





# Illegal Wildlife Trade (IWT) Challenge Fund Evidence Annual Report

To be completed with reference to the "Project Reporting Information Note": (https://iwt.challengefund.org.uk/resources/information-notes/)

It is expected that this report will be a maximum of 20 pages in length, excluding annexes)

Submission Deadline: 30th April 2024

Submit to: BCF-Reports@niras.com including your project ref in the subject line

### **IWT Challenge Fund (IWTCF) Project Information**

Project reference	IWTEV009
Project title	Gathering evidence to address illegal trade in African fish maws
Country/ies	Republic of Congo, Senegal, Madagascar, and Hong Kong SAR (match-funding)
Lead Partner	TRAFFIC
Project partner(s)	-
IWTCF grant value	£98,211
Start/end dates of the project	1 April 2023 – 31 September 2024
Reporting period	April 2023 – March 2024 (Annual Report 1)
Project Leader name	Simone
Project website/blog/social media	
Report author(s) and date	Simone & Markus 18/04/2024

### 1. Project summary

The fish maw trade is a complex issue that has conservation, resource management, and governance concerns that extend from small-scale fisheries through the market chain to the end consumer demand. The lure of high returns in the short term at the expense of the long-term sustainability of stocks, is a temptation for many small-scale fishers living in Africa, and the very high value obtained by certain fish maws is a major incentive for uncontrolled and illegal trade. Left unmanaged, this could lead to the collapse of fish stocks, a valuable source of protein for coastal and inland communities in Africa.

Illegal fish maw trade will also undermine an important opportunity for legal and sustainable catch and export of high-value maws, which has the potential to make a positive contribution to the livelihoods of African fishers, processors, and traders. It would also generate State revenue by taxes on legitimate fish maw exports, which are currently going undetected from most African countries.

However, information on fish maw catches, fishing gear (e.g., gillnets), trade dynamics such as the supply and value chain, and the associated livelihood implications, especially for maws traded from Africa, is extremely limited. There is no information on the harvesting of maw from marine fishing along the African coastline, yet import data are indicating a growing supply from the continent.

Recent evidence also suggests maws are increasingly being used as a substitute for shark fins. This shift may become even more evident after the recent CITES listings that now see more than 70% of international shark trade regulated under CITES. As the maw trade expands, it is imperative to understand which species are being targeted, and the level of threat posed both to fish populations and the livelihoods of coastal fishers, dependent on healthy fish stocks.

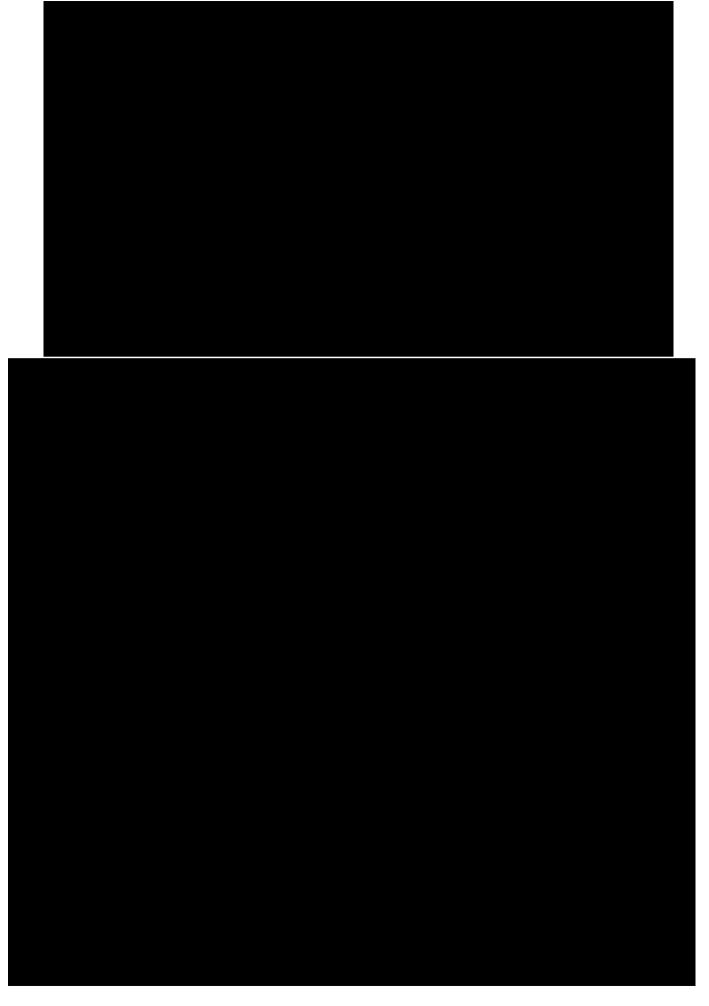
Across Asia and Africa, there is a diversity of species known to be used for their fish maws, especially members of the croaker (Sciaenidae) family. However, in recent years there has been a growing concern that the demand for croakers may be increasing and resulting in intensifying small-scale fisheries, and as a result the IUCN World Congress, published a new resolution (in 2021) on controlling and monitoring the trade in croaker swim bladders. The IUCN World Congress has urged members to document catches of croakers and exports of fish maws from major source countries and encouraged states to incorporate specific provisions regulating these fisheries that are vital to local livelihoods, food security, and national economies.

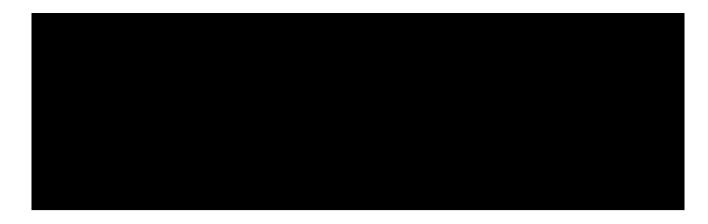
From a social and economic perspective, the high value of fish maw can be an important boost to the incomes of small-scale fishers. Managed properly, such a boost would be a welcome source of revenue but in the unregulated and open access fisheries that are common in many African countries, coupled with weak governance and the very high unit value of certain maw types, the potential for illegal capture and trade is high.

This project aims to investigate and gather evidence on the fish maw trade in major source countries such as Senegal, the Republic of Congo, and Madagascar, including one major consumer destination: Hong Kong SAR. This information is currently lacking for these countries and will greatly contribute towards ensuring effective legal frameworks and deterrents that are not in place for the growing fish maw trade in Africa.

### 2. Project stakeholders/partners

This project is international, multidisciplinary, and highly collaborative in nature. The importance of liaising with other organizations and stakeholders is something we aim to increasingly achieve through several means. We have experienced some delays in implementing project activities as a result of setting up engagements and certain conditions required by the project stakeholders which will be discussed below and in the project progress section (3).





### 3. Project progress

### 3.1 Progress in carrying out project Activities.

Output 1: Country-specific reports detailing improved knowledge and understanding of fish maw trade dynamics, including recommendations to address illegal catch, for Madagascar, the Republic of Congo, and Senegal

Activity 1.1: The customs trade data analysis has been completed for each country and has since been updated in March 2024 (see Annex 4) with the most recent data that became available for 2023. The data was sourced from the UN Comtrade Database and compared with the Hong Kong Special Administrative Region (SAR) import data sourced from the Hong Kong SAR Bureau of Statistics. The detailed analysis provides a good basis for the legally reported trade in fish maws from the targeted countries of Senegal, the Republic of Congo, and Madagascar. The discrepancy analysis provides evidence of the under-reporting or complete lack of reporting exports from the target countries, and additionally, it provides evidence of the fish maw trade taking place with the main destinations and trade routes identified. The information gathered under this activity is primarily targeted at customs officials in each country – to provide evidence of the lack of reporting and raise awareness of the fish maw trade, concealment methods of fish maw consignments, and to be alert of the high volumes and value of this trade.

Activity 1.2: There have been significant challenges and delays in Year 1 in undertaking the market surveys in one of our target countries – the Republic of Congo. Firstly, the project surveys needed to undergo a lengthy ethical clearance process as fieldwork surveys were being conducted with vulnerable groups (fishers). Provisional clearance has been granted, with one revision request. Additionally, we faced further challenges associated with obtaining the required approval and authorization from the Ministry of Fisheries in Congo, and the field surveys in Pointe Noire have accordingly been delayed. At the start of the project, this permission was not a requirement in the country. Another challenge associated with obtaining the authorizations is the lack of a permanent TRAFFIC office presence in the country, which hinders the progress of getting the necessary approvals, as communication takes much longer via email, and without inperson meetings it is difficult to gain trust. Due to these challenges, TRAFFIC has engaged with an organization based in Pointe Noire, WCS, undertaking similar fisheries projects. WCS has expressed interest in collaborating on the project as it falls within the scope of their current work. It will greatly support the project to work with WCS due to their presence in Pointe Noire, their local knowledge of fish landing sites, and already established relationships with fishers and the government. As a result of the delays, TRAFFIC could not undertake the surveys in Year 1 for the Republic of Congo as initially planned and will be submitting a financial change request to accommodate the loss of funds and re-shift Year 2 activities to undertake the surveys in Year 2 of the project and complete this deliverable.

Activity 1.3: The e-commerce monitoring component has now been completed for the project. TRAFFIC undertook a 3-month survey, from January 2024 until March 2024, which fell on the dates before, during, and after the Chinese New Year. This was decided as research suggests that the highest volume of sales takes place leading up to the major festivals when consumers purchase these high-value products for the celebrations. The results, however, yielded minimal online sales from Alibaba and 21Food, which perhaps only indicates that online sales from low-income countries like Senegal, Congo, and Madagascar, are not necessarily a high priority in terms of exporting fish maws. The networks have already been established within the countries,

and the buyers and exporters do not at this point require other methods of selling their fish maw supplies.

# Output 2: Improved knowledge and understanding of consumer market dynamics in the Hong Kong Special Administrative Region (SAR) and consumer preferences for fish maws sourced from African countries.

Activity 2.1: The physical market surveys in Hong Kong's Dried Seafood Street were completed in September 2023, to better understand the demand and consumer preferences for fish maws sourced from African countries. Semi-structured interviews were conducted with traders, wholesalers, and dried seafood shop owners located on 'Des Voeux Road', an area with a concentration of retail shops selling a range of dried seafood products. In an attempt to obtain information on the fish species from Africa supplying the maw trade, fish maw samples described as coming from Africa were collected in the market. These were identified by their Cantonese labels and verified by the shop owners. DNA analysis was conducted on the samples by Stellenbosch University which determined the samples to come from Asian Sea Bass and not species originating from South Africa as described on the labels. The draft report from the Hong Kong market surveys has been completed and can be found in Annex 5. Once the report has been reviewed, it will be shared with the relevant stakeholders in Hong Kong, particularly the Customs Authority, Wildlife Authority, and the Hong Kong Sustainable Seafood Coalition.

**Activity 2.2:** In addition to physical market surveys, two e-commerce platforms, namely, Taobao and Jingdong, were monitored for an hour each day over a period of one month for online sales of fish maws originating from African countries to gain a better understanding of the market dynamics and key countries. There was very little data found for online fish maw sales and local experts advised that many of the consumers purchasing fish maws were from the older generation who prefer buying maws from the market rather than online. Additionally, a comprehensive analysis of the international trade in dried fish maws (HS code: 03057210) imported from all African countries for the period 2015-2022 was completed.

# Output 3: Improved awareness and understanding of issues around the trade in fish maw – including illegal catch and sustainability – for policy, resource management and enforcement officials in Madagascar, Republic of Congo, and Senegal

**Activity 3.1:** TRAFFIC was involved in meetings with United States Homeland Security officials including officials based in Senegal, where information on the fish maw trade and the potential risks associated with the trade and species in the region were shared. Additionally, information has been shared with the Environmental Justice Foundation (EJF) which has offices based in Senegal, with the potential of assisting with the on-ground research in the country. TRAFFIC has discussed the project with the Ministry of Fisheries in Madagascar and provided an update again recently, where the Minister expressed a desire for TRAFFIC to support the development of regulations for fish maw trade in Madagascar.

TRAFFIC held an online presentation for members of the AFRICA-TWIX network on the 7<sup>th</sup> of March 2024. The webinar included members of law enforcement from Central African countries, including the Republic of Congo and Senegal. The purpose of the webinar was to raise awareness of the fish maw trade for law enforcement and show evidence of the emerging fish maw trade in Central Africa. The webinar agenda can be found in Annex 6.

#### 3.2 Progress towards project Outputs

# Output 1: Country-specific reports detailing improved knowledge and understanding of fish maw trade dynamics, including recommendations to address illegal catch, for Madagascar, the Republic of Congo, and Senegal

Much knowledge of fish maw trade dynamics and discrepancies in reporting has been obtained so far through TRAFFIC's data collection. The information gathered will greatly support evidence of illegal, unreported, and undetected (IUU) fishing, particularly relevant for customs officials, where fish maw export consignments are leaving the target countries undetected. As mentioned, in section 3.1, there have been delays in the market surveys, particularly for the Republic of Congo, due to obtaining the required authorizations and approvals from the Ministry of Fisheries to undertake the field surveys. TRAFFIC is working to mitigate these challenges through

collaborating with organizations (WCS) based in the Republic of Congo. The Terms of Reference have been developed and shared with the organizations and consultants (Annex 7) and the questionnaires have been developed and supported by WCS for the interviews with stakeholders in the fish maw supply chain. TRAFFIC has adapted its strategy and will be able to complete this output through collaboration with stakeholders.

# Output 2: Improved knowledge and understanding of consumer market dynamics in the Hong Kong Special Administrative Region (SAR) and consumer preferences for fish maws sourced from African countries.

This output has been completed with the country report in draft format (Annex 5). The market surveys in Hong Kong and semi-structured interviews with local traders, suppliers, and shop owners, generated much evidence on the consumer market dynamics and preferences for fish maws sourced from African countries. The knowledge generated provided evidence of the issues associated with the labeling of products and traceability of dried seafood products in Hong Kong's markets. There were many products mislabeled with the incorrect country of origin and species labeled on the product.

# Output 3: Improved awareness and understanding of issues around the trade in fish maw – including illegal catch and sustainability – for policy, resource management and enforcement officials in Madagascar, Republic of Congo, and Senegal

Progress has been made towards raising awareness and understanding of the issues around the fish maw trade, through meetings held with Homeland Security, where members from Senegal were present, and additionally, an awareness-raising webinar was held for the Africa-TWIX network which included law enforcement officials from all spheres of government in Central Africa. This output is expected to be fully achieved at the end of the project, once all reports are completed and webinars held with the West Africa-TWIX and SADC-TWIX networks, which will cover law enforcement officials from all three target countries of this project.

### 3.3 Progress towards the project Outcome

Project Outcome: Enhanced understanding of fish maw trade from three African countries to East Asia, provides evidence for the design of a full intervention to address illegal and unsustainable catch and trade.

The fish maw trade continues to rise in Africa, and according to recent results from this project, volumes are increasing for the target countries, yet there has been no other organization researching the fish maw trade in Africa. We believe the evidence gathered from this project will significantly contribute to our understanding of the emerging fish maw trade and will provide evidence for legislative reform that is currently lacking in each of our target countries.

Our Outcome indicators remain suitable for achieving progress towards the project outcome.

# 0.1 By end 2024, identification of the fish species harvested in Madagascar, the Republic of Congo, and Senegal, to supply the maw trade to East Asia.

Through discussions with local organizations in the Republic of Congo, the initial identification of fish species harvested for the maw trade has been established. The field surveys will take place in Year 2 to further confirm the identification of fish species. Additionally, the information gathered from Output 1 will greatly enhance our understanding of the fish species harvested to supply the maw trade in each of the target countries through field surveys at fish landing sites and interviews with the main stakeholders in the supply chain.

### 0.2 By mid-2024, development of a policy brief with guidelines on the management and conservation of marine species associated with the fish maw trade in Madagascar, the Republic of Congo, and Senegal.

The country reports developed for Output 1 and Output 2 will provide the evidence base needed to develop guidelines on the management and conservation of the marine species associated with the fish maw trade in each target country.

# 0.3 Preliminary recommendations for best practices in sustainable fishing of key species by coastal fishing communities

The country reports for Output 1 will provide recommendations based on the species targeted to supply the maw trade, and based on the evidence of fishing practices used to catch the species associated with the fish maw trade.

### 3.4 Monitoring of assumptions

The project's outcome and output level assumptions still hold true, except there were assumptions not previously known which have come to light and are highlighted for the following:

Under Output 1, the assumption was made that fishermen in local communities are willing to discuss and share local knowledge and practices on the fish maw trade. However, as mentioned above, an important assumption for this Output should instead be, that the Ministry of Fisheries in each target country approves and supports the work to undertake field surveys in the country. TRAFFIC will now be pursuing a collaborative approach with local organizations within target countries, especially, the Republic of Congo, to ensure the necessary approvals can be obtained to complete the field surveys.

# 3.5 Impact: achievement of positive impact on illegal wildlife trade and poverty reduction

Sustainable fish maw supply chains require a level of community involvement, and through this project, TRAFFIC will identify all the role players and the level of dependence on the resource, from the fishers, and the processors (and determine whether these include women and children) to the middlemen and traders exporting the final product. Additionally, interviews with small-scale fishers will gain an understanding of whether they are being exploited and not gaining the appropriate revenue seen later in the value chain This information will be provided to relevant government agencies and NGOs to support the development of informed decision-making on measures impacting on the livelihoods of these role-players. TRAFFIC will also actively engage with the relevant authorities within customs and fisheries management to understand the underreporting of fish maw exports as this is almost certainly resulting in the loss of trade-related revenue to affected countries.

#### 4. Thematic focus

The project is working to support two of these themes. The research and evidence gathered into the illegal fish maw trade in each target country will inform law enforcement officials, particularly customs officials on the lack of reporting export consignments, and fisheries officials on the specific species targeted to supply the fish maw trade, the level of threat the trade poses to the sustainability of the populations, and the fishing practices used to catch the species for supplying the maw trade. This information is currently lacking amongst law enforcement officials in the target countries, with minimal evidence or knowledge of the trade known to law enforcement officials. This project aims to raise the awareness of law enforcement officials on the illegal fish maw trade and provide recommendations for identifying and intercepting the consignments.

The second theme this project supports is ensuring effective legal frameworks and deterrents. There are no regulations or legislation in place for the catch and trade in the fish species and maw products for each of our target countries. The primary aim of the project is to gather evidence to support the basis of developing legal frameworks that regulate and support the sustainable trade of fish species associated with the maw trade.

### 5. Impact on species in focus

Across Asia and Africa, there is a diversity of species known to be used for their fish maws, especially members of the croaker (Sciaenidae) family. However, in recent years there has been a growing concern that the demand for croakers may be increasing and resulting in intensifying

small-scale fisheries, and as a result the IUCN World Congress, published a new resolution (132) on controlling and monitoring the trade in croaker swim bladders. The IUCN World Congress has urged members to document catches of croakers and exports of fish maws from major source countries and encouraged states to incorporate specific provisions regulating these fisheries that are vital to local livelihoods, food security, and national economies. This project will focus particularly on species from the Scienidae family as the greatest demand for fish maws is coming from this vulnerable fish group.

### 6. Project support for multidimensional poverty reduction

As described under 3.5, this project does not intend to alleviate poverty directly, but our combined project outputs will help to create the conditions to support future livelihood interventions, helping to address poverty reduction in the long term.

## 7. Gender Equality and Social Inclusion

Please quantify the proportion of women on the Project Board <sup>1</sup> .	70% (five out seven)
Please quantify the proportion of project partners that are led by women, or which have a senior leadership team consisting of at least 50% women <sup>2</sup> .	N/A

GESI Scale	Description	Put X where you think your project is on the scale
Not yet sensitive	The GESI context may have been considered but the project isn't quite meeting the requirements of a 'sensitive' approach	
Sensitive	The GESI context has been considered and project activities take this into account in their design and implementation. The project addresses basic needs and vulnerabilities of women and marginalised groups and the project will not contribute to or create further inequalities.	
Empowering	The project has all the characteristics of a 'sensitive' approach whilst also increasing equal access to assets, resources and capabilities for women and marginalised groups	Х
Transformative	The project has all the characteristics of an 'empowering' approach whilst also addressing unequal power relationships and seeking institutional and societal change	

The main project staff that are accountable for its success are women, constituting 70% of the total project, and are directly involved in the implementation of the project and in lead roles in managing the project. The project leader, finance and admin, and implementation of activities such as Output 1 and Activities 1.1 include females.

In terms of the project outputs, TRAFFIC has taken into consideration women and marginalised groups: Along the West African coastline, women form an integral part of the fish preservation process which supports peoples' diets across coastal and inland communities. Being involved

<sup>&</sup>lt;sup>1</sup> A Project Board has overall authority for the project, is accountable for its success or failure, and supports the senior project manager to successfully deliver the project.

<sup>&</sup>lt;sup>2</sup> Partners that have formal governance role in the project, and a formal relationship with the project that may involve staff costs and/or budget management responsibilities.

with processing, women are often in direct contact with the buyers and/or end-users, making them vital to understanding the value chain of fisheries products in trade.

The semi-structured interviews with fishers, processors, and traders will allow TRAFFIC to better understand the role of women and children in the fish maw supply chain (and, in the processing of the fish swim bladders), their level of dependence on the resource and potential issues around exploitation.

Determining the components of the fish maw value chain will also identify opportunities for women to secure fairer rewards and better working conditions, and for measures to ensure that children are not exploited in fishing or processing activities.

### 8. Monitoring and evaluation

Monitoring and evaluation of project progress are done through meetings with the primary project team. Delays in deliverables (such as those mentioned above in 3.2) have been discussed with the project team, with mitigating measures put in place. However, due to significant delays, TRAFFIC will be adjusting plans going forward to complete deliverables, particularly for the Republic of Congo fieldwork.

As we begin to generate more results in Year 2, monitoring of progress against Logframe indications will become quantified and provide a greater range of measures to inform TRAFFIC's internal project review process.

A change request will be sent to DEFRA for Year 2 activities and shifts in the budget to accommodate the loss of funds not spent in Year 1.

The monitoring and evaluation team will meet fortnightly in Year 2 to ensure progress is on track with the project and to avoid any further delays in activities.

#### 9. Lessons learnt

A key area of learning has been the timeframe required for negotiating with supporting organizations in our target countries, which in most cases has taken longer than anticipated. It has been challenging, especially with TRAFFIC not having a base office in the country, with staff on the ground, to meet organizations in person and pursue effective engagements – particularly for countries with limited access to the internet and where the first language is not English. In the future, we would attempt to advance these conversations sooner – perhaps even between the first and second stages of the application on a provisional basis – to shorten the timeframe for these negotiations and reduce some of these administrative considerations for the project once underway.

### 10. Actions taken in response to previous reviews (if applicable)

N/A This is the project's first Annual technical report.

## 11. Risk Management

There have been a few new risks that came up during the last 12 months of the project. The main risk not previously anticipated is the willingness of the Ministry of Fisheries in the Republic of Congo to provide the required authorization for the project to undertake the fieldwork at fish landing sites. The actions taken to mitigate this new risk are through collaboration with an organization based in Pointe Noire, Congo, which is implementing similar projects at the fish landing sites and supporting the project activities. TRAFFIC is pursuing an MoU agreement with this organization to undertake the fieldwork activities.

### 12. Sustainability and legacy

The post-project sustainability will mainly be achieved through active engagement with organizations based locally in each target country. TRAFFIC is currently working on agreements with organizations to collaborate and ensure support of the project to further the recommendations post-project. These organizations focus on community development and sustainable marine conservation, and our collaboration with these organizations will assist in formulating capacity-building efforts that are supportive of the sustainable harvest of marine

species associated with the fish maw trade. The outputs generated from this project will also form the basis of knowledge on the fish maw trade in the target countries, which will be used to raise awareness and advocate for the regulation of the fish maw trade and the sustainability of the fish species associated with the trade.

## 13. IWT Challenge Fund identity

The project has not undertaken a strategic communications campaign yet because of the sensitive nature of the project and the fear of stimulating trade for this high-value resource. The fish maw trade is not widely publicized; however, the trade has many characteristics similar to that of other high-value seafood products like shark fins and sea cucumber. TRAFFIC has been advised by numerous experts to avoid publicizing the fish maw trade and should rather aim to share results and information with relevant stakeholders.

All the communications, reports, and presentations coming from the project will certainly highlight the IWT Challenge Fund.

## 14. Safeguarding

Has your Safeguarding Policy been updated in the past 12 months?				
Have any concerns been reported in the past	12 months	<del>Yes</del> /No		
Does your project have a Safeguarding focal point?	Yes/No [Saheed	•		
Has the focal point attended any formal training in the last 12 months?	<del>Yes</del> /No			
What proportion (and number) of project staff training on Safeguarding?	have received formal	Past: % [and number]		
Has there been any lessons learnt or challeng Please ensure no sensitive data is included w		e past 12 months?		
N/A				
Does the project have any developments or activities planned around Safeguarding in the coming 12 months? If so please specify.				
TRAFFIC has a safeguarding statement wis safeguarding statement is currently being new SEAH (Sexual Exploitation and Haras	reviewed along with th			
Please describe any community sensitisation include topics covered and number of participation		er the past 12 months;		
N/A				
Have there been any concerns around Health past year? If yes, please outline how this was		your project over the		
No.				

## 15. Project expenditure

Table 1: Project expenditure during the reporting period (April 2023-March 2024)

Project spend (indicative) since last Annual Report	2023/24 Grant (£)	2023/24 Total actual IWTCF Costs (£)	Variance %	Comments (please explain significant variances)
Staff costs (see below)				An amount of of staff cost was approved to be shifted from Year 1 to Year 2
Consultancy costs				An amount of of consultant cost was approved to be shifted from Year 1 to Year 2. However the survey in Congo could not be carried out in Year 1, thus the related survey cost could not be spent down
Overhead Costs				As a result of the change in the staff cost, an amount of of overhead cost was approved to be moved to Year 2.
				This budget was overspent in Year 1 because:
				1. The staff rates in the head office and South Africa office were budgeted higher in the original budget than the actual rates. Therefore the staff could allocate more time to the project. Since the overhead cost is depended on the number of staff working time, as a result, the overhead cost was charged more than the budget.
Travel and subsistence				
Operating Costs	2,317.49	260.04	89%	As no survey in the selected countries was carried out in Year 1,

			no sample purchase cost was spent.
Capital items (see below)			
Others (see below)			
TOTAL	64,339.41	29,966.92	

Table 2: Project mobilised or matched funding during the reporting period (1 April 2023 - 31 March 2024)

	Secured to date	Expected by end of project	Sources
Matched funding leveraged by the partners to deliver the project (£)			Paul Angell Family Foundation
Total additional finance mobilised for new activities occurring outside of the project, building on evidence, best practices and the project (£)			

## **Checklist for submission**

	Check
Different reporting templates have different questions, and it is important you use the correct one. Have you checked you have used the <b>correct template</b> (checking fund, type of report (i.e. Annual or Final), and year) and <b>deleted the blue guidance text</b> before submission?	Х
Is the report less than 10MB? If so, please email to <a href="mailto:BCF-Reports@niras.com">BCF-Reports@niras.com</a> putting the project number in the subject line.	
Is your report more than 10MB? If so, please discuss with BCF-Reports@niras.com about the best way to deliver the report, putting the project number in the subject line.	
<b>Have you included means of verification?</b> You should not submit every project document, but the main outputs and a selection of the others would strengthen the report.	Х
If you are submitting photos for publicity purposes, do these meet the outlined requirements (see section 17)?	N/A
Have you involved your partners in the preparation of the report and named the main contributors	N/A
Have you completed the Project Expenditure table fully?	
Do not include claim forms or other communications with this report.	ı