



**BIODIVERSITY
CHALLENGE FUNDS**



Biodiversity Challenge Funds Projects Darwin Initiative, Illegal Wildlife Trade Challenge Fund, and Darwin Plus

Half Year Report

It is expected that this report will be a **maximum of 2-3 pages** in length.

If there is any confidential information within the report that you do not wish to be shared on our website, please ensure you clearly highlight this.

Submission Deadline: 31st October 2025

Please note all projects that were active before 1st October 2025 are required to complete a Half Year Report.

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

Project reference	IWTEV023
Project title	Strengthening Evidence to Counter Wildlife Laundering in Colombia and Mexico
Country(ies)/territory(ies)	Colombia, Mexico
Lead Organisation	Royal United Services Institute
Partner(s)	Sub-Contracted Partner: TRAFFIC Non-Commercial Partners: <ul style="list-style-type: none"> - The Royal Foundation's United for Wildlife and their Latin America and Caribbean Regional Chapter - London Stock Exchange Group (LSEG) Risk Intelligence - Galicia - Brigard Urrutia
Project Leader	Anne-Marie Weeden
Report date and number (e.g. HYR1)	HYR2
Project website/blog/social media	Strengthening Evidence to Combat Wildlife Laundering in Colombia and Mexico Royal United Services Institute

1. Outline progress over the last 6 months (April – September) against the agreed project implementation timetable (if your project started less than 6 months ago, please report on the period since start up to end of September).

Although we are not looking for specific reporting against your indicators, please use this opportunity to consider the appropriateness of your monitoring, evaluation and learning (MEL) systems (are your indicators still relevant, can you report against any Standard Indicators, do your assumptions still hold true?). The guidance can be found on the resources page of the relevant fund website.

In HY1, Activity 1.1 was already fully complete and Activity 1.2 and 1.3 were partially complete. In HY2, the project has made substantial progress towards Outputs 2 and 3. The project team exceeded the target number of 20 semi-structured interviews, with 31 in total (Activity 1.2). This included subject matter experts, law enforcement officials, former government and intergovernmental representatives and banking compliance officers, providing a well-rounded

understanding of the problem, both globally, regionally and nationally. The interviews shed light on roles of women and indigenous and local communities in wildlife laundering supply chains, which were integrated into the written research outputs. The interviews met the target gender disaggregation (M: 58%, F:42%), however engagement with Indigenous communities proved to be methodologically challenging, given that the interviews were virtual and the snowballing technique did not facilitate contacts within these communities. The project team identified the omission of indigenous perspectives in the research as an important gap that needs to be addressed in future research, to fully understand their complex role in wildlife laundering supply chains.

The project team then built three detailed typologies of wildlife laundering modalities and illicit finance indicators in Colombia and Mexico (in addition to the typology produced in H1), exceeding the target of two typologies (Activity 1.3). These included typologies on wildlife sanctuaries as fronts for illegal wildlife trade in Mexico; cross-border illicit flows of poison frogs and reptiles from Colombia to breeding farms in Panama and Peru; and laundering of shark fin by seafood exporters in Mexico. Each typology contained analysis of the legal and institutional weaknesses that facilitated wildlife laundering, red flags for suspicious client and transaction activity, and preliminary recommendations for policymakers, enforcement agencies, the financial sector and civil society.

These typologies were then tested in a series of virtual bilateral meetings in each country (Activity 2.1 and 2.2): one with subject matter experts in Colombia (M:3, F:4, 7 total) and Mexico (M:3, F:3, 6 total); two separate meetings with PROFEPA (M:3, F:0) and one meeting with CONABIO (M:0, F:3, 3 total); one meeting with CONALDEF in Colombia (M:2, F:0, 2 total) and one meeting with Panamanian law enforcement officials (M:2, F:1, 3 total). As expected, gender disaggregation was skewed toward male attendees in the law enforcement meetings. The overall approach to these activities and associated indicators were rescoped in CR3 to account for risks identified around combining subject matter experts and practitioners in one meeting. Furthermore, the cross-border nature and limited supporting evidence for the Colombia typology meant it was necessary to coordinate meetings with stakeholders in Panama and Peru. The coordination of these meetings resulted in valuable, comprehensive feedback on the typologies that allowed their refinement.

The project team also completed the drafting of the RUSI paper, which was submitted to RUSI's Publications department in late August and sent for external peer-review in early September (Activity 3.1). It was also shared with TRAFFIC and interview participants for additional feedback. The paper combined insights from the literature review, database collection, interviews and typologies. A key focus of the paper was on the oversight to date of recognising wildlife laundering harms for indigenous and local communities and national economies, and the need to take it more seriously. The paper received positive feedback from peer reviewers and was returned to RUSI's Publications team in mid-October, with a publication date set for 2nd December. The translated version will be published later in December, to ensure inclusivity.

In parallel, RUSI drafted a Summary Briefing Note to accompany the main paper, summarising specific implications of the findings and practical recommendations for policymakers, wildlife authorities, enforcement agencies, intergovernmental institutions, donors, private sector and civil society (Activity 2.3). The document will be published as a Scrolltelling webpage on the project webpage on 27th November, in time for the RUSI/TRAFFIC side event at the Twentieth conference of the parties (CoP20) to CITES the following day.

RUSI and TRAFFIC made progress registering and conceptualising the side event for CoP20 (Activity 4.2) scheduled for 28 November, which will comprise a presentation by RUSI of the research findings and a panel moderated by TRAFFIC with representation from source and destination countries (including Mexico, Ecuador and the UK), to discuss challenges around the detection and prosecution of wildlife laundering and paths forward for enhanced international cooperation. Planning for Activity 4.3 is also underway, with support from British Embassies in

Bogotá and Mexico City, which will help to convene and engage key decision makers in the national workshops.

In addition to the planned activities, RUSI also had the opportunity to present preliminary research findings on corporate red flags for wildlife laundering at two events targeting the financial sector: a 'World Café' event organised by the British Embassy in Bogotá convening financial sector actors to discuss challenges and opportunities to combat the illegal wildlife trade on 20th August; and GAFILAT's regional typology workshop held in Panama on 21st August, attended by Latin American FIUs. These events demonstrated the strengths of the strategic partnerships established with regional actors during the course of the project. These events set a strong precedent for the further dissemination of research findings under Activities 3.3 and 4.3.

2. Give details of any notable problems or unexpected developments/lessons learnt that the project has encountered over the last 6 months. Explain what impact these could have on the project and whether the changes will affect the budget and timetable of project activities.

Team Resource Changes:

RUSI updated its project risk register (RR) in February 2025 to include the risk that the US funding freeze could lead to staff redundancies at RUSI and/or TRAFFIC. Redundancy processes subsequently took place at both organisations. TRAFFIC's key personnel on this project (Renata Cao) were unaffected, but Second Analyst Charlotte Davies had to leave RUSI in August 2025. Her responsibilities and corresponding budget allocation were distributed between Anne-Marie Weeden (Project Lead) and Jennifer Scotland (Lead Analyst). These changes were detailed in CR3 and were necessary to maintain project delivery capacity despite changes and losses to team capacity.

Russian Designation:

On 2 September 2025, RUSI was designated an "undesirable organisation" by Russia's Prosecutor General's Office, which led RUSI's Senior Management Team (SMT) to recommend that RUSI staff undertake enhanced travel risk assessments (TRAs) for travel to countries with close relations with Moscow. This applied to RUSI's planned delivery of the CITES CoP20 side event in Samarkand, Uzbekistan (Activity 4.2), which remained subject to approval of CR3. Approval of the CR was therefore placed on hold until the TRA was completed and approved by RUSI's SMT. The TRA found no evidence of extradition risks for third-country nationals from Uzbekistan or Turkey (a transit country for travel to Uzbekistan) to Russia and RUSI leadership approved the travel in mid-October 2025. Approval of CR3 was received from Defra in late-October, after RUSI shared the updated RR and internal TRA with Niras. This process delayed approval of the CR3, resulting in an increase in flight costs that meant that Renata Cao will no longer be able to travel within the allocated budget. However, other TRAFFIC staff will be able to support with the event and it remains feasible within the parameters of the overarching budget. Despite the setbacks, the CoP20 side event has been successfully scheduled for 28 November, with planning and logistics underway.

3. Have any of these issues been discussed with NIRAS and if so, have changes been made to the original agreement?

Discussed with NIRAS:	Yes
Formal Change Request submitted:	Yes
Received confirmation of change acceptance:	Yes
Change Request reference if known: N0483	

Guidance for Section 4: The information you provide in this section will be used by Defra to review the financial status of projects. This review will identify projects at random for spot checks on financial management and will include requests for evidence of the actual spend

information provided below. Please ensure the figures you provide are as accurate as possible and that you have the evidence to support it. You do not need to provide it now.

4a. Please confirm your actual spend in this financial year to date (i.e. from 1 April 2025 – 30 September 2025)

Actual spend: [REDACTED]

4b. Do you currently expect to have any significant (e.g. more than £5,000) underspend in your budget for this financial year (ending 31 March 2026)?

Yes ☐ No ☒ Estimated underspend: [REDACTED]

4c. If you expect an underspend, then you should consider your project budget needs carefully. Please remember that any funds agreed for this financial year are only available to the project in this financial year.

If you anticipate a significant underspend because of justifiable changes within the project, please submit a re-budget Change Request as soon as possible, and not later than 31st December. There is no guarantee that Defra will agree a re-budget so please ensure you have enough time to make appropriate changes to your project if necessary. Please DO NOT send these in the same email as your report.

NB: if you expect an underspend, do not claim anything more than you expect to spend this financial year.

5. Are there any other issues you wish to raise relating to the project or to BCFs management, monitoring, or financial procedures?

Suspensions or allegations related to fraud and error concerns should be reported to fraudanderror@Defra.gov.uk

N/A

6. Project risk management

6a. If your project has an Overseas Security and Justice assessment, please provide an update on any related risks, and any special conditions in your award paperwork if relevant for your project.

This project does not have an Overseas Security and Justice Assessment. Details of project risk management which has evolved in the last period of reporting are outlined above, in Q.5.

7. Please use this section to respond to any feedback provided when your project was confirmed, or from your most recent Annual Report. As a reminder, all projects that were scored as 'Not Yet Sensitive' in the Gender Equality and Social Inclusion (GESI) assessment of their latest Annual Report should demonstrate how they are meeting the minimum GESI-Sensitive standard.

AR Feedback 1: Specific initiatives to transfer the project to the host countries and create mechanisms for these stakeholders to organically continue the work without additional funds.

This has been elucidated above in the update on progress towards Outputs in Q.1, particularly with reference to Activities 3.3, 4.2 and 4.3, both of which recently had changes approved in CR3 to strengthen this aspect of their implementation design. For instance, high-level engagement at the national and international levels in the in-country workshops (4.3) and CoP20 side-event (4.3) will generate important dialogue among key decision makers. By leveraging British Embassy support in convening 4.3, the events will carry additional authority and endorsement and strengthen accountability for any commitments made for future efforts against the problem of wildlife laundering. The UfW event (3.3) will also strengthen cross-sector collaboration and support Regional Chapter engagement in the host countries and wider region, building long-term relations across key stakeholders which will strengthen the partnerships evolving under this grant, so that they continue to thrive without RUSI as an interlocuter.

AR Feedback 3: Additional Comments in Stage 2 Feedback Letter²

In the pre-award letter from Niras dated March 2024, feedback was included which RUSI was asked to respond on once funding had been confirmed. Due to an administrative oversight driven by various unforeseen factors causing an eight-month delay between this letter and the contract being signed, the RUSI project team omitted to provide this feedback at the appropriate time. The feedback, and our responses, include:

Stage 2 Feedback

RUSI Response

¹ Please note, Annex II is a pre-editorial copy of the paper and subject to further changes as part of the RUSI Publications process. It is only being shared as evidence of GESI-sensitivity and must not be circulated or published in any form without the express written and prior permission of RUSI.

² This feedback was received in a letter from Niras dated March 2024.

<p>The application indicates it will contribute to the CBD Aichi targets yet these are no longer relevant and have been replaced</p>	<p>Under the new Kunming Montreal framework for CBD, the project supports Goal A, B, C and D; and Target 4, 5, 9, 15 and 23.</p>
<p>Please reflect on whether the timeframe and outlined budget are sufficient to carry out all project activities</p>	<p>As demonstrated in our change requests (CR1, CR2, CR3) RUSI has regularly reviewed the programme as part of its adaptive approach to project management, to ensure that the activity plan continues to provide the best strategic approach and optimal value for money and is achievable in the timeframe and budget. This continues to be sufficient at the current time.</p>
<p>Please ensure data collected regarding workshop participation is disaggregated by gender</p>	<p>The original application (Stage 2) stated 'at least 40% of interviewees and event participants identify as women' on p.9, and then added all indicators would be 'disaggregated by gender wherever applicable.' Our AR1 also included preliminary data on gender disaggregated interviewee numbers. Therefore, RUSI believe this comment is already satisfied, and as the GESI analysis and answer to Q1 above shows, RUSI plans to continue to record the gender of project participants but for project efficiencies will conduct one endline survey targeting all individuals the project has engaged with, to capture GESI-characteristics for the disaggregated reporting. This is likely to exclude 3.3, due to the data privacy challenges of accessing personal data of event attendees which will be held by UFW. However, RUSI will explore ways in which UFW can share the disaggregated totals, rather than any raw data, in the event planning and report on the outcome in the next AR.</p>

Checklist for submission

Have you responded to feedback from your latest Annual Report Review ? You should respond in section 6, and annexe other requested materials as appropriate.	Y
Have you reported against the most up to date information for your project ?	Y
Have you clearly highlighted any confidential information within the report that you do not wish to be shared on our website?	N/A
Include your project reference in the subject line of submission email.	Y
Submit to BCF-Reports@niras.com	Y
Please ensure claim forms and other communications for your project are not included with this report.	