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## 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: 30<sup>th</sup> April 2025**

**Submit to: [BCF-Reports@niras.com](mailto:BCF-Reports@niras.com) including your project ref in the subject line**

### IWT Challenge Fund (IWTCF) Project Information

Project reference	IWTEV023
Project title	Strengthening Evidence to Combat Wildlife Laundering in Colombia and Mexico
Country/ies	Colombia and Mexico
Lead Organisation	Royal United Services Institute for Defence and Security Studies
Project partner(s)	TRAFFIC United for Wildlife Legal Alliance for Latin America’s Sustainability (Alianza del Ecosistema Legal para la Sostenibilidad de América Latina – AES) <sup>1</sup> London Stock Exchange Group (LSEG) Risk Intelligence
IWTCF grant value	£99,718
Start/end dates of project	October 2024 – March 2026
Reporting period (e.g. April 2024-Mar 2025) and number (e.g. Annual Report 1, 2, 3)	October 2024 – March 2025
Project Leader name	Anne-Marie Weeden
Project website/blog/social media	<a href="https://www.rusi.org/explore-our-research/projects/strengthening-evidence-combat-wildlife-laundering-colombia-and-mexico">https://www.rusi.org/explore-our-research/projects/strengthening-evidence-combat-wildlife-laundering-colombia-and-mexico</a>
Report author(s) and date	Anne-Marie Weeden, Jennifer Scotland, Charlotte Davies – 30 <sup>th</sup> April 2025

<sup>1</sup> Providing pro bono support for the project at the country level, via Mexican law firm Galicia and Colombian law firm Brigard Urrutia.

## 1. Project summary

The project aims to generate evidence of ‘wildlife laundering’ as a trafficking modality in Colombia and Mexico that can inform the design of interventions to combat this crime, including financial investigation and policy reform. Wildlife laundering occurs when specimens captured illegally in their natural habitat and traded through legal supply chains as if they were of licit origin. This phenomenon is facilitated by corruption and legal loopholes.

Colombia and Mexico are both important source countries for wildlife and have a rich biodiversity. Wildlife laundering presents a significant threat to the conservation of endemic endangered species as it undermines the efforts of CITES and the Colombian and Mexican governments to promote sustainable legal trade, which rural communities and commercial sectors often depend on for their livelihoods. Further, studies have suggested that by strengthening the captive breeding sector, demand will decrease for illegally wild-caught specimens,<sup>2</sup> thereby reducing pressure on endangered and unsustainably harvested wildlife species – including CITES and non-CITES-listed species – as well as the fragile ecosystems in which they exist. In doing so, we expect the project to also contribute to lessening the burden for protected area and border enforcement communities.

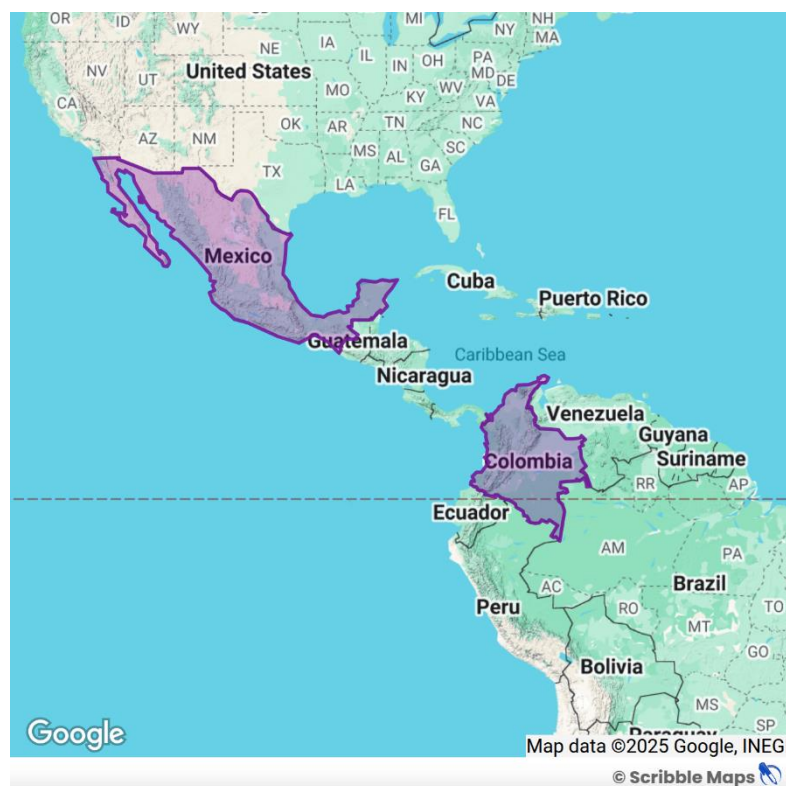


Figure 1: Focal countries for IWTEV023<sup>3</sup>

The project builds empirical evidence to inform stronger investigative approaches to identify and combat laundering in a number of species and therefore contribute to their conservation in the wild. As further detailed under 5 below, the species most likely to be impacted by this project include those that are primarily listed on CITES Appendix II (species of turtles including one vulnerable species; sharks including critically-endangered, endangered and vulnerable species; caiman including one critically-endangered species, and primates including endangered and vulnerable species), along with species of sea cucumber which are not CITES-listed for the focal countries, but are nonetheless impacted by trade.

To date, there is limited research and evidence of wildlife laundering and how it is financed, and as a result it is critically under-enforced. This project therefore seeks to build evidence of

<sup>2</sup> Volker Herzig, Tobias J. Hauke and Tim Lüddecke, 'Unmasking Trends and Drivers of the International Arachnid Trade', *Frontiers in Arachnid Science* (Vol. 2, Art. 1161383, 2023), <https://doi.org/10.3389/frchs.2023.1161383>

<sup>3</sup> Map created using ScribbleMaps.com, based on guidance from Chat GPT, 30 April 2025

typologies of wildlife laundering in Colombia and Mexico, to improve the capacity of authorities to combat this form of wildlife trafficking. While Colombia and Mexico are the focal countries, the project learnings are likely to have wider regional relevance, given the transnational nature of the crime and the replication of wildlife laundering *modus operandi* in different jurisdictions.

## 2. Project stakeholders/partners

The project is being led by RUSI with support from TRAFFIC's Latin America regional office and four pro-bono partners, including the Royal Foundation's United for Wildlife (UFW) Financial and Transport Taskforces; the London Stock Exchange Group (LSEG); and national law firms Galicia (Mexico) and Brigard Urrutia (Colombia), both former members of the now-defunct AES.

Since December 2024, the project partners have met on a bi-monthly basis to discuss and report on project progress, plan activities going forward, and comment on aspects of risk that have informed RUSI's decision making. In addition, RUSI has held regular bilateral meetings with TRAFFIC, LSEG and UFW to support the implementation of the project activities under Output 1 and more recently, meetings have been held with Galicia and Brigard Urrutia on their role under Output 1.3.

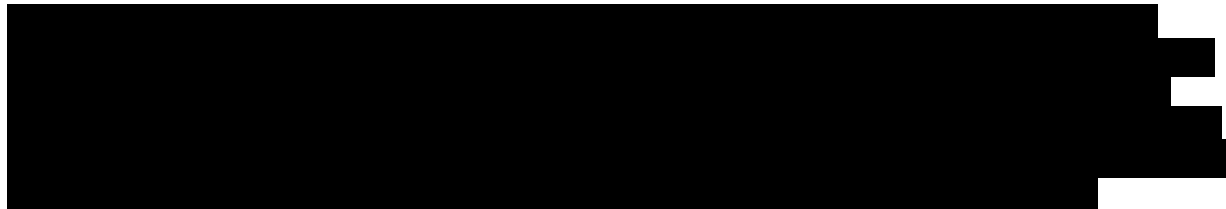
[REDACTED]

[REDACTED] the partnerships have demonstrated significant strengths, particularly in leveraging *pro bono* support from the private sector as seen in two prime examples. Firstly, interest from LSEG in supporting the project with data analysis and engagement, unlocked a novel opportunity for expanding the partnership and obtaining a fresh influx of matched funding – as outlined in Change Request 2. Secondly, access to UFW's Latin America and the Caribbean (LAC) Chapter provided an opportunity to present our project to their members from the financial and transport sectors, and civil society, and is almost certain to be a valuable channel to communicate our findings later in the project.

Regular contact with the British embassies in Colombia and Mexico has also been helpful, in terms of helping to identify potential risks to the project, providing advice on outreach with government stakeholders, and supporting with the identification of interview subjects. The British Embassy in Bogota also invited RUSI to a workshop for the financial and transport sectors which provided another potential channel for engagement and dissemination of the project findings.

At the national authority level, close collaboration with TRAFFIC has been instrumental in establishing contact with new government stakeholders, including Colombia's National Council to Fight Against Deforestation and Other Environmental Crimes (Consejo Nacional de Lucha contra la Deforestación y otros crímenes ambientales – CONALDEF), as well as supporting RUSI in re-establishing contact with Mexico's Federal Attorney for Environmental Protection (Procuraduría Federal de Protección al Ambiente – PROFEPA) following post-election rotations in personnel, and the National Commission for the Knowledge and Use of Biodiversity (Comisión Nacional para el Conocimiento y Uso de la Biodiversidad – CONABIO) (both of which provided letters of support for the project). Conversations with these stakeholders in Q3, Year 1 (Oct-Dec 2024) – the first quarter of activity – enabled RUSI and TRAFFIC to get feedback and endorsement on the project design and ensure alignment with government priorities.

Of these, CONALDEF and PROFEPA are the main government stakeholders, and have verbally agreed to provide technical guidance to the project [REDACTED]



In parallel, RUSI has also developed relations with the Colombian Navy's International Centre for Research and Analysis against Maritime Drug Trafficking (Centro Internacional de Investigación y Análisis contra el Narcotráfico Marítimo – CMCON). CMCON's mandate encompasses environmental commodity trafficking, and they have agreed to support this project where relevant, by using its seizure database to provide wildlife laundering cases, recommending interview subjects, and attending events (see letter of support under Annex 4.15). The Navy is a critical security actor in tackling organised crime activities in the ports and maritime domain, meaning this programme thematic area aligns with the Navy's enforcement remit, but CMCON have observed the research conducted under this project will fill a critical knowledge gap on wildlife commodity types and typologies, historically overlooked due to competing priorities.

### **3. Project progress**

#### **3.1 Progress in carrying out project Activities**

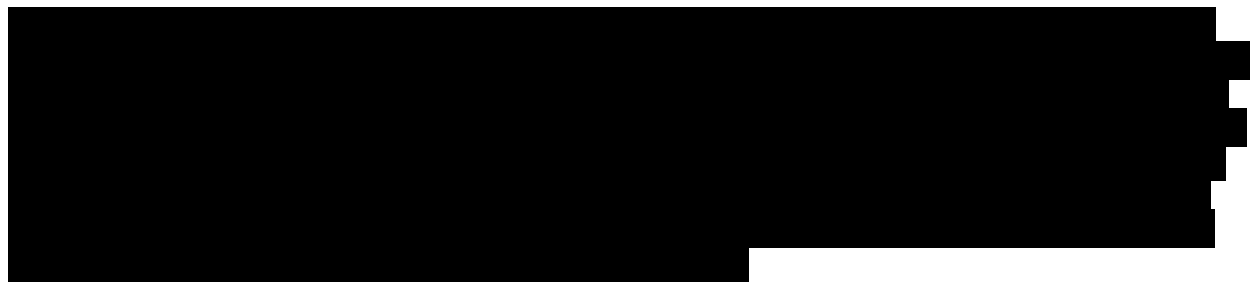
1.1 - By January 2025, RUSI - with support from LSEG, TRAFFIC and government stakeholders - compiled a database of 19 wildlife laundering cases from open sources, included under Annex 4.1. RUSI has ranked the cases based on levels of confidence that they are examples of wildlife laundering, and elements of interest such as indications of illicit financial flows – such as money laundering or shell companies – and transnational links – such as facilitation of laundering over porous borders or exploitation of diverging legislation – that warrant further investigation and their potential to inform laundering typologies. LSEG supported the collation of wildlife laundering cases through use of its WorldCheck database that contains adverse media reporting of environmental crimes. Government stakeholders – including PROFEPA and CONALDEF – helped to identify species of interest and point to open cases that they were aware of. Finding cases of wildlife laundering in open sources proved challenging, given that, seeing as they are cases of legitimate companies involved in malpractice, these crimes often go undetected and unreported. When they are reported, it can be difficult to ascertain whether it was a case of laundering or clandestine smuggling, as there is a lack of clarity around different typologies. Nonetheless, seven high-confidence cases were chosen to be prioritised for further exploration in the interviews.

By January 2025, RUSI had largely completed a review of existing literature on wildlife laundering, which was subsequently supplemented with new publications and those sent by contacts, and has collated findings from 58 published sources from NGOs, media, and academia that covered illegal wildlife trade in Colombia and Mexico, studies of wildlife laundering in other regions and jurisdictions, and evaluations of legislative and enforcement gaps that have facilitated wildlife laundering in Colombia and Mexico. A breakdown of the literature review findings can be found in Annex 4.3. In parallel, RUSI mapped out the institutional functions of Colombian and Mexican authorities responsible for wildlife management (Annex 4.10), as well as an outline of national IWT legislation, policies and frameworks, augmented by the legal reviews being conducted by Galicia (Annex 4.11) and Brigard Urrutia (Annex 4.17) under Activity 1.3.

RUSI supplemented this review of the literature with data analysis of the CITES and UN Comtrade databases, to supplement the team's understanding of commonly traded species in the focal countries. This has enabled the identification of potential irregularities in the trade data and triangulation of findings, which are being explored further in qualitative research interviews under Activity 1.2.

1.2 - By February 2025, RUSI had developed an interview protocol, consent form and project flyer to be shared with prospective interview subjects, which was approved by RUSI's internal Research Committee on 12<sup>th</sup> March after an internal research ethics review. By March 2025, RUSI and TRAFFIC had mapped and reached out to the initial practitioners and subject matter

experts for interview. Given the nature of wildlife laundering as a transnational threat that exploits gaps in international regulatory infrastructure such as CITES, targets included international experts identified in the literature, to map how country-specific vulnerabilities to wildlife laundering may be replicated in other jurisdictions, as well as national and regional subject matter experts. As of 30<sup>th</sup> April 2025, qualitative research interviews were ongoing; so far, RUSI has conducted 10 interviews across academics, civil society and independent actors, of which 60% were female interviewees. From all interviewees to date, five (50%) had expertise on Colombia, three (30%) had expertise on Mexico, one (10%) had expertise on both countries and one (10%) had an international perspective. Of the 10 interviews conducted to date, nine have yielded very strong findings that have been collated into an interview results matrix to facilitate analysis (see Annex 4.16).



1.3 – Findings from the literature review and interviews have contributed towards RUSI's understanding of legislation and wildlife management and financial investigative capacity. As of 30<sup>th</sup> April 2025 Galicia and Brigard Urrutia had made progress on their reviews of domestic legal frameworks, which followed guidance from RUSI on aspects of interest, such as priority species and potential legal loopholes identified in the research. Galicia submitted their draft legal review to RUSI on 29<sup>th</sup> April 2025 (see Annex 4.11) and Brigard Urrutia submitted their report on 30<sup>th</sup> April 2025 (see Annex 4.17). As of 30<sup>th</sup> April, RUSI was awaiting Brigard Urrutia's legal review, which is due imminently.

Once the interviews are finalised, RUSI will collate these legal reviews into a comprehensive review of legislation, wildlife-management and financial-investigative capacity in each country.

2.1 – RUSI and project partners have made progress towards the compilation of typologies of wildlife laundering and associated illicit finance. The research to date has led RUSI to identify recurring wildlife laundering patterns in Colombia and Mexico that will inform rich typologies for practical use by law enforcement and the financial sector. For example, an emerging typology has included the use of high-profile wildlife sanctuaries in Mexico as fronts for illegal transfers of endangered exotic species both within the country and to wildlife sanctuaries in other countries, potentially using donation pages as money laundering mechanisms. RUSI's interest in this case led to collaboration with UFW and an external conversation with C4ADS who had looked at a similar case in a different jurisdiction with links to the one identified by RUSI and LSEG. The research findings were used to support UFW in the development of an emerging global typology ([Alert #00217](#)) on wildlife laundering through captive breeding facilities and wildlife sanctuaries, which was distributed to the UFW mailing list comprising over 3,300 civil society, financial sector and law enforcement contacts on 18 February 2025 (see Annex 4.14). RUSI has therefore made progress in the Activity 2.1 target of developing two typologies but seeks to investigate this modality in more depth in the context of Mexico to understand how illicit finance is linked to wildlife sanctuaries and what legal loopholes and capacity gaps are facilitating this activity.

Other emerging typologies include the cross-border laundering of pirarucu, matamata turtles and other endangered species in the tri-border area between Brazil, Colombia and Peru, where there are clear indications of illicit drug proceeds being linked to legitimate wildlife enterprises, given the presence of organised crime groups in the region. Such activities appear to be facilitated by legal loopholes and lack of capacity and resources of the local authorities to address these issues given the prevalence of other crime types.

Activities 2.2-4.3 will be reported on in the next period, given that while foundational work on these activities has been done, no tangible milestones have been reached.

### **3.2 Progress towards project Outputs**

Significant progress has been made towards Output 1 of the project, which is that 'novel research is conducted, with a database of known wildlife-laundering cases compiled, situational analyses produced, and reviews of legislation, wildlife-management and financial-investigative capacity conducted'. As shown in section 3.1, RUSI and the project partners have completed Activity 1.1 and are close to finalising Activities 1.2 and 1.3.

At the beginning of the project, baseline knowledge of wildlife laundering and associated finance in Colombia and Mexico was very limited. In the literature review, RUSI found that information on wildlife laundering in each country to be fragmented, with evidence of laundering practices limited to very specific cases. Except for two reports on Mexico – one journal article and one book chapter – there were no examples in the literature of attempts to interrogate laundering risk as a wildlife trafficking modality in the focal countries. However, many reports mentioned laundering risk in passing, indicating that the risk of laundering is increasingly recognised, but the prevalence of this crime and typologies remain understudied and poorly understood. As such, both public and private sector actors in each country were unprepared to address this risk.

The project has made significant progress in closing this knowledge gap. The literature review, compilation of known wildlife laundering cases and semi-structured interviews have provided important insights into how wildlife laundering is facilitated in both countries, both by loopholes in domestic and international environmental regulations, as well as enforcement capacity gaps, and the ways in which illicit finance is being moved. This has enabled RUSI to begin building rough typologies for wildlife laundering and illicit finance and RUSI was able to support UFW in developing an emerging typology ([Alert #00217](#)) on wildlife laundering through captive breeding facilities and wildlife sanctuaries, which was distributed to the UFW mailing list comprising over 3,300 civil society, financial sector and law enforcement contacts on 18 February 2025 (see Annex 4.14). As such, the project has made progress towards Output 2, i.e., that 'findings are shared and tested at country-specific virtual workshops, with typologies on wildlife laundering and associated illicit finance affecting Colombia and Mexico produced and refined for practical future use'.

Given that the validation, dissemination and capacity building activities under Outputs 2-4 depend on the enhanced evidence base developed under Output 1, the baseline for these outputs is also low by default. However, much of the work conducted since October has set the groundwork for the remaining Outputs, including Output 2, as well as Output 3 (an 'enhanced evidence base, typologies and guidance are published as 1 open-access RUSI Emerging Insights paper and 2 shorter-form articles in English and Spanish, with an online launch') and Output 4 ('the enhanced evidence base is disseminated, and concrete follow-on programming explored at workshops in each country, with capacity built among participating organisations to use the evidence in future programming').

RUSI and TRAFFIC have established ties with government stakeholders and RUSI has built rapport with the British Embassies in Colombia and Mexico and the UFW LAC chapter and its members, as well as engaging new partners including LSEG and CMCON, which will have considerable added value during the dissemination and outreach phases of the project in Output 3. UFW and LSEG are well placed to disseminate project findings to private sector stakeholders, who were not included in the project design but are an important additional sector to engage, for example in the form of risk indicators. CMCON, on the other hand, as part of the Colombian Navy, has a regional network, providing a channel to build awareness of wildlife laundering in the armed forces and wider security and defence sector in Latin America.

Through this outreach, as well as stakeholder mapping and the interview process, RUSI and partners have begun to build up a network of contacts that will be key stakeholders in the workshops planned in Outputs 2, 3 and 4.



### 3.3 Progress towards the project Outcome

Progress towards the project Outcome is on track, i.e., that ‘innovative research strengthens the evidence base on wildlife laundering in Colombia and Mexico, informing novel options to strengthen financial investigation and other enforcement responses via follow-on capacity-building activities.’

As previously outlined in section 3.2, the baseline for this is low, with a limited knowledge base on wildlife laundering in Colombia and Mexico at the project outset and a limited capacity for financial investigations on this crime type. The compilation of wildlife laundering cases demonstrated that most of the high-profile investigations into wildlife laundering that led to prosecutions were instigated and led by US law enforcement. Comparatively, few cases had been investigated by domestic authorities and those that had did not appear to have reached the stages of a financial investigation, barring one case.


Considering this clear capacity gap, progress against the Outcome has therefore been very positive, given that the research conducted to date has already strengthened evidence on wildlife laundering in Colombia and Mexico, and RUSI has already begun to build and disseminate wildlife laundering typologies, in collaboration with UFW (see Annex 4.14). While delivery of some of the individual activities has been delayed, this is not expected to affect progress towards the project outcome, and RUSI is confident that activities will accelerate after the research phase of the project is finalised, and the Outcome will be achieved as proposed by the end of the funding period.

In addition, on 29<sup>th</sup> April 2025 the [project webpage](#) went live on RUSI's website, and was promoted by a social media post on the Organised Crime and Policing research group's LinkedIn page on 30<sup>th</sup> April, to begin raising broader awareness of the project and provide an outlet for public outputs to be shared and accessed both during and beyond the project cycle.

### 3.4 Monitoring of assumptions

Assumption 1: Governments are committed to combating IWT via legal supply chains and remain committed post-project, allowing scaling of practical law-enforcement capacity building.

Comments: Governments have demonstrated their commitment to combating IWT via legal supply chains, by agreeing to attend meetings to discuss the project, and offering their verbal support with attending events, identifying potential interview subjects, and providing feedback on their priorities.



Assumption 2: The security situation remains sufficiently stable in key areas of Colombia and Mexico for project activities to take place.

Comments: As stated in the risk register, RUSI and partners are regularly monitoring for emerging in-country security risks.



Assumption 3: Suitable outlets are willing and able to use their platforms to publish the written outputs produced under Output 3.

Comments: This assumption has not changed.

Assumption 4: Workshop participants are willing and able to attend, and provide constructive feedback on the products produced, allowing their refinement.

Comments: This assumption has not changed.

#### 4. Thematic focus

‘Strengthening law enforcement’ was the original thematic focus for this project and remains its primary objective. The project is still contributing to this theme, as evidenced by the emphasis and beneficiaries involved in its Activities.

For example, the stakeholder mapping for the project has identified relevant law enforcement and regulatory authorities to include, either as government focal points that can endorse the project, advise on design, and help convene events under Outputs 2, 3 and 4. Interview subjects have been identified to enrich the research findings regarding law enforcement capacity gaps (Activity 1.2). In the literature review and interviews to date (Activity 1.2), law enforcement capacity gaps – including limited resources, conflicting priorities and lack of expertise – have been identified as a key facilitator of wildlife laundering, reinforcing the value of pursuing this theme. In some cases, legal frameworks (Activity 1.3) to regulate wildlife management and trade have been shown to be robust, but lack of sufficient enforcement capacity and competing priorities given the prevalence of other serious crimes renders these frameworks redundant.

Upcoming activities, such as the workshops under Activity 2.2 and 4.2, will benefit enforcement and regulatory stakeholders as participants who will be able to engage in dialogue on the research findings, help validate hypotheses and inform future capacity building activity planning. The design of the activities, outputs and outcome of the project is heavily focused on having a positive impact in strengthening law enforcement around this problem.

The research findings to date also reflect alignment with a secondary thematic focus of the IWT Challenge Fund, ‘ensuring effective legal frameworks and deterrents.’ In the literature review, legal review and interviews, legal loopholes – both in the focal countries and neighbouring countries – have frequently been identified as an important facilitator of wildlife laundering. These include jurisdictional differences in wildlife management regulation that encourage cross-border laundering of species, or national regulations that allow certain kinds of subsistence harvesting can be exploited by illegal actors. The interviews shed light on ways that these legal loopholes could be closed to strengthen legislative frameworks and combat wildlife laundering, thereby cutting across more than one area of thematic focus.

#### 5. Impact on species in focus

The project application listed six groups of species that the project would focus upon:

1. Reptiles targeted for live trade, including matamata turtle (*Chelus fimbriatus*), yellow-spotted river turtle (*Podocnemis unifilis*);
2. High-value flora including rosewood (*Dalbergia* spp.), big leaf mahogany (*Swietenia macrophylla*), Argentine cedar (*Cedrela fissilis*) and candelilla (*Euphorbia antisiphilitica*);
3. Various species of sea cucumbers, including *Holothuria mexicana*, *Isostichopus badionotus*, *Isostichopus fuscus* and *Actinopyga agassizi*;
4. Various species of threatened sharks including scalloped hammerhead (*Sphyrna lewini*), pelagic thresher (*Alopias pelagicus*), silky shark (*Carcharhinus falciformis*) and shortfin mako (*Isurus oxyrinchus*);
5. Various species of caiman impacted by the skin trade, including dwarf caiman (*Paleosuchus palpebrosus*), smooth-fronted caiman (*Paleosuchus trigonatus*), black caiman (*Melanosuchus niger*), spectacled caiman (*Caiman crocodilus*) and Orinoco crocodile (*Crocodylus intermedius*), and;
6. Various species of primates targeted for live trade, including spider monkey (*Ateles*), squirrel monkey (*Saimiri*), capuchin (*Cebus* and *Sapajus*), howler monkey (*Alouatta*), tamarin (*Saguinus*) and marmoset (*Callithrix*).

Under Output 1, Activity 1.1 was completed to conduct a review of a) academic and grey literature publications, along with data analysis using the CITES Trade Database and UN Comtrade; b) national legislation and c) wildlife laundering case studies to compile a database for further examination and analysis. The collated findings of this work built understanding of



laundering vulnerabilities and modalities within each species group and convergence with other crimes and associated illicit financial flows, while also revealing the need to address additional species groups.

In terms of the original scope, academic and grey literature provided examples of trade and laundering risks related to caimans, turtles, sea cucumbers and sharks, and evidenced the need to examine trade in additional species such as poison dart frogs (*Oophaga* and *Phylllobates*) from Colombia and arapaima (*Arapaima gigas*) in the tri-border area of Colombia which is also a strategic hub for organised crime; while the case studies demonstrated the importance of considering non-native felids (*Panthera* spp.) in the context of wildlife refuges and associated criminal activities in Mexico.

The initial research led RUSI to identify high risk and high interest species in Colombia to be matamata turtles, poison dart frogs, arapaima, and various shark species; and in Mexico sea cucumber, non-native felids, and various shark species. These species were chosen as they came up frequently in the literature and laundering of these species demonstrated interesting indicators with clear links to illicit finance and criminal convergence. RUSI tested these findings with external CSO stakeholders such as the UNODC Latin America office and designed a research strategy that intends to use the interviews to both explore general wildlife laundering threats in Colombia and Mexico, as well as identify subject matter experts that could speak to the risks facing these high-priority species in more depth, in order to develop detailed typologies that have a high relevance for financial investigations, while speaking to many of the challenges facing the other target species.

During December 2024 and January 2025, virtual meetings were held with beneficiaries in the focal countries (PROFEPA, CONABIO, CONALDEF). RUSI and TRAFFIC introduced the project, presented initial findings from Activity 1.1 and solicited opinion and feedback about the species scope, to ensure the project was closely aligned to government priorities and their understanding of species to be at highest existential risk from laundering. Beneficiaries provided positive feedback on the species identified.

The scope therefore remains largely the same but has been slightly revised to include fauna only, and includes the prioritisation of high-interest species, though the others remain relevant to the study.

RUSI and TRAFFIC considered that timber would significantly broaden the research scope – which may be problematic given the short project timeline – whereas a narrower focus on uncharismatic and typically under-prioritised fauna species would yield a stronger outcome, with scope for scaling the project to include timber. Researchers are confident that this refined scope is reflective of the secondary research evidence to date and has the advantage of alignment with beneficiaries' priorities and mandates and is therefore practitioner-informed to facilitate the uptake of project outputs.

## **6. Project support for multidimensional poverty reduction**

Through the impact of enhancing the evidence base and consequent capacity building activities, the project seeks to benefit lower-income communities affected by multi-dimensional poverty (MDP). The project integrates contemporary understandings of MDP drivers into its design, recognising it as a complex issue that goes beyond monetary deprivation, encompassing other welfare dimensions such as access to resources, clean water, ecosystem services, climate change impacts, and poor governance practices like gender inequality or community inclusion in decision-making. It emphasises the need to understand the complexities of poverty and its intersection with community vulnerability to exploitation by organised crime; the doom loop of species depletion, biodiversity loss and climate change; as well as the detrimental impacts of illicit financial flows on governments' abilities to generate sufficient public revenues.

It also recognises the opportunities that resilient, sustainable livelihoods harnessing green and blue economies can bring to communities and national economies, which include significant proportions of IPLCs and other marginalised groups. By empowering stronger wildlife trade economies, competition with illicit wild-caught flows of species will be lessened, reducing the demand for illegal wildlife sourcing but also increasing sustainable, climate-resilient economic opportunities for legitimate actors.

While both focal countries are upper middle-income countries, Colombia and Mexico also show deep economic inequality,<sup>4</sup> and some biodiverse regions occupied by indigenous populations include those who are economically marginalised.<sup>5</sup> Experts interviewed under the qualitative research phase have already provided insights into how organised crime groups can exploit local communities’ access to natural resources to source wildlife that then enters licit and illicit supply chains. In targeting threatened species in biodiverse regions of Colombia and Mexico, the project contributes to the protection of community access to wildlife-related revenues and mitigates threats to longer-term sustainable and equitable use of biodiversity, which supports economic development for local communities.

Furthermore, the project addresses illicit financial flows from wildlife laundering – as a result of money laundering and tax evasion

Globally, IWT generates billions of USD in illicit profits annually, with significant price mark-ups between source and destination countries.<sup>6</sup> These illicit financial flows deprive governments of revenue to invest in economic diversification and development to boost gainful employment and ensure sustainable development. In enabling governments to better disrupt these flows, the project will contribute to reducing organised crime groups’ abilities to exploit ILPCs and other rural groups. Additionally, by highlighting opportunities for more incisive targeting of wildlife laundering toward higher-level, financial beneficiaries of crime, the project seeks to mitigate the threat of disproportionate targeting of lower-level offenders who may already experience poverty.

The project design contributes to various UN Sustainable Development Goals (SDGs) including SDG 1 (ending poverty), as well as SDGs which indirectly contribute to poverty alleviation like SDG 5 (gender equality), SDG 8 (economic growth), SDG 10 (reduced inequalities), SDG 13 (climate action), SDG 14 (conservation and sustainability of marine resources), SDG 15 (terrestrial ecosystems and biodiversity), and SDG 16 (peace, justice and strong institutions).

7. Gender Equality and Social Inclusion

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	

<sup>4</sup> World Bank, ‘World Bank Poverty Report Highlights Persistent Inequalities in Colombia’, 3 December 2024, <https://www.worldbank.org/en/news/press-release/2024/12/03/informe-sobre-pobreza-del-banco-mundial-destaca-desigualdades-persistentes-en-colombia> and Coneval, ‘Multidimensional Poverty Measurement in Mexico: An Economic and Social Rights Approach’, n.d., and <https://www.coneval.org.mx/informesPublicaciones/FolletosInstitucionales/Documents/Multidimensional-Measurement-of-poverty-in-Mexico.pdf>

<sup>5</sup> EL PACCTO, ‘EL PACCTO with the Indigenous Communities of Latin America’, 20 April 2021, <https://elpaccto.eu/en/espanol-el-paccto-con-las-comunidades-indigenas-de-america-latina/> and Naomi Basik Treanor, Jessica Webb and Katie Reytar, ‘Indigenous and Community Forests’, World Resources Institute, 26 June 2024, <https://gfr.wri.org/social-governance-issues-indicators/indigenous-community-forests>

<sup>6</sup> Financial Action Task Force, ‘Money Laundering and the Illegal Wildlife Trade’, 2020, p. 13, <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Money-laundering-and-illegal-wildlife-trade.pdf.coredownload.pdf>

<b>Sensitive</b>	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.	X
<b>Empowering</b>	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	
<b>Transformative</b>	The project has all the characteristics of an 'empowering' approach whilst also addressing unequal power relationships and seeking institutional and societal change	

The project demonstrates GESI-sensitive design and implementation to ensure that project activities maximise inclusivity and generate equitable net benefits for all and will continue to seek opportunities to scale to GESI-empowering approaches.

Regarding rights and resources, the scope of the legal reviews for both Colombia and Mexico and the interview design includes components on legal and customary rights of indigenous people and local communities in the management of wildlife resources which will directly inform the evidence base.

Regarding practice, the project is underpinned by the principle 'do no harm'. In line with RUSI's robust standards for ethical research, all interview candidates will be able to exercise free, prior and informed consent in participation, and individual rather than group interviews will take place to maximise each participant's opportunity to speak freely. At the time of writing, no potential barriers to participation have been identified, however the project team remains vigilant to the identification and mitigation of potential restrictions, stigmas or other factors that might influence participation.

Regarding representation, the project integrates GESI principles throughout its design and implementation and supports this by monitoring with gender-disaggregated indicators across both Standard Indicators and project indicators. Additionally, Standard Indicators include – where appropriate in the disaggregation – monitoring of "Indigenous Peoples and local communities" (ILPC), tracking the number of people engaged under relevant Standard Indicators who self-identify as indigenous or as members of distinct local communities. This is relevant to Activities 2.2, 3.3 and 4.2.

Practical steps have been taken to ensure GESI-sensitivity. Firstly, early and ongoing engagement of primary beneficiaries in the focal countries in their native language solicited inputs which directly informed the research focus to ensure that the project scope is aligned with their priorities and mandates. Secondly, stakeholder mapping by 31st March 2025 identified an initial list of 31 individuals to be invited to participate in research interviews, with the result that a) 61% were identified as men and 39% as women, while it is expected that, while public sector functions may be male-dominated, further stakeholder mapping and participation will ensure at least 40% of interviewees are women (in fact to date, the majority – at 60% – of interviewees are women but this figure may adjust over time as the indicator is completed); b) 77% of these initial potential candidates were from the focal countries (both upper middle income countries); and c) there is broad representation across ages and professional sectors (government, academic, civil society and the private sector). Thirdly, the interview design has considered the role of gender in relation to wildlife laundering in Colombia and Mexico and the impacts of GESI-related stressors and vulnerability on the dynamics at play, which is expected to generate novel evidence to inform project beneficiaries under Output

2. Lastly, the research has been conducted by a female-led and female-dominant team comprising 5 women out of 6 key personnel.

## **8. Monitoring and evaluation**

Outcome: “Innovative research strengthens the evidence base on wildlife laundering in Colombia and Mexico, informing novel options to strengthen financial investigation and other enforcement responses via follow-on capacity-building activities”

As evident in the programme design, this project will deliver Activities and Outputs in a logical results chain, collectively ensuring the Outcome as outlined above. As described in Section 3.1, under Activity 1.1, RUSI and partners are conducting reviews of relevant literature and datasets to create a database of ‘wildlife laundering’ cases relevant to the focal countries. The literature review (Annex 4.3) alone identified 58 published sources of relevance to the project in both English and Spanish, and the team is also halfway to achieving the indicator on the number of interviews with subject matter experts. comprised of 22 papers in academic journals, 32 reports and news articles and four books, of which 36 sources (62%) covered Colombia or Mexico specifically, nine (16%) covered Latin America and the remaining 13 (22%) covered international examples.

Aggregated with the inputs from LSEG – including a review of their WorldCheck database of adverse media reports – this helped to identify 19 cases of potential value which were then assessed to determine that seven showed strong wildlife laundering indications and money laundering indications, eight showed medium laundering indications and four had some but minimal laundering indications, demonstrating the pertinence of these foundational activities to the project outcome. This analysis was cross-referenced with reviews of quantitative UN Comtrade data, and these cases – along with other themes and considerations identified in the programme design and literature review – will be further explored and triangulated during qualitative interviews with subject matter experts, already well underway. In this way, the activities build towards the successful completion of Output 1.

The project team has collectively created several tools with which to monitor the indicators of these achievements (see Annex 2 for a full list of project indicators including BCF-aligned Standard Indicators). Under Activity 1.1, the RUSI team created a structured Microsoft Excel database which enabled researchers to collate, classify and assess the literature and RUSI and TRAFFIC subsequently co-designed a research template using Microsoft Word (Annex 4.2), which segmented features of each case along with information gaps. Data points taken from the candidate cases in the database were then analysed in Microsoft Excel (Annex 4.1) to assess the strength of laundering indications and prioritise the cases. These formats enabled RUSI, TRAFFIC and LSEG to collaborate more efficiently on the prioritisation of cases and to compare criteria across cases.

In preparation for the primary qualitative research under Activity 1.2, a secure and UK GDPR-compliant interview tracker was designed using Microsoft Excel, to list potential participants against their specific areas of expertise, and track communications and consent documentation.

Progress on the project is frequently shared with partners and key stakeholders, either through direct collaboration on monitoring tools and trackers, or through regular project update meetings and broader stakeholder engagement, especially with the British Embassies in Bogota and Mexico City. However, whilst all partners contribute to providing and/or receiving and discussing monitoring inputs and progress, the RUSI team retains the accountable role in the coordination and evaluation of these monitoring activities, as well as reporting, as outlined in the project’s personnel structures and design.

In addition, the project achieved enhanced external exposure among a predominantly regional cross-sector audience through UFW’s quarterly LAC Chapter meetings. During the meeting of 17<sup>th</sup> December 2024, RUSI provided an informal update to attendees to introduce and socialise the project, and on the 25<sup>th</sup> March 2025, RUSI and TRAFFIC formally presented to LAC

Chapter members on progress and findings to date (Annex 4.13) – a presentation made entirely in Spanish.

## **9. Lessons learnt**

The process of re-engaging project partners and government stakeholders in the inception phase of the process and making a start on project activities took much longer than expected. Some of the reasons for this were out of RUSI's control

However, there were also factors RUSI had overlooked in the initial inception period, such as the potential need for formal agreements with *pro bono* partners and government stakeholders before collaboration could begin in earnest.

Furthermore, the number of partners and stakeholders involved in the project – which has increased since inception – has meant that coordination of partners has taken up more time than expected, which would be something to consider in similar projects in the future. That said, the number of partners involved in the project has been a notable strength and is projected to improve durability and scalability. Whilst it hails from a different continent, an African proverb resonates here: if you want to go fast, go alone; if you want to go far, go together.

The degree of interest and resources available in the British Embassies in Bogota and Mexico City to support the project was unanticipated and has helped RUSI and project partners navigate the local landscape, for example by identifying individuals for interview that the project partners had not considered and providing advice on stakeholder engagement. RUSI would therefore recommend other projects operating in new jurisdictions engage with a similarly open mind with the relevant British Embassies.

Another more technical learning regarded how to introduce the phenomenon of 'wildlife laundering' to project partners and stakeholders. After a couple of interactions at the beginning of the project it became clear that there was confusion between wildlife laundering and money laundering, and that the term wildlife laundering was not always widely recognised, reflecting the need for the project. However, to improve understanding during activity engagement, RUSI chose to define the term 'wildlife laundering' at the beginning of each external interaction, including in interviews. This is evidenced in the interview protocol (Annex 4.4) and PowerPoint presentation to UFW (Annex 4.13). This nuancing of approach helped to overcome any uncertainty as to the scope of the project.

The M&E process was slightly complicated by the change in Standard Indicators since the time of project design and project conception. As such, under Annex 3 RUSI has realigned the old Standard Indicators against the new framework, where feasible, and migrated the discontinued Standard Indicators to the project indicators. The team will continue to monitor both types of indicators as detailed in the Logistical Framework, for the rest of the project duration.

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

Not applicable.

## **11. Risk Management**



## **12. Scalability and durability**

To engage potential adopters, including government and civil society stakeholders, RUSI and TRAFFIC conducted a series of bilateral and multilateral meetings to introduce the project, gauge interest in the issue of wildlife laundering, and ensure there is alignment on priorities regarding species types. Evidence of the attractiveness of the project to government adopters has been demonstrated by their attendance in these meetings, and their commitment to attend follow-on meetings to follow project progress, as well as pursuing a more formalised cooperation, such as through a Memorandum of Understanding or letter of support. To consolidate these relationships in the longer term, in-country partners including TRAFFIC and the British Embassy in Bogota have attended meetings and been an important part of these conversations, forging relationships which are expected to sustain project momentum beyond its end date.

Regarding potential adopters in the private sector, RUSI attended two UFW LAC Chapter events and presented the project to its members. Separately, RUSI and TRAFFIC also virtually attended a workshop on the illegal wildlife trade held by the British Embassy in Bogota attended by financial and transport sector representatives in Colombia, providing access to potential channels to disseminate research findings effectively and sustainably. RUSI's close relations with UFW and LSEG Risk Intelligence will also provide a channel for disseminating typologies on wildlife laundering and associated illicit finance to private sector stakeholders to support their suspicious transaction monitoring and due diligence processes beyond the project cycle. This has already come to pass – the [global typology](#) distributed by UFW in March on captive breeding, zoos and rescue centres utilised inputs from RUSI, TRAFFIC and LSEG's research on a specific case study on the database, involving several actors working in wildlife management establishments in Mexico who have previously been suspected of wildlife laundering or other IWT-related activities. This was circulated to the UFW database of over



3,300 contacts spanning law enforcement, NGOs, transport companies and the anti-money laundering sector.

Through these efforts, the project is keeping in line with the original exit plan that emphasises the development of networks and knowledge, putting information in the hands of frontline actors for enforcement, civil society and private sector responses to combating IWT, to sustain the future application and development of wildlife laundering and financial typologies so that they can be built on in perpetuity.

The research findings to date have also confirmed RUSI's hypothesis on potential opportunities to scale the project that were outlined in the original exit plan. These include the implementation and dissemination of the findings at a wider regional level to disrupt cross-border wildlife laundering operations. The research findings to date have revealed distinct cross-border wildlife laundering typologies – for example in the tri-border region of Brazil, Colombia and Peru – and the need for greater cross-border collaboration and synergy over wildlife management regulations to combat these crimes.

### **13. IWT Challenge Fund identity**

RUSI submitted a Visibility Statement for IWTEV023 on 6 March 2025, which acknowledged that assets carrying the UK International Development/IWT Challenge Fund logos or acknowledging UK International Development/IWT Challenge Fund funding would include project flyers, a project webpage hosted on [www.rusi.org](http://www.rusi.org), an interview consent form, social media content and other public communications, presentations about the project to government stakeholders and wider audiences, webinar and in-person event branding, and written publications.

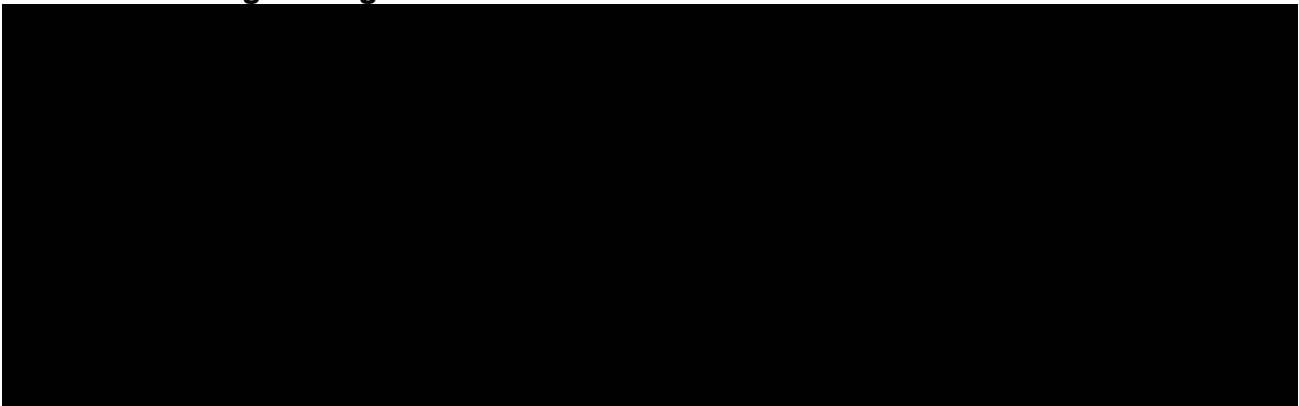
To date, the IWT Challenge Fund logo and/or recognition of IWT Challenge Fund funding has been used in project flyers and interview consent forms that have been sent to prospective interview subjects (see Annexes 4.7 and 4.5) and other relevant stakeholders such as the British Embassy in Bogotá and PROFEPA. Acknowledgement of IWT Challenge Fund funding was also used in PowerPoint presentations made to CONABIO, CONALDEF and PROFEPA to introduce the project and seek endorsement and feedback, as well as a presentation made to the UFW LAC Chapter on 25 March 2025 to raise awareness of the project among its members.

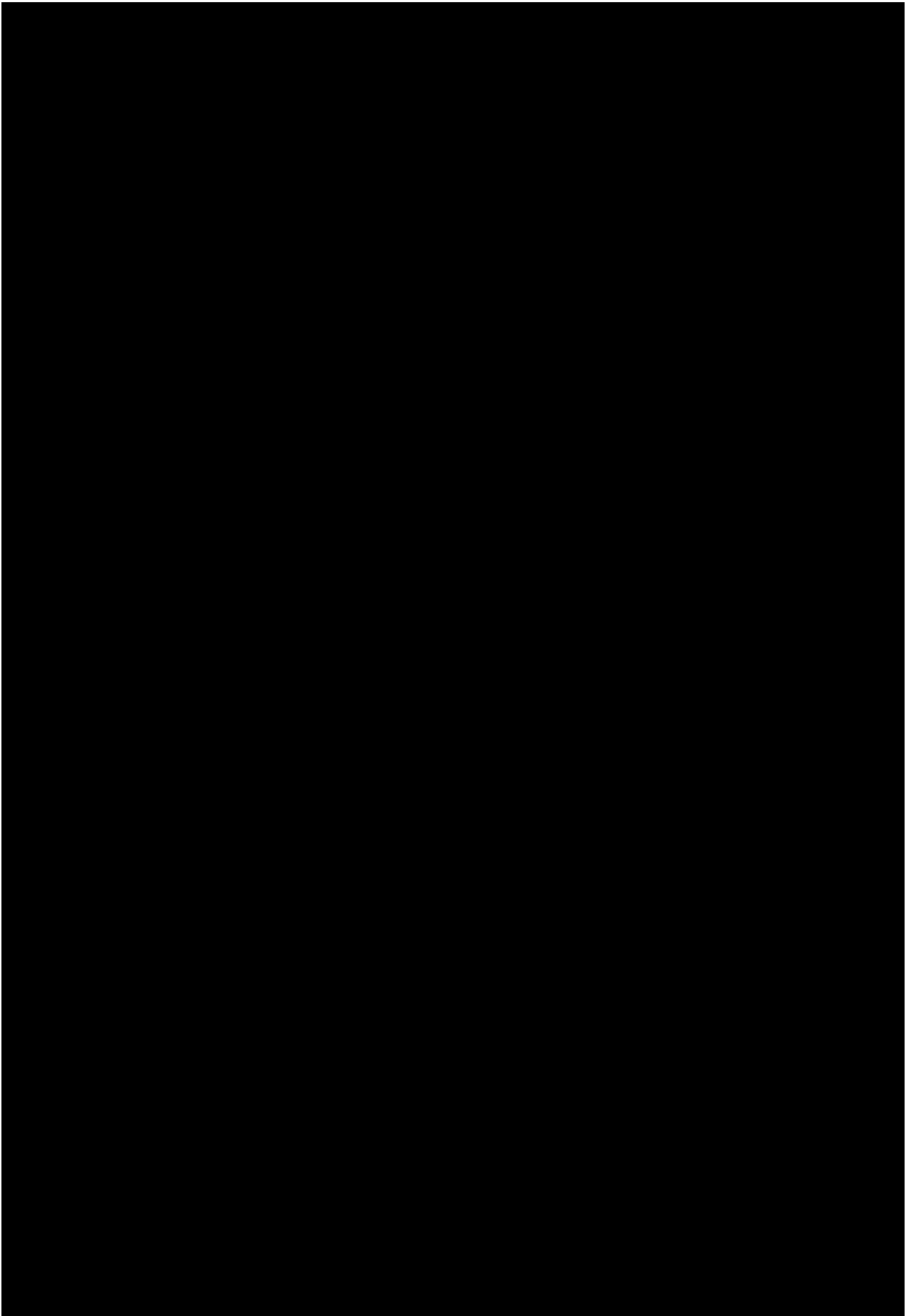
The IWT Challenge Fund was also attributed for its funding on the project webpage, which was uploaded onto [www.rusi.org](http://www.rusi.org) on 28 April 2025 and can be found [here](#). The upload of the project webpage was accompanied by a LinkedIn post on the Organised Crime and Policing research group's LinkedIn page on 30 April 2025 to promote the project and the UK government's contribution as the funder. The Biodiversity Challenge Funds LinkedIn page was tagged in this post. Project partners – including the British Embassies in Bogota and Mexico City, and LSEG Risk Intelligence – agreed to repost or share this on their pages to reach a wider audience.

As shown by the Annexes and the linked webpage, IWT Challenge Fund funding is recognised as a distinct project with a clear identity.

It is unclear to what extent there is an understanding of the IWT Challenge Fund in the host countries. However, the British Embassies have agreed to promote the project and the IWT Challenge Fund by sharing the project webpage on their social media channels, as well as distributing the project flyer when appropriate, to raise visibility.

### **14. Safeguarding**





## 15. Project expenditure

**Table 1: Project expenditure during the reporting period (April 2024-March 2025)**

Project spend (indicative) since last Annual Report	2024/25 Grant (£)	2024/25 Total actual IWTCF Costs (£)	Variance %	Comments (please explain significant variances)
Staff costs (see below)				
Consultancy costs				
Overhead Costs				
Travel and subsistence				
Operating Costs				
Capital items (see below)				
Others (see below)				
<b>TOTAL</b>				

**Table 2: Project mobilised or matched funding during the reporting period (1 April 2024 – 31 March 2025)**

	Secured to date	Expected by end of project	Sources
Matched funding leveraged by the			

partners to deliver the project (£)			
Total additional finance mobilised for new activities occurring outside of the project, building on evidence, best practices and the project (£)			

## 16. Other comments on progress not covered elsewhere

One key learning has been that wildlife laundering typologies, while Americas focused, will have international relevance given that financial typologies of these crimes remain underexplored beyond Latin America. The public interest in [the Vantara private zoo in India](#) during recent months, as well as extensive coverage of other seizures and examples of wildlife laundering the world over, indicates a growing problem and one the IWT community is impatient to address, with evidence-based analysis, intelligence and recommendations.

The interview design and research strategy has therefore been refined slightly to account for international as well as local perspectives on how wildlife laundering is facilitated not just at the local level but by flaws and oversights in international wildlife management regulations (e.g. CITES), so that the research findings will have relevance not just for Colombia and Mexico but can serve as risk indicators for law enforcement and the financial and transport sectors more widely and inform broader recommendations for international regulators, mitigating risk of criminal displacement.

Furthermore, based on a recommendation from one of the interviews, RUSI and TRAFFIC are pursuing another potential avenue for investigation that could support the enhancement of the evidence base:



## 17. OPTIONAL: Outstanding achievements or progress of your project so far (300-400 words maximum). This section may be used for publicity purposes.

I agree for the Biodiversity Challenge Funds to edit and use the following for various promotional purposes (please leave this line in to indicate your agreement to use any material you provide here).

File Type (Image / Video / Graphic)	File Name or File Location	Caption including description, country and credit	Social media accounts and websites to be tagged (leave blank if none)	Consent of subjects received (delete as necessary)
				Yes / No
				Yes / No
				Yes / No
				Yes / No
				Yes / No

## Annex 1: Report of progress and achievements against Indicators of Success for Financial Year 2024-2025

Project summary	Progress and Achievements April 2024 - March 2025	Actions required/planned for next period
<b>Outcome</b> Innovative research strengthens the evidence base on wildlife laundering in Colombia and Mexico, informing novel options to strengthen financial investigation and other enforcement responses via follow-on capacity-building activities.		
<p>Outcome indicator 0.1</p> <p>At least two (<math>n \geq 2</math>) typologies for practical usage are developed on movements of illicit finance and cross-border IWT flows linked to specific wildlife-laundering modalities affecting Colombia and Mexico, based on the enhanced evidence base on wildlife laundering developed by December 2025 [previously numbered IWTCF-D26; now IWTCF-D11].</p>	<p>Progress against this indicator is on track against the timeframe indicated. During Year 1, RUSI and project partners made progress towards building wildlife laundering typologies by developing an enhanced evidence base through a comprehensive literature review, compilation of wildlife laundering cases into a database (evidence provided in Annexes 4.1, 4.2 and 4.3), analysis of CITES and UN Comtrade data, and semi-structured interviews with subject matter experts (see interview materials and sanitised notes in Annex 4.4, 4.5, 4.7, 4.8 and 4.9). RUSI and project partners have identified strategies to disseminate the typologies once they are built to ensure wide reach among a range of different stakeholder groups, including the public sector, civil society and the private sector. Evidence of this has already been seen with RUSI's support to UFW in using research findings to develop 1 x global wildlife trafficking typology on wildlife sanctuaries and captive breeding facilities, with inputs on typologies involving Mexico, which was distributed to the UFW mailing list (see Annex 4.14). Further dissemination of this typology will be feasible in line with others produced under this project.</p>	<p>RUSI will use the evidence collated to build at least two typologies by the end of May 2025. RUSI and project partners will use the channels identified to disseminate these typologies to different stakeholder groups by the end of August 2025.</p>
<p>Outcome indicator 0.2</p> <p>Dedicated project page – including all published evidence, typologies and project outputs – receives an average of 100 monthly impressions by March 2026 [previously IWTCF-D18 – now discontinued and converted to a project indicator].</p>	<p>Progress against this indicator is on track against the timeframe indicated. A dedicated <a href="#">project webpage</a> was uploaded onto RUSI's website on 28 April 2025 and shared on the Organised Crime and Policing Research Group's LinkedIn page on 29 April 2025. Project partners and stakeholders [REDACTED] id they would repost this on their pages to broaden reach.</p>	<p>RUSI and project partners will continue to promote the project and use the dedicated webpage to hold public outputs, to increase the number of monthly impressions.</p>
<p>Outcome indicator 0.3</p> <p>Outline guidance frameworks (<math>n=1</math> per country) are produced on options for use of financial-investigation tools, and the capacity of at least 3 organisations per country participating in workshops in Colombia and Mexico is built to integrate evidence and typologies generated into future programming, with tangible steps taken to</p>	<p>Progress against this indicator is on track against the timeframe indicated. RUSI and project partners have not yet started to build the outline guidance frameworks, however they have made significant progress in building the evidence base for these, as well as mapping out key stakeholders for</p>	<p>RUSI will use the evidence collated under Output 1 and validated in workshops in Output 2 to build the outline guidance frameworks by August 2025.</p>

design follow-on law-enforcement-focused projects based on the evidence generated by March 2026 [Source: project indicator].	inclusion in law enforcement capacity building activities (see explanation in Sections 3, 4, 7).	
<b>Output 1</b> Novel research is conducted, with a database of known wildlife-laundering cases compiled, situational analyses produced, and reviews of legislation, wildlife-management and financial-investigative capacity conducted (for inclusion in Emerging Insights paper).		
Output indicator 1.1. By January 2025, a database of a minimum of 20 wildlife laundering cases is compiled, and literature review covering a minimum of 50 sources (n≥25 per country) in Colombia and Mexico is compiled [previously IWTCF-B07; now converted to a project indicator].	Progress against this indicator is functionally complete. By January 2025, RUSI and LSEG had compiled a database of 19 wildlife laundering cases of varying levels of confidence and interest (see Annex 4.1 and section 3 for more details), and revised 50 reports, including NGO and media reports, journal articles and book chapters (see Annex 4.3 and section 8 for more details). By April 2025, after conducting interviews, more reports were added to this review and more will be added in the course of ongoing research and as novel publications are released. Milestones for the number of cases in this milestone may have been over-ambitious side, with no more than 19 relevant cases identified. If a 20 <sup>th</sup> (or more) case is identified during further research and interviews, this/these will be added in due course, but in the meantime, this indicator is considered complete the 5% shortfall against the number of cases thought to be negligible in terms of achieving the project outcome.	This indicator has been completed and the findings will be used to inform subsequent activities.
Output indicator 1.2. By March 2025, at least 20 practitioners or subject matter experts on Colombia and Mexico are interviewed (n≥10 per country) including at least 40% female experts [Source: project indicator].	Progress against this indicator was partially completed during the reporting period, due to minor delays to the ethics review and recruitment activities. By March 2025, RUSI had developed an interview protocol and strategy, produced project-relevant interview consent forms in Spanish and English, and begun to reach out to prospective interview subjects (see Annex 4.4 and 4.5 and Section 3 for evidence). Half the total subject matter expert interviews have been completed (n=10), with a greater proportion of female respondents to date than initially projected (60% cf. target of 40%). Of these, five (50%) have expertise on Colombia, three (30%) have expertise on Mexico, one (10%) has expertise on both countries and one (10%) has an international	RUSI will continue to interview relevant subject matter experts and practitioners until there is enough information to build situational analyses and typologies for practical use. RUSI aims to finalise the interviews by the end of May 2025.



	perspective. Of the 10 interviews conducted to date, nine yielded strong findings that have been collated into an interview results matrix to facilitate analysis (see Annex 4.16).	
<p>Output indicator 1.3.</p> <p>By March 2025, at least two reviews of legislation, wildlife-management and financial-investigative capacity are conducted and documented for Colombia and Mexico [Source: project -c indicator].</p>	<p>Progress against this indicator was partially completed during the reporting period [REDACTED].</p> <p>By January 2025 RUSI had begun to map out legislative frameworks and relevant authorities for wildlife management in Colombia and Mexico, as part of the literature review and stakeholder mapping (attached in Annex 4.10). On 29 April 2025, Galicia sent RUSI detailed reviews of wildlife legislation in Colombia and Mexico (see Annex 4.11), and Brigard Urrutia's review was received late on 30<sup>th</sup> April (see Annex 4.17).</p>	<p>RUSI will compile findings from the legal reviews provided by Brigard Urrutia and Galicia and the interviews to write up two reviews on legislative vulnerabilities and capacity gaps for Colombia and Mexico, by the end of May 2025.</p>
<p><b>Output 2.</b></p> <p>Findings are shared and tested at country-specific virtual workshops, with typologies on wildlife laundering and associated illicit finance affecting Colombia and Mexico produced and refined for practical future use.</p>		
<p>Output indicator 2.1.</p> <p>By May 2025, at least two typologies are developed on movements of illicit finance linked to specific wildlife laundering modalities and cross-border IWT flows affecting Colombia and Mexico, based on the enhanced evidence base developed [previously IWTCF-B05; now converted to IWTCF-B13].</p>	<p>Progress is on track to be completed next quarter. RUSI used research findings to support UFW in the development of a wildlife laundering typology of global relevance, regarding the illegal transfer of endangered species between wildlife sanctuaries, which was published on 18 February 2025 (see Annex 4.14) and disseminated to UFW's mailing list comprising over 3,300 civil society, financial sector and law enforcement contacts. RUSI and partners have made good progress towards identifying other country-specific typologies with strong links to illicit finance, as mentioned in Section 3.</p>	<p>RUSI will continue with interviews and use the findings from Output 1 to build detailed country-specific typologies. Options for dissemination of these typologies will be discussed with UFW and LSEG.</p>
<p>Output indicator 2.2.</p> <p>At least 5 key NGO and INGO stakeholders and 5 key public sector officers participate in 1 virtual workshop for each focal country (n=20) to share findings and gather input to test and refine the typologies produced by June 2025 [previously IWTCF-D21; now IWTCF-D07].</p>	<p>Progress against this indicator is on track to be completed next quarter.</p>	<p>RUSI will continue to engage with key partners and stakeholders throughout the conceptualisation, logistics planning, invitation and recruitment of participants, and delivery of this workshop, by late June 2025.</p>
<p>Output indicator 2.3.</p>	<p>Progress against this indicator is on track to be completed next year.</p>	<p>RUSI and TRAFFIC will collaborate, with inputs from the</p>

One outline guidance framework, covering options for use of financial-investigation tools, is developed per focus country to support the response to wildlife laundering and associated illicit finance by August 2025 (for inclusion in subsequent Emerging Insights paper) [previously IWTCF-B21; now converted to a project indicator].		wide partnership as appropriate, on preparing the framework for each focal country.
<b>Output 3.</b> Enhanced evidence base, typologies and guidance are published as 1 open-access RUSI Emerging Insights paper and 2 shorter-form articles in English and Spanish, with an online launch.		
Output indicator 3.1. By December 2025, 1 peer-reviewed RUSI Emerging Insights paper that contains 2 country specific case studies, typologies and guidance is published as an open-access asset in English and Spanish on www.rusi.org [previously IWTCF-D13 and IWTCF-D17; now both discontinued and converted to a single project indicator].	Progress against this indicator is on track to be completed by the end of the calendar year.	RUSI will draft, review, edit, format, translate and produce 1 x paper by December 2025.
Output indicator 3.2. By November 2025, 2 shorter-form pieces will be published in appropriate outlets in English and Spanish to raise awareness of strengthened evidence base [previously IWTCF-D13; now discontinued and converted to a project indicator].	Progress against this indicator is on track to be completed next year.	RUSI will draft, with input from partners where relevant, 2 x commentaries or short-form blog posts which will be edited and published by November 2025.
Output indicator 3.3. By December 2025, 1 online launch event is held in English and Spanish to disseminate findings, attended by at least 30 participants working in relevant fields in the focus countries, including at least 40% female attendees [previously IWTCF-D20; now IWTCF-D06].	Progress against this indicator is on track to be completed next year.	RUSI will continue to engage with key partners and stakeholders throughout the conceptualisation, logistics planning, invitation and recruitment of participants, and delivery of this event, by December 2025
<b>Output 4.</b> The enhanced evidence base is disseminated, and concrete follow-on programming explored at workshops in each country, with capacity built among participating organisations to use the evidence in future programming.		
Output indicator 4.1. The peer-reviewed RUSI Emerging Insights Paper achieves at least 200 total page impressions by March 2026 [previously IWTCF-D14; now discontinued and converted to a project indicator].	Progress against this indicator is on track to be completed next year.	RUSI will monitor webpage impressions and continue to promote project outputs on social media to boost engagement with the project material and raise awareness of findings.

<p>Output indicator 4.2.</p> <p>At least 50 IWT decision-makers, including relevant law enforcement practitioners, attend the workshops covering Colombia and Mexico by January 2026 [previously IWTCF-D21; now IWTCF-D07].</p>	<p>Progress against this indicator is on track to be completed next year.</p>	<p>RUSI will continue to engage with key partners and stakeholders throughout the conceptualisation, logistics planning, invitation and recruitment of participants, and delivery of this workshop, by January 2026.</p>
<p>Output indicator 4.3.</p> <p>By March 2026, the capacity of a minimum of 3 organisations attending workshops has been built in the use of the evidence generated in future programming, alongside the development of tangible plans for follow-on law-enforcement capacity building [previously IWTCF-D03; now IWTCF-D04].</p>	<p>Progress against this indicator is on track to be completed next year.</p>	<p>RUSI, project partners and other stakeholders will discuss options for scaling the project and ensuring project sustainability beyond the end date.</p>

## Annex 2: Project's full current Indicators of Success as presented in the application form (unless changes have been agreed)

Project summary	SMART Indicators	Means of verification	Important Assumptions
<b>Impact:</b> <i>This row is not included in the simplified Evidence tier template therefore it has been left blank.</i>			
<b>Outcome:</b> Innovative research strengthens the evidence base on wildlife laundering in Colombia and Mexico, informing novel options to strengthen financial investigation and other enforcement responses via follow-on capacity-building activities.	0.1 – At least two (n≥2) typologies for practical usage are developed on movements of illicit finance and cross-border IWT flows linked to specific wildlife-laundering modalities affecting Colombia and Mexico, based on the enhanced evidence base on wildlife laundering developed by December 2025 <b>[previously numbered IWTCF-D26; now IWTCF-D11]</b> .  0.2 – Dedicated project page – including all published evidence, typologies and project outputs – receives an average of 100 monthly impressions by March 2026 <b>[previously IWTCF-D18 – now discontinued and converted to a project indicator]</b> .  0.3 – Outline guidance frameworks (n=1 per country) are produced on options for use of financial-investigation tools, and the capacity of at least 3 organisations per country participating in workshops in Colombia and Mexico is built to integrate evidence and typologies generated into future programming, with tangible steps taken to design follow-on law-enforcement-focused projects based on the evidence generated by March 2026 <b>[Source: project indicator]</b> .	0.1 – Documentation outlining two typologies; inclusion of typologies in published RUSI Emerging Insights paper; records of peer-review feedback on typologies developed.  0.2 – Website analytics; website data on download rates, average time on page, average session duration; project output publication records; RUSI Emerging Insights Paper peer-review documentation.  0.3 – Outline guidance framework documents; post-workshop survey results; email circulation records; correspondence with workshop participants; zoom analytics; dedicated funding proposals developed.	<i>This column is not included in the simplified Evidence tier template therefore it has been left blank.</i>

Project summary	SMART Indicators	Means of verification	Important Assumptions
<p><b>Output 1:</b></p> <p>Novel research is conducted, with a database of known wildlife-laundering cases compiled, situational analyses produced, and reviews of legislation, wildlife-management and financial-investigative capacity conducted (for inclusion in Emerging Insights paper).</p>	<p>1.1 – By January 2025, a database of a minimum of 20 wildlife laundering cases is compiled, and literature review covering a minimum of 50 sources (n≥25 per country) in Colombia and Mexico is compiled <b>[previously IWTCF-B07; now converted to a project indicator]</b>.</p> <p>1.2 – By March 2025, at least 20 practitioners or subject matter experts on Colombia and Mexico are interviewed (n≥10 per country) including at least 40% female experts <b>[Source: project indicator]</b>.</p> <p>1.3 – By March 2025, at least two reviews of legislation, wildlife-management and financial-investigative capacity are conducted and documented for Colombia and Mexico <b>[Source: project indicator]</b>.</p>	<p>1.1 – Database files; collation and cataloguing of literature review sources (grey and academic literature); outline of national IWT legislation, policies and frameworks.</p> <p>1.2 – Interview protocols; interview consent forms; interview notes; email correspondence with interviewees; gender disaggregation of interviewee data; situational analysis documentation.</p> <p>1.3 – Documentation (word documents, excel files) outlining two capacity reviews; iterative development of capacity reviews over consecutive word documents and excel files.</p>	<p><i>This column is not included in the simplified Evidence tier template therefore it has been left blank.</i></p>
<p><b>Output 2:</b></p> <p>Findings are shared and tested at country-specific virtual workshops, with typologies on wildlife laundering and associated illicit finance affecting Colombia and Mexico produced and refined for practical future use.</p>	<p>2.1 – By May 2025, at least two typologies are developed on movements of illicit finance linked to specific wildlife laundering modalities and cross-border IWT flows affecting Colombia and Mexico, based on the enhanced evidence base developed <b>[previously IWTCF-B05; now converted to IWTCF-B13]</b>.</p> <p>2.2 – At least 5 key NGO and INGO stakeholders and 5 key public sector officers participate in 1 virtual workshop for each focal country (n=20) to share findings and gather input to test and refine the typologies produced by June</p>	<p>2.1 – Documentation (word documents, excel files) outlining two typologies; iterative development of typologies over consecutive word documents and excel files.</p> <p>2.2 – Workshop invitation documentation; email correspondence; attendance confirmation records; virtual workshop recording; zoom analytics</p> <p>2.3 – Word document outlining framework developed in Colombia; word document outlining workshops framework developed in Mexico; records of email dissemination.</p>	<p><i>This column is not included in the simplified Evidence tier template therefore it has been left blank.</i></p>

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	<p>2025 <b>[previously IWTCF-D21; now IWTCF-D07]</b>.</p> <p>2.3 – One outline guidance framework, covering options for use of financial-investigation tools, is developed per focus country to support the response to wildlife laundering and associated illicit finance by August 2025 (for inclusion in subsequent Emerging Insights paper) <b>[previously IWTCF-B21; now converted to a project indicator]</b>.</p>		
<p><b>Output 3:</b></p> <p>Enhanced evidence base, typologies and guidance are published as 1 open-access RUSI Emerging Insights paper and 2 shorter-form articles in English and Spanish, with an online launch.</p>	<p>3.1 – By December 2025, 1 peer-reviewed RUSI Emerging Insights paper that contains 2 country specific case studies, typologies and guidance is published as an open-access asset in English and Spanish on <a href="http://www.rusi.org">www.rusi.org</a> <b>[previously IWTCF-D13 and IWTCF-D17; now both discontinued and converted to a single project indicator]</b>.</p> <p>3.2 – By November 2025, 2 shorter-form pieces will be published in appropriate outlets in English and Spanish to raise awareness of strengthened evidence base <b>[previously IWTCF-D13; now discontinued and converted to a project indicator]</b>.</p> <p>3.3 – By December 2025, 1 online launch event is held in English and Spanish to disseminate findings, attended by at least 30 participants working in relevant fields in the focus countries, including at least 40% female</p>	<p>3.1 – Paper submission form; RUSI Publications department confirmation email; peer-review feedback documentation; records of iterative development of manuscript based on peer-review feedback; online publication records; google analytics.</p> <p>3.2 – Article submission documentation; receipt confirmation email; editorial feedback documentation; records of iterative development of manuscript based on feedback; online publication records; google analytics.</p> <p>3.3 – Online launch event invitations; online launch event materials including PowerPoint, presentation, notes and diagrams; online event attendance list; recordings of event; bookings and procurement of event related services.</p>	<p><i>This column is not included in the simplified Evidence tier template therefore it has been left blank.</i></p>



Project summary	SMART Indicators	Means of verification	Important Assumptions
	attendees [ <b>previously IWTCF-D20; now IWTCF-D06</b> ].		
<p><b>Output 4:</b></p> <p>The enhanced evidence base is disseminated, and concrete follow-on programming explored at in-person workshops in each country, with capacity built among participating organisations to use the evidence in future programming.</p>	<p>4.1 – The peer-reviewed RUSI Emerging Insights Paper achieves at least 200 total page impressions by March 2026 [<b>previously IWTCF-D14; now discontinued and converted to a project indicator</b>].</p> <p>4.2 – At least 50 IWT decision-makers, including relevant law enforcement practitioners, attend the workshops in Colombia and Mexico by January 2026 [<b>previously IWTCF-D21; now IWTCF-D07</b>].</p> <p>4.3 – By March 2026, the capacity of a minimum of 3 organisations attending workshops has been built in the use of the evidence generated in future programming, alongside the development of tangible plans for follow-on law-enforcement capacity building [<b>previously IWTCF-D03; now IWTCF-D04</b>].</p>	<p>4.1 – Web analytics; download statistics.</p> <p>4.2 – Briefing invitation documentation; email correspondence; attendance confirmation records; virtual workshop recording; zoom analytics; post-event evaluation survey results; correspondence with event participants.</p> <p>4.3 - Post-event surveys and documentation; capacity-building workshop materials; email circulation records; correspondence with event participants; dedicated funding proposals developed.</p>	<p><i>This column is not included in the simplified Evidence tier template therefore it has been left blank.</i></p>
<p><b>Activities</b> (each activity is numbered according to the Output that it will contribute towards, for example 1.1, 1.2 and 1.3 are contributing to Output 1)</p> <p>1.1 Conduct in-depth literature reviews and review national legislation, wildlife management and financial-investigation capacity. Produce database of known wildlife-laundering case studies for further examination.</p> <p>1.2 Identify and conduct semi-structured interviews with subject-matter experts in Colombia and Mexico, using tailored interview protocol.</p> <p>1.3 Conduct situational analyses, interpreting the results of 1.1 and 1.2, and build the findings into a minimum of two typologies on movements of illicit finance and cross-border IWT flows linked to specific wildlife-laundering modalities affecting Colombia and Mexico.</p> <p>2.1 Design and run one virtual workshop per country, designing agenda to allow the testing and refinement of the typologies developed under 1.3.</p> <p>2.2 Identify, invite and facilitate input at virtual workshops from in-country and international experts and practitioners.</p> <p>2.3 Draft one outline guidance framework per focus country to support the response to wildlife laundering, covering specific implications of the findings and practical options for use of financial-investigation tools based on the evidence generated.</p>			

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<p>3.1 Draft RUSI Emerging Insights paper, engaging with key stakeholders on drafts and incorporating feedback. Submit paper to RUSI Publications department and submit to standard peer-review procedure, refining the draft, prior to translation into Spanish.</p> <p>3.2 Write two shorter-form articles and submit for publication in appropriate outlets to raise awareness of strengthened evidence base generated.</p> <p>3.3 Plan and run launch event to present project findings and facilitate key stakeholder discussions around scalability.</p> <p>4.1 Publish and promote dedicated webpage on <a href="http://www.rusi.org">www.rusi.org</a>, and promote the peer-reviewed RUSI Emerging insights paper via a tailored dissemination strategy in English and Spanish.</p> <p>4.2 Conceptualise workshops covering Colombia and Mexico, inviting participation by relevant organisations working on IWT with the goal of building their capacity to use the evidence generated in relevant programming.</p> <p>4.3 Run workshops covering Colombia and Mexico, building the capacity of participating organisations to use the evidence generated in future programming, while developing tangible plans and proposals for funding of follow-on law-enforcement capacity building.</p>			

## 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, scheme, type of report (i.e. Annual or Final), and year) and <b>deleted the blue guidance text</b> before submission?	√
<b>Is the report less than 10MB?</b> 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.	√
<b>Is your report more than 10MB?</b> If so, please consider the best way to submit. One zipped file, or a download option is recommended. We can work with most online options and will be in touch if we have a problem accessing material. If unsure, please discuss with <a href="mailto:BCF-Reports@niras.com">BCF-Reports@niras.com</a> about the best way to deliver the report, putting the project number in the subject line.	N/A
<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.	√
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 preparation of the report and named the main contributors	√
Have you completed the Project Expenditure table fully?	√
Do not include claim forms or other communications with this report.	