own hands, which creates a cycle of violence that makes it even harder for the judiciary to conduct fair and effective trials.”

Finally, the investigative and social records in Turkana identified a tragic loss of human life resulting from the community's desperate attempts to secure their livestock. A participant in the FGD observed that:

“In their frustration and lack of trust in the slow pace of formal justice, the community has increasingly resorted to vigilante justice and the killing of suspected thieves; this has led to the unnecessary loss of many young men who otherwise could have been mentored to become productive and useful members of society.”

3.4.9 Migration and demographic changes

The findings of the study established that, theft and illegal trade in donkey and products had caused economic displacement which was also driving demographic changes. Respondents noted the rural-to-urban migration patterns triggered by the illicit trade. A NGAO officer reported that:

“An increase in migration is evident, where young men are leaving rural areas for towns because they can no longer sustain a living through traditional donkey-based transport. The theft of these animals has essentially destroyed the entry-level economy for our youth; without a donkey to provide haulage services, there is no work left for them in the village, forcing them to abandon their homes in search of low-skilled labour in the cities.”

This observation highlights a significant demographic drain that threatens the future of rural productivity. For the populations that remained in the affected sub-counties, the daily experience of survival had transformed regressively. A Chief from Mwingi East pointed out that the older generation had been significantly affected as a direct result of the loss of animal power. He testified that:

“Older men are increasingly forced to perform the 'heavy lifting' previously done by donkeys and youths who have now gone to towns, diverting their energy away from technical farming or community leadership. Simultaneously, older women are pushed into even more gruelling physical labour to maintain the household. Tasks that were once mechanized by the donkey such as carrying massive containers of water or transporting heavy loads of firewood are now placed back onto the backs of the women, leading to increased physical strain.”

The loss of entry-level rural livelihoods provided by donkeys was driving rural-to-urban migration by the most productive population which had a negative effect in food production as farming was left to the old population.

A NGAO officer in Turkana County representative reported:

“Young men are leaving rural areas because donkey-based livelihoods have collapsed.”

3.4.10 Limited Mobility, Health Access and Emergency Transport

Communities highlighted the role of donkeys in accessing healthcare, the decline in donkey due to illegal trade had affected health outcomes and emergency response capacity. For

instance, in Turkana local administration within NGAO identified critical logistical disruptions that affected the nomadic nature of the local population. A senior Chief observed that,

“The loss of donkeys has created severe transportation nightmares for our people, particularly during periods of intense drought when migrating communities traditionally relied on these hardy animals as their primary mode of transport to reach water and safer grazing lands.”

Another chief in Turkana added:

“Donkeys transport expectant mothers and the sick; their loss compromises access to medical care.”

3.4.11 Declining Donkey Population and Long-term Sustainability

The study also highlighted the broader demographic threat to the species and the regional economy. Representatives from the Anglican Development Services (ADS) issued a warning regarding the current trajectory of the trade, asserting that:

“The continued illegal trade is leading to a rapid decrease in the donkey population, potentially threatening the long-term sustainability of donkey-reliant livelihoods in the region. If the rate of theft and illegal slaughter continues to outpace the natural birth rate of the donkeys, we are looking at a future where the rural poor will be stripped of their primary engine of development, leading to a permanent collapse of the local transport and agricultural sectors.”

Local authorities warned of an emerging extinction risk which threatens the long-term viability of donkey-reliant livelihoods. In Embu, respondents observed that the scarcity of donkey labour had triggered a secondary welfare crisis for the surviving animals and a shift in regional safety dynamics. In Machakos local community observer noted that because only fewer donkeys are available, the remaining population is *“overworked and forced to carry double their usual loads,”* leading to rapid physical exhaustion and spinal injuries.

A police officer in Narok County reported: *“Biological recovery cannot match theft rates.”*

The participants of the FGD in Kajiado stated that, *“when donkeys are stolen, the burden of labour often shifts to children and as results school going pupils and students are frequently forced to drop out of school to assist with fetching water and manual chores, trapping the next generation in a cycle of structural poverty.”*



Figure 7: Scene of Illegal Donkey Slaughter in Ololoitikoshi in Kajiado West

Source: Photograph Captured by the author during Fieldwork March, 2026

The evidence in Figure 2 depicts a site of mass illegal donkey slaughter in Ololoitikoshi, Kajiado West, serving as a stark illustration of the bush slaughter phenomenon that contributing to extinction of donkeys.

The image reveals a high-volume processing site where carcasses have been abandoned in an open, unsanitary environment, confirming that the primary objective of these syndicates is the rapid extraction of hides where the clandestine operation results in the immediate depletion of the local donkey. Development actors across the study counties cautioned that the rural poor risk losing their primary engine of development due to the diminishing herds of donkeys.

3.5 Effectiveness of the Measures for Curbing Patterns in Theft and the Illegal Trade in Donkey Skins and Related Products

3.5.1 Institutions Responsible for Prevention, Enforcement and Oversight

The institutional framework for addressing the illegal donkey trade involved a multisectoral approach, ranging from frontline security to veterinary, administrative oversight and civil society groups. Based on the insights provided by the respondents, the following institutions were identified as critical to the prevention, oversight and enforcement process:

Table 13: State and non- state institutions addressing the prevention of illegal donkey trade

State institutions	Non-state Institutions
National Government Administration Officers	Association for Donkey Owners Kenya
National Police Service (NPS), Judiciary	Community Surveillance Networks,
Directorate of Veterinary Services	Caritas
Kenya Wildlife Service (KWS)	Nyumba Kumi Initiatives.
County Government (Livestock Dept)	ADS Eastern.
Kenya Forest Service (KFS)	KENDAT (Tunza Punda Akutunze),
Public Health Dept.	INADES
County Governments	Slaughterhouse Management Committees.
	KALRO.
	Brooke East Africa
	Community Leaders.
	IPDR (Institute for Peace Development and Disaster Management)

Note. Data obtained from field survey (2026)

The study established the various stakeholders addressing the prevention of illegal donkey

trade worked through collaborations. Respondents gave an account of how the various actors were working.

A Representative of the office of the NGAO in Kitui provided an account of how NGAO work through the command structure, the officer remarked that:

“The National Government Administration Officers (NGAO) provides high-level coordination for security operations, ensuring that the response to donkey trafficking is integrated across various departments. This high-level oversight is essential for mobilizing resources and aligning the efforts of the police, judiciary, and technical departments to create a unified front against the criminal syndicates operating in the region.”

The Veterinary Officer in Kitui and in Machakos stated that,

“Veterinary departments are responsible for enforcing animal health acts and monitoring movement permits, however there is a significant weakness in monitoring and enforcement due to a lack of proper legislation specifically tailored to deter the illegal slaughtering of donkeys. A critical gap exists in the Meat Control Act, which primarily focuses on traditional livestock (cattle, goats, and sheep) and lacks stringent, specific penalties for the clandestine slaughter of donkeys. Furthermore, current laws do not adequately address the unique logistics of the donkey skin trade; for instance, there is a legislative vacuum regarding the possession and transportation of donkey hides without corresponding meat inspection certificates. This legal ambiguity allows smugglers to exploit loopholes where penalties are often minimal fines that do not reflect the high market value of the hides, thereby failing to serve as an effective deterrent against organized criminal networks.”

Findings equally highlighted the critical role of local administrative at the grassroots level. Local administrators described the important role they play of being the primary points of reporting suspicious movements and illegal slaughter activities.

They remarked that they acted as the bridge between the community and the security forces, ensuring that intelligence gathered by residents is quickly escalated into actionable police operations. A NPS officer Embu County reported that:

“The Nyumba Kumi initiative serves as a primary frontline institution for prevention, utilizing community-based policing to monitor suspicious activities within neighbourhoods. This grassroots oversight relies on the principle of collective vigilance, where residents are organized into small clusters to identify

and report the presence of unfamiliar vehicles or individuals loitering near livestock pens during the night. By establishing a 24-hour presence in the villages, the initiative acts as a critical early-warning system that can disrupt a theft before it escalates into a "bush slaughter" or illegal transit. This local surveillance is complemented by the formal security sector, which provides the legal and physical force necessary to intercept criminal syndicates."

Veterinary officers provided an account of the technical oversight they spearheaded. They reported that their primary responsibility was enforcing animal health acts and conducting mandatory inspections of donkeys in transit.

A veterinary officer in Machakos remarked that:

Our role is to ensure that no donkeys are moved across county lines without valid permits, thereby preventing the spread of zoonotic diseases and the movement of stolen livestock. By strictly monitoring the transit permits, we can identify and intercept illegal shipments before they reach the clandestine slaughterhouses or regional markets."

The study also highlighted the importance of non-governmental partnerships in strengthening the formal enforcement mechanisms. A NGAO officer in Kiambu noted that:

"We also collaborate with non-governmental organizations like Caritas, which provides support in capacity building and public awareness on animal welfare and the legal requirements for donkey movement. Through these partnerships, we are able to educate farmers on their rights and the proper channels for reporting theft, while also training local administrators on the technical signs of illegal slaughter and disease outbreaks, effectively expanding our surveillance footprint."

The study established that sometimes the geographic complexity of the trade often necessitates the involvement of specialized environmental security forces.

In Embu County NPS highlighted the involvement of the Kenya Wildlife Service (KWS), particularly in areas where illegal trade may intersect with protected conservation zones or where transit routes pass through national reserves. A NPS officer stated that:

"The KWS is a vital partner because traffickers frequently use the cover of national reserves and conservancy thickets to hide their movements or establish clandestine slaughter sites. Their expertise in tracking and their mandate to secure these protected lands allow us to intercept syndicates in remote areas where standard police patrols are less frequent, effectively closing the 'wilderness gap' that criminals exploit to move stolen donkeys undetected."

Non-governmental organizations and community groups also provide essential support in

advocacy and animal welfare oversight. Participants in Focus Group Discussions (FGDs) identified institutions such as ADS, Caritas and KENDAT who worked with communities in awareness creation. FGD participants in Machakos remarked:

“ADS and KENDAT (specifically through the Tunza Punda Akutunze initiative) are pivotal institutions that bridge the gap between community needs and formal enforcement. These organizations, alongside faith-based groups like Caritas, work to educate the public on donkey rights and create local reporting structures.”

Equally, veterinary officers identified the key institutional stakeholders that were currently collaborating to manage and oversee the prevention of these illegal activities. A veterinary officer in Machakos remarked:

"Institutions involved include the county government, NGOs like INADES (focused on donkey health), the police, and local administrators. This multi-agency approach is essential for combining regulatory oversight with grassroots enforcement and health monitoring. By integrating the efforts of local chiefs with the strategic resources of the county and non-governmental organizations, the region aims to create a more comprehensive shield against the exploitation of donkey owners."

A NGAO representative in Nakuru identified a multi-agency framework of state and non-state actors tasked with securing donkey populations and regulating the trade. The officer remarked:

"The National Government Administration Officers (NGAO) are deeply involved, particularly through the sensitization of the public during local barazas, where we emphasize the importance of vigilant animal care. The National Police Service (NPS) provides the necessary enforcement, while the County Government operates through its agriculture and livestock departments to manage oversight. Furthermore, the management committees of various slaughterhouses play a role in regulation, supported by non-governmental organizations like INADES and KENDAT, which provide specialized advocacy and technical support."

INADES representative in Machakos identified a multi-sectoral network of state and non-governmental actors currently collaborating to monitor, regulate, and combat the illicit donkey trade:

"A diverse range of institutions are active in the prevention and oversight of the donkey trade, including INADES, which focuses heavily on community sensitization. The government, at both the National and County levels, provides the primary framework for enforcement and regulation. Additionally, faith-based and specialized organizations like Caritas Kitui, ADS Eastern/Central,

and Donkey Africa partners are deeply involved. We also benefit from regional cooperation through ASPA from Tanzania, which works in close coordination with Partners of Brooke to address the cross-border dimensions of this crisis."

Participants in the FGD held in Namanga, Kajiado County, identified a diverse network of state and non-state actors responsible for the prevention, enforcement, and oversight of the donkey trade.

The participants listed the following institutions and groups as the primary entities involved in managing the crisis:

"The oversight and enforcement of the donkey trade involve several key government agencies, including the Kenya Wildlife Service (KWS), the National Police Service (NPS), and the Kenya Forest Service (KFS). At the technical and administrative levels, the Directorate of Veterinary Services and the County Government provide the necessary regulatory framework and animal health inspections. Furthermore, community-led oversight is maintained through local leaders and members of the community who act as the first line of defence against theft. Non-governmental organizations, specifically Brooke East Africa, also play a critical role in supporting welfare and advocacy for donkey owners."

A Media Representative in Nakuru reported that while organizations like "Brooke East Africa" have been "very vocal" and are "coming up with some policies to safeguard donkeys," the formal oversight institutions were severely compromised.

3.5.2 Measures and their Effectiveness in Addressing Patterns in Theft and the Illegal

Trade in Donkey Skins and Related Products

To combat the rising cases of theft and the illicit trade of donkey skins and meat, various stakeholders had implemented different measures. The following table highlights the measures and their effectiveness as highlighted by respondents: Findings show a mixed picture of effectiveness of measures implemented to curb illegal trade and theft in donkey and products. These interventions vary between counties. In Kitui County, efforts have focused on the development of a Donkey Welfare Policy and the strengthening of regulations governing the movement of equines and equine products. In Kajiado, authorities have imposed a freeze on inter-county movement permits, prohibited the transportation of more than ten donkeys on highways, and introduced mandatory movement verification procedures for large herds.

Stringent controls have also been placed on hide handling permits and the movement of equine materials, while the official closure of slaughterhouses has sought to eliminate legal avenues that could facilitate the trade.

Enforcement efforts have been enhanced through the establishment of strategic roadblocks on major highways, increased highway intercepts, proactive raids on bush slaughter sites, and specialized foot patrols aimed at apprehending thieves in the act. Environmental management interventions, including the targeted clearing of thickets used as clandestine slaughter grounds and the use of specialized chemicals to treat hazardous slaughter waste, have further disrupted illegal activities. Public health authorities have strengthened oversight through the issuance of strict health certificates, enhanced vigilance by meat inspectors, safe disposal of slaughter waste, and the financing of deep trenches for the burial of carcass remains.

Community participation has played a central role in prevention and response efforts. Local surveillance clusters, collective night vigils, and 24-hour community early-warning systems have been established to facilitate rapid reporting and response to theft incidents.

Community awareness has been promoted through regular barazas and Rapid Results Initiative (RRI) campaigns, while some farmers have adopted protective measures such as constructing improved shelters and keeping donkeys close to their homes at night.

Collaboration and innovation have also featured prominently in combating the trade. Multi-agency working groups and cross-border monitoring mechanisms have strengthened coordination and facilitated the recovery of stolen animals across national boundaries. Technological innovations, including the "Punda-Wangu" artificial intelligence platform, toll-free recovery hotlines, and community-based "Reform Warriors" groups, have enhanced information sharing, surveillance, and rapid response capabilities. Collectively, these interventions represent a comprehensive approach combining policy reforms, law enforcement, public health safeguards, community engagement, and technological innovation to address the complex challenge of donkey theft and illegal trade.

At the national level, several strategic interventions have been undertaken to strengthen the prevention of donkey theft and the illegal trade in donkeys and their products. Kenya instituted a ban on commercial donkey slaughter and trade in 2020, marking a significant policy shift aimed at protecting donkey populations and safeguarding livelihoods. National Rapid Results Initiatives (RRIs) and multi-agency security teams have enhanced coordination in surveillance,

intelligence gathering, and enforcement operations. Sensitization of Court Users Committees and other justice sector actors has further strengthened the prosecution and adjudication of cases involving donkey theft and illegal slaughter. Kenya has actively contributed to continental policy processes, including participation in the African Union Executive Decision establishing a moratorium on donkey slaughter for skins and the development of the Pan-African Strategy for the Sustainable Management and Welfare of Donkeys. In addition, the production of a donkey production manual by the Directorate of Livestock Production has provided technical guidance to farmers and stakeholders on improved husbandry, health management, and sustainable utilization of donkeys, thereby promoting their conservation and long-term contribution to rural livelihoods.

Table 14: Measures and their effectiveness in address theft and illegal trade in donkey products

Strategic Measures & Interventions	Status and Effectiveness
Development of National Donkey Welfare Policy	Not effective
Total freeze on inter-county movement permits.	Not effective
Prohibiting movement of more than 10 donkeys on highways	Implemented in counties such as Kitui- in progress
local surveillance clusters	Effective in counties such as Kitui, Machakos
Using specialized chemicals to manage hazardous slaughter waste	Implemented Effective
Strategic roadblocks on tarmac roads	Not effective-due to comprised multi-agency groups
24-hour community early-warning systems.	Not effective
High way intercepts	Effective to some extent
Proactive raids on "bush slaughter" sites.	Not effective- happens at night
Public Health disposal.	Effective to some extent- implemented in counties such as Kjiado
Consistent Barazas for community awareness creation	Effective in some counties
Issuance of strict public health certificates	Not effective- has not deterred perpetrators
Financing deep trenches for safe burial of left over carcasses	Effective
Specialized foot patrols to catch "act-in-progress" theft.	Effective
Mandatory movement verification for large herds.	Not effective- no laws to support
Official closure of slaughterhouses.	Not effective-changed to bush slaughters
Increased meat inspector vigilance	
Environmental Clearing: Targeted clearing of thickets used as clandestine slaughter grounds.	Not effective-slaughtering was still happening at night
Hide Handling Permits	Not effective
Stringent regulations on the movement of equine materials.	Not effective

Strategic Measures & Interventions	Status and Effectiveness
Farmers sleeping inside houses with donkeys;	Effective in counties such as Kiambu
Construction of better shelter for donkey	Effective
Cross-border recovery: Intensified tracking of stolen livestock moving between Kenya and territories.	Effective
collective night vigils.	Effective
Multi-agency working groups	Effective
Tech-Innovation "Punda-wangu" AI platform; toll-free recovery hotlines; "Reform Warriors" groups.	Effective
cross-border monitoring and surveillance	Effective
"RRI" (Rapid Results Initiative) in awareness creation	Effective

Note. Data obtained from field survey (2026)

The evaluation of current interventions revealed a significant divergence in perspective between local community, grassroots administrators and high-level technical officers. While community-based strategies were seen as successful in immediate prevention, systemic gaps continue to undermine the overall impact of the response. At the local administrative level, the measures are viewed with a high degree of optimism

The study established that some counties such as Kitui had embarked on development of policies on donkey welfare although the policy was still not complete so its effectiveness could not be established. Veterinary officer in Kitui provided a strategic update on the formalization of donkey protections, reporting that:

“A comprehensive donkey welfare policy is currently being developed and has reached the cabinet level for approval. This policy is designed to close the legal loopholes that have allowed traffickers to exploit the lack of specific protections for equines.

NGAO officers in Kitui described the measure as not effective at all. They suggested that without a finalized national policy and more stringent cross-border enforcement, the current localized efforts remain insufficient to stop the high-level organized syndicates driving the trade. A NGAO officer reported.

“Localized roadblocks and village -level patrols are merely 'band-aids' on a wound that requires a national surgical intervention. These syndicates are well-funded and highly mobile; they move across county and national boundaries with ease, while our enforcement remains fragmented.

Further the study also found that some counties such as Kitui, Machakos, Kajiado had also effected limiting of inter-county donkey movements through strict issuing of movements permits. The move was vied with optimism by technical officers who observed that it had

allowed closer monitoring of donkey movement. This suggests a shift from reactive policing to a proactive, state-level institutionalization of donkey security.

The response was a response by veterinary officer Kitui:

“No movement permits are being issued for inter-county donkey transit, a deliberate measure to monitor and curb the flow of stolen donkeys across borders. By freezing the legal transit of these animals between jurisdictions, we have created a situation where any vehicle found transporting donkeys on the highways is immediately flagged as a high-risk or illegal operation, allowing for faster intervention by security forces.”

Further, administrative officers had also implemented specific constraints on the logistics of the trade. A chief in Kitui county mentioned that:

“A specific directive has been issued prohibiting the movement of more than 10 donkeys at a time on highways and major roads to prevent bulk illegal transit. This 'cap' on the size of the herds being moved allows the police and the Nyumba Kumi groups to easily identify syndicates attempting to relocate large numbers of animals from the villages to the clandestine abattoirs. Any group exceeding this number is stopped and should undergo a rigorous verification of ownership and destination before being allowed to proceed.”

Participants in FGD in Kajiado commented:

Furthermore, the County Government and the Directorate of Veterinary Services have introduced the issuance of strict public health certificates and movement permits to regulate the transport of animals.

A probation Officer at Mwingi Central provided a critical analysis of the structural gaps in the current enforcement model, reporting that:

“While movement permits and legal charges provide a framework for control, they only partially address the root of the illegal trade. The issuance of permits is a administrative deterrent, but it does not stop the clandestine 'bush slaughter' where no transport of live animals across borders is required. Furthermore, legal charges can only be applied after an arrest, meaning the system remains reactive rather than purely preventative in the face of determined criminal actors.”

Majority of study counties had implemented and strengthened grassroots monitoring of donkey movements and trade. Communities had made use of existing community structures such as Nyumba Kumi to monitor activities involving donkeys in efforts to defend the welfare of the donkey. This was one the measure that respondent reported of its effectiveness due to its ability

to deter movement of large herds of donkey. An Assistant Chief in Machakos provided a critical analysis of the localized defence structures, reporting that:

“Active utilization of the Nyumba Kumi initiative and community policing to monitor local activities. By organizing the village into small clusters of ten households, we have created a human early-warning system that can detect the presence of outsiders or unusual movements of livestock during the high-risk night hours. This grassroots approach ensures that no activity goes unnoticed, effectively closing the surveillance gap that formal police patrols cannot always fill in remote areas.”

This grassroots monitoring was further corroborated by participants in the Focus Group Discussions (FGDs) in Kajiado, who explained the operational details of these neighbourhood watches. They testified that,

“Nyumba Kumi members are specifically tasked with investigating individuals seen with unfamiliar donkeys. If a person is moving an animal that the community does not recognize as belonging to a local household, they are stopped and required to provide proof of ownership. This peer-to-peer accountability has made it significantly more difficult for traffickers to blend into the community while moving stolen stock.”

Beyond collective policing at community level, the study highlighted the shift toward personalized security and identification by donkey owners. Farmers in all counties highlighted how they had taken personal initiatives to protect their donkeys through night time vigilance, construction of better shelter and labelling of donkeys. Although the move to secure donkeys by farmers was identified as key towards protection, communities had not yet embraced it fully as traditionally donkeys were viewed as animals that did not require much human interventions, so it was still work in progress. FGD participants in Turkana mentioned that:

“Donkey labelling and the personal responsibility among owners as measures laid down to secure their donkeys. Many of us have turned to branding or unique marking of our animals to ensure they can be easily identified if recovered. Furthermore, there is a renewed emphasis on personal responsibility, where owners no longer leave their donkeys to graze unattended in the open fields; instead, we are investing in more secure pens and ensuring that the animals are tethered close to the homestead under constant watch.”

These findings establish that the defence against donkey theft is being fought on two fronts: through the organized strength of the Nyumba Kumi and the increased tactical vigilance of individual owners. Nyumba kumi and local administrators in collaboration with civil society were very vocal in sensitizing communities on donkey protection. Local authorities reported

that the move was yielding good results as locals were reporting on suspicious activities involving donkeys.

A Police Officer in Machakos noted:

“Ongoing public sensitization efforts are aimed at encouraging citizens to report any suspicious donkey dealings immediately. We are moving away from a purely reactive model of policing toward a proactive one, where the 'eyes and ears' of the community are trained to recognize the signs of illicit trade such as the movement of strange vehicles at night or the emergence of new, unverified livestock pens and funnel that information directly to the station before a theft occurs.”

The views were equally supported by from a legal perspective by judicial officers. A Judiciary Officer in Machakos mentioned that:

“Judiciary dialogues are being held to sensitize the public on the legal consequences of these crimes. It is essential that the community understands that donkey theft is not a minor civil dispute but a serious criminal offense with mandatory sentencing. These dialogues serve to rebuild trust in the court system and discourage the 'mob justice' that often arises when the public feels the legal process is too slow or lenient.”

Community engagement and public awareness campaigns were further utilized to shift local perceptions regarding the value of these animals. An official within the NGAO framework noted that,

“The establishment of 'Reform Warriors' has been instrumental in sensitizing the community on the vital importance of donkeys; simultaneously, whistle-blowing through high-profile media documentaries, such as the 'Donkey Beef' feature on Citizen TV, has brought much-needed national attention to the crisis.”

The Institute of Pastoralism Development and Research (IPDR) specifically highlighted that,

“Constant monitoring of the closed donkey slaughterhouses within the Lodwar area remains a priority to ensure that these facilities do not secretly facilitate the illegal processing of hides or meat under the cover of darkness

Sensitization and public awareness have emerged as critical pillars of the prevention strategy. Study findings pointed towards awareness creation efforts by various stakeholders (especially civil society groups) aimed at educating the public on illegal trade.

A Chief from Kajiado County stated that:

“Ongoing efforts are being made to educate the public on the dangers of the illegal donkey meat trade and how to spot and report suspicious individuals within their neighbourhoods. This advocacy is significantly amplified by non-governmental organizations and community groups.”

Participants in Focus Group Discussions in the Embu County equally noted this on awareness creation:

“Anglican Development Services (ADS) and KEDAT, through the Tunza Punda Akutunze initiative, as essential partners in providing the community with the tools to protect their donkeys. These organizations, alongside Caritas and the Department of Donkeys, form a collaborative network that integrates formal law enforcement with grassroots oversight to mitigate the impact of the illegal trade.”

Public sensitizations efforts were further validated by police officers who observed measurable shift in the operational landscape. A Police Officer at Mwingi Central rated the current measures as effective, testifying that,

“Increased public sensitization and patrol efforts have created a more hostile environment for donkey thieves. We are no longer operating in a vacuum of silence; the public is now a proactive partner in our surveillance chain.”

The local administration and security forces had also improved on enforcement efforts through road blocks and night patrols; this was aimed at limiting the physical mobility of donkeys to reduce opportunities for theft. This move was viewed with some reservations as some security officers observed that limited resources was hindering its success.

A NPS officer in Embu and local village elders reported that;

“New restrictions have been placed on donkey movement, with specific measures introduced to limit the transport of these donkeys after 6:00 PM. These enforcement actions are paired with active night patrols and the targeted arrest of suspected criminals to disrupt the operations of known syndicates. Furthermore, the Police Officer in Mwea Sub-county emphasized the expansion of community policing initiatives, which rely on local intelligence to bolster officer patrol efforts.”

A NGAO representative for Machakos outlined the active tactical and community-based interventions currently deployed to suppress the illicit donkey trade:

"The primary measures implemented to address this issue include the arrest of perpetrators to deter further criminal activity and the consistent holding of barazas to educate the public on animal security. Furthermore, a critical deterrent has been the proactive role of the community, where local members identify and expose individuals known to be dealing in stolen donkeys, effectively stripping them of the anonymity required for these illegal operations."

Multi-agency response was also highlighted as a measure counties were implementing. This involved police officers, public health officers, veterinary officers and administration officers. In Machakos County a police officer highlighted the following on the multi-agency group:

"Our current interventions involve a coordinated approach that includes direct police apprehension of suspects and the active involvement of Public Health Officers to manage the safe disposal of hazardous waste whenever illegal slaughter sites are discovered. We also partner with various welfare societies to conduct community sensitization drives aimed at educating the public on the dangers of the illicit trade."

Collaborative intervention strategies to mitigate biological factors were also identified in counties such as Kajiado. Respondents observed that organization such as Brooke in collaboration with Public Health Officers were helping community in proper disposal of carcasses, to mitigate biological risks.

A police officer in Kajiado remarked:

."We maintain a high-level coordination with them whenever we spot the movement of donkeys in large numbers to verify their legitimacy. Furthermore, Brooke provides the necessary financing for digging deep trenches to ensure the proper burial of donkey carcasses. To mitigate biological risks, Public Health Officers are actively involved in providing the specialized chemicals required for safe disposal and advising our units on the most effective ways to manage these sites to prevent disease outbreaks."

Regulatory ban and subsequent closure of donkey slaughterhouses was also primary structural intervention aimed at cutting off the large-scale supply of hides and meat.

In Kiambu County, the move was welcomed by administrators as it helped intercept donkey meat.

"The most significant measure implemented has been the official ban and closure of donkey slaughterhouses. To support this, there is increased vigilance among meat inspectors who are actively working to identify and intercept donkey meat before it enters the commercial market."

Administrative officers in Turkana County observed the ban on slaughter and sale of donkey meat and related products which was used to control the trade. The measure was identified as minimally effective as the community in Turkana treated donkey meat as a delicacy that was embedded in the culture. Perpetrators exploited the gap to continue with illegal trade. A senior official noted that,

"The national government has implemented a comprehensive ban on the slaughter and sale of donkey meat and related products; furthermore, the county government has introduced stringent regulations requiring the issuance of hide handling permits to ensure that any movement of such materials is strictly monitored and authorized."

The NGAO Representative for Kiambu corroborated these community efforts by highlighting the transition from passive warnings to active grassroots environmental management:

"We utilize barazas and door-to-door visits to warn the public against engaging in illegal donkey theft, slaughter, and trade. Beyond sensitization, the NGAO representatives for Nachu and Lucugiti in Kiambu directed villagers to clear thickets within the area specifically targeting secluded bushland that had previously been exploited as clandestine slaughter grounds for donkeys."

Beyond domestic policing, the security apparatus in Turkana expanded its reach through international cooperation and specialized investigative units. The DCI specifically highlighted that,

"Cross-border recovery efforts have been intensified to track stolen livestock moving between Kenya and neighbouring territories; additionally, investigative teams from Nakuru were utilized to execute warrants that led to the apprehension of two foreign nationals and the seizure of a major consignment of illegal donkey hides."

Technological innovation within Turkana identified a modernized approach to livestock protection and reporting.

The Institute of Pastoralism Development and Research (IPDR) specifically highlighted that,

“The establishment of a toll-free hotline and the 'Punda-wangu' platform has revolutionized the recovery process, with over 300 stolen donkeys successfully recorded; moreover, the integration of Artificial Intelligence (AI) and the comprehensive census of all donkeys across different regions have provided a data-driven layer of security.”

Organizations such as Institute of Pastoralism Development and Research (IPDR) specifically highlighted measures such as constant monitoring of the closed donkey slaughterhouses. For instance, In Turkana the measure was a priority as it ensured that these facilities do not secretly facilitate the illegal processing of hides or meat under the cover of darkness.

In Nakuru County respondents reported *"Rapid Results Initiative (RRI)"* that was launched through a collaborative meeting involving stakeholders from government and civil societies aimed at addressing a lack of awareness among law enforcement on donkey related crimes.

Grassroots monitoring was significantly strengthened through community structures. An assistant chief from Mwingi East provided a critical analysis of the localized defence structures, reporting the,

“Active utilization of the Nyumba Kumi initiative and community policing to monitor local activities. By organizing the village into small clusters of ten households, we have created a human early-warning system that can detect the presence of outsiders or unusual movements of livestock during the high-risk night hours. This grassroots approach ensures that no activity goes unnoticed, effectively closing the surveillance gap that formal police patrols cannot always fill in remote areas.”

This administrative oversight was further corroborated by participants in a Focus Group Discussions (FGDs) in Mwingi East, who explained the operational details of these neighbourhood watches. They testified that,

“Nyumba Kumi members are specifically tasked with investigating individuals seen with unfamiliar donkeys. If a person is moving an animal that the community does not recognize as belonging to a local household, they are stopped and required to provide proof of ownership. This peer-to-peer accountability has made it significantly more difficult for traffickers to blend into the community while moving stolen stock.”

Beyond collective policing, the study highlighted the shift toward personalized security and identification. FGD participants mentioned,

“Donkey labelling and the personal responsibility among owners as measures laid down to secure their donkeys. Many of us have turned to branding or unique marking of our animals to ensure they can be easily identified if recovered. Furthermore, there is a renewed emphasis on personal responsibility, where owners no longer leave their donkeys to graze unattended in the open fields; instead, we are investing in more secure pens and ensuring that the animals are tethered close to the homestead under constant watch.”

These findings establish that the defence against donkey theft was being fought on two fronts: through the organized strength of the Nyumba Kumi and the increased tactical vigilance of individual owners. A Police Officer at Mwingi Central provided a critical analysis of the community-based intelligence framework, reporting that,

“Ongoing public sensitization efforts are aimed at encouraging citizens to report any suspicious donkey dealings immediately. We are moving away from a purely reactive model of policing toward a proactive one, where the 'eyes and ears' of the community are trained to recognize the signs of illicit trade such as the movement of strange vehicles at night or the emergence of new, unverified livestock pens and funnel that information directly to the station before a theft occurs.”

This operational shift was supported by a significant effort to align public expectations with the formal legal system. From a legal perspective, a Judiciary Officer at Mwingi Central mentioned that,

“Judiciary dialogues are being held to sensitize the public on the legal consequences of these crimes. It is essential that the community understands that donkey theft is not a minor civil dispute but a serious criminal offense with mandatory sentencing. These dialogues serve to rebuild trust in the court system and discourage the 'mob justice' that often arises when the public feels the legal process is too slow or lenient.”

Collectively, these reports established a unified front where the police, the courts, and the probation department were working in concert to create a meaningful deterrent against the trade. According to the NPS officer in Mbeere South and the in Mwea Sub-county;

“The establishment of strategic roadblocks on tarmac roads has become a primary method for intercepting illegal cargo. These physical barriers are supported by intensified night patrol operations and the introduction of mandatory movement permits, which are designed to regulate intercounty

transit and ensure that any donkeys being moved can be traced to a legitimate owner or destination.”

Sensitization and public awareness emerged as critical pillars of the prevention strategy. The Chief from Mwea Sub County and the NPS officer Mbeere South stated that,

“Ongoing efforts are being made to educate the public on the dangers of the illegal donkey meat trade and how to spot and report suspicious individuals within their neighbourhoods. This advocacy is significantly amplified by non-governmental organizations and community groups.”

Participants in Focus Group Discussions in the Makima division noted that,

“Anglican Development Services (ADS) and KEDAT, through the Tunza Punda Akutunze initiative, as essential partners in providing the community with the tools to protect their donkeys. These organizations, alongside Caritas and the Department of Donkeys, form a collaborative network that integrates formal law enforcement with grassroots oversight to mitigate the impact of the illegal trade.”

A NGAO representative for Machakos outlined the active tactical and community-based interventions currently deployed to suppress the illicit donkey trade:

“The primary measures implemented to address this issue include the arrest of perpetrators to deter further criminal activity and the consistent holding of barazas to educate the public on animal security. Furthermore, a critical deterrent has been the proactive role of the community, where local members identify and expose individuals known to be dealing in stolen donkeys, effectively stripping them of the anonymity required for these illegal operations.”

The Nyumba Kumi Elder in Machakos outlined a community-driven security framework that relies on high-visibility deterrents and the mobilization of local intelligence to reclaim the safety of their livestock:

“We have significantly increased our security patrols across the most vulnerable areas of our jurisdiction to create a persistent presence that discourages potential traffickers. This effort is reinforced by stricter enforcement of livestock movement protocols, ensuring that any suspicious transport is intercepted and thoroughly vetted by the authorities. Most importantly, we have successfully mobilized 'eyes on the ground' through our resident network, creating a continuous surveillance system where every household remains vigilant for signs of unauthorized slaughter or transit.”

The Sub-County Police Commander provided a candid evaluation of the multi-agency response within Machakos County, highlighting the systemic friction between frontline enforcement and the judicial process:

"Our current interventions involve a coordinated approach that includes direct police apprehension of suspects and the active involvement of Public Health Officers to manage the safe disposal of hazardous waste whenever illegal slaughter sites are discovered. We also partner with various welfare societies to conduct community sensitization drives aimed at educating the public on the dangers of the illicit trade."

Participants in the FGD held in Namanga, Kajiado County, identified a range of operational and regulatory interventions designed to curb the illicit donkey trade. The participants described these measures as a combination of community-led vigilance and state-enforced compliance:

"The interventions implemented in this locality focus on both prevention and enforcement. Community sensitization programs are conducted to educate owners on how to better protect their livestock from theft. At the administrative level, there is a formal ban on the theft and illegal trade of donkeys, supported by the National Police Service through regular foot patrols to apprehend offenders in the act. Furthermore, the County Government and the Directorate of Veterinary Services have introduced the issuance of strict public health certificates and movement permits to regulate the transport of animals. Members of the community are also encouraged to promptly report any theft cases to ensure a rapid response from the relevant authorities."

The Sub-County Police Commander in Kajiado West outlined a collaborative intervention strategy that combines specialized NGO expertise with governmental public health protocols to manage the fallout of the illicit donkey trade

"We have implemented several measures to address this crisis, primarily through sensitization programs led by Brooke, who provide critical education to the community. We maintain a high-level coordination with them whenever we spot the movement of donkeys in large numbers to verify their legitimacy. Furthermore, Brooke provides the necessary financing for digging deep trenches to ensure the proper burial of donkey carcasses. To mitigate biological risks, Public Health Officers are actively involved in providing the specialized chemicals required for safe disposal and advising our units on the most effective ways to manage these sites to prevent disease outbreaks."

The National Police Service in Kikuyu identified the high-level regulatory ban and subsequent closure of donkey slaughterhouses as the primary structural intervention aimed at cutting off the large-scale supply of hides and meat:

"The most significant measure implemented has been the official ban and closure of donkey slaughterhouses. To support this, there is increased vigilance among meat inspectors who are actively working to identify and intercept donkey meat before it enters the commercial market."

This administrative shift is reinforced by community-level mobilization, as local residents in Kiambu participating in Focus Group Discussions described an intensive, self-driven security strategy born out of necessity:

"Farmers have managed to come together in groups to keep a collective vigilance at night. In some extreme cases, villagers have even resorted to sleeping with their donkeys inside their houses to ward away thieves. The villages are also establishing recovery efforts where stray or recovered stolen donkeys are secured and reported to local administrators to help reunite them with their owners."

The NGAO Representative for Kiambu corroborated these community efforts by highlighting the transition from passive warnings to active grassroots environmental management:

"We utilize barazas and door-to-door visits to warn the public against engaging in illegal donkey theft, slaughter, and trade. Beyond sensitization, the NGAO representatives for Nachu and Lucugiti in Kiambu directed villagers to clear thickets within the area specifically targeting secluded bushland that had previously been exploited as clandestine slaughter grounds for donkeys."

The administrative framework within Turkana County identified a robust policy shift aimed at dismantling the commercial viability of the illicit trade. A senior official noted that,

"The national government has implemented a comprehensive ban on the slaughter and sale of donkey meat and related products; furthermore, the county government has introduced stringent regulations requiring the issuance of hide handling permits to ensure that any movement of such materials is strictly monitored and authorized."

Enforcement strategies within Turkana have transitioned toward a more active and collaborative judicial approach. A participant in the Focus Group Discussion (FGD) observed that,

“Local communities have increasingly taken an active role in security by conducting arrests and handing over suspected donkey thieves to the relevant authorities for formal prosecution, which represents a growing partnership between the public and the legal system.”

Beyond domestic policing, the security apparatus in Turkana expanded its reach through international cooperation and specialized investigative units. The DCI specifically highlighted that,

“Cross-border recovery efforts have been intensified to track stolen livestock moving between Kenya and neighbouring territories; additionally, investigative teams from Nakuru were utilized to execute warrants that led to the apprehension of two foreign nationals and the seizure of a major consignment of illegal donkey hides.”

Technological innovation within Turkana identified a modernized approach to livestock protection and reporting. The Institute of Pastoralism Development and Research (IPDR) specifically highlighted that,

“The establishment of a toll-free hotline and the 'Punda-wangu' platform has revolutionized the recovery process, with over 300 stolen donkeys successfully recorded; moreover, the integration of Artificial Intelligence (AI) and the comprehensive census of all donkeys across different regions have provided a data-driven layer of security.”

The Veterinary Officer from Nakuru County reported that a *"Rapid Results Initiative (RRI)"* was launched through a collaborative meeting involving "the government, DCI, and the ministry" to address a lack of awareness among law enforcement.

Collectively, these reports establish a unified front where the police, the courts, veterinary departments, public health, community and civil society and even probation department were working in concert to create a meaningful deterrent against the trade. According to the NPS officer in Embu County:

“The establishment of strategic roadblocks on tarmac roads has become a primary method for intercepting illegal cargo. These physical barriers are supported by intensified night patrol operations and the introduction of mandatory movement permits, which are designed to regulate intercounty transit and ensure that any donkeys being moved can be traced to a legitimate owner or destination.”

These findings establish that the illegal donkey trade is not merely opportunistic theft but a highly organized industrial activity that adapts to and overcomes the baseline security measures implemented at the village level. In contrast, officers dealing with the broader legal and county-wide landscape reported a lack of success. In Kitui County a judiciary officer provided a critical assessment of the current enforcement landscape, rating the existing measures as not effective. They pointed toward the continued presence of illegal slaughter sites as evidence of a reactive rather than a preventative system. The Judiciary Officer specifically highlighted the difficulty in securing convictions that truly deter donkey theft and illegal trade, testifying that:

“The lack of specific, high-stakes legislation for equine crimes means that many traffickers are either released on low bail or receive non-custodial sentences that do not reflect the economic and ecological damage they cause. Until the courts have the statutory power to treat donkey theft with the same weight as high-value property crimes, the legal system will continue to be a 'revolving door' for repeat offenders.”

The effectiveness of the measures implemented to curb donkey theft and illegal trade in Embu County were viewed with significant divergence among stakeholders, reflecting a clear disconnect between high-level administrative perceptions and the experiences of technical or field-based practitioners.

3.5.3 Challenges Hindering Effective Prevention, Enforcement or Oversight

The challenges hindering effective prevention, enforcement, and oversight of the illegal donkey trade are multifaceted ranging from, physical and geographical barriers, inadequate operational resources, social barriers, to deep-seated systemic failures, and legal and policy gaps discussed in the consecutive section. The study established that primary security and administrative framework efforts were frequently compromised by a lack of specialized infrastructure, such as gazetted holding grounds for "living evidence" and specialized transport for night operations. Across counties like Kitui and Kiambu, enforcement was hampered by a "logistical nightmare" where officers were expected to personally fund the care of seized animals, or lack the basic technology to preserve forensic evidence. A police officer in Kitui remarked:

“The illegal trade operates almost exclusively under the cover of darkness, forcing us to respond to intercepts at 2:00 AM or 3:00 AM without specialized transport vehicles, adequate lighting, or security escorts. This lack of emergency infrastructure not only delays the processing of suspects but also puts the safety of the technical officers at risk when confronting potentially violent syndicates in remote transit corridors.”

Additionally, a Police officer in Machakos highlighted this on holding place for live donkeys.

“Lack of designated land to hold arrested donkeys and the absence of funds for animal feed.”

This was corroborated by a police officer in Mwingi Central, who indicated that the burden of feeding and providing human labour for the care of arrested donkeys is unsustainable under current budget allocations. The officer reported that:

“When we intercept a truck with 20 stolen donkeys, we have nowhere to put them. We are often forced to keep them in police station yards that lack grazing land or water troughs. The cost of buying hay and hiring handlers to prevent the animals from starving or straying back into the hands of the thieves falls on the individual officers or the station’s meagre petty cash, creating a logistical nightmare that discourages further arrests.”

A Probation Officer in the same area added,

“The judiciary cannot process the case if the evidence the donkey cannot be maintained in a healthy state for the duration of the trial. If an animal dies in custody due to lack of feed, the case often collapses. Until the county and national governments allocate specific 'livestock holding funds' and gazette protected holding grounds, the technical departments will continue to view large-scale intercepts as a liability rather than a success.”

National Police Service corroborated these structural failures by highlighting a critical deficit in the technical and evidentiary tools required for successful prosecution where authorities noted that enforcement was severely hindered by a lack of intelligence-based evidence and noted the lack of basic documentation, manpower, and equipment to handle these cases. They reported notable absence of freezers to preserve meat evidence and proper photography for crime scenes.

Furthermore, the infiltration of criminal syndicates into the enforcement apparatus in counties such as Kiambu created presence of "two centres of power" thus a significant barrier to a unified response. This institutional infiltration was further detailed by a NGAO representative in Ndeiya, who pointed to a systemic paralysis caused by conflicting interests and a lack of unified command within the state:

"The nature of 'two centres of power' is really frustrating the efforts to fight donkey theft. There is a continuous struggle both within and outside the system to curb this trade. The illegal trade exists as an entire web compromising element of the police, the prosecution, and the judiciary, making it a very

difficult fight to win when the opposition is embedded within the enforcement structure."

Geographical characteristics of majority areas around donkey keeping communities ranging from the vast and porous borders such as Turkana hindered enforcement. In addition, geographical and administrative overlaps also created significant hurdles for law enforcement. A Police Officer in Embu explained that:

"The close proximity of county boundaries makes it difficult to execute arrests, as suspects frequently cross into neighbouring jurisdictions to evade pursuit. This jurisdictional challenge is compounded by a lack of clarity in identifying illicit activity."

A senior Chief in Turkana observed that:

"The vastness of locations such as Oropoi presents a major mobility challenge that prevents authorities from responding to incidences in a timely manner; furthermore, this is exacerbated by poor coordination with certain law enforcement officers who are occasionally compromised, alongside regional insecurity along the borders of Uganda, Kenya, and South Sudan that masks the illicit trade."

These logistical difficulties were further detailed by investigative units who pointed to a breakdown in the physical and digital infrastructure of the region.

A DCI specifically highlighted that:

"Effective enforcement is hindered by poor road networks and a lack of reliable communication signals, which are compounded by the porous nature of our international borders that allow for the easy movement of stolen donkeys; additionally, intelligence gathering is often stalled by language barriers and the intentional distortion of witness statements during translation."

There were also challenges related to the disconnect in the reporting and documentation process. Respondents provided an assessment of the procedural gaps within the initial reporting phase of criminal investigations. A NGAO officer raised concerns regarding the same, the officer noted that:

"Miswriting at police stations, reporting that cases are often recorded as something completely different from what was actually reported, which compromises the legal chain of evidence."

This systemic weakness enabled technical nature of incidences such as “bush slaughter” or “illegal transit” such instances often to be lost in translation during the filing of the First Information Report (FIR). This reduced complex stock theft to a minor administrative infraction or an unrelated offense by a recording officer. The result was prosecution losing the ability to present a cohesive and accurate legal argument in court, often leading to the acquittal of traffickers on technical grounds. Respondents further noted that, accurate documentation was the foundation of a conviction, yet it remained one of the weakest links in the multi-agency response.

A senior police officer in Machakos further identified a critical systemic failure, noting that the compartmentalization of data prevented a unified front against trafficking syndicates: The officer remarked:

"One of the most significant challenges hindering our effective prevention and oversight is the profound lack of information flow between the various actors involved in this response. While the police, public health officers, veterinary departments, and the judiciary all play distinct roles, our operations are often stalled because there is no centralized system for sharing real-time intelligence. This fragmented approach means that critical data regarding suspicious transit vehicles or repeat offenders does not reach the necessary field units in time, allowing traffickers to exploit the communication gaps between our different administrative and legal institutions."

Social barriers, including the intimidation of witnesses by well-connected cartels and the economic desperation of local communities, further created a "culture of silence" that protected traffickers. Additionally, threats were also extended to technical officers who reported of the personal and professional risks involved in the enforcement of livestock regulations. A veterinary officer in Kajiado said:

"Frequent intimidations by criminal agents and high-level culprits." when we attempt to intercept illegal transit vehicles or inspect suspected "bush slaughter" sites, we are often met with direct threats. This environment of fear is not accidental but is a calculated tactic used by organized syndicates to create a "no-go zone" for technical inspectors, effectively neutralizing the state's frontline of defence through the psychological and physical coercion of individual officers. This atmosphere of intimidation is further compounded by a profound lack of faith in the judicial process."

Grassroots administrators pointed toward the human element of the crisis. Widespread poverty within community members presented a challenge to enforcement as local people were

vulnerable to the lure of the illegal trade. The syndicates often exploited financial desperation of the local population by offering immediate cash payments for "scouting" or "holding" stolen donkeys making it hard for authorities to confiscates the stolen animals.

A Chief Kitui provided a critical analysis of the economic landscape, identifying that:

“This economic dependency creates a "recruitment pool" for the traffickers, where the urgent need for survival overrides the long-term communal interest in protecting the donkey population.”

Participants of FGD in Nakuru described these challenges as a mix of local vulnerabilities they remarked:

“The prevention of donkey theft is primarily hindered by a lack of awareness regarding the welfare of donkeys and a general state of poverty that drives individuals to participate in illegal activities for financial gain. We also observe significant community negligence, where donkeys are not well protected by their owners, making them easy targets for thieves.”

Beyond economic pressure, the study highlighted a significant disparity between the temperament of the victims and the aggression of the perpetrators. The Peace-loving nature of local donkey owners made them susceptible to intimidation by aggressive perpetrator; many owners were often hesitant to confront suspicious individuals or report thefts due to a well-founded fear of violent retaliation. An Assistant Chief in Kajiado noted that:

This "culture of silence" is actively cultivated by the syndicates, who use their physical presence and aggressive posturing to neutralize the community's informal defence mechanisms, effectively turning the residents' pacifism into a tactical advantage for the criminals.”

A veterinary officer in Kitui noted that,

“Without a robust security escort and a guarantee of witness protection, they cannot fulfil their mandate to monitor the trade effectively.”

The challenge of enforcement was also highlighted and was aggravated by the blurring of lines between legitimate commerce and criminal activity. This was reinforced by the findings from the Focus Group Discussions (FGDs) in Kiambu, where participants reported that:

“Difficulties in identifying thieves because they often reside within the community and disguise themselves as innocent traders.”

An official within the NGAO framework observed that:

“Because the sale of hides often follows a willing-seller, willing-buyer model, it becomes exceptionally difficult to effect arrests as participants feel no crime has been committed; this is bolstered by a level of local support for the hide business that makes the community reluctant to cooperate with security agencies.”

Representatives from the Anglican Development Services (ADS) and participants in Focus Group Discussions (FGDs) in the Embu County added that:

“It is nearly impossible to distinguish between genuine traders and criminal elements. Corruption within the permit issuance process, allows criminals to carry officer documentation that provides a veneer of legitimacy to their operations.”

Cultural barriers in communities such as Turkana regarding the utility of the donkeys also presented a unique challenge to enforcement efforts within the Turkana justice system. An official from the ODPP noted that:

“A significant challenge is the local culture that embraces donkey meat, known as 'Epong Edawa,' which is widely considered to have medicinal properties; this belief inherently encourages the slaughter of donkeys and complicates the prosecution of those involved in the trade.”

The cultural barriers were further complicated by community communal living; fear of communal backlash also stifled the flow of information from the public to the authorities. A participant in a Focus Group Discussion (FGD) in Turkana noted that:

“Reporting perpetrators has become difficult because the theft is frequently carried out by our own sons or village mates; exposing them brings the brand of a traitor upon an individual, which discourages whistleblowing even when the theft is widely known.”

Beyond all barriers, a Public Health Office (PHO) in Kiambu identified a biological and consumer-level challenge that allowed the trade to remain invisible to the end-user. The officer remarked:

“It is extremely difficult to distinguish between donkey meat and beef once it has been processed. This physical similarity has allowed traders to continuously dupe customers, selling them donkey meat under the guise of legitimate beef without detection.”

Finally, across study counties there was consensus from respondents on the lack of political goodwill in addressing illegal trade in donkey and products. In Turkana investigative authorities identified the challenge, equally in Kiambu authorities reported interference of political class in prosecution. The Institute of Pastoralism Development and Research Reports

(IPDR) specifically highlighted that:

“The fight against donkey theft is hindered by a lack of political goodwill and a reliance on alternative dispute resolution within villages which bypasses formal justice; moreover, the legal system suffers from slow court processes and resource-intensive requirements, while the communal herding method makes it easy for thieves to steal animals undetected from large, mixed groups.”

3.5.4 Legal and Policy Gaps in Addressing the Theft and Illegal Trade

The following analysis examines the critical legal and policy deficiencies that impede the effective prosecution of illegal trade and theft of donkeys.

The study identified some of the legal and policy gaps in addressing theft and illegal trade in donkeys.

The study revealed persistent gaps in legal frameworks intended to curb donkey theft and illegal trade, exposing a legal grey area that shielded perpetrators from meaningful consequences. In the absence of species-specific legislation, judicial officers often prosecuted offenders under general “meat handling” laws, which respondents noted as less punitive. This weak enforcement allowed wealthy syndicates to dismiss minor fines as negligible compared to the profits from the lucrative donkey skin trade, treating them as routine business costs. Consequently, the lack of targeted legal provisions perpetuated widespread theft, smuggling, and illegal slaughter of donkeys, undermining both animal welfare and regulatory control. This pattern was well observed in Kiambu and Kitui counties.

The NGAO Representative in Kikuyu identified a fundamental weakness in the judicial process, noting that current statutes fail to provide specific grounds for prosecuting donkey-related crimes:

“Our law is not clear on donkey meat; it only bans it but does not give clear laws to prosecute the offenders. If arrested, you are only charged with handling meat in an unhealthy manner. This lack of specific legal teeth means that the actual gravity of the theft and illegal slaughter is never fully addressed in court.”

The Veterinary Officer in Mwingi Central stated that,

“the primary challenge with prosecution is reliance of outdated animal welfare law that are scattered across several statutes. For example, the Prevention of Cruelty to Animal Act (Cap.360) (1962), the Animal Diseases Act (Cap 364) and Animal Disease Rules, 1968 that regulate animal movements, import/export

and disease outbreak response. The Penal Code (Cap 63) Laws of Kenya Section, 289 criminalizes the killing of an animal with intent to steal the carcass or skin, which serves as a specific legal provision for prosecuting individuals who slaughter animals solely for the value of their hides or meat rather than the value of the live animal. However, these ageing laws contain loopholes that limit real protection for animals.”

A Judicial Officer Nakuru highlighted a critical gap in the lenient sentencing guidelines, reporting that:

“The current fines and penalties are not high enough to act as a deterrent for wealthy syndicates driving the trade.”

Similarly, a Probation Officer in Kitui pointed out that:

“The legal system lacks clear post-conviction management strategies for donkey offenders, which often leads to recidivism.”

A police officer in Turkana observed that:

“The current laws do not categorize donkey-related crimes with enough specificity, often forcing police to use general donkeys’ theft charges that do not address the environmental crimes associated with illegal slaughter.

This legal ambiguity compounded was further complicated by a core regulatory contradiction, as the Public Health Officer (PHO) in Kiambu highlighted how the historical classification of the species has created a persistent loophole:

"The confusion began when the donkey was officially classified as a food animal. This has created a loophole where one is simply charged with transporting and handling meat from unknown sources. This attracts a very small fine that can be easily afforded by the perpetrators and their associates, effectively making the penalty a minor cost of doing business."

The impact of the less punitive laws was the creation of a "revolving door" effect where suspects were frequently released on low bail or bond terms, as observed by representatives from the Anglican Development Services (ADS). These representatives emphasized that:

“The failure to classify donkeys as essential economic assets within national agricultural policies further weakens the ability of the judiciary to hand down stiffer penalties that reflect the true socio-economic impact on the victim.”

Furthermore, the Meat Control Act's focus on regulated abattoirs thus leaving "bush slaughter" operations unregulated. This created risks of cross-contamination risk for the public food

supply through sale of uninspected donkey meat.

A veterinary officer in Turkana noted that standardization is the only way to turn the tide; as long as every sub-county has different rules or no rules at all, the syndicates will simply move their 'bush slaughter' operations to the area of least resistance. A chief in Kitui reported that:

“There are no clear bylaws governing the management of seasonal riverbeds, allowing illegal slaughtering to continue in these ecologically sensitive areas without specific environmental litigation.”

A veterinary in Narok county provided a critical analysis of the current legislative framework, identifying that:

“Gap in the Meat Control Act, which does not sufficiently address the clandestine 'bush slaughter' and the subsequent cross-contamination of the beef supply chain. They testified that the existing laws were primarily designed for regulated abattoirs and do not provide the specific enforcement powers needed to police informal, open-air slaughter sites. This legal oversight creates a significant risk to public health, as uninspected donkey meat can be integrated into the formal beef supply chain without detection, bypassing the sanitary and phytosanitary standards intended to protect consumers from zoonotic diseases and foodborne illnesses.”

Equally, a veterinary officer in Kiambu noted that until the Meat Control Act is amended to include specific penalties for "clandestine equine processing," the deterrent effect of inspections will remain low.

The study identified the challenge of evidentiary burden remaining a massive obstacle for both victims and administrators (proving ownership). Without mandatory branding or a digital traceability system, respondents observed that, physical evidence of theft was effectively erased the moment an animal was moved from a county to another and slaughtered. Once donkeys were stolen and transported to different counties, tracing back to the original owners was nearly impossible due to lack of digital traceability.

An assistant chief in Kitui commented that:

“There is no legal provision mandating the branding or microchipping of donkeys, which makes it nearly impossible for law enforcement to prove ownership in a court of law once an animal is recovered.”

A farmer in Machakos lamented:

“The lack of legal protection for donkey owners, reporting that the burden of proof for theft currently lies too heavily on the victim rather than the suspicious possessor of the animal.”

A village elders expressing his disappointed in the current laws argued that:

“The burden of proof currently rests on the victim to identify their animal, which is impossible once the skin is removed. A digital identification system would shift that burden to the transporter, who would have to scan the animal’s ID to prove it was not stolen before it ever reached the slaughter site.”

This was compounded by the lack of laws criminalizing the possession of skins without a verifiable source, this ensured that the illegal donkey trade remained a high-profit venture with minimal legal jeopardy. In addition, to the while the National Police Service (NPS) and the National Government Administration Officers (NGAO) provide the primary security and administrative framework, their efforts are frequently compromised by a lack of specialized infrastructure, such as gazetted holding grounds for "living evidence" and specialized transport for night operations

A look into existing policy framework surrounding the donkey trade revealed critical gaps that hindered effective oversight and enforcement. Respondents across the administrative, security, and technical sectors reported a significant gap in the lack of a finalized national donkey welfare policy that was cascaded to the local level, noting that the absence of a localized regulatory framework created an administrative challenge in monitoring skin trade. They urged that, until a localized regulatory framework is implemented, the "skin-only" trade will continue to evade monitoring.

A health officer in Kiambu said that:

A finalized national policy would provide the uniform movement permit laws necessary to lock down the highways and ensure that every donkey in transit is accounted for by a legitimate veterinary certificate.”

These insights show that without a centralized and codified policies, the efforts of local health, veterinary and administration remained fragmented and reactive. Officers in those sectors emphasized that the lack of guidelines on donkey skin trade allowed traffickers to operate in a grey area.

In addition, it allowed the destruction of animal biomass as it was inadequately penalized,

effectively preventing the standardization of hygiene and safety audits across the country.

Inadequacy of specific, stringent movement permit laws for donkeys was also major loophole that allowed traders to bypass inter-county inspections with minimal legal risk. Local health, veterinary and administration and security officers noted that, donkeys were often excluded from the rigorous permitting requirements applied to cattle and other commercial livestock. This gave a loophole for illegal traders to move large numbers of stolen animals under the guise of "informal transit." This legal oversight ensured that even when a shipment is intercepted, the lack of a mandatory, species-specific permit made it difficult for enforcement officers to prove a violation of the law, thereby reducing the "legal risk" for the syndicates.

A representative of the office of NGAO representative Mwingi Central summarized these systemic failures by stating that:

"The current laws are "toothless" because they do not explicitly criminalize the possession of donkey skins without a verifiable source of origin."

Participants in the FGDs in Kitui added that:

"The law fails to recognize the loss of livelihood in a way that allows farmers to seek adequate compensation through the courts."

This sentiment was echoed by participants in Focus Group Discussions (FGDs) in Embu County who stated that:

"There is no clarity on matters regarding donkey theft and the illegal trade in related products. Without specific, high-stakes legislation targeting the unique nature of the donkey skin and meat trade, criminal syndicates will continue to operate with a perceived sense of safety."

A NGAO Representative in Machakos noted a specific gap regarding the burden of proof and the possession of live animals:

"There is no legal framework to address individuals found with large numbers of donkeys for which they cannot explain the source. This inability to prosecute based on unexplained possession allows traffickers to move herds with relative ease."

Findings also identified disconnect between local bylaws and national regulations. Technical and administrative stakeholders pointed that, where there existed by laws at the local level there was a disconnect with existing national laws. A representative of Livestock Production at KALRO (Machakos) identified a critical disconnect between the existence of regulatory

frameworks and their actual impact on the ground, suggesting that the primary failure is operational rather than legislative:

"The primary issue regarding legal and policy gaps is not a lack of existing regulations, but rather that the implementation of these policies is not being effectively executed. While we have frameworks in place to manage livestock movement and slaughter, the actual enforcement and follow-through on these mandates remain inconsistent and insufficient to deter illegal trade."

These combined legal and policy gaps in definition, sentencing, and regulatory oversight ensured that the illegal trade remains a low-risk, high-reward venture for offenders.

CHAPTER FOUR: SUMMARY OF FINDINGS, CONCLUSION AND RECOMMENDATIONS

4.1 Introduction

This chapter presents summary of the findings of the study with regards to the current patterns of theft in donkeys and donkey products, the mode of operation (*modus operandi*) of theft in donkeys and donkey products, the impacts of theft in donkeys and donkey products and the effectiveness of the measures for curbing the theft in donkeys and donkey products. The chapter also provides the conclusions, recommendations and areas for further research arising from the study.

4.2 Summary of Findings

The illicit donkey trade in Kenya has evolved from localized, petty theft into a sophisticated, highly organized enterprise fueled by global *ejiao* demand and the pursuit of rapid financial gain. This "zero-waste" model systematically exploits environmental stressors, porous borders, and institutional contradictions between legal exports and criminalized slaughter to maintain a steady supply of skins, meat, and specialized parts for both local and international shadow markets. This criminal activity is entrenched by a systemic enforcement gap, where well-capitalized syndicates utilize flexible logistics and industrial storage to bypass under-resourced law enforcement. This environment, characterized by high profit and low risk, leverages urban protein demand and systemic corruption to insulate operators from judicial scrutiny, ultimately leaving rural households to bear the socioeconomic burden of losing their essential livestock assets.

Research indicates that the trade operates through an adaptive, tiered hierarchy that integrates local reconnaissance with high-level institutional and political protection. By employing a division of labor and leveraging "legal mimicry" such as forged documentation and strategic bribery these syndicates successfully circumvent regulatory frameworks, allowing the trade to persist despite periodic interventions. The sustainability of this enterprise is underpinned by a cycle of community and institutional collusion that facilitates product movement and the neutralization of forensic evidence.

Through counter-detection strategies such as biological waste disposal, route diversification, and the intimidation of local authorities, the trade persists as a resilient, professionalized threat that endangers both local livelihoods and public safety.

The impacts of this trade are multifaceted, extending beyond immediate economic losses to trigger a systemic collapse of rural socioeconomic structures. The depletion of donkeys causes environmental degradation through carcass abandonment, while the loss of traditional haulage forces a regressive shift to manual labor, which disproportionately burdens women and children with "time poverty" and traps households in intergenerational cycles of poverty. This crisis is further exacerbated by the erosion of social cohesion, as resource scarcity replaces traditional mutual aid with suspicion and instability. As theft rates outpace biological recovery, the resulting demographic drain and rural-to-urban migration strip the agricultural sector of its labor force, dismantling the rural micro-economy and depriving communities of the foundational transport necessary for long-term viability.

The prevention and oversight of the trade involve a complex, multi-agency framework including NGAOs, the National Police Service, and veterinary departments, coordinating alongside initiatives like *Nyumba Kumi* and NGOs such as Brooke East Africa and KENDAT. While community surveillance and technological platforms like "*Punda-Wangu*" have proven effective in some areas, efforts remain hampered by inconsistent implementation and systemic resource deficits. Ultimately, the effectiveness of current strategies is undermined by profound legal, structural, and socio-economic challenges. Enforcement remains largely reactive, constrained by a lack of gazetted holding grounds, forensic infrastructure, and "toothless" legal frameworks that fail to provide meaningful deterrents or clear mechanisms for proving ownership.

4.3 Conclusions

In conclusion, the illicit donkey trade in Kenya has evolved from localized, petty theft into a highly organized, clandestine enterprise driven by global demand for ejiao and the pursuit of rapid financial gain.

The data reveals a shift toward a sophisticated "zero-waste" commodity model where criminal networks systematically exploit environmental stressors, porous borders, and institutional gaps such as the contradiction between licensed exports and criminalized slaughter to maintain a

steady supply chain of skins, meat, and specialized equine parts for both local and international shadow markets.

The persistence of these criminal activities is further entrenched by a systemic "enforcement gap," where well-capitalized syndicates utilize flexible logistics and industrial-scale storage to bypass localized, often under-resourced, law enforcement. This creates a high-profit, low-risk environment that effectively leverages urban protein demand and systemic corruption to insulate operations from judicial scrutiny, leaving rural households to bear the brunt of the socioeconomic and productive losses caused by the continuous depletion of their essential livestock assets.

The research findings showed that the illicit donkey trade functions through a highly adaptive and tiered hierarchy that effectively integrates local reconnaissance with high-level institutional and political protection. This operational structure relies on a "division of labour" model, where localized actors such as youth groups, scouts, and compromised officials perform the high-risk tasks of theft and clandestine processing, while financial controllers and urban brokers manage the supply chain to minimize personal exposure. By leveraging "legal mimicry," forged documentation, and systemic bribery, these syndicates successfully bypass regulatory frameworks, allowing the trade to persist despite periodic enforcement efforts.

Ultimately, the sustainability of this illicit enterprise is underpinned by a cycle of community and institutional collusion that facilitates both the "conveyor belt" movement of products and the neutralization of forensic evidence. Whether through the use of biological disposal systems, route diversification, or the strategic intimidation of local authorities, the trade demonstrates a sophisticated capacity for counter-detection. This creates a high-stakes environment where the combination of rural resource exploitation and urban market demand, shielded by powerful political and security "umbrellas," ensures that the illegal acquisition of donkeys remains a resilient, professionalized, and dangerous threat to local livelihoods and public safety.

The impacts of the illicit donkey trade are multifaceted, extending beyond immediate economic losses to trigger a systemic collapse of rural socio-economic structures.

The depletion of these essential livestock assets serves as a catalyst for environmental degradation, where the abandonment of carcasses in grazing lands and water sources creates

severe public health hazards, including the spread of zoonotic diseases and the contamination of vital water supply chains. Furthermore, the loss of donkey-based haulage forces a regressive shift toward manual labour, disproportionately burdening women and children with "time poverty," which ultimately stifles educational attainment and traps vulnerable households in cycles of structural, intergenerational poverty.

This crisis is compounded by the erosion of social cohesion, as resource scarcity dissolves traditional mutual aid systems and replaces them with a climate of suspicion, vigilantism, and instability. As the donkey population faces a real risk of regional extinction due to theft rates far outpacing biological recovery, the resulting demographic drain manifested through rural-to-urban migration strips the agricultural sector of its labour force. Ultimately, the illegal trade acts as a permanent destabilizer, dismantling the rural micro-economy and leaving communities without the foundational transport and agricultural support necessary for long-term viability and development.

The prevention and oversight of the illicit donkey trade rely on a complex, multi-agency framework involving National Government Administration Officers, the National Police Service, and veterinary departments, which coordinate alongside community-led initiatives such as the *Nyumba Kumi* and non-governmental organizations like Brooke East Africa and KENDAT. While interventions such as community surveillance clusters, night vigils, and the integration of technological platforms like "*Punda-Wangu*" have demonstrated effectiveness in specific regions, many enforcement efforts remain hampered by inconsistent implementation and systemic resource deficits.

Strategic measures, including highway intercepts and public health disposal protocols, often face limitations, as criminal syndicates exploit the absence of species-specific legislation and the lack of unified, real-time intelligence sharing between state and non-state actors.

The effectiveness of current strategies is further undermined by profound legal, structural, and socio-economic challenges that continue to facilitate the trade. Enforcement is severely constrained by the lack of gazetted holding grounds for recovered animals, insufficient forensic infrastructure, and "toothless" legal frameworks that rely on outdated statutes, which fail to provide meaningful deterrents or clear mechanisms for proving ownership once animals are

slaughtered. Beyond these logistical barriers, deep-seated systemic issues including institutional infiltration, the "culture of silence" fostered by intimidation, and regional cultural beliefs regarding the utility of donkey products create a hostile environment for frontline officers. Ultimately, as documented in," the current enforcement model remains largely reactive, struggling to transition from disjointed, localized responses toward the centralized policy and operational cohesion required to dismantle the industrial-scale exploitation of donkey populations.

4.4 Recommendations

To strengthen the prevention, enforcement, and oversight on theft and the illegal trade in donkeys and related products, various stakeholders across the nine Counties proposed a multifaceted approach centred on legislative reform and inter-agency collaboration.

4.4.1 Key Policy Recommendations

Therefore, this study makes the following key policy recommendation addressed to specific state and non-state actors:

1. Ministry of Agriculture & Livestock Development): /Directorate of Veterinary Services/County Government Veterinary Services):

- i. Enact a comprehensive Donkey Protection Law to strengthen donkey welfare, regulate the donkey value chain, promote sustainable reproduction, and establish specific offences and penalties.
- ii. Declare donkeys a threatened livestock species and fully domesticate and enforce the African Union moratorium on donkey slaughter for skins, including revoking illegal slaughter operations and strengthening regulatory oversight.
- iii. Implement a national donkey identification and traceability system, strengthen livestock movement controls through verified certificates of origin, and support enforcement with holding grounds, rescue centres, and veterinary services for recovered donkeys.
- iv. Promote sustainable donkey-based livelihoods, including milk and other non-extractive value chains.
- v. Strengthening cross-border collaboration through the East African Community (EAC) and partnerships with wildlife authorities to combat links between donkey trafficking, wildlife crime, and bushmeat trade.

- vi. Standardize and digitize livestock movement permits and dispatch notes, including a mandatory no-objection clearance system for inter-county donkey movements to prevent document fraud and illegal transport.
- vii. Strengthen routine and unannounced inspections of meat processing facilities and hide and skin collection centres to improve compliance, traceability, and detection of illegal donkey products.

2. National Government (Ministry of Interior & National Administration); National Police Service (NPS) & Directorate of Criminal Investigations (DCI)

- i. Domesticate and implement the Rapid Response Initiative (RRI) model in collaboration with the Ministries responsible for Livestock and Public Health to strengthen coordinated prevention and response to donkey theft and illegal slaughter.
- ii. Recognize donkey theft and bush slaughter as emerging forms of organized crime by recording donkey theft alongside cattle rustling statistics and prioritizing reporting, investigation, and response at all police stations.
- iii. Strengthen intelligence-led, multi-agency enforcement by enhancing coordination between the NPS, DCI, and Veterinary Services, targeting criminal syndicates across the entire illegal trade chain rather than only low-level offenders.
- iv. Intensify public awareness on donkey protection and welfare through village barazas, community policing forums, and security meetings.
- v. Strengthen anti-corruption and accountability measures at transit checkpoints through enhanced oversight, digital surveillance, and internal integrity systems to prevent collusion and the illegal movement of donkeys.

3. Office of the Director of Public Prosecutions (ODPP) & Judiciary

- i. Build the capacity of prosecutors and judicial officers on livestock-related offences and the applicable legal framework to ensure effective prosecution and the imposition of appropriate deterrent penalties.
- ii. Apply maximum statutory penalties, asset forfeiture, and asset recovery measures to remove the financial incentives for donkey theft and the illegal skin trade.

- iii. Strengthen community awareness on donkey protection and welfare through the Court User Committees (CUCs) and other public outreach initiatives.

4. Kenya Revenue Authority (Customs) & Border Control Agencies

- i. Strengthen inspection and verification of animal products at all import and export points through mandatory declarations and inter-agency collaboration to prevent the laundering of donkey skins through legitimate trade channels.
- ii. Enhance border surveillance and intelligence sharing with neighboring countries and relevant enforcement agencies to disrupt cross-border donkey theft and illegal trade networks.
- iii. In line with the national moratorium on donkey slaughter for skins, review Kenya's export classification and remove donkeys and donkey products as export commodities to eliminate opportunities for illegal trade through formal export channels.

5. Civil Society Organizations

- i. Strengthen grassroots awareness on responsible donkey ownership, welfare-based management, natural reproduction, and donkey security.
- ii. Promote community policing, rapid reporting mechanisms, and collaboration with local leaders and the National Police Service to prevent donkey theft and illegal trade.

4.5 Suggestions for Further Studies

To provide evidence on what is failing in the criminal justice system, enabling targeted legal reforms and improved enforcement strategies, there is need to analyse all cases to get the prosecution outcomes, conviction rates, and sentencing patterns. This will help also examine barriers faced by police, prosecutors, and judiciary.

CRITICAL QUESTIONS EMERGING FROM THE STUDY

The persistence of donkey theft and illegal trade despite existing bans and regional commitments raises several critical questions for policy, enforcement, and governance.

First, if Kenya imposed a ban on donkey slaughter for export, why does the regulatory framework still not explicitly prohibit the export of donkey skins, creating a potential legal loophole exploited by traffickers? Secondly, in a context where legal slaughter

is prohibited, how is it that large consignments of donkey skins, some reportedly fresh, continue to be intercepted, suggesting ongoing illegal bush slaughter operations?

At the regional level, if Kenya has participated in key continental and regional commitments such as the Pan-African Donkey Conference (PADCo) Declaration, the African Union Executive Decision on the moratorium, the development of the Pan-African Donkey Strategy, and even Parliamentary engagement through the East African Legislative Assembly motion, why does cross-border smuggling of donkeys and donkey products continue unabated, particularly between countries that have also announced bans such as Tanzania and Uganda?

From a governance and livelihoods perspective, critical questions arise on what concrete measures governments are implementing to safeguard donkey-dependent communities whose livelihoods are increasingly threatened by the depletion of donkey populations. If declining donkey numbers prompted the original policy ban, why do illegal slaughter and trade networks continue to operate, and what explains the apparent gap between policy intent and enforcement reality?

Further, in light of outdated legal provisions that appear to attract relatively lenient fines and penalties, what specific legislative amendments are being considered to ensure effective deterrence, including stronger sanctions and closure of legal loopholes? In counties such as Kitui, where donkey protection policy drafts have remained pending for several years, what is delaying their enactment, and how does this legislative inertia affect local enforcement efforts?

Finally, given the closure of known slaughter facilities such as Kithyoko abattoir and the revocation of licences for facilities such as Yogde International Trade Co. Ltd, what explains the continued existence of known slaughter and processing sites, and what enforcement or intelligence gaps are allowing illegal operations to persist despite targeted interventions?

CASE SCENARIO

During the course of the study, the researchers encountered a classical case scenario that is particularly useful because it demonstrates that the challenge is not merely one of enforcement, but also one of legal design and criminal procedure. Even where large-scale consignments are intercepted, weaknesses in charge formulation, evidence management, and the absence of specific offences can create opportunities for traffickers to evade accountability and continue operating.

Case Title: Interception and Prosecution of a Donkey Skin Consignment along the Thika–Garissa Highway

Background

During the study period, a significant law enforcement operation provided an opportunity to observe the functioning of the criminal justice system in responding to the trade in donkey skins. As shown in Figure 8, while on routine patrol within Nguutani area at Musingi Market along the Thika–Garissa Highway, officers attached to the Kanyonyoo Multi-Agency Team intercepted motor vehicle registration number KAQ 902H, a Renault prime mover towing trailer registration number ZE 4659.

The vehicle was travelling from Kithyoko towards Nairobi.

A search conducted on the trailer revealed approximately 3,721 pieces of dry donkey skins weighing about 12 tonnes. Upon being requested to produce movement permits and other supporting documents authorizing transportation of the animal products, the occupants failed to produce the requisite documentation. The vehicle and its occupants were escorted to Nguutani Police Station for investigations.

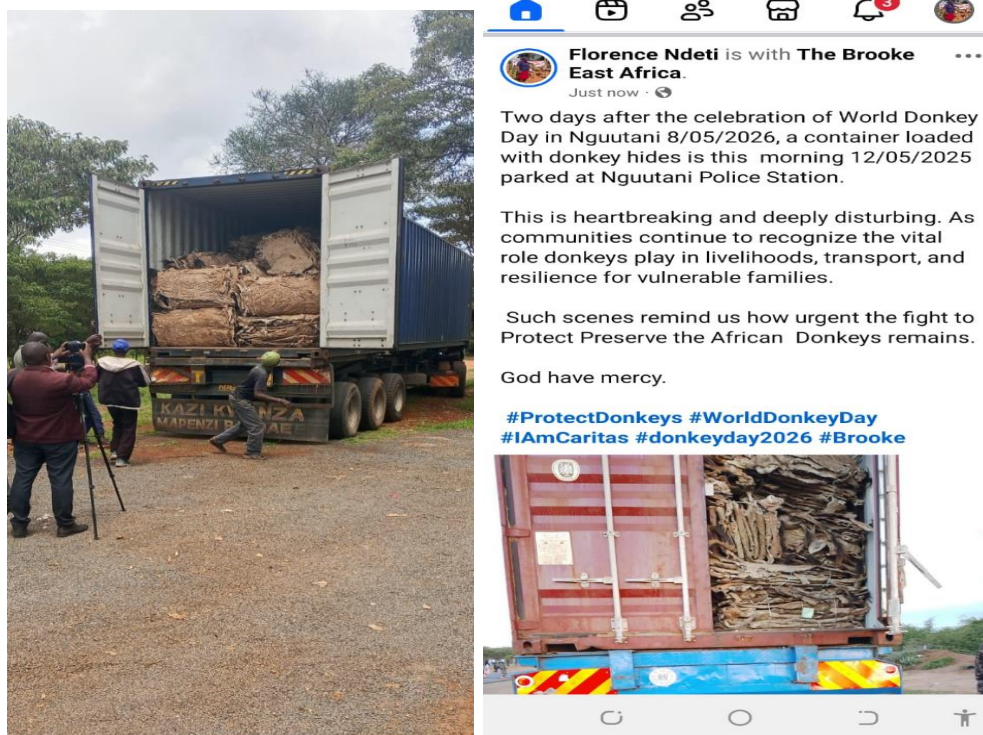


Figure 8: A shipping container seized at Nguutani Police Station containing donkey hides

Documentary Evidence and Cross-Border Elements

Among the documents recovered was Dispatch Note No. 672930 indicating that the skins originated from Turkana County. Additional documents reviewed during investigations suggested that some of the donkeys had originated from Moroto District in Uganda, indicating a cross-border dimension to the trade and possible violations of East African Community customs and animal movement regulations.

Initial Charges and Collapse of Proceedings

The suspects were charged with transporting animal products without a permit contrary to Section 8(1) as read together with Section 8(2) of the Meat Control Act, Cap. 356 Laws of Kenya. The matter was registered as Criminal Case No. 410 of 2026 before the Kitui Law Courts.

Appended below in Figure 9, 10 and 11 is a copy of movement permits, dispatch note, No Objection, veterinary documentations and court record charge sheet.

Documentary Evidence and Cross-Border Elements

Among the documents recovered was Dispatch Note No. 672914 indicating that the skins originated from Turkana County. Additional documents reviewed during investigations suggested that some of the donkeys had originated from Moroto District in Uganda, indicating a cross-border dimension to the trade and possible violations of East African Community customs and animal movement regulations as explicitly evidenced by the documentation presented in Figures 9, 10, 11, 12, and 13.

ORIGINAL

REPUBLIC OF KENYA
THE HIDE, SKIN AND LEATHER TRADE ACT
(Cap. 359)

TENTH SCHEDULE (Rule 36 (3))

REGISTRATION OF PREMISES CERTIFICATE

The premises situated at Nairobi West (Lokichau)
and occupied by Paul Kariuki
have been inspected by me, and I hereby approve them as being
suitable for the purpose of suspension drying/wet salting/tanning*
I also certify that the owner/occupier* of such premises and th-
persons employed therein are capable of satisfactorily preparing
processing* hides and skins in the prescribed manner.

The premises have been given the following Registration/
Number JTG/006/25

Fee Paid KSh. 500/-

Amount in words Five hundred only

Expiry on 31st December, 2025

Date 25/3/25

**Delete whichever word is not applicable*

Inspector
VETERINARY OFFICER (V.O)
COUNTY GOVERNMENT OF TURKANA
P. O. Box 52-30500,
LODWAR

25 MAR 2025

Figure 9: Registration of Premises Certificate located at Nairobi West issued unde the Hides, Skins and Leather Trade Act (Cap. 359), Tenth Schedule.



BUSINESS REGISTRATION SERVICE
P. O. BOX 30001
NAIROBI
9 OCT 2024

To:
The Director
YONGDE INTERNATIONAL TRADE CO.
LTD
P.O. Box 61759
80000 - CITY SQUARE

THE COMPANIES ACT, 2015

Records relating to the below company held by the Companies Registry as at 2 Oct 2024.

COMPANY	YONGDE INTERNATIONAL TRADE CO. LTD
COMPANY NUMBER	PVT-5JUZ73A2
NOMINAL SHARE CAPITAL	100,000.00
NUMBER AND TYPE OF SHARES (VALUE PER SHARE)	ORDINARY: 1000 (KES 100.00 EACH)
DATE OF REGISTRATION	2 OCT 2024
REGISTERED OFFICE	P.O BOX 61759, CITY SQUARE TELEPHONE: +25468085988, EMAIL: SUNFLOWERINTERNATIONAL99@GMAIL.COM COUNTY: NAIROBI, DISTRICT: LANGATA DISTRICT, LOCALITY: MADARAKA STREET: LANGATA ROAD, BUILDING: GOGO STAR PLAZA
POSTAL ADDRESS	P.O BOX 61759 CITY SQUARE
ENCUMBRANCES	

Name of Directors and Shareholders of the above company with their particulars are as follows:

NAME	DESCRIPTION	ADDRESS	NATIONALITY	SHARES
KELVIN KIPNG'ETICH MUTAI	DIRECTOR/SHAREHOLDER	P.O BOX 61759 CITY SQUARE	KENYA	ORDINARY: 1000
TOTAL				1000

Yours Faithfully,
REGISTRAR OF COMPANIES

REF NO: PVT-5JUZ73A2

(REMARKS: THIS IS A SYSTEM GENERATED CERTIFICATE AND DOES NOT REQUIRE A SIGNATURE)

Figure 10: Registration of Premises Certificate for Yongde International Trading Co. Ltd, showing the cancellation stamp by the Directorate of Veterinary Services.

COUNTY GOVERNMENT OF MACHAKOS



Website: www.machakoscounty.go.ke
P.O. BOX: 30001
Nairobi
Tel: 020 240 0000

Business No: C24G00363
Certificate of Registration No: 34949239

Business Name: YONGDE INTERNATIONAL TRADE CO. LTD
PIN Number: P052368485W
VAT Number: PVT-5JUZ73A2

SSP NO 2024/C24G0036301
Grant Date: Year: 2024

SINGLE BUSINESS PERMIT

To engage in activity / business / profession or occupation of:

Business Activity Code & Description: ☒ 472 Small Professional Services For Users (Traders)
Business Activity Description: ☒ MARKET/OUTLET/STALL/STAND/BOOTH/STAND/STALL

SINGLE BUSINESS PERMIT

KES (In Words) *** SEVENTEEN THOUSAND ONLY ***

Business under this license shall be exclusively conducted at the address indicated below:

Plot No: ISOLATED
Physical Location: KITHYOKO
Postal Address: 61759 CITY SQUARE
Telephone: 0722379615
Fax & Email:

Validity Period: Issued on: 01 Oct 2024
Expiry Date: 31 Oct 2024

Permit issued by: 
REG. 01008A2024000000



Notice: Counting this license shall NOT exempt the holder from any other applicable law or regulation by the Government of Machakos

Figure 11: Single Business Permit issued by the County Government of Machakos to Yongde International Trade Co. Ltd

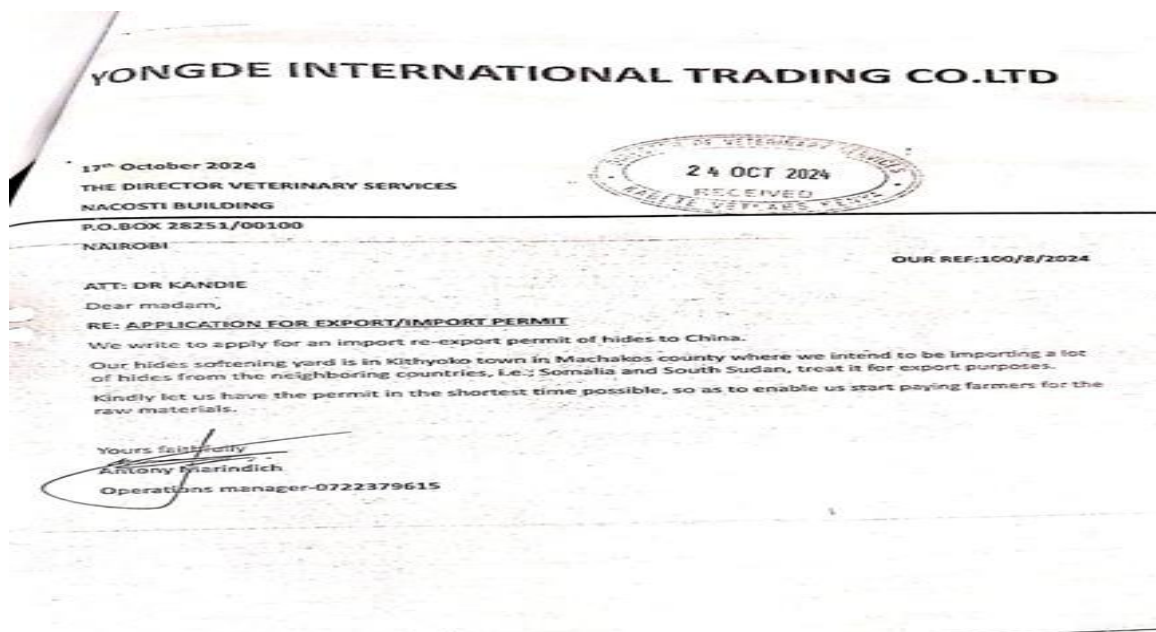


Figure 12: Formal application letter from Yongde International Trading Co. Ltd to the Director of Veterinary Services requesting an import/export permit.

REPUBLIC OF KENYA
 THE HIDE, SKIN AND LEATHER TRADE ACT
 (Cap. 353)
 TWELFTH SCHEDULE
 No 672914
 ORIGINAL

DISPATCH NOTE

I HEREBY certify that I have inspected the consignment listed below and found the details entered to be correct. These hides and skins may therefore be transported from LODWAR-TURKANA COUNTRY Market/Town in TURKANA COUNTY District to MATUV (KITHOKO) Market/Town in MACHAKOS COUNTY District in accordance with regulations 22 and 40 (3) of the Hides, Skins and Leather Trade Rules, 1988.

Name of buyer KERIKEL PAUL
 Original owner INDIVIDUAL (GROWN) PASTORALIST (GROWN)
 Licence No. TEG/007/2025
 Address PO BOX 08-34500 LODWAR
 Name and Registration No. of vehicle JERRY - KCD 980Y
 Intended destination MATUV (MACHAKOS)
 Name of driver MA STANLEY MANA MUTHI - 0718-202114

	QUANTITY AND GRADES							
	I		II		III		IV	
	Pieces	Kg.	Pieces	Kg.	Pieces	Kg.	Pieces	Kg.
Hides	<u>500 pcs @ 200g</u> <u>= 500 pcs =</u>							
Goat Skins								
Hair-Sheep Skins								
Wool-Sheep Skins								

Receipt of KSh 1000
 Date 25/03/2025
 Signed [Signature] Inspector
 District TURKANA COUNTY
 COUNTY DIRECTOR VETERINARY SERVICES
 COUNTY GOVERNMENT OF TURKANA

*Please specify.
 Note:—1. The Original is to be left at the point of delivery.

Figure 13: Dispatch Note No. 672914 detailing the movement of animal products from Turkana to Machakos.

Initial Charges and Collapse of Proceedings

The suspects were charged with transporting animal products without a permit contrary to Section 8(1) as read together with Section 8(2) of the Meat Control Act, Cap. 356 Laws of Kenya. The matter was registered as Criminal Case No. 410 of 2026 before the Kitui Law Courts.

However, the case was dismissed under Section 89(5) of the Criminal Procedure Code on account of defective charges. The charge sheet failed to indicate the penalty provisions applicable to the offences charged. Further, one of the counts relied upon Gazette Notice No. 63 of 2020 issued under the Prevention of Cruelty to Animals Act, which had subsequently been revoked by Kenya Gazette Vol. CXXII No. 75 published on 24 April 2020. Consequently, both the accused persons and the consignment were released by the court, as demonstrated by the excerpt from the initial charge sheet (Count II) in Figure 14.

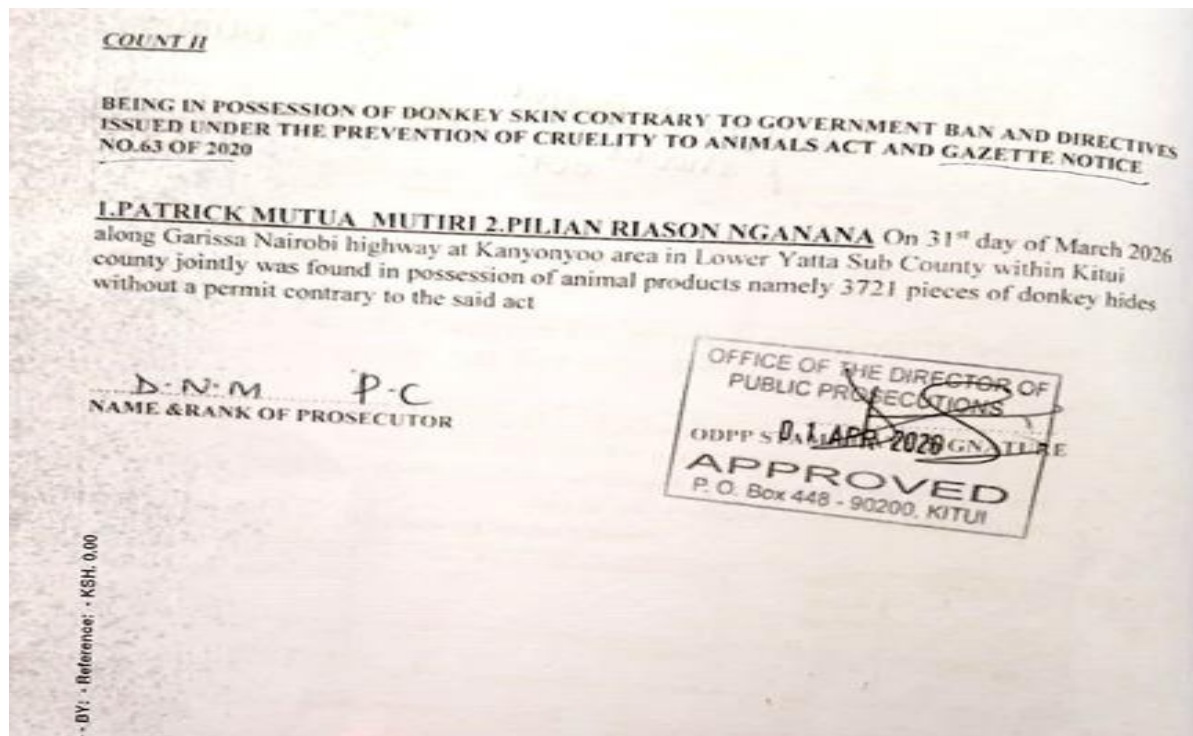


Figure 14: Excerpt from the initial charge sheet (Count II) in Criminal Case No. 410 of 2026, demonstrating the reliance on a revoked Gazette Notice.

Re-Interception and Preservation of Evidence

Police officers manning a roadblock at Kithimani along the Garissa–Thika Highway intercepted the same lorry at approximately 8.00 p.m. while it was transporting the consignment. Upon interception, the driver fled the scene, abandoning the vehicle.

To facilitate further consultations with the Office of the Director of Public Prosecutions (ODPP) and other stakeholders, the vehicle and consignment were detained at Kithimani Police Station pending further investigations, suspect profiling, and collection of additional evidence.

Revised Charges and Conviction

Following extensive consultations, investigators preferred alternative charges under the Hides, Skins and Leather Trade Rules, Cap. 359 and related legislation. The accused persons were charged with:

- i. Possession and transportation of donkey skins from undisclosed premises without a dispatch note contrary to Rule 22 of the Hides, Skins and Leather Trade Rules;
- ii. Failure to possess and display a valid buyer's licence while transporting skins contrary to Rule 27 of the Hides, Skins and Leather Trade Rules;
- iii. Transportation of goods originating from a partner state without a Community Certificate of Origin contrary to Rule 4 of the East African Community Customs Union (Rules of Origin) Rules and Section 44A of the Tax Procedures Act;
- iv. Importation of hides and skins without inspection, certification and issuance of valid dispatch notes contrary to Rule 22 as read together with Rule 39(4) of the Hides, Skins and Leather Trade Rules. The court subsequently secured convictions against the accused persons and imposed custodial sentences of two years on Count I and one year each on Counts II and III, with an alternative fine of KShs. 80,000 on each count as illustrated in Figures 15, 16, 17, 18, and 19.

The documentation provides a comprehensive overview of the regulatory actions taken against Yongde International Trading Co. Ltd. Figure 15 presents the official Registration of Premises Certificate for the company, which is prominently marked as cancelled by the Directorate of Veterinary Services. This cancellation is further detailed

in Figure 16, which contains a formal letter from the Directorate of Veterinary Services explicitly stating that the registration was terminated due to a breach of the intended purpose declared in the company's application. The initial application submitted by the company for this registration, filed under the Hides, Skin and Leather Trade Act, Cap 359, is provided in Figure 17. Furthermore, Figure 18 displays the formal Dispatch Note No. 672914, which was issued under the same Act to serve as critical documentation for the authorized movement of animal products. Finally, Figure 19 includes a revenue collection receipt issued by the Moroto Municipal Council in Uganda, which serves as evidence of cross-border loading fees paid for the donkey skins.

REPUBLIC OF KENYA
THE HIDE, SKIN AND LEATHER TRADE ACT
CAP. 359
TENTH SCHEDULE
REGISTRATION OF PREMISES CERTIFICATE

The premises situated at _____
and occupied by _____
have been inspected by me, and I hereby approve them as being
suitable for the purpose of suspension drying/retanning/tanning.
I also certify that the owner/occupier of such premises and the
persons employed therein are capable of satisfactorily preparing
processing hides and skins in the prescribed manner.

The premises have been given the following Registration
Number HS/25/12/24

Fee Paid KSh. 12,000

Amount in words Twelve Thousand

Expiry on 31st December, 2024

Date 27.11.24

Cancelled

OFFICIAL RECEIPT D
2256244
Yongde International Trading Co. Ltd.
Directorate of Veterinary Services
27 NOV 2024

Figure 15: Official Registration of Premises Certificate for Yongde International Trading Co. Ltd, prominently marked "Cancelled" by the Directorate of Veterinary Services.

MASINGA SUBCOUNTY VETERINARY OFFICER

MINISTRY OF AGRICULTURE AND LIVESTOCK DEVELOPMENT
STATE DEPARTMENT FOR LIVESTOCK DEVELOPMENT
DIRECTORATE OF VETERINARY SERVICES

Telephone: 020 – 8043441
E-mail: info@svs.kilimo.go.ke

Veterinary Research Laboratories
P.O. Box 29114-00625 Kangemi
Nairobi

Date: 11th DECEMBER 2024

When replying, please quote:
Ref: HS/KPC/VOL.111/18

All correspondences should be addressed to:
The Director of Veterinary Services

DIRECTOR YONGDE INTERNATIONAL COMPANY LIMITED

Dear Sir/Madam

RE: CANCELLATION OF REGISTRATION OF PREMISES NUMBER HS/25/NOV/2024:

The above Registration of Premises issued on 27/11/2024 belonging to Yongde International Ltd situated in Kithioko, Machakos county is hereby **CANCELLED** in accordance to **Hides, Skin and Leather Trade Act CAP 359 Part IV Section 12, 3 (b)**. The opinion of the inspector found your premises not satisfactory because you breached the intended purpose which you declared as per your application that the store is for storing cattle hides but it was found to be used for Donkey skin.

Therefore, you are given one week to surrender the registration certificate issued to the Director of Veterinary Service Kabete before 23rd December 2024.

NORAH KANDIE
HEAD LEATHER DEVELOPMENT
FOR: DIRECTOR VETERINARY SERVICE

11 DEC 2024

CC.

- County Commander of Police-Machakos County
- CEC, Agriculture and Livestock
- ✓ CDVS-Machakos County

Figure 16: Formal letter from the Directorate of Veterinary Services officially cancelling the premises registration due to breach of declared purpose.

Approved
Pay 10,000
27/11/2024

Ministry of Agriculture & Livestock Development
STATE DEPARTMENT FOR LIVESTOCK
Office of the Director of Veterinary Services
Hide, Skin and Leather Trade Act Cap 359
9th Schedule Rule 36

APPLICATION FOR A REGISTRATION OF PREMISES CERTIFICATE:

To the inspector:

SECTION A: COMPANY INFORMATION

Name of entity: YONGDE LTD

Type of entity (company, sole proprietorship, partnership): COMPANY

Physical Address: KITHIOKO, MACHAKOS County: MACHAKOS

Postal Address: P.O. BOX 6159 Postal Code: 00000

Plot No/ L.R. No:

Company contact person: KEVIN MUTHI Position: DIRECTOR

Email address: kevin.muthi@yongde.co.ke Phone Number: 0968025988

Directors' details:

Name	Nationality	Contact details	Email address
<u>KEVIN MUTHI</u>	<u>KENYAN</u>	<u>0968025988</u>	<u>kevin.muthi@yongde.co.ke</u>

SECTION B: FACILITY INFORMATION

Type of ownership: Freehold/ Leased Leased

Registration history of premises

Please select applicable category and indicate the average monthly production capacity.

Figure 16: Formal letter from the Directorate of Veterinary Services officially cancelling the premises registration due to breach of declared purpose.

Wet blue Chrome Tanned Leather
 a) Skins Pieces.
 b) Hides Sq. Ft.
 Crust Tanned Leather Sq. Ft.
 Finished Leather Sq. Ft.
 Go-down (Raw hides/skins) Kg/Tonnes
 Leather craft (Leather Goods and Footwear)
 a) Number of pieces for leather article/ Goods
 b) Pairs of shoes
 Feathers Kgs.
 Wool Kgs.
 Bristles Kgs.
 Scales Pieces.
 Hooves Pieces.
 Horns Pieces.
 Bones Pieces.

SECTION C: PUBLIC HEALTH
 The premises to which this application relates are suitable, having regard to the interests of public health.
 Name of Medical Officer of Health or person authorized: P. Kingori
 Designation: SEPH
 Signature: [Signature] Date: 25/11/2024

SECTION D: DECLARATION AND SIGNATURE
 I certify that my answers are true and complete to the best of my knowledge. I have also attached the necessary documents required with this application.
 Signature: [Signature] Date: 25/11/2024

SECTION E: FOR OFFICIAL USE ONLY
 Approved/ Not approved.
 Reasons for Not approved
 Name of Inspector:
 Designation:
 Signature: Date:

Figure 17: Application for a Registration of Premises Certificate submitted by Yongde International Trade Co. Ltd under the Hides, Skin and Leather Trade Act, Cap 359.

REPUBLIC OF KENYA
 THE HIDES, SKIN AND LEATHER TRADE ACT
 (CAP. 359)
 TWELFTH SCHEDULE
 N2 672914

Dispatch Note
 I HEREBY certify that I have inspected the consignment listed below and found the details entered to be correct. These hides and skins may therefore be transported from TOLEAIA COUNTY District to MATUU (MACHAKOS) MARKET/TOWN in MACHAKOS COUNTY District in accordance with regulations 22 and 40 (3) of the Hides, Skins and Leather Trade Rules, 1988.
 Name of buyer: KODIKET PAK
 Original owner: INDUSTRIAL (GENERO) PASTORALIST TRADERS (GENERO)
 Licence No. KG/002/2025
 Address: PO BOX 08-3450 Toleaia
 Name and Registration No. of vehicle: JERRY - KCD 980Y
 Intended destination: MATUU (MACHAKOS)
 Name of driver: MR STANLEY MANA MURTHI - 0718-002114

	QUANTITY AND GRADES							
	I		II		III		IV	
	Pieces	Kg.	Pieces	Kg.	Pieces	Kg.	Pieces	Kg.
Hides	<u>500 pcs @ 200g</u>							
Goat Skins								
Hair-Sheep Skins								
Wool-Sheep Skins	<u>500 pcs</u>							

Receipt of KSh 1000
 Date: 25/03/2025
 Signed: [Signature] Inspector
 District: TOLEAIA COUNTY
 COUNTY DIRECTOR VETERINARY SERVICES
 COUNTY OFFICE OF TUSKANA
 DATE: 25/03/25

Figure 18: Formal Dispatch Note (No. 672914) issued under the Hides, Skins and Leather Trade Act, which serves as critical documentation for the authorized movement of animal products.

MOROTO MUNICIPAL COUNCIL
P.O BOX 36, MOROTO TEL NO 045-4470102
REVENUE COLLECTION RECEIPT - OFFLOADING AND LOADING FEES

Date: 15/09/2025 Station: South Division

Received from: KCV850H

The sum of shillings One hundred thousand shillings only

Being: Payment for Loading for

Description of payment

Cash / Cheque No. _____

Shs 100,000

CODE: _____

ITEM: SKINS

Voucher No. 5426

Signature of Town Treasurer

INDELIBLE INK MUST BE USED

N.B Original to be issued to payer. Duplicate to be filed as the voucher in accounts. Triplicate to remain in the book

Figure 19: Revenue collection receipt from Moroto Municipal Council, Uganda, evidencing cross-border loading fees for donkey skins.

Key Findings and Implications

This case illustrates how weaknesses within the criminal justice process can inadvertently enable the illegal trade in donkey skins. Although law enforcement officers successfully intercepted a substantial consignment linked to transboundary trafficking networks, procedural and legal shortcomings initially resulted in the release of both the suspects and the consignment. The case exposed significant capacity gaps among investigators and prosecutors regarding applicable laws, preparation of charge sheets, crime scene management, evidence preservation, and utilization of intelligence.

The case demonstrates that multi-agency security operations are critical in effective surveillance and interception of illegal donkey skin trafficking networks. The coordinated efforts of police, veterinary, and other enforcement officers enabled timely detection, re-interception, and preservation of evidence, highlighting that no single agency can adequately monitor or disrupt the complex and mobile nature of the trade on its own.

The case further demonstrated deficiencies in inter-agency sharing and coordination, resulting in delays in identifying appropriate offences. More fundamentally, it highlighted the absence of clear and specific offences criminalizing the possession, transportation, and trade in donkey skins. In practice, most prosecutions rely on movement permit violations and administrative offences carrying relatively lenient penalties. Such offences often allow offenders to plead guilty and pay minimal fines, thereby treating sanctions as a cost of doing business.

Consequently, the judicial process itself may unintentionally facilitate the continuation of the illegal trade by failing to provide a sufficiently robust deterrent. The case underscores the urgent need for legislative reform, specialized training of investigators and prosecutors, development of standardized operating procedures, improved intelligence management, and the establishment of specific offences and stronger penalties targeting the illegal trade in donkeys and donkey products.

This case study is particularly useful because it demonstrates that the challenge is not merely one of enforcement, but also one of legal design and criminal procedure. Even where large-scale consignments are intercepted, weaknesses in charge formulation, evidence management, and the absence of specific offences can create opportunities for traffickers to evade accountability and continue operating.

The following recommendations may be included after the case study to demonstrate the institutional reforms required closing the gaps identified during the study.

Recommendations Arising from the Case Study

The circumstances surrounding the interception and prosecution of the donkey skin consignment reveal the need for legal, institutional, and operational reforms aimed at strengthening the response to donkey theft and illegal trade. Specific recommendations are proposed for different actors within the criminal justice chain and the wider donkey sector.

Law Enforcement Agencies

Law enforcement agencies should strengthen intelligence gathering, information sharing, and coordination through established multi-agency frameworks. There is need for continuous capacity building of police officers, veterinary officers, customs officials, and public health personnel on the applicable legal framework governing donkey theft, animal products, and transboundary trade. Standard operating procedures should be developed for handling cases

involving donkey skins, including crime scene management, chain of custody, evidence preservation, profiling of suspects, and tracing of financial and communication networks behind trafficking syndicates. Enforcement efforts should shift beyond transporters and target financiers, aggregators, storage facilities, and organized criminal networks involved in the trade.

Office of the Director of Public Prosecutions

The Office of the Director of Public Prosecutions should develop prosecutorial guidelines and establish specialized prosecution teams for wildlife and livestock-related crimes. Early engagement between investigators and prosecutors should be institutionalized to ensure that appropriate charges are preferred and that defects in charge sheets are eliminated before cases are filed. Prosecutors should pursue multiple offences where applicable, including customs violations, tax offences, forgery, money laundering, organized crime, and conspiracy charges, rather than relying solely on movement permit offences which attract relatively lenient penalties.

Judiciary

The Judiciary should strengthen the capacity of magistrates and members of Court Users Committees through continuous judicial education on emerging crimes involving donkey theft and illegal trade. Specialized judicial training on animal-related crimes and transnational trafficking should be undertaken to promote consistency in interpretation and sentencing. The Judiciary should also encourage the use of aggravating factors, such as organized criminal conduct and cross-border dimensions, in determining appropriate sentences. Improved mechanisms for preservation of exhibits and expedited hearing of cases involving perishable animal products are equally necessary.

Legislative and Policy Reforms

The study demonstrates the urgent need for legislative reform. Parliament should amend existing laws to create clear and specific offences relating to the theft, possession, transportation, purchase, storage, export, and trade in donkey skins and related products. Existing provisions under the Animal Diseases Act, Meat Control Act, Hides, Skins and Leather Trade Rules, and Prevention of Cruelty to Animals Act should be harmonized to eliminate overlaps and loopholes. Penalties should be enhanced to provide an effective deterrent and should include imprisonment, substantial fines, forfeiture of proceeds of crime,

confiscation of vehicles and equipment used in the commission of offences, and cancellation of licences of businesses implicated in illegal trade. Consideration should also be given to enacting a dedicated Donkey Protection and Welfare Act to provide a comprehensive legal framework for the management, welfare, and protection of donkeys.

Veterinary and Regulatory Authorities

The Directorate of Veterinary Services and other regulatory agencies should strengthen inspection and licensing procedures for hide and skin facilities and undertake periodic compliance audits. Digital systems for movement permits, dispatch notes, and traceability of hides and skins should be established to reduce opportunities for document falsification and illegal movement of donkey products. Enhanced cross-border collaboration with neighbouring countries should be promoted to monitor the movement of equine products and facilitate recovery of stolen animals.

Donkey Owners and Communities

Donkey owners should be encouraged to strengthen community surveillance mechanisms and promptly report suspicious activities to authorities. Collective night patrols, early-warning systems, branding, microchipping, and improved housing structures for donkeys should be promoted to reduce vulnerability to theft. Communities should also be sensitized on the modus operandi employed by traffickers and the importance of preserving evidence and cooperating with investigations.

Civil Society and Development Partners

Civil society organizations and development partners should continue supporting awareness creation, legal reform processes, and capacity building of criminal justice actors. Strategic public interest litigation, documentation of cases, and support for intelligence-led investigations can contribute to improving accountability. Partnerships with media institutions should also be strengthened to expose illegal trade networks and sustain public attention on the issue.

Regional and Continental Institutions

Regional bodies and the African Union should support harmonization of laws governing donkey welfare and trade across member states. Strengthened cross-border intelligence sharing, joint operations, and implementation of the African Union moratorium on donkey

slaughter for skins are necessary to disrupt transnational trafficking networks and ensure long-term protection of donkey populations.

Overall, the case scenario demonstrates that effective control of donkey theft and illegal trade requires not only stronger enforcement but also comprehensive legal reforms, enhanced institutional capacities, and coordinated action across the entire criminal justice system.

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Lincoln, Y. S., & Guba, E. G. (1985). *Naturalistic inquiry*. Sage Publications.

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APPENDICES: DATA COLLECTION TOOLS



NATIONAL CRIME RESEARCH CENTRE

Fighting Crime Through Research



REPUBLIC OF KENYA

Appendix I: Key Informant Interview Guide

A Study on Theft in Donkey and Donkey Products in Kenya

County: _____

Sub-County: _____

Location: _____

Sublocation: _____

Date of interview: _____

Start time: _____ End Time: _____

Name of the Researcher: _____

Introduction

The **National Crime Research Centre (NCRC)** is a State Corporation established by the National Crime Research Centre Act, No. 4 of 1997. The Centre is conducting a study on **“Theft in Donkey and Donkey Products in Kenya”**.

You are, therefore, requested to participate in the exercise by providing relevant information on the subject. Your participation is critical in making this study a success and helping the Government to address the challenge of theft in donkey and donkey products in the country. All information shared will be treated with utmost confidentiality and will be used for research purposes only.

Thank you.

Tick appropriately

1. Respondent agrees to be interviewed
2. Respondent does not agree to be interviewed

Section A: Background Information

Position/Title: _____

Organization/Institution affiliated to (where applicable): _____

How long have you been working in your current role? _____

Briefly describe your involvement in matters of donkeys and donkey products.

Section B: Current Patterns of the Theft in Donkeys and Donkey Products

1. How would you describe the situation or trends in donkey theft within your locality in the last 2 years? (Probe for whether or not the problem increased, decreased, or changed in nature in recent years)
2. Which specific areas, routes, or communities are most affected by donkey theft, and why do you think they are targeted? (Probe for identifiable hotspots, key transit corridors and where applicable, for cross-border routes)
3. Are there particular periods, seasons, circumstances or conditions when theft incidents tend to rise? (Probe for whether fluctuations are linked to market demand, festive seasons, or enforcement lapses)
4. What types of donkey products (e.g., hides, meat, live animals) are most involved in the current theft activities, and have you noticed any new or emerging trends? (Probe for any new or emerging products being targeted)
5. In your experience, what are the main factors influencing the current patterns of donkey theft of donkeys and donkey products? (Note factors such as market demand, enforcement measures, cultural practices, or economic pressures)

Section C: Mode of operation (*modus operandi*) of theft in donkeys and donkey products

6. Can you describe how donkey thefts are usually planned and carried out in your area? (Probe for who is typically involved at each stage of the process)
7. What methods or means are commonly used to transport stolen donkeys or donkey products to markets and/or across borders? (Probe for preferred routes and/or modes of transportation used for concealment)

8. How do offenders manage to avoid detection by authorities or community members during theft or theft operations? (Probe for indications of compromise/corruption, false documentation, or forged permits)
9. What networks or collaborations exist among those involved in the theft processes? (Probe for local brokers, transporters, slaughterhouse operators, or international buyers)
10. How do traffickers respond when enforcement efforts or community interventions disrupt their operations? (Probe for change of tactics, routes, or products over time)

Section D: Impacts of theft in donkeys and donkey products

11. What have been the main effects of theft in donkeys and donkey products on the livelihoods of donkey owners and users in this locality? (Probe for how it has affected household incomes, transportation, or agricultural productivity)
12. In your view, what are the broader social and community impacts resulting from the loss or decline of donkeys? (Probe for: how it has influenced social relations, mobility, or gender roles in affected households; and psychological or emotional impacts such as stress, fear, or loss of trust in local security or institutions)
13. How has the theft of donkeys and donkey products affected local economy? (Query for observable changes in market dynamics, employment, or trade activities)
14. What environmental or animal welfare consequences have resulted from the increased theft and illegal slaughter of donkeys? (Probe for whether or not there are cases of overexploitation, disease transmission, or poor handling practices)

Section E: Effectiveness of the measures for curbing the theft in donkeys and donkey products

15. Which institutions are responsible for prevention, enforcement, or oversight in this locality?
16. What measures or interventions have been implemented to address theft in donkeys and donkey products in this locality?
17. How effective have these measures been in practice?
18. What is your opinion about the judicial and/or legal processes in addressing the theft in donkeys and donkey products?

19. What challenges hinder effective prevention, enforcement, or oversight?
20. What recommendations would you suggest to strengthen prevention, enforcement, or oversight?
21. Please ask any questions or concerns you may have about this study.

Thank you for your time and cooperation.



NATIONAL CRIME RESEARCH CENTRE

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REPUBLIC OF KENYA

Appendix II: Focus Group Discussion (FGD) Interview Guide

A Study on Theft in Donkey and Donkey Products in Kenya

County: _____

Sub-County: _____

Location: _____

Sublocation: _____

Date of interview: _____

Start time: _____ End Time: _____

Name of the Researcher: _____

Introduction

The **National Crime Research Centre (NCRC)** is a State Corporation established by the National Crime Research Centre Act, No. 4 of 1997. The Centre is conducting a study on **“Theft in Donkey and Donkey Products in Kenya”**.

You are, therefore, requested to participate in the exercise by providing relevant information on the subject. Your participation is critical in making this study a success and helping the Government to address the challenge of theft in donkey and donkey products in the country. All information shared will be treated with utmost confidentiality and will be used for research purposes only.

Thank you.

Section A: Current Patterns of the Theft in Donkeys and Donkey Products

1. How would you describe the situation or trends in donkey theft within your locality in the last 2 years? (Probe for whether or not the problem increased, decreased, or changed in nature in recent years)
2. Which specific areas, routes, or communities are most affected by donkey theft, and why do you think they are targeted? (Probe for identifiable hotspots, key transit corridors and where applicable, for cross-border routes)
3. Are there particular periods, seasons, circumstances or conditions when theft incidents tend to rise? (Probe for whether fluctuations are linked to market demand, festive seasons, or enforcement lapses)
4. What types of donkey products (e.g., hides, meat, live animals) are most involved in the current theft activities, and have you noticed any new or emerging trends? (Probe for any new or emerging products being targeted)
5. In your experience, what are the main factors influencing the current patterns of donkey theft of donkeys and donkey products? (Note factors such as market demand, enforcement measures, cultural practices, or economic pressures)

Section B: Mode of operation (*modus operandi*) of theft in donkeys and donkey products

6. Can you describe how donkey thefts are usually planned and carried out in your area? (Probe for who is typically involved at each stage of the process)
7. What methods or means are commonly used to transport stolen donkeys or donkey products to markets and/or across borders? (Probe for preferred routes and/or modes of transportation used for concealment)
8. How do offenders manage to avoid detection by authorities or community members during theft or theft operations? (Probe for indications of compromise/corruption, false documentation, or forged permits)
9. What networks or collaborations exist among those involved in the theft processes? (Probe for local brokers, transporters, slaughterhouse operators, or international buyers)
10. How do traffickers respond when enforcement efforts or community interventions disrupt their operations? (Probe for change of tactics, routes, or products over time)

Section C: Impacts of theft in donkeys and donkey products

11. What have been the main effects of theft in donkeys and donkey products on the livelihoods of donkey owners and users in this locality? (Probe for how it has affected household incomes, transportation, or agricultural productivity)
12. In your view, what are the broader social and community impacts resulting from the loss or decline of donkeys? (Probe for: how it has influenced social relations, mobility, or gender roles in affected households; and psychological or emotional impacts such as stress, fear, or loss of trust in local security or institutions)
13. How has the theft of donkeys and donkey products affected local economy? (Query for observable changes in market dynamics, employment, or trade activities)
14. What environmental or animal welfare consequences have resulted from the increased theft and illegal slaughter of donkeys? (Probe for whether or not there are cases of overexploitation, disease transmission, or poor handling practices)

Section D: Effectiveness of the measures for curbing the theft in donkeys and donkey products

15. Which institutions are responsible for prevention, enforcement, or oversight in this locality?
16. What measures or interventions have been implemented to address theft in donkeys and donkey products in this locality?
17. How effective have these measures been in practice?
18. What is your opinion about the judicial and/or legal processes in addressing the theft in donkeys and donkey products?
19. What challenges hinder effective prevention, enforcement, or oversight?
20. What recommendations would you suggest to strengthen prevention, enforcement, or oversight?
21. Please ask any questions or concerns you may have about this study.

Thank you for your time and cooperation



Photo Source: Cover Page photos Shared by Key Informants During Data Collection

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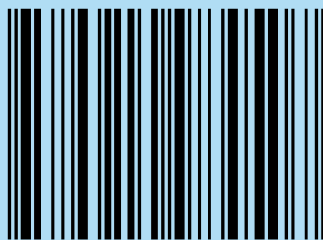
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Fighting Crime Through Research

ISBN 978-9914-9845-0-7



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