

Applicant: **McCarthy, John**
Organisation: **Environmental Investigation Agency UK**
Funding Sought: **£99,993.00**

IWTR8S2\1040

Developing a unique open-source global wildlife crime tracker

This project will seek to improve access to IWT resources for public and private stakeholders, including financial institutions and law enforcement agencies, through EIA's Global Environmental Crime Tracker. EIA will build relationships with CSOs in key IWT countries who collect seizure and prosecution records to contribute data into the tool. Partnering with United for Wildlife, EIA will disseminate data to Financial Taskforce members which will be embedded into customer due diligence systems and improve identification of IWT money laundering risks.

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Section 1 - Contact Details

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GMS ORGANISATION

Type	Organisation
Name	Environmental Investigation Agency UK
Phone	[REDACTED]
Email	[REDACTED]
Website	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]

Section 2 - Objectives, Species & Summary

Q3. Title:

Developing a unique open-source global wildlife crime tracker

What was your Stage 1 reference number? e.g. IWTR8S1\1001

IWTR8S1\1158

Q4. Which of the four key IWT Challenge Fund objectives will your project address?

Please tick all that apply. Note that projects supporting more than one will not achieve a higher score.

- Ensuring effective legal frameworks and deterrents
- Strengthening law enforcement

Q5. Species project is focusing on

Where there are more than four species that will benefit from the project's work, please add more boxes using the selection option below.

Elephantidae	Manidae
Panthera tigris	Panthera pardus

Do you require more fields?

- Yes

Panthera uncia	Rhinocerotidae
Neofelis nebulosa	Timber (all species)

Q6. Summary

Please provide a brief summary of your project, its aims, and the key activities you plan on undertaking. Please note that if you are successful, this wording may be used by Defra in communications e.g. as a short description of the project on the website.

Please write this summary for a non-technical audience.

This project will seek to improve access to IWT resources for public and private stakeholders, including financial institutions and law enforcement agencies, through EIA's Global Environmental Crime Tracker. EIA will build relationships with CSOs in key IWT countries who collect seizure and prosecution records to contribute data into the tool. Partnering with United for Wildlife, EIA will disseminate data to Financial Taskforce members which will be embedded into customer due diligence systems and improve identification of IWT money laundering risks.

Section 3 - Title, Dates & Budget Summary

Q7. Country(ies)

Which eligible host country(ies) will your project be working in? Where there are more than four countries that your project will be working in, please add more boxes using the selection option below.

Country 1	Nigeria	Country 2	Malaysia
Country 3	Vietnam	Country 4	No Response

Do you require more fields?

No

Q8. Project dates

Start date:

01 July 2022

End date:

30 September 2023

Duration (e.g. 2 years, 3 months):

1 year, 3 months

Q9. Budget summary

Year:	2022/23	2023/24	2024/25	2025/26	Total request
Amount:	£68,330.00	£31,663.00	£0.00	£0.00	£ 99,993.00

Q10. Proportion of IWT Challenge Fund budget expected to be expended in eligible countries: %

Q11a. Do you have matched funding arrangements?

Yes

What matched funding arrangements are proposed?

EIA has secured funding from public and private donors which will contribute to the total costs of this project over the grant period.

Q11b. Total confirmed & unconfirmed matched funding (£)

Q11c. If you have a significant amount of unconfirmed matched funding, please clarify how you fund the project if you don't manage to secure this?

There is a total of £3560 of unsecured matched funding which is expected to be secured during the period of the project.

Section 4 - Problem statement & Gap in existing approaches

Q12. Project stage

With reference to the application guidance, please select the relevant project stage.

Evidence

Q13. Problem the project is trying to address

Please describe the problem your project is trying to address in terms of illegal wildlife trade and its relationship with poverty. Please describe the level of threat to the species concerned. Please also explain which communities are affected by this issue, and how this aspect of the illegal trade in wildlife relates to poverty or efforts of people and/or

states to reduce poverty.

Please cite the evidence you are using to support your assessment of the problem (references can be listed in your additional attached PDF document).

Environmental crime is estimated to generate as much as USD 281 billion in criminal gain each year (RHIPTO, INTERPOL,GI,2018). To move, hide and launder proceeds, wildlife traffickers exploit weaknesses in the financial sectors to facilitate further criminality which fuels corruption, threatens biodiversity and damages financial integrity. The 2020 FATF review of money laundering and IWT concluded that financial and non-financial institutions should have processes in place to identify, assess, monitor, manage and mitigate such risks. The review also recognised that identification of risks was affected by limited open-source and law enforcement information. It is recognised that the lack of publicly available data on environmental crime makes it difficult for governments and public organisations to develop effective policies to combat these crimes (UNEP,2018).

Publicly available information on seizures of illegal wildlife and forest crime is sporadic, with prosecution data difficult to obtain. EIA has developed a comprehensive database of global wildlife seizures and law enforcement action linked to ivory, pangolin, rhino horn, Asian big cats and timber. This is replicated by other international and national organisations to improve knowledge on law enforcement efforts and provide data for analysis of IWT trends. Through engagement with stakeholders however, EIA has recognised the need for organisations who collect data to share resources, preventing duplication of effort and providing an established location for data collation.

Furthermore, due to reporting biases, the use of seizures alone to analyse the scale and trends in IWT is problematic. Governments, academics, law enforcement agencies and civil society organisations (CSOs) need to be provided with the means to analyse data alongside other information sources, such as trade data and intelligence. Qualitative data on IWT intelligence is not typically available in a form that can be easily accessed or analysed alongside law enforcement outcomes.

Data held within EIA's database shows that since 2010, Vietnam has been implicated in more than 700 seizures totalling at least 123 tonnes of ivory, 111 tonnes of pangolin scales and 2.7 tonnes of rhino horn. Of these seizures, Nigeria has been implicated as the exporting country in 19 tonnes (21%) of ivory and 62 tonnes (73%) of pangolin scales, highlighting its significance in the wildlife trade from Africa to Asia. Malaysia has been linked as a transit or destination country to 309 IWT seizures from Africa and EIA intelligence indicates it plays a significant role in the transport of wildlife. EIA's work on the tiger trade has also identified Vietnam to be a persistent trade hub for tigers and their derivatives.

The volumes traded suggest that strengthening law enforcement efforts in these countries will have a significant effect on IWT networks operating between Africa and Asia. Countries should target those in the chain who are profiting the most from IWT to disrupt and deter traffickers who see the trade as a lucrative business. The financial sector needs access to relevant data to develop internal strategies to detect illicit financial flows linked to wildlife crime and identify those within the financial systems who are benefiting.

Q14. Gap in existing approaches

What gap does your project fill in existing approaches? Evidence projects should describe how the improved evidence base will be used to design an intervention and the gap the intervention will fill. Extra projects should also provide evidence of the intervention's success at a smaller scale.

The project will seek to address gaps by developing the breadth and use of EIA's recently launched Global Environmental Crime Tracker. The tool provides stakeholders with access to EIA's 11,500 incident database and the use of interactive dashboards and maps to effectively analyse trends in wildlife and forest crime. EIA will aim to fill gaps in seizure, prosecution and court data, through outreach to civil society organisations (CSOs) in key IWT countries: Nigeria, Malaysia and Vietnam.

EIA's existing Media Monitoring programme, initially developed as part of a previous IWT Challenge Fund grant, provides a framework for effective information sharing with the financial sector, facilitating improved due diligence and risk monitoring. EIA partners with TRAFFIC to feed open-source data directly to banks, financial institutions and third-party data providers such as World Check. The programme was highlighted as a good example of NGO and financial sector collaboration by FATF in its 2020 report, with 10,900 entity names submitted since 2016. EIA has held initial discussions on expanding the programme to United for Wildlife(UfW) Financial Taskforce members. Due to lack of resources, the programme has been unable to expand, requiring improved technology which would be achieved through this project.

Section 5 - Objectives & Commitments

Q15. Which national and international objectives and commitments does this project contribute towards?

Consider national plans such as NBSAPs and commitments such as London Conference Declarations and the Kasane and Hanoi Statements. Please provide the number(s) of the relevant commitments and some brief information on how your project will contribute to them. There is no need to include the text from the relevant commitment.

The project will contribute towards the following international objectives:

London Conference Declaration 2014

- IX: Promoting effective practices to detect money laundering linked to wildlife crime.

- X: Promote the use of the full range of legislation and law enforcement, including money laundering

Kasane Statement:

- 5: Helping to ensure law enforcement authorities have the knowledge to investigate financial crimes associated with wildlife crime.

London Conference Declaration 2018:

- 10: Increasing public/private collaboration to identify criminal networks engaged in IWT

Section 6 - Method, Change Expected, Gender & Exit Strategy

Q16. Methodology

Describe the methods and approach you will use to achieve your intended Outcome and contribute towards your Impact. Provide information on:

- How have you reflected on and incorporated evidence and lessons learnt from past and present activities and projects in the design of this project?
- The need for this work and a justification of your proposed approach.
- How you will undertake the work (materials and methods).
- How you will manage the work (roles and responsibilities, project management tools, risks etc.).

EIA's wildlife project work in Nigeria, part-funded by DEFRA IWT R7 grant, has highlighted the need for better international coordination of information between countries such as Vietnam. EIA is in contact with key government agencies such as Nigeria Customs Service and the Nigeria Financial Intelligence Unit to assess needs in tackling IWT. Capacity building work has been carried out by EIA with investigators, prosecutors and the judiciary on the application of Nigeria law to wildlife trafficking cases, along with a legal review of current legislation. This project will complement this work by providing a platform to track cases in Nigeria and linked to Nigeria and provide transparency on prosecution rates.

Through a current partnership with Education for Nature Vietnam (ENV), EIA regularly shares data on wildlife cases for peer review. Through EIA's contacts in Vietnam, EIA will conduct outreach to government agencies to promote the use of the Crime Tracker in understanding trends in wildlife crime globally. Vietnam has been the subject of an ongoing review under the Financial Action Task Force (FATF) to assess Vietnam's implementation of FATF Recommendations and its framework for preventing criminal abuse of the financial system. EIA will work with United for Wildlife (UfW) to identify banks and financial institutions to join the Media Monitoring programme and improve available information to entities implicated in wildlife trafficking.

EIA's media monitoring programme has been recognised in a 2022 report by Amanda Gore for the Centre of Global Advancement. The report highlights the importance of NGOs collaborating with data aggregators to boost data on environmental offenders and encourage more law enforcement investigations. It also raises the importance of data-sharing platforms such as UfW's Taskforces to support law enforcement actions.

The project will improve the efficiency of the Media Monitoring programme through the automation of the data flow and increased capacity for additional financial institutions to receive data regularly and efficiently. Partnering with UfW to expand the programme to Financial Taskforce members, EIA will identify financial institutions significant to Nigeria,

Malaysia and Vietnam to share bad actor information with. EIA and UfW will deliver training on the use of the Global Environmental Crime Tracker and provide members with regular trend assessments and financial typologies to improve knowledge on IWT.

EIA will employ software and GIS mapping consultants to provide technical guidance on improving the dashboards and mapping tools, including adding additional data sources. EIA will conduct data research to fill gaps in court and prosecution data as well as conducting outreach and relationship building with in-country CSOs who already collate data to regularly input into the Tracker, setting up data sharing agreements where required.

EIA has identified limited CSOs monitoring wildlife crime data in Malaysia. Justice for Wildlife Malaysia (JWM) will employ a full-time Case Tracker for 12 months to collate and update cases of wildlife crime in Malaysia in order to input into EIA's Crime Tracker and provide transparency on crime and prosecution rates nationally. This data will add value to the global picture of wildlife trafficking as Malaysia is a key source and transit country. JWM will be able to produce a national record of wildlife related court cases that will assist law enforcement in producing strategies and government agencies to review policies on wildlife trafficking.

EIA regularly peer reviews its data through the sharing of data with partner NGOs, such as TRAFFIC, WCS and Oxpeckers, who will be key stakeholders in this project. EIA will use current relationships to convene a multi-stakeholder working group on the collation of open-source data to identify key obstacles in data sharing. The group will seek to put forward recommendations for collaboration on an online platform which combines current databases and tools into one location that can be easily accessible to governments, journalists and academics. The project will seek to identify a software company and obtain quotes with a view to securing further funding to achieve the desired solution. The EIA Data Manager and Data Analyst will lead on this work.

Q17. Capability and Capacity

How will you support the strengthening of capability and capacity in the project countries at organisational or individual levels, please provide details of what form this will take and the post-project value to the country.

The project will look to provide training on the use of the Crime Tracker to CSOs in the target countries so the use of the tool can assist with understanding volumes of trade in illegal wildlife and contributing to strategies on combatting IWT. Having access to mapping and analysis tools through the tracker without the need for licences will allow organisations to do their own analysis on trends and hot spots. Recruitment of a Case Tracker in Malaysia through JWM will strengthen their capacity to monitor cases of illegal wildlife nationally and track prosecution rates. The work conducted under JWM's Project Minerva assists in evaluating their capacity building programme for law enforcements agencies and prosecutors in Malaysia. JWM will produce a national record of wildlife crime court cases in Malaysia which can be used to inform national strategies on wildlife trafficking, in Malaysia and globally.

The activities under the project will strengthen the capability of financial institutions to identify illicit financial flows linked to wildlife trafficking globally. By providing banks and financial institutions with training and access to a platform of relevant wildlife trafficking cases will improve their knowledge on wildlife crime. EIA will also provide training on the tool to the Financial Intelligence Units in the target countries which will increase understanding of wildlife trafficking and assist LEAs in identifying traffickers using the financial systems and encourage investigations. The dissemination of trend assessments and red flag documents to UfW Financial Taskforce members will improve their due diligence processes and provide companies with the knowledge to design internal training programmes for financial sector staff on wildlife crime.

Q18. Gender equality

All applicants must consider whether and how their project will contribute to reducing inequality between persons of different gender. Explain how your understanding of gender equality within the context your project, and how is it reflected in your plans.

In line with the International Development Act (Gender Equality) 2014, EIA and the project partners are committed to ensuring gender equality and equity are promoted throughout the project.

All outreach activities will be aimed at accessing all genders working in civil society organizations with the aim of curbing wildlife and financial crime. It is recognized that there may be unequal gender representation in these organisations that result in more men benefitting from the activities and tools than women. However, we will monitor obstacles to equal

participation and address them to ensure as equal representation as possible. EIA has a range of policies to ensure gender balance amongst teams and prevent discrimination at all levels of the organisation.

EIA's research and investigations into IWT indicate that both men and women are involved in the syndicates using money laundering to finance the trade. EIA advocates for intelligence led enforcement to target the major criminals controlling wildlife crime regardless of gender.

At the community level, the reduction of illicit financial flows linked to wildlife crime through the investigation and prosecution of criminal syndicate leaders and facilitators will increase equality including gender equality through improved rule of law and good governance. By ensuring revenue is not lost more investment can also be made into services and infrastructure that equally benefit the needs of men and women and boys and girls. Since the project is not working at the community level we are not planning to collect data related to gender impacts but will report back on any unexpected benefits and monitor any unintended negative impacts that may arise related to gender from the project.

Q19. Change expected

Detail the expected changes to both illegal wildlife trade and poverty reduction this work will deliver. You should identify what will change and who will benefit, considering both people and species of focus a) in the short-term (i.e. during the life of the project) and b) in the long-term (after the project has ended).

When talking about how people will benefit, please remember to give details of who will benefit, differences in benefits by gender or other layers of diversity within stakeholders, and the number of beneficiaries expected. The number of communities is insufficient detail – number of households should be the largest unit used. Demand reduction projects should demonstrate their indirect links to poverty reduction.

Short-term: The project will provide an improved resource through EIA's Global Environmental Crime Tracker that is available to all CSOs, governments, private sector companies, journalists and academics to increase awareness of IWT trends. Improved access to seizure and prosecution data will provide policy-makers with the information required to make informed recommendations relating to legislation in key countries across Africa and Asia.

The financial sector will have increased awareness and capacity to use AML techniques to disrupt IWT criminal syndicates through the project. Effective relationships will have been built with the UfW Financial Taskforce members to facilitate the data flow from global NGOs/CSOs and strengthen mechanisms for banks to verify new customers through KYC and due diligence checks.

CSOs and law enforcement agencies in Nigeria, Malaysia and Vietnam will have the tools available to visualise, map and analyse their seizure and prosecution data for reports and strategy development. The development and maintenance of relationships between key partners and NGOs will ensure coordinated data sharing and reduce duplication between organisations. The publication of a national record of wildlife crime cases in Malaysia will fill a gap in knowledge on the scale of trafficking in Malaysia and provide improved knowledge of trends across the entire wildlife trade chain.

Long-term: Identification of joint-partner technology solution that combines the effort of international NGOs and provides a central hub for IWT and environmental crime data will provide enhanced access to the information required for long-term legislation and policy change.

The project will lead to the identification of CSOs across other countries in Africa and Asia who have the ability to monitor wildlife trafficking and environmental crime prosecutions and who will contribute to the tracker, given resources and training. This will lead to an improved picture of wildlife trafficking globally and allow governments and policy-makers to more effectively analyse prosecution data to strengthen wildlife laws across Africa and Asia. This will encourage more law enforcement investigations and aid in successful prosecutions of wildlife traffickers globally, breaking supply routes to consumer markets.

Communities affected by wildlife trafficking include those living in and around wildlife source areas in West and Central Africa, Malaysia and Vietnam. Increased wildlife crime investigations and improved visibility of successful prosecutions will discourage criminal networks from sourcing wildlife from marginalised and underdeveloped rural areas, which will have an outcome for poverty reduction.

It will reduce overexploitation of wildlife and prevent the depletion of resources that communities would have traditionally

used for subsistence needs and provide a basis for wildlife-related development opportunities (e.g. ecotourism and protected area employment opportunities).

It will also reduce the likelihood that rural communities in source areas engage in wildlife exploitation that brings them into contact with animals of disease risk. Ivory and pangolin scale supply chains include other species that are of significant disease risk such as bats, monkeys and apes. By preventing wildlife trafficking and diminishing the benefits of poaching, this project will protect the health of people come in to contact with wildlife from zoonotic diseases.

Q20. Pathway to change

Please outline your project's expected pathway to change. This should be an overview of the overall project logic and outline how you expect your Outputs to contribute towards your overall Outcome and, longer term, your expected Impact.

This project will improve access to IWT resources for a range of public and private stakeholders, including financial institutions and law enforcement agencies. It will do this by expanding EIA's Crime Tracker to include additional data sources, improved analysis dashboards and mapping tools. Building relationships with CSOs in key IWT countries who are collecting seizure and prosecution records will enhance the overall picture of IWT in the country and assist in informing future strategies.

Identification within the financial sector of risks associated with illicit funds from wildlife trafficking will be improved and embedded into customer due diligence systems. This will be achieved by developing EIA's Media Monitoring programme and partnering with UfW to disseminate data to the Financial Taskforce members on a regular basis. This will lead to enhanced knowledge and awareness of IWT trends within financial institutions.

Additionally, the project will increase collaboration between NGOs collecting IWT data and identify joint working opportunities for a publicly available shared platform on wildlife crime, intelligence and conservation data.

This will lead to increased transparency and scope of information available on illegal wildlife trends, enabling more informed policy responses by governments and private sector and assisting in targeting law enforcement responses.

Q21. Exit Strategy

How the project will reach a sustainable point and continue to deliver benefits post-funding? Will the activities require funding and support from other sources, or will they be mainstreamed in to "business as usual"? How will the required knowledge and skills remain available to sustain the benefits? How will your approach, if proven, be scaled?

This project will have lasting impacts by focusing on providing key institutions with data on bad actors, effectively raising awareness of related financial flows and the need for financial investigations to curtail criminal syndicates which together with wider governmental support will lead to the systematic application of financial investigations and AML laws to counter wildlife trafficking.





The provision of trend assessments and red flag documents to private sector banks will increase the ability of their investigative and compliance departments to detect suspicious transactions and customers linked to IWT. The project will ensure that major financial institutions take steps to curtail IWT-related financial flows by embedding IWT risk assessment as a routine practice in terms of due diligence and compliance procedures.

The project addresses chronic information gaps which stymie the use of financial investigations and laws to tackle IWT by public sector agencies. Provision of an open access Crime Tracker to monitor and analyse wildlife crime globally will provide resources for government agencies to review and implement effective policies on wildlife crime.

Working with CSOs to improve data collection and recording will ensure the continued monitoring of wildlife crime in target countries and provide a national public database for use by policy makers. Identifying and implementing more effective data sharing processes by working collaboratively with international NGOs will assist in continued data collection and peer review of datasets to be used in national strategies.

This evidence project has the possibility of being able to be scaled across countries globally. Activities to improve data sharing processes and through increased automation by secure means, will enable the Media Monitoring programme to be implemented in additional countries, to additional private sector organisations and to cover additional types of environmental crime.

If necessary, please provide supporting documentation e.g. maps, diagrams, references etc., as a PDF using the File Upload below:

-  [IWTR8S2-1040 - References](#)
-  22/03/2022
-  17:43:15
-  pdf 88.41 KB

Section 7 - Risk Management

Q22. Risk Management

Please outline the 6 key risks to achievement of your Project Outcome and how these risks will be managed and mitigated, referring to the [Risk Guidance](#). This should include at least one Fiduciary, one Safeguarding Risk, and one Delivery Chain Risk.

Projects should also draft their initial risk register, using the [Risk Assessment template](#), and be prepared to submit this when requested if you are recommended for funding. Do not attach this to your application.

Risk Description	Impact	Prob.	Gross Risk	Mitigation	Residual Risk
<p>Fiduciary</p> <p>EIA and project partners unable to adhere to financial management of project funds as required by DEFRA IWT CF</p>	Major	Unlikely	Major	EIA will apply systems and knowledge gained through four previous Challenge Fund grants which were successfully audited. EIA will conclude a sub-agreement with the project partner setting out financial reporting requirements. EIA will also provide financial training to the partner.	Minor
<p>Safeguarding</p> <p>Names of individuals not implicated in IWT erroneously included in media monitoring reports to financial institutions</p>	Major	Rare	Moderate	EIA has strict criteria governing what information is included in the Media Monitoring, including use of full name and evidence of charges against the individual	Minor
<p>Delivery Chain</p> <p>Financial institutions unwilling to accept information compiled by EIA through its media monitoring programme</p>	Moderate	Rare	Minor	EIA has regular discussions with financial due diligence companies which receive information under the Media Monitoring programme. During the 15 months EIA has operated the programme no companies have withdrawn.	Minor
<p>Risk 4</p> <p>EIA unable to find a suitable candidate for the new Data Manager role</p>	Major	Rare	Moderate	EIA is confident that a suitable candidate will be found and will use its existing networks to identify suitable candidates. Recruitment will be a priority at the outset of the project.	Insignificant

Risk 5 Law enforcement and other target audiences unwilling to use EIA's Environmental Crime Tracker	Moderate	Unlikely	Moderate	EIA will proactively publicise the Crime Tracker amongst existing law enforcement contacts and via platforms such as the United for Wildlife taskforces.	Minor
Risk 6 EIA lacks staff with appropriate language skills to monitor media in key countries	Moderate	Unlikely	Moderate	EIA has both staff and consultants with the requisite language skills and has not experienced any difficulties in covering key countries since it began gathering open source IWT case information in 2017, Consultancy funds within the budget have been allocated for specific language research as required.	Insignificant





Section 8 - Implementation Timetable

Q23. Provide a project implementation timetable that shows the key milestones in project activities

Provide a project implementation timetable that shows the key milestones in project activities. Complete the Word template as appropriate to describe the intended workplan for your project.

[Implementation Timetable Template](#)

Please add/remove columns to reflect the length of your project. For each activity (add/remove rows as appropriate) indicate the number of months it will last, and fill/shade only the quarters in which an activity will be carried out. The workplan can span multiple pages if necessary.

 [IWTR8S2-1040 - Implementation-Timetable](#)
 22/03/2022
 18:16:54
 pdf 174.74 KB

Section 9 - Monitoring and Evaluation

Q24. Monitoring and evaluation (M&E)

Describe how the progress of the project will be monitored and evaluated, making reference to who is responsible for the project's M&E.

IWT Challenge Fund projects are expected to be adaptive and you should detail how the monitoring and evaluation will feed into the delivery of the project including its management. M&E is expected to be built into the project and not an 'add' on. It is as important to measure for negative impacts as it is for positive impact. Additionally, please indicate an approximate budget and level of effort (person days) to be spent on M&E (see [Finance Guidance](#)).

Throughout its duration monitoring and evaluation will be embedded in the project to ensure outputs remain on track and adaptations made where necessary as the project progresses. The M & E plan will be largely based on the project partner's

current information collation and assessment systems, with additional project-specific tools being developed. Overall responsibility for M & E will be held by the Project Leader, supported by the Data Manager and Data Analyst.

At the outset of the project a planning meeting will be held between relevant staff from EIA and partners United for Wildlife and Justice for Wildlife Malaysia to discuss roles and responsibilities, including M & E requirements, and to agree priorities for the first six months of the project. Every quarter key staff will hold a conference call to assess progress and identify potential problems with implementation. Throughout the project quarterly action plans will be created by the project partners. These will refer to project activities, specifying timelines and project staff members responsible for delivery, as well as estimated costs. At the end of each quarter these plans will be assessed in terms of completion and implementation and will include lessons learned so that the project can be refined accordingly as it progresses

EIA will also ensure that activities and outputs of the project are embedded in the organisation's internal strategy planning process. This includes development of a campaigns tracker system developed by EIA and based on the "Project Management for Wildlife Conservation" approach. It will involve setting work packages, minor milestones and major milestones, relevant to the project, all of which are assigned to named members of the relevant campaigns team. Prior to commencing the project its Outputs, Indicators and Activities will be inserted into the EIA Wildlife programme tracker.

Total project budget for M&E in GBP (this may include Staff, Travel and Subsistence costs)	██████████
Percentage of total project budget set aside for M&E (%)	██
Number of days planned for M&E	18

Section 10 - Logical Framework





Q25. Logical Framework

IWT Challenge Fund projects will be required to monitor and report against their progress towards their Outputs and Outcome. This section sets out the expected Outputs and Outcome of your project, how you expect to measure progress against these and how we can verify this.

- [Stage 2 Logframe Template](#)

Please complete your full logframe in the separate Word template and upload as a PDF using the file upload below – **please do not edit the template structure other than adding additional Outputs if needed as a logframe submitted in a different format may make your application ineligible**. Copy your Impact, Outcome and Output statements and your activities below - these should be the same as in your uploaded logframe.

Please upload your logframe as a PDF document.

 [IWTR8S2-1040 -Logical-Framework](#)
 22/03/2022
 18:24:28
 pdf 80.44 KB

Impact:

Increased transparency and scope of information on illegal wildlife trade trends enables more informed policy responses by governments and private sector and assists in targeting law enforcement responses

Outcome:

EIA's expanded Global Environmental Crime Tracker serves as a key resource on IWT trends for a range of public and private sector stakeholders, including financial institutions and law enforcement agencies

Project Outputs

Output 1:

A publicly available resource on IWT which provides greater transparency of law enforcement efforts and analysis of trends to feed into future strategies to disrupt trafficking of key wildlife species.

Output 2:

Improved knowledge and awareness of wildlife seizures assist the financial sector to improve identification of risks associated with money laundering and embedded into customer due diligence systems.

Output 3:

Increased collaboration between international NGOs on sharing data and identification of joint working opportunities for a publicly available platform of wildlife crime, intelligence and conservation data

Output 4:

No Response

Output 5:

No Response

Do you require more Output fields?

It is advised to have fewer than 6 Outputs since this level of detail can be provided at the Activity level.

No

Activities

Each activity is numbered according to the Output that it will contribute towards, for example, 1.1, 1.2, 1.3 are contributing to Output 1.

- 1.1 New Case Tracker role within Justice for Wildlife Malaysia will research and document cases of wildlife trafficking and prosecution outcomes to improve data records in EIA's Crime Tracker.
- 1.2 Outreach conducted to CSOs in Nigeria and Vietnam to share data on cases and prosecutions in-country.
- 1.3 Collaborating with partners and key stakeholders, EIA will produce trend assessments on IWT trade routes, financial flows and methodology of wildlife trafficking in target countries which will be disseminated to national and international law enforcement agencies and members through United for Wildlife.
- 1.4 Training on the use of the Crime Tracker to key CSOs and government agencies in target countries through outreach.
- 1.5 Working with tech consultants, identification and integration of additional data source to add to the Crime Tracker for analysis.
- 2.1 EIA will employ tech consultants to automate Media Monitoring programme databases for efficient data sharing.
- 2.2 United for Wildlife will facilitate collaboration with Financial Taskforce members and EIA to include training and data sharing through the programme.
- 2.3 Identification of key banks and financial institutions in target countries to sign up to the programme and receive data.
- 2.4 Production of financial red flag documents to share with public and private financial sector on IWT.
- 3.1 Engagement with NGOs collecting wildlife crime data to agree regular data sharing.
- 3.2 Creation of a working group with key stakeholders to discuss issues with data collection for wildlife crime and challenges with sharing information.
- 3.3 Scoping and comprehensive gap analysis carried out on current or developing platforms for wildlife crime data
- 3.4 Proposal document produced on future collaborative platform, costed out and partners identified.

Section 11 - Budget and Funding

Q26. Budget

Please complete the appropriate Excel spreadsheet, which provides the Budget for this application. Some of the questions earlier and below refer to the information in this spreadsheet.





Note that there are different templates for projects requesting under £100,000 and over £100,000. Please refer to the [Finance Guidance](#) for more information.

- [Budget form for projects under £100k](#)
- [Budget form for projects over £100k](#)

Please ensure you include any co-financing figures in the Budget spreadsheet to clarify the full budget required to deliver this project.

N.B.: Please state all costs by financial year (1 April to 31 March) and in GBP. The IWT Challenge Fund cannot agree any increase in grants once awarded.

Please upload your completed IWT Challenge Fund Budget Form Excel spreadsheet using the field below.

 [IWTR8S2-1040 - Budget template under 100k](#)
 22/03/2022
 19:02:38
 xlsx 36.98 KB

Q27. Funding

Q27a. Is this a new initiative or does it build on existing work (delivered by anyone and funded through any source)?

- Development of existing work

Please provide details:

The project builds on a programme of work developed by Liberty Shared to share entity data on wildlife criminals to financial institutions to curb illicit financial flows. Liberty Shared created the programme to focus on using the existing Anti-Money Laundering (AML) framework to share information on those profiting from slavery, wildlife trafficking and environmental crimes. It made more than 15,000 submissions of profiles of individuals and entities in global criminal justice systems to partners such as Refinitiv World Check, Dow Jones Risk Compliance and to various financial institutions such as banking groups and money service providers.

EIA has been a key contributor of wildlife trafficking data to the programme since 2016 and has collaborated with Liberty Shared on a number of financial typologies. Due to a lack of funding and resources at Liberty Shared to continue the programme, EIA took over the programme in January 2021 for wildlife trafficking and environmental crimes and has continued to provide data to financial sector partners through the programme, resulting in over 750 profiles being created or updated on Refinitiv's World-Check database in 2021.

Q27b. Are you aware of any current or future plans for similar work to the proposed project?

- Yes

Please give details explaining similarities and differences, and explaining how your work will be additional and what attempts have been/will be made to co-operate with and learn lessons from such work for mutual benefits.

EIA is not aware of other projects similar to the Media Monitoring programme, which was a gap highlighted in the Centre for Global Advancements' report on data aggregators and bad actor lists.

EIA has done initial scoping and gap analysis on the need for an open access wildlife crime database and identified a number of stakeholders who have been developing solutions, including TRAFFIC's Wildlife Trade Portal and Oxpeckers' WildEye maps. Our assessment is that each organisation provides different functionality and data but that their solutions

do not provide the ability to analyse and assess trends globally. By linking EIA's Crime Tracker to the Media Monitoring programme, it presents a unique and efficient platform for sharing data to the financial sector, as well as providing an accessible online tool for governments, law enforcement agencies, NGOs, academics and the media. As an Evidence project, this work will seek to conduct more detailed gap analysis into available solutions. EIA will use existing relationships with key organisations to coordinate through a working group on seizure data and collectively identify future mechanisms for effective data sharing. As part of the working group, organisations will identify possible tech solutions for a shared wildlife crime platform.

Q28. Capital items

If you plan to purchase capital items with IWT funding, please indicate what you anticipate will happen to the items following project end. If you are requesting more than 10% capital costs, please provide your justification here.

n/a

Q29. Value for Money

Please describe why you consider your application to be good value for money including justification of why the measures you will adopt will secure value for money.

The wide-ranging benefits resulting from increased effectiveness of public and private sector financial institutions in targeting the profits derived from IWT, compared with the project cost, ensure that this proposal offers good value for money. By the end of the project the provision of an accessible tool for monitoring wildlife crime, plus detailed trend assessments and red flag documents, will have elevated awareness of money flows linked to IWT amongst public and private sector beneficiaries and enhanced their capabilities to appropriate action, creating a lasting legacy.

The project budget also provides value for money through alignment with current systems already created by the project partners, such as United for Wildlife's Financial Taskforce. The project will utilise information management systems and specialist software already in place at EIA, developing these through consultants to ensure the systems are as efficient and cost effective as possible through automation.

Using existing relationships and data sharing agreements with key stakeholders such as TRAFFIC, will provide comprehensive databases and peer review without additional cost. Provision of a Case Tracker in Malaysia will significantly enhance their capability to track wildlife crime in the country, which in turn will assist the understanding of wildlife trafficking along the entire trade chain.

Section 12 - Safeguarding and Ethics

Q30. Safeguarding

Projects funded through the IWT Challenge Fund must fully protect vulnerable people all of the time, wherever they work. In order to provide assurance of this, projects are required to have appropriate safeguarding policies in place.

Please confirm the Lead Partner has the following policies in place and that these can be available on request:

Please upload the lead partner's Safeguarding Policy as a PDF on the certification page.

We have a safeguarding policy, which includes a statement of our commitment to safeguarding and a zero tolerance statement on bullying, harassment and sexual exploitation and abuse

Checked

We have attached a copy of our safeguarding policy to this application (file upload on certification page)	Checked
We keep a detailed register of safeguarding issues raised and how they were dealt with	Checked
We have clear investigation and disciplinary procedures to use when allegations and complaints are made, and have clear processes in place for when a disclosure is made	Checked
We share our safeguarding policy with downstream partners	Checked
We have a whistle-blowing policy which protects whistle blowers from reprisals and includes clear processes for dealing with concerns raised	Checked
We have a Code of Conduct for staff and volunteers that sets out clear expectations of behaviours - inside and outside the work place - and make clear what will happen in the event of non-compliance or breach of these standards	Checked

Please outline how you will implement your safeguarding policies in practice and ensure that downstream partners apply the same standards as the Lead Partner.

If your project involves data collection and/or analysis which identifies individuals (e.g. biometric data, intelligence data), please explain the measures which are in place and/or will be taken to ensure the proper control and use of the data. Please explain the experience of the organisations involved in managing this information in your project

Information generated will be managed according to EIA's internal protocols ensuring safe storage, robust analysis and compliance with data protection rules. EIA is registered with the UK's Information Commissioner's Office to hold data, is compliant with the EU General Data Protection Regulation, and adheres to UK Data Protection Act regulations. EIA has secure databases in place for the collection of sensitive data which is managed by EIA's internal intelligence team. EIA shares data under conditions which ensures that sensitive data is safeguarded. Sensitive data is sanitised before disseminated, therefore not putting individuals at risk. All staff members undergo stringent training before they can handle data. There is also an internal catalogue which holds all information which has been disseminated to other organisations, so that this can be easily monitored. EIA is also in the process of signing an Information Sharing Agreement (ISA) with TRAFFIC. This ISA will create clear guidelines for both partners on how to process, store, analyse, deal with security incidents and further disseminate data so that the data handling is in accordance to GDPR guidelines.

Q31. Ethics

Outline your approach to meeting the key ethical principles, as outlined in the guidance.

As this project focuses on data analysis and sharing the main ethical questions relate to how the project partners gather, store and disseminate information, especially that pertaining to individuals.

EIA has robust systems and protocols on the use of data. For example EIA is registered with the UK's Information Commissioner's Office, including a journalistic derogation to hold data on individuals in the public interest. EIA is also compliant with the provisions of the General Data Protection Regulation (GDPR).

In terms of its media monitoring programme EIA adheres to standards comparable to those of third-party due diligence service providers i.e. names of individuals shared from open source media searches can only include names of individuals charged with wildlife crime offences and where the full name of the individual is known. These measures ensure that the rights and privacy of individuals impacted by the project are protected.

Internally EIA has a policies relating to ethical principles, including health and safety, safeguarding, and equality, diversity and inclusiveness. Implementation of these policies is overseen by EIA's Senior Management Team.

Section 13 - FCDO Notifications

Q32. FCDO Notifications


Please state whether there are sensitivities that the Foreign Commonwealth and Development Office will need to be aware of should they want to publicise the project's success in the Darwin Initiative in any country.

No


Please indicate whether you have contacted FCDO Embassy or High Commission to discuss the project and attach details of any advice you have received from them.

Yes

Please attach evidence of request or advice if received.

 [IWTR8S2-1040 - Comms with FCDO](#)

 22/03/2022

 18:31:13

 pdf 450.85 KB

Section 14 - Project Staff

Q33. Project staff

Please identify the core staff (identified in the budget), their role and what % of their time they will be working on the project.

Please provide 1-page CVs or job description, further information on who is considered core staff can be found in the [Finance Guidance](#).

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Mel Butler	Project Leader	10	Checked
Julian Newman	Campaigns Director	5	Checked
Shaliza Malik	Data Analyst	90	Checked
TBC	Data Manager	100	Checked

Do you require more fields?





Yes

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
TBC	Case Tracker JWM	100	Checked
No Response	No Response	0	Unchecked
No Response	No Response	0	Unchecked

No Response	No Response	0	Unchecked
No Response	No Response	0	Unchecked
No Response	No Response	0	Unchecked
No Response	No Response	0	Unchecked
No Response	No Response	0	Unchecked

Please provide 1 page CVs (or job description if yet to be recruited) for the project staff listed above as a combined PDF.

Ensure the file is named clearly, consistent with the named individual and role above.

 [IWTR8S2-1040 - Combined CVs](#)
 22/03/2022
 18:32:15
 pdf 727.62 KB

Have you attached all project staff CVs?

Yes

Section 15 - Project Partners

Q34. Project partners

Please list all the Project Partners (including the Lead Partner), clearly setting out their roles and responsibilities in the project including the extent of their engagement so far and planned.

This section should demonstrate the capability and capacity of the Project Partners to successfully deliver the project. Please provide Letters of Support for all project partners or explain why this has not been included.

Lead partner name: Environmental Investigation Agency (UK) Limited (EIA)

Website address: www.eia-international.org

Details (including roles and responsibilities and capabilities and capacity):

EIA will oversee project management and evaluation. The Senior Intelligence Analyst has been leading on the creation and implementation of the Crime Tracker and Media Monitoring programme for EIA and will continue to provide oversight of its development. The Campaigns Director will use EIA's previous experience on AML projects and their established relationships in target countries to identify how the project can complement other funded projects in this area. The Data Manager will lead on the implementation of the Media Monitoring programme to additional private sector companies and work with tech consultants to improve efficiency of the database. They will lead on the outreach to international and national CSOs to create a working group and network for data sharing. The Data Analyst will assist in disseminating data throughout the project, conducting open-source research to identify additional data and by producing trend analysis documents. They will also support the partners with data cleansing activities and by providing training on the Crime Tracker to all stakeholders.

Allocated budget (proportion or value): ██████████

Represented on the Project Board Yes

Have you included a Letter of Support from this organisation? Yes

Have you provided a cover letter to address your Stage 1 feedback? Yes

Do you have partners involved in the Project?

Yes

1. Partner Name: United for Wildlife (UfW), The Royal Foundation of the Duke and Duchess of Cambridge

Website address: <https://unitedforwildlife.org/>

Details (including roles and responsibilities and capabilities and capacity): UfW will lead on the training and use of EIA's Crime Tracker as a key tool for Financial and Transport Taskforce members to increase knowledge of understanding of wildlife crime. They will encourage Financial Taskforce members to partner with EIA on the Media Monitoring programme so that they can obtain relevant data on bad actors involved in wildlife trafficking. UfW will lead on the dissemination of EIA's wildlife crime trend assessments and red flag documents to the financial sector. Throughout the project UfW will encourage organisations to share data collaboratively and will identify additional stakeholders to take part in the working group on wildlife crime data.

Allocated budget: ██████████

Represented on the Project Board Yes

Have you included a Letter of Support from this organisation? Yes

2. Partner Name: Justice for Wildlife Malaysia (JWM)

Website address: <https://www.justicewildlifemy.com/>

Details (including roles and responsibilities and capabilities and capacity): JWM will assist in obtaining, collating, verifying, and validating data from Malaysia which will be entered into EIA's Crime Tracker database. JWM will work closely with EIA and UfW to build relationships and engage with key financial institutions in Malaysia, supporting training on the Crime Tracker and encouraging them to join the Media Monitoring programme. JWM will provide insights on wildlife crime data in Malaysia to feed into EIA's analysis outputs.

Allocated budget: ██████████

Represented on the Project Board Yes

Have you included a Letter of Support from this organisation? Yes

3. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capabilities and capacity): *No Response*

Allocated budget: £0.00

Represented on the Project Board Yes
 No

Have you included a Letter of Support from this organisation? Yes
 No

4. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capabilities and capacity): *No Response*

Allocated budget: £0.00

Represented on the Project Board Yes
 No

Have you Yes
included a Letter No
of Support from
this
organisation?

5. Partner *No Response*
Name:

Website *No Response*
address:

Details *No Response*
(including roles
and
responsibilities
and capabilities
and capacity):

Allocated *£0.00*
budget:

Represented on Yes
the Project No
Board

Have you Yes
included a No
Letter of
Support from
this
organisation?

6. Partner *No Response*
Name:

Website *No Response*
address:

Details *No Response*
(including roles
and
responsibilities
and capabilities
and capacity):

Allocated *£0.00*
budget:


Represented on the Project Board Yes
 No

Have you included a Letter of Support from this organisation? Yes
 No


If you require more space to enter details regarding Partners involved in the project, please use the text field below.


No Response


Please provide a cover letter responding to feedback received at Stage 1 if applicable and a combined PDF of all letters of support.


 [IWTR8S2-1040 - Cover Letter](#)

 22/03/2022

 18:35:06

 pdf 89.7 KB

 [IWTR8S2-1040 - Letters of Support](#)

 22/03/2022

 18:34:49

 pdf 624.9 KB

Section 16 - Lead Partner Capability and Capacity

Q35. Lead Partner Capability and Capacity

Has your organisation been awarded IWT Challenge Fund funding before (for the purposes of this question, being a partner does not count)?

Yes

If yes, please provide details of the most recent awards (up to 6 examples).

Reference No	Project Leader	Title
IWT104	Debbie Banks	Enhancing enforcement to reduce tiger trafficking in the Mekong
IWT101	Mary Rice	Disrupting international wildlife trafficking networks in West and Central Africa
IWT059	Julian Newman	Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade
IWT056	Julian Newman	Strengthening enforcement against the illegal pangolin trade in Uganda
IWT046	Debbie Banks	Enhancing Enforcement to End Tiger Trade in South East Asia
IWT030	Mary Rice	Combatting illegal ivory trade: training film to aid enforcement officers

Have you provided the requested signed audited/independently examined accounts?

If yes, please upload these on the certification page. Note that this is not required from Government Agencies.

Yes

Section 17 - Certification

Q36. Certification

On behalf of the

Trustees

of

Environmental Investigation Agency UK

I apply for a grant of



I certify that, to the best of our knowledge and belief, the statements made by us in this application are true and the information provided is correct. I am aware that this application form will form the basis of the project schedule should this application be successful.

(This form should be signed by an individual authorised by the applicant institution to submit applications and sign contracts on their behalf.)

- I have enclosed CVs for project key project personnel, letters of support, budget, logframe, safeguarding policy and project implementation timetable (uploaded at appropriate points in application).
- Our last two sets of signed audited/independently verified accounts and annual report (or other financial evidence – see [Financial Guidance](#)) are also enclosed.

Checked

Name

JOHN MCCARTHY

Position in the organisation

Trust and Statutory Funding Manager

Signature (please upload e-signature)

[JM signature](#)

18/03/2022

10:52:31

jpg 15.01 KB

Date

22 March 2022

Please attach the requested signed audited/independently examined accounts.

[EIA UK Annual Report and Accounts 2020](#)

18/03/2022

10:55:27

pdf 2.51 MB





[EIA UK Annual Report and Accounts 2019 - SINGLE PA
GES](#)

18/03/2022

10:54:04

pdf 3.17 MB

Please upload the Lead Partner's Safeguarding Policy as a PDF

-  [EIA UK Safeguarding Policies](#)
-  18/03/2022
-  10:55:48
-  pdf 369.42 KB

Section 18 - Submission Checklist

Checklist for submission

	Check
I have read the Guidance, including the "IWT Challenge Fund Guidance", "Monitoring Evaluation and Learning Guidance", "Risk Guidance" and "Financial Guidance".	Checked
I have read, and can meet, the current Terms and Conditions for this fund.	Checked
I have provided actual start and end dates for the project.	Checked
I have provided my budget based on UK government financial years i.e. 1 April – 31 March and in GBP.	Checked
I have checked that our budget is complete, correctly adds up and I have included the correct final total at the start of the application.	Checked
The application been signed by a suitably authorised individual (clear electronic or scanned signatures are acceptable).	Checked
I have attached my completed logframe as a PDF using the template provided	Checked
(If copying and pasting into Flexi-Grant) I have checked that all my responses have been successfully copied into the online application form.	Checked
I have included a 1 page CV or job description for all the Project Staff identified at Question 33, including the Project Leader, or provided an explanation of why not.	Checked
I have included a letter of support from the Lead Partner and partner(s) identified at Question 34, or an explanation of why not.	Checked
I have included a cover letter from the Lead Partner, outlining how any feedback received at Stage 1 has been addressed where relevant.	Checked
I have included a copy of the Lead Partner's safeguarding policy, which covers the criteria listed in Question 30.	Checked
I have been in contact with the FCDO in the project country/ies and have included any evidence of this. If not, I have provided an explanation of why not.	Checked
I have included a signed copy of the last 2 annual report and accounts for the Lead Partner, or other evidence of financial capacity as set out in the Financial Guidance, or provided an explanation if not.	Checked
I have checked the IWT Challenge Fund website immediately prior to submission to ensure there are no late updates.	Checked

I have read and understood the Privacy Notice on the IWT Challenge Fund website.

Checked

We would like to keep in touch!

Please check this box if you would be happy for the lead applicant (Flexi-Grant Account Holder) and project leader (if different) to be added to our mailing list. Through our mailing list we share updates on upcoming and current application rounds under the Darwin Initiative and our sister grant scheme, the IWT Challenge Fund. We also provide occasional updates on other UK Government activities related to biodiversity conservation and share our quarterly project newsletter. You are free to unsubscribe at any time.

Checked

Data protection and use of personal data

Information supplied in the application form, including personal data, will be used by Defra as set out in the **Privacy Notice**, available from the [Forms and Guidance Portal](#).

This **Privacy Notice must be provided to all individuals** whose personal data is supplied in the application form. Some information may be used when publicising the Darwin Initiative including project details (usually title, lead partner, project leader, location, and total grant value).