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# **KENYA VETERINARY ASSOCIATION**

## **TECHNICAL WORKING GROUP POSITIONAL PAPERS ON:**

**Enhancing the Safety of Animal Source Foods  
in Kenya: Concerns, Challenges  
and recommendations**

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**The Donkey Skin Trade Crisis: A Threat to  
Livelihoods, Animal Welfare, Public Health, and  
Constitutional Commitments**

**APRIL 2025**



## ACKNOWLEDGEMENT

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## **KVA TECHNICAL WORKING GROUPS**

Kenya Veterinary Association (KVA) is the Professional Membership Organization for all Veterinary Surgeons in Kenya. KVA was founded in 1967 under the Societies Act, Cap 108 Laws of Kenya. It has a membership of over 1500 Veterinary Surgeons. Its primary mandate is to promote the economic development and welfare of the members, as well as to safeguard the health and welfare of animals.

The KVA established TWGs in 2024 to support and guide the association and the Veterinary Profession in navigating challenges experienced in key thematic areas. The two TWGs as outlined below have the pleasure to present their stance and recommendations as outlined in the document:

### **I. Processing, Food Safety and Quality Assurance TWG (KVA WG 05/2024)**

The TWG composed of fourteen members has among its key objectives, the research and support to KVA on matters related to the Safety of Animal Origin products namely meat, milk, eggs, honey, etc. The TWG developed the Animal Source Foods (ASF) paper.

### **II. Animal Welfare TWG (KVA WG 02/2024)**

The TWG composed of nineteen members has within its mandate, the research and support to KVA on matters related to Animal Welfare. The TWG developed the Position Paper on Donkey Skin Trade.

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## INTRODUCTION TO THE POSITION PAPERS

Food Safety and Donkey Welfare face various challenges including inadequate compliance to existing regulations, lacunae in the governing laws and regulations and inadequate stakeholder awareness of requisite laws that uphold Food Safety and Donkey Welfare.

By supporting the development of these Position Papers, KVA aims to spur and steer a discussion amongst all stakeholders in a bid to continuously improve the Food Safety and Donkey Welfare situation in the Kenya. KVA anticipates that there will be improved stakeholder awareness of the challenges that affect these two key Veterinary Concerns and recommendations for amelioration in order to spur positive change.



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## POSITION PAPER 1

### Enhancing the Safety of Animal Source Foods in Kenya: Concerns, Challenges and recommendations

#### Introduction

Animal source foods (ASFs), including meat, milk, eggs, fish, and honey, play a crucial role in human nutrition by providing essential proteins, vitamins, and minerals. In Kenya, these products contribute significantly to food and nutrition security, improved livelihoods and trade. However, their safety remains a major concern due to contamination, adulteration and substitution. The increasing demand for these products, coupled with rapid urbanization and the expansion of informal markets, coupled with insufficient regulatory enforcement, has exacerbated food safety risks, making it imperative to strengthen oversight mechanisms across the entire food supply chain).

Unsafe ASFs contribute to a high burden of foodborne diseases, which affect millions of people annually. The World Health Organization (WHO) estimates that globally, foodborne illnesses result in 600 million cases and 420,000 deaths each year, with children under five years bearing 40% of the disease burden (WHO, 2015). In Kenya, foodborne illnesses are linked to microbial contamination, chemical residues, and poor hygiene practices. Reports indicate that an estimated 70% of households in Kenya experience foodborne illnesses annually, leading to severe health and economic consequences. Hospital admissions due to foodborne diseases continue to rise, placing pressure on the healthcare system and reducing workforce productivity.

Addressing food safety requires a coordinated approach involving national and county governments, regulatory agencies, veterinary services, and food industry stakeholders. Effective policies, strict enforcement of food safety regulations, and investment in infrastructure such as cold chains and quality assurance laboratories are critical to mitigating risks. Public awareness and consumer education on safe food handling practices are also essential in reducing health hazards associated with contaminated animal products. Strengthening food safety measures is not only vital for public health but also for economic growth, trade opportunities, and achieving national and global food security goals.

#### Main concerns in ASF safety

##### Milk Safety Concerns

- **Microbial Contamination:** Over 30% of informal market milk exceeds acceptable bacterial levels, posing health risks.
- **Aflatoxin Contamination:** Up to 100% occurrence of Aflatoxin M1 (AFM1) in milk has been reported, with levels exceeding the EU limit of 0.05 µg/kg.
- **Adulteration:** Studies show that milk from automated dispenser (ATMs) in Nairobi contains hydrogen peroxide (70%) and formaldehyde (16.7%)

- **Antimicrobial & Pesticide Residues:** Up to 33.3% of tested milk samples contained antibiotic residues above Maximum Residue Levels.

### Meat Safety Concerns

- **Microbial Contamination:** Poor hygiene in slaughterhouses and butcheries leads to contamination with pathogens such as *Salmonella* and *E. coli*.
- Campylobacter was detected in 33–44 percent of indigenous and broiler chicken from small scale poultry producers farms in Dagoretti and Kibera Sub Counties of Nairobi County. This pathogen is one of the most frequently isolated from children suffering from diarrhea in Kenya (Carron et al. 2018).
- **Adulteration:** Reports indicate that some supermarkets have sold expired or chemically treated meat to extend shelf life (Wanjala et al., 2018).
- **Substitution:** Substituting high commercial-value meats with similar cheaper or undesirable species is a common form of food fraud that raises ethical, religious, and dietary concerns. Nairobi retail market has been found to have up incidences of substitution of beef with donkey meat. The source of this substituted meat is illegal unregulated bush slaughter that poses a serious health risk, as it bypasses meat inspection protocols.

### Fish Safety Concerns

- **Regulatory gaps:** Inadequate fish safety regulations and fish safety inspectors. Further, there is inadequate systematic inspection of Fish Business Operators.
- **Contamination:** High levels of heavy metals and microbial contamination have been reported in fish sold in open markets.
- **Adulteration:** Cases of fish treated with formalin to extend shelf life have been reported.

### Egg Safety Concerns

- **Regulatory gaps:** Inadequate egg safety regulations. Further there is inadequate systematic inspection of Egg Business Operators.
- **Egg Contamination:** Poor storage and handling lead to microbial contamination, increasing the risk of bacterial infections such as *Salmonella* infections.

### Honey Safety Concerns

- **Regulatory gaps:** Inadequate honey safety regulations, and insufficient inspection of honey Business Operators Countrywide. This increases food safety risks.
- **Honey Adulteration:** Reports of honey diluted with sugar syrup or contaminated with harmful substances undermine consumer safety.



## Challenges Affecting Food Safety Enforcement

1. **Weak Regulatory Coordination:** Overlapping mandates and lack of harmonisation among agencies hinder enforcement of food safety standards.
2. **Inadequate Infrastructure:** Lack of cold chain facilities and poor hygiene in markets increase contamination risks.
3. **Low Human Resource Capacity:** Insufficient veterinary officers and food safety inspectors reduce regulatory effectiveness.
4. **Limited Public Awareness:** Many consumers are unaware of food safety risks, leading to unsafe consumption behaviors.
5. **Inadequate Investment:** Minimal county-level funding for food safety programs weakens inspection and monitoring efforts.

## Recommendations & Call to Action

### For the Directorate of Veterinary Services (DVS):

- Fast-track enactment of the Veterinary Public Health (VPH) Bill which provides regulations for all the ASFs.
- Intensify public sensitization on the role of veterinary services in food safety.
- Sensitize all stakeholders on the importance of ASFs Food Safety.

### For County Governments:

- Develop County-level VPH laws that cover Food Safety of all ASFs.
- Increase funding for food safety enforcement, including staffing, training, and infrastructure.
- Ensure all slaughterhouses are staffed with veterinary officers and meat inspectors.
- Strengthen surveillance for zoonotic and transboundary animal diseases.
- Facilitate the provision of public cold chain systems for milk, meat, and fish to reduce contamination risks.
- Conduct routine microbiological quality assessments for milk, meat, and fish.
- Sensitize all stakeholders on the importance of ASFs Food Safety.

### For the National Police Service:

- Enforce laws against illegal slaughter and unregulated meat transportation.
- Establish a hotline for reporting suspicious food safety violations.

### For the Food Business Operator (FBO):

- The responsibility to provide safe food lies with the FBO
- Each FBO should put all necessary measures to ensure food safety

### **For the Public:**

- Purchase only inspected meat, milk, eggs, and fish from licensed traders.
- Report suspicious food safety practices to relevant authorities.

### **For the Media & Consumer Rights Organizations:**

- Highlight the dangers of unsafe ASFs and advocate for stricter enforcement.
- Promote consumer education on identifying safe and hygienic food sources.

### **For the Ministry of Health & County Health Departments:**

- Strengthen collaboration with veterinary services to ensure food safety along the value chain for all ASFs.
- Implement regular surveillance for foodborne disease outbreaks and share reports with the DVS and CDVS.

### **The Kenya Dairy Board**

- Strengthen capacity building for actors along the dairy value chain on dairy products hygiene and safety

### **For the Learning Institutions**

- Match training to industry requirements

### **For researchers and research institutions**

- Increase research in food safety to provide data on current food safety situation
- Provide data and information on food safety issues to inform policy

### **Conclusion**

Food safety is central to achieving SDG 2 (Zero Hunger) and SDG 3 (Good Health and Well-being). The deteriorating food safety situation in Kenya requires urgent intervention from all stakeholders including the National and County Governments; National Police Service, Fourth estate, value chain actors and consumer rights organizations. Without decisive action, the risks to public health, economic productivity, and food security will continue to escalate. As the theme for World Food Safety Day states, *"If it is not safe, it is not food."* Prioritizing food safety is non-negotiable for a healthy and prosperous nation.

## POSITION PAPER 2

### The Donkey Skin Trade Crisis in Kenya: A Threat to Livelihoods, Animal Welfare, Public Health, and Constitutional Commitments

#### Background

Kenya has long recognized the central role of livestock in supporting livelihoods, particularly within its rural and arid and semi-arid land (ASAL) communities. Among these, donkeys play a vital role in transporting water, food, goods, and people, contributing significantly to the livelihoods, resilience, and dignity of some of the most vulnerable populations in the country. Donkeys as a natural resource have a cultural significance to the people and they are protected by law. The Constitution of Kenya recognizes the cultural, economic, and ecological importance of animals, and further guarantees its citizens the right to a clean and healthy environment (Article 42), the protection of property (Article 40), the preservation of cultural heritage (Article 11), the promotion of public health (Article 43) and protection of animals and their welfare (schedule 4). In Article 2(6), treaties or conventions ratified by Kenya forms part of the laws of Kenya under this Constitution hence Executive Decisions of the African Union (AU) Heads of States forms a legal basis for action by Member States. In 2024, the AU through an Executive Decision EX.CL/Dec.1233-1264(XLIV) considered and adopted a report on donkey species preservation and a moratorium in Africa on the exploitation of the donkey through its slaughter for its skin.

The donkey skin trade emerged in Kenya in 2016 with the licensing and operationalization of four export slaughter houses by 2018. This was a response to growing global demand for *ejiao*, a gelatin derived from donkey hides to produce Traditional Chinese Medicine.

This triggered a crisis of theft, illegal slaughter, meat fraud, and population collapse. Other resulting threats include; the rapid decline of the national donkey population; the loss of donkey dependent livelihoods especially in ASAL regions; violations of animal welfare; the undermining of food safety and public health; increased psychological distress among affected households—especially women and children.

In 2020, the government banned slaughter of donkeys and revoked the licenses of the export slaughter houses. Despite this effort, bush slaughter of donkeys is now a major threat. The Government of Kenya through the Principal Secretary for Internal Security & National Administration as well as the Principal Secretary, State Department for Livestock Development, Ministry of Agriculture and Livestock Development declared a 100-day Rapid Results Initiative (RRI) to curb adulteration of food especially meat value chain with donkey meat. The RRI went a long way in fighting donkey slaughter and donkey skin trade all over the country and yielded positive results. The RRI led to formation of multi-agency security teams to enforce the livestock rules and regulations, rescue donkeys from slaughter and disrupt the

distribution of illegally sourced and unhygienic donkey meat from reaching the unsuspecting consumers.

The Kenya Veterinary Association presents this position paper as a call to action, advocating for the urgent alignment of policy priorities, Kenya's laws, and enforcement mechanisms with both the Constitution and continental commitments to end this harmful trade.

## **1.1 Introduction**

Donkey slaughter, driven by demand for *ejiao* (gelatin from donkey skins) for the Traditional Chinese Medicine, has become a critical threat to Kenya's rural livelihoods, animal welfare, public health, and socio-cultural integrity. As China's donkey population collapsed from 11.2 million (1992) to 1.97 million (2021), African countries, including Kenya, became major supply sources.

Between 2016 and 2018, Kenya licensed four slaughterhouses, increasing the annual slaughter from 20,768 donkeys (1.1% of population) in 2016 to 159,631 (8.1%) in 2018. By 2019, the national donkey population had plummeted from 1.83 million (2009) to 1.1 million—a 40% decline. The 2020 nationwide ban and the 2024 African Union (AU) moratorium on the commercial donkey skin trade represent critical policy shifts. However, illegal slaughter and smuggling continue, undermining these gains and requiring urgent and coordinated enforcement.

## **1.2 Key Concerns**

### **1.2.1 Legal, Constitutional, and Policy Gaps**

Kenya's legal framework inadequately safeguards donkeys and lacks a framework for their production and productivity even though they are listed as food animals under the Meat Control Act (Cap. 356). The use for consumption has negatively impacted on the donkey population and according to the sessional paper no. 3 of 2020 on the livestock policy, their slaughter was destined to be outlawed for lack of appropriate measures to safeguard them. Moreover, donkey theft, cross border smuggling and illegal trade violate numerous Kenyan laws:

- Animal Diseases Act (Cap. 364): Breached due to undocumented movement and biosecurity lapses.
- Prevention of Cruelty to Animals Act (Cap. 360): Regularly violated through inhumane transport and slaughter.
- Hide, Skin, and Leather Trade Act (Cap. 359): Frequently bypassed by smuggling networks.
- Stock and Produce Theft Act (Cap. 355) & Penal Code (Section 278): Highlight the criminality of donkey theft—883 cases were reported in 2018 alone.

Under Article 2(6) of the Kenyan Constitution, international and regional treaties ratified by Kenya—including AU decisions and moratoriums—are binding. Additionally, Article 11 recognizes culture as the foundation of the nation and obligates the State

to protect communities' cultural heritage, including culturally significant animals like donkeys in ASAL regions.

### **1.2.2 Socio-Economic and Cultural Impacts**

Donkeys are vital to transport, agriculture, water access, and market participation, especially in Arid and Semi-Arid Lands (ASALs) and in urban areas where donkeys remain integral part of transport. Research has shown that a working donkey contributes over KES 11,000/month to household income—more than its one-time value in the skin trade which averages KES 15,000. Their loss devastates livelihoods and disproportionately burdens women and children, leading to increased school dropouts, poverty, and gender-based labor inequities.

For many ASAL communities, donkeys hold deep cultural and emotional significance. Their loss not only destabilizes local economies but also erodes communal identity and resilience.

### **1.2.3 Public Health Risks**

Uninspected and illegally traded donkey meat enters the food chain, posing serious food safety risks. Additionally, donkey theft and slaughter have indirect impacts on mental health, particularly for rural women, children, and the elderly who depend on donkeys, and therefore the loss of their donkeys through theft or gender-insensitive decisions at the family level can devastate the quality of their life and thus disrupt their mental health.

The World Organization for Animal Health (WOAH) has linked unregulated donkey movement to transboundary disease outbreaks—notably the 2019 equine influenza in West Africa. Furthermore, there is growing concern over meat fraud, where donkey meat is deceptively sold as beef—compounding consumer health risks.

### **1.2.4 Animal Welfare Violations**

Both legal and illegal donkey slaughter present appalling welfare conditions:

- Long-distance, overcrowded transport without food or water.
- Inhumane slaughter—27% of donkeys in one study were not stunned.
- Unsustainable reproductive rates—between 2016 and 2018, slaughter outpaced reproduction fivefold.

These violations undermine Kenya's constitutional commitment under Article 42 to ensure a clean and healthy environment—which includes the humane treatment of animals and responsible resource management.

## **1.3 Recommendations and Call to Action**

Recognizing the Government of Kenya's efforts from 2020 to date; noting the key concerns; and to align with Kenya's constitutional mandates, international obligations, and regional leadership through the AU's moratorium on the slaughter of donkeys in Africa for their skin, KVA calls on the Government of Kenya to:

1. Enact and enforce a total prohibition of commercial donkey slaughter and export of donkey skins.
2. Implement strict penalties for illegal slaughter, trade, and theft of donkeys.
3. Revoke all existing slaughter and export licenses and prohibit issuance of new ones.
4. Establish national donkey identification, registration, and traceability systems.
5. Safeguard the cultural and economic role of donkeys in ASAL communities.
6. Support regulated, community-level slaughter only in areas where donkey meat is culturally consumed as food.
7. Launch a national public awareness campaign on the legal, cultural, and health implications of the trade.
8. Support alternative livelihood programs for communities formerly reliant on the donkey skin trade.
9. Uphold constitutional provisions related to property rights (Article 40), cultural protection (Article 11), public health (Article 43), animal welfare (schedule 4) and international obligations (Article 2(6)).

#### **1.4 Conclusion**

Besides being an animal welfare issue, the donkey skin trade is a crisis at the intersection of constitutional justice, public health, economic dignity, cultural heritage, and sustainable development. Continued slaughter threatens the survival of donkeys, marginalizes rural communities, violates multiple national and regional laws, and undermines Kenya's moral standing in the global community.

KVA urges the Government of Kenya to act decisively, aligning national law with the AU moratorium, upholding the Constitution, and protecting the lives and livelihoods of Kenya's citizens.

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