



Illegal Wildlife Trade (IWT) Challenge Fund Final Report

To be completed with reference to the “Writing a Darwin Report” guidance: (<http://www.darwininitiative.org.uk/resources-for-projects/reporting-forms>). It is expected that this report will be a **maximum** of 20 pages in length, excluding annexes.

IWT Challenge Fund Project Information

Project reference	IWT021: Following the Money: Disrupting Wildlife-Linked Illicit Financial Flows in Kenya/Tanzania/Uganda
Project title	Following the Money: Disrupting Wildlife-Linked Illicit Financial Flows in Kenya/Tanzania/Uganda
Country(ies)	Kenya, Tanzania, Uganda
Contract holder institution	Royal United Services Institute
Partner institution(s)	Environmental Investigation Agency, Interpol, Mars Omega, Standard Chartered Bank
Total IWT grant value	£158,984
Start/end dates of project	01/04/2016 – 31/03/2018
Project leader’s name	Tom Keatinge
Project website/blog/social media	N/A
Report author(s) and date	Tom Keatinge and Cathy Haenlein, in collaboration/consultation with key partners, 30/06/2018

1. Project Summary

This project addressed the low-risk financial environment that allows criminal actors to profit from IWT. Specifically, it built capacity to enforce IWT-linked anti-money laundering (AML) legislation in Kenya, Tanzania and Uganda, and to prosecute on this basis. This is much needed: IWT is financially driven crime generating an estimated \$7–23 billion annually. Little is known about the money flows it generates in source/transit areas in East Africa. The 2015 Global Center on Cooperative Security report on illicit financial flows in East Africa cited IWT only in passing. In East Africa, financial investigation capacity remains limited, with the Financial Action Task Force (FATF) singling out Kenya, Tanzania and Uganda in the early 2010s for strategic AML deficiencies, including those tied to IWT.



All three governments have shown political will to meet international standards. Yet limited awareness of AML risks amongst law-enforcement and judicial authorities has typically impeded financial approaches. Notably, in investigating IWT, the financial leads available to track high-level facilitators have rarely been followed in the past; arrests have generally been limited to low-level actors caught with wildlife products in hand. Meanwhile, in prosecuting IWT, wildlife acts

have traditionally been used almost exclusively: in Kenya, Tanzania and Uganda, opportunities to use the weightier penalties and asset forfeiture provisions offered by AML legislation have not generally been taken.

This low-risk environment has assured East Africa's status as the largest poaching and trafficking hub for ivory, and an important hub for rhino horn. Kenya and Tanzania, for example, accounted for 64% of all large ivory seizures from 2009-11, and continue to represent two of the most crucial exit points from the continent. The impact on animal populations has been severe: Tanzania, for example, has lost 60% of its elephants since 2009. Uganda, for its part, acts as a key transit hub for ivory moving from Central Africa to coastal exit ports.

Illicit financial flows tied to IWT also undermine governance and development. Global Financial Integrity estimates that Africa loses \$60billion per year to illicit financial flows – dwarfing inflows of overseas aid. Beyond damaging poverty-alleviation efforts, these flows hollow out national institutions, financial resource bases, and the state's ability to provide public services. Across East Africa, poaching also dispossesses communities whose livelihoods rely on wildlife tourism.

To respond to this situation, this project focused on a neglected component of the fight against IWT, building capacity in Kenya, Tanzania and Uganda to detect and prosecute IWT-linked money laundering, which stalls development and entrenches poverty. With this aim, the project piloted a new approach: a strategic assessment of IWT-linked financial flows followed by multi-agency training, bridging law-enforcement, banking, wildlife, justice and customs agencies.

Through this approach, training has improved government agencies' capacity to investigate and prosecute financial crime tied to IWT in Kenya, Tanzania and Uganda, as evidenced below. This enhances their ability to create a 'higher risk' environment for traffickers, disrupting their activities and hastening a drop in poaching. Direct beneficiaries of training included 43, 55 and 51 individuals from public and private sectors in Kenya, Tanzania and Uganda, respectively, with pre/post-course evaluation surveys demonstrating enhanced capacity to track money flows tied to IWT. Meanwhile, the project contributes to a longer-term recovery of animal species and to poverty reduction over the longer term: enhanced capacity to disrupt IWT-linked money flows positively impacts other beneficiaries as part of the project's contribution to its stated impact, by reducing the hiring of poachers, leading to a drop in poaching and thus benefiting communities who depend on wildlife tourism. Beyond rural source areas, citizens also benefit from the reduced damage to governance and public finances made by IWT-linked illicit money flows.

2. Project Partnerships

The project has involved extensive collaboration with formally named project partners, local stakeholders and technical experts. Named project partners include the Environmental Investigation Agency (EIA), Interpol, Mars Omega and Standard Chartered Bank (SCB).

EIA has worked closely with RUSI on the assessment and training phases, contributing in-depth knowledge of the dynamics of IWT in all countries. Most prominently, EIA's investigatory expertise has allowed it to contribute technical modules and case studies to all training courses. EIA experts have designed and delivered modules on both public- and private-sector courses, covering 'Setting the Regional and Global Scene' around IWT and 'Understanding Trade and Shipping'. On the Kenya, Tanzania and Uganda courses, EIA have shared real-world case studies of the use of financial intelligence linked to IWT, and have participated actively in facilitating group exercises.

Interpol provided an expert trainer to public- and private-sector portions of the Kenya course, contributing to group sessions and delivering key modules. As noted in the proposal, Interpol's contribution to the courses is pro bono; it was in this way that they supported the Kenya course. In Uganda and Tanzania, however, the extensive additional training and pro bono support available (see below) was such that RUSI did not depend on Interpol facilitation to the same extent. A decision was made to refrain from imposing on Interpol Nairobi's overstretched time for these courses, particularly with the departure of the lead officer in Nairobi, who is currently being replaced.

Mars Omega took part actively in the assessment phase of the project. This involved providing its JIGZAW system to capture and evaluate information gathered on illicit money flows linked to IWT, as well as providing support on the system's use. JIGZAW is an advanced database and intelligence analyst's interface developed by the Mars Omega, which acts as a common

repository of knowledge to allow the extraction of meaningful insight from multiple sources. Mars Omega has operated in East Africa for five years, supplying JIGZAW free-of-charge to conservancies such as the Northern Rangeland Trust in Kenya. Drawing on this experience, during this phase of the project, Mars Omega also contributed additional sources of information of utility to the assessment. As per the proposal, Mars Omega's involvement was limited to this phase, which concluded in Q2.

SCB has contributed to the project pro bono, as detailed in the project proposal, by providing expertise to the assessment phase and to the design of training courses. However, it has also gone further, with expert trainers delivering modules pro bono on private-sector courses. In Kenya, Tanzania and Uganda, SCB's Country Manager/Head of Financial Crime Compliance gave detailed presentations on the challenges IWT poses to banks and SCB best practice. SCB slides with this content were provided to all private-sector participants after each course.

RUSI has also collaborated with a range of other bodies: the project is by nature collaborative, given the focus on bringing together institutions across sectors. Many relationships have grown from time spent conducting over 100 interviews in the assessment phase, across all sectors (Annex 5). Particularly fruitful relationships have developed with 5 organisations and 2 independent experts: the EU's Anti Money Laundering/Countering the Financing of Terrorism in the Horn of Africa (AML/CFT HoA) programme, UNODC, the International Fund for Animal Welfare (IFAW), the Uganda Conservation Foundation (UCF), PAMS Foundation, and experts Elizabeth Gitari and Cortney Brown. All have seen value in the project and have become informal but critical partners, who have been integral to the successes witnessed.

In Kenya and Tanzania, for example, the EU AML/CFT HoA programme provided their Team Leader pro bono as an expert trainer. In Tanzania, the EU AML/CFT programme also covered full venue costs (conferencing and accommodation), to allow the rescheduling of the postponed course (more on this below). In Kenya, IFAW contributed pro bono to course logistics and to ensuring attendance from key officials. In Kenya and Uganda, Elizabeth Gitari took on a critical training role as host and facilitator; Cortney Brown assumed a similar role pro bono in Uganda. Also in Uganda, UCF worked on training logistics and ensured exceptional public-sector attendance. In Tanzania, PAMS Foundation fulfilled a similarly critical role, ensuring wide-ranging public-sector participation and themselves covering the costs of a number of key participants to enable the course to be rescheduled. In Tanzania, UNODC provided two key experts to contribute to the training course in Tanzania, who led sessions on the use of standard operating procedures by prosecutors, on UNODC's container control programme, and on collaborating with the private sector. One of these UNODC experts was appointed in January 2018 to a two-year position based in Nairobi with sole responsibility for enhancing the use of financial tools in two countries covered by the project: Kenya and Tanzania (as well as Botswana). As such, collaboration was critical to ensuring sustainability of the training, enabling the expert to witness first hand and build on the IWT Challenge Fund work already done.

Beyond these partnerships, the project has collaborated positively with all institutions that sent trainees to the courses. Interactions did not take the form of a simple issuance of invitations; in all cases, consultation – in many cases via face-to-face meetings – took place to establish needs and interests. This led to much higher than anticipated attendance of the courses: 8 public-sector agencies and 14 banks in Kenya; 10 public-sector agencies and 12 banks in Tanzania; and 9 public-sector agencies and 10 banks in Uganda (Annexes 7-9).

RUSI believes that the extent and quality of these partnerships has been one of the project's core strengths. Often, partnerships grew from local demand (e.g. inclusion of the Law Development Centre in Uganda, upon recommendation and request). RUSI has also welcomed involvement by all stakeholders in decision-making, course design and delivery. For example, courses have been tailored considerably based on partner and stakeholder feedback, and local experts have shaped and led numerous sessions, sharing local expertise and challenges. In all cases, international and local trainers have collaborated well, with no issues encountered.

RUSI has taken great care to maintain positive relationships, many of which have endured, and will continue to do so, after the end of the project. For example, the project has set up enduring email/Whatsapp groups with trainees in all countries (Annex 25). At the same time, RUSI, EIA, Interpol and Standard Chartered Bank are continuing to collaborate on a follow-on project under

Challenge Fund Round 3, extending the training to three new countries and providing top-up courses in Kenya, Tanzania and Uganda in 2018-2019.

3. Project Achievements

3.1 Outputs

The project application and logical framework set out three outputs, all of which were achieved. This can be verified through evidence of their achievement, as shown by the indicators and means of verification detailed in the logical framework. Details on each are set out as follows.

Output 1: A strategic assessment provides an overview of knowledge of the problem to be tackled, in terms of the scale and dynamics of illicit financial flows deriving from IWT in Kenya, Tanzania and Uganda, and documents the capacity of relevant authorities to tackle these.

This output has been achieved. The baseline was one of highly limited published knowledge on financial flows linked to IWT. No papers covered the topic explicitly; instead, it was touched on in very generic, superficial terms, in a small number of articles.

This situation has changed and Output 1 has been achieved with the publication of a dedicated assessment of existing knowledge on IWT-linked financial flows and capacity to address them in the focus countries. The Occasional Paper 'Follow the Money: Using Financial Investigation to Combat Wildlife Crime' was published in September 2017 (Annex 26). Prior to publication, the team also sought to share knowledge gained through 2 shorter published articles: *Newsweek*, 'Follow the Money: How Financial Investigation Can Combat Poaching in Kenya', and *RUSI.org*, 'Wildlife Crime is Financial Crime: The Response Needs to Reflect This' (Annex 28).

To achieve this, three activities took place (Activities 1.1 – 1.3). Under Activities 1.1 and 1.2, an extensive assessment was undertaken, involving desk research and interviews in Kenya, Tanzania and Uganda. The latter were undertaken through a research trip in May–June 2016, which saw two staff conduct 80 interviews with ministries, wildlife agencies, anti-corruption bodies, financial intelligence units (FIUs), central banks, FATF-style regional bodies, commercial banks, prosecution services, international organisations and NGOs (Annexes 5-6, 31). These were followed by phone interviews with experts elsewhere for further context, bringing the total to 100 interviews (Annex 5). JIGZAW was used to collate findings from all sources.

Findings on both the scale and dynamics of illicit money flows tied to IWT (1.1) and the capacity in place to address them (1.2) were then mapped and analysed. In doing so, findings were laid out in a preliminary report (1.3), which was later published as the RUSI Occasional Paper (Activity 3.3 – see Annex 26). The first core finding detailed in 1.3 was the lack of a detailed picture of how money linked to IWT moves in any of the three countries studied. This forms part of a broader theme: interviews covering transit and destination states showed a similar dearth of knowledge. This owes to a second core finding, namely the lack of capacity in target countries to use financial tools to investigate IWT-linked money flows.

In line with Indicator and Means of Verification (MoV) 1.1, evidence of this output includes the Occasional Paper (Annex 26), interim articles (Annex 28), and coverage of the paper's launch (Annex 27). Further evidence lies in accessed rates: the paper received 224 unique views and 263 page views in week 1, 522 unique and 615 page views in month 1, and 654 unique and 767 page views by 19 November 2017 (Annex 29). Finally, the paper led to 147 social-media interactions directly from RUSI tweets, and innumerable indirect tweets/mentions. When Googling 'follow the money' + 'wildlife crime' in the UK, the top 3 results are now project links (Annex 29).

In line with Indicator and MoV 1.2, the paper and interim articles have been cited by domestic and international studies, and other projects have incorporated their findings into planning. This is verified by media citations, citations by other studies, and planning by other bodies. The Associated Press article 'To Fight Wildlife Crime, Experts Say "Follow the Money"' was run by 128 outlets, such as Fox News, Yahoo.com (on its front page), LA Times and regional outlets across the supply chain (Japan Times, South China Morning Post, Arab Times etc) (Annex 29). For citation in other studies, see Asia/Pacific Group and UNODC, 'Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime', pp. 9, 17, 52. Finally,

other projects have engaged with findings, as testified by requests by the World Bank's Global Wildlife Programme to discuss them with the project team, so as to incorporate them into planning. IFAW has also requested updates from the project team, hoping to build findings into a guided financial investigation in Kenya.

This feeds into Indicator and MoV 1.3, whereby findings are recognised by relevant international and governmental agencies and incorporated into planning. Beyond the World Bank and IFAW, project documents and follow-up interviews with Kenyan and Ugandan agencies show that Occasional Paper recommendations are being actively pursued as part of agency strategy. In Kenya, for example, the Kenya Wildlife Service and the Financial Reporting Centre are pursuing a Memorandum of Understanding (MoU) to guide cooperation, (see p. viii of the paper, Annex 26). In Uganda, meanwhile, both the pursuit of an AML charge on a recent large-scale case and the formation of a joint prosecution team between the Uganda Wildlife Authority, Natural Resource Conservation Network, Office of the Director of Public Prosecutions and Financial Intelligence Authority echoes in a highly practical, tangible way the Paper's recommendations (pp. viii, ix, Annex 26; see also Annexes 20, 32).

Output 2: Relevant financial, field and other officers from law-enforcement agencies and the private sector in Kenya, Tanzania and Uganda are specifically trained to more effectively collect and share financial intelligence to facilitate high-level investigations and prosecutions.

This output has been achieved. The baseline condition was one in which wildlife investigators/prosecutors, field and other officers lacked training on financial approaches, impeding high-level investigations and prosecutions. Financial officers, for their part, lacked training on IWT issues, and the application of financial tools specifically to IWT cases.

This situation has changed and Output 2 achieved with the delivery of 22 days' training (2 by email in Kenya) to financial, field and other officers. In Kenya, training was delivered to 43 delegates from 8 state agencies and 14 banks (Annexes 8, 14). In Uganda, training was delivered to 51 delegates from 9 state agencies and 10 banks (Annexes 7, 13). In Tanzania, training was delivered to 55 delegates from 10 state agencies and 12 banks (Annexes 9, 15).

It should be noted that these 22 days are two lower than the 24 days noted in Indicator 2.1. This was a change that was requested formally as the project progressed. Specifically, a change request was submitted in November 2017 to reduce the training in Tanzania from 8 to 6 days (and thus the total to 22 days) due to costs incurred in the last-minute postponement of the training with the tragic murder of the co-director of PAMS Foundation, RUSI's in-country partner for the course, days before the training was due to take place. The team responded flexibly, worked hard in the following days, weeks and months to reassure all stakeholders, and is very pleased that the training could eventually be rescheduled, with 6 days of training completed in February 2018, following the approval of the change request. Means of verifying the 22 days' training delivered (Indicator 2.1) include project notes, photos, agendas, delegate lists and pre-/post-course evaluation surveys (Annexes 7–19).

The training was delivered through three activities (Activities 2.1 – 2.3). Activity 2.1 saw courses developed collaboratively, with project partners, technical experts and local partners designing key modules and circulating for feedback (Annexes 10-11). The course was designed as an 8-day curriculum, as follows:

- Days 1-4: Public-sector course
- Day 5: 1-day private-sector workshop
- Day 6: 1-day mixed public-private workshop
- Days 7-8: Mentoring (select public-sector participants).

The training was designed to include theoretical sessions on the fundamentals of AML, local AML regimes and dynamics of IWT, as well as practical sessions on preparing cases and network analysis, among others. Throughout, IWT case study exercises were run, requiring trainees to enact the theoretical/technical content learned. All content was designed flexibly, with modifications made by country (see Annexes 10-11).

Under Activity 2.2, courses were run in Kenya in January 2017, in Uganda in March 2017, and in Tanzania in February 2018 (Annexes 7-18). A brief overview of each course will be presented here. In Uganda, training was delivered to 51 delegates from 9 state agencies and 10 banks. Public-sector trainees hailed from the Uganda Wildlife Authority (UWA), Natural Resource Conservation Network (NRCN), Uganda Revenue Authority, Office of the Director of Public

Prosecutions (ODPP), Judiciary, Financial Intelligence Authority (FIA), Bank of Uganda, Law Development Centre, and Ministry of Tourism, Wildlife and Antiquities (Annex 7). Engagement (public and private) was highly positive, with clear appetite for the training (Annexes 18, 22). Sessions to facilitate exchange between wildlife and financial bodies were clearly needed: a lack of familiarity between UWA and FIA was apparent from day 1. Knowledge gaps were also addressed in the use of AML legislation on IWT cases. Meanwhile, there was clear desire to grasp how public and private sectors could cooperate, on which Day 6 focused.

Feedback and pre/post-course evaluation surveys showed clear learning outcomes (Annex 13). Prominently, learning occurred around means used to launder proceeds of IWT and the functions of an FIU. For example, knowledge among public-sector trainees of the use of mobile money to move proceeds grew from 50% pre-course to 80% post-course. Awareness of the role of FIUs to respond to law-enforcement requests rose from 60% to 80%. Awareness of the obligation of bureaux de change to report to the FIU grew from 72% to 92%. Finally, course satisfaction ratings (with training topics, content, discussion quality, case studies and group exercises) were high: averaging 4.4 and 4.8 out of 5 in public and private sectors, respectively. Comments on surveys and orally in sessions mirrored these findings (Annexes 17-18).

Following the training in Uganda, 2 mentoring days were spent constructively. On 17 February, 3 days before the course, 3 individuals had been arrested in Kampala with 1.3 tons of ivory (the 'Kromah case') and a subsequent house search had yielded circa 500 documents, including company formation documents, shipping documentation, transfer receipts, and other corporate and personal data. For 2 days, the project team mentored the UWA and NRCN trainees responsible for the case on interpreting the financial leads present (Annex 19). At time of writing, positively, and as noted in the annual report, AML charges are being pursued and the case is awaiting a hearing date in the High Court (Annexes 20, 32).

In Kenya, training was delivered to 43 delegates from 8 state agencies and 14 banks. Public-sector trainees hailed from the Kenya Wildlife and Forest Services (KWS and KFS), ODPP, Financial Reporting Centre (FRC)/Central Bank, Asset Recovery Unit, Transnational Organised Crime Unit, Ethics and Anti-Corruption Commission, and Kenya School of Monetary Studies (Annexes 8, 14). Again, engagement was very positive, with both sectors showing strong appetite for the course. As in Uganda, there was a lack of familiarity within KWS of the role of the FRC (Kenya's FIU); the latter took a proactive role in building knowledge, and measures to bolster joint working were discussed actively. As in Uganda, knowledge gaps concerned the use of AML law on IWT cases; much teaching focus was thus placed on powers under Kenya's Proceeds of Crime and AML Act (POCAMLA). Private-sector engagement was also strong, with the public-private workshop seeing fruitful debate and requests for regular follow-up dialogue (Annex 21).

Again, feedback and pre- and post-surveys showed clear learning outcomes (Annex 21). Notably, this took place around AML law: pre course, 50% of public-sector trainees knew of the option to use POCAMLA for IWT cases, rising to 94% post course. Similar learning concerned how funds from IWT move: up from 72% to 94% in the case of mobile money. Knowledge of the need for bodies other than banks to report to an FIU also rose: in the case of money remittance companies from 44% to 94% and for bureaux de change from 67% to 82%. Course ratings were again high, at 4.4 and 4.6 out of 5 for public and private sectors (Annex 21).

In Kenya, the mentoring, however, posed greater challenges. Plans were confirmed to deliver 2 days to KWS officials, re-confirmed by an embedded IFAW mentor. However, on both days, mentees were called away to attend to an urgent KWS audit. Mentors used the hours they could not spend directly with mentees assessing KWS' investigatory setup and available tools. On this basis, they emailed materials and advice to mentees, following up to offer support.

In Tanzania, unavoidable circumstances prevented the delivery of training in the planned timeframe. The course was postponed first due to an unforeseen restructuring of the National and Transnational Serious Crimes Investigation Unit (NTSCIU) and Police, and the emergence of strong tensions around this. The course was rescheduled for August 2017, with delegates from 10 state agencies signed up. However, 48 hours before trainers were due to fly, a further, very difficult decision was made to postpone, in light of the tragic murder of Wayne Lotter – director of PAMS Foundation and one of the project team's key partners facilitating on-the-ground course logistics. Following extensive efforts to engage with partners both in country and abroad, the team was very pleased to have been able to deliver 6 days of training in February 2018.

In Tanzania, training was delivered to 55 delegates from 10 state agencies and 12 banks. attendees hailed from the Bank of Tanzania, Tanzanian Police, Financial Intelligence Unit, National Taskforce Anti-Poaching (NTAP), Ngorongoro Conservation Area Authority, ODPP, Prevention and Combating of Corruption Bureau, Tanzania National Parks, Tanzania Wildlife Authority and Wildlife Division (Annexes 9, 15). As in Kenya and Uganda, participation and engagement was highly positive, with both sectors showing strong appetite for the course (Annex 23). While multi-agency working was already better developed in Tanzania, limited awareness and capacity was apparent in relation to mechanisms around conducting financial investigation among wildlife agency representatives. Meanwhile, as in Kenya and Uganda, private-sector engagement was strong, with the private-sector workshop greeted with particular enthusiasm: many participants noted that this was the first time they had attended a course on the topic (Annex 23).

Again, feedback and pre- and post-course evaluation surveys showed clear learning outcomes (Annex 23). For example, awareness of the use of the formal financial system to move the proceeds of IWT rose from 47% pre course to 60% post course. With regard to the forms of legislation that can be used in Tanzania to prosecute financial crime linked to IWT, awareness of the relevance of the Proceeds of Crime Act rose from 17% pre course to 68% post course. Meanwhile, pre course, a full 30% of participants were not able to correctly name any relevant legislation – a proportion that fell to 7% post course. Course ratings were again high, at 4.7 and 4.3 out of 5 for public and private sectors, respectively (Annex 23).

Under Activity 2.3, meanwhile, courses contained modules dedicated to the collaborative design of SOPs (Annex 24). The rapid reference guide 'Wildlife Offences In Kenya: Points to Prove' was used as a model to facilitate the exercise; the guide contains a series of SOPs but none, as yet, on financial investigation. As such, in line with Indicator 2.2, standard procedures were set up and documented, where formerly processes to guide financial investigation of IWT were patchy. This result can be verified in the procedures themselves (Annex 24). Though to date no internal agency reports verify implementation, the pursuit of an AML charge in the Kromah case in Uganda testifies that many of the processes taught are being effectively used (Annexes 20, 32). In line with Indicator 2.3, meanwhile, all public-sector agencies that took part have identified a 'champion' to access and use the content delivered. Means of Verification include project notes on the assignment of champions during the training courses in all countries.

Output 3: Best-practice and lessons learned are generated, and recommendations made, for building capacity in investigating illicit financial flows linked to IWT – to feed into effective future programming.

This output has been achieved. The baseline condition was one in which no best practice existed to inform capacity building on IWT-linked financial flows or to feed into future programming. This situation has changed and Output 3 has been achieved with the publication of the Occasional Paper (Annex 26). In addition to the strategic assessment of knowledge on IWT-linked illicit financial flows and of capacity to address them in the focus countries, the paper outlines lessons learned from the training and recommendations for future capacity-building. These lessons learned and best practices have also been transmitted orally to a range of audiences at a series of formal presentations. These include the official launch of the Occasional Paper and an invited presentation at the Foreign and Commonwealth Office in September 2017 to an in-person audience and to HMG staff who dialled in from numerous countries (Annex 30).

In line with Indicator and MoV 3.1, evidence of this includes the Occasional Paper 'Follow the Money: Using Financial Investigation to Combat Wildlife Crime', published in September 2017 (Annex 26). Further evidence includes the 2 shorter articles published to share knowledge generated on an ongoing basis: *Newsweek*, 'Follow the Money: How Financial Investigation Can Combat Poaching in Kenya', and *RUSI.org*, 'Wildlife Crime is Financial Crime: The Response Needs to Reflect This' (Annex 28). The citations and accessed rates of the Occasional Paper, and the online publication of the video of the paper's launch provide further evidence of the generation and sharing of these lessons (Annexes 27, 29) – as described above in more detail with regard to MoV 1.1 – 1.3. Further evidence lies in the transcript of the presentation given at the Foreign and Commonwealth Office in September 2017 (Annex 30). In line with Indicator 3.2 and MoV 3.2, evidence lies in the documentation of SOPs for ongoing use by government agencies and international bodies, as evidenced in project notes (Annex 24), and as described above under Output 2. As noted above, though to date no internal agency reports verify

implementation, the pursuit of an AML charge in the Kromah case in Uganda testifies that procedures are being effectively used (Annexes 20, 32).

To achieve this output, three activities were conducted (Activities 3.1 – 3.3). Under Activities 3.1 and 3.2, the project team analysed and collated findings and lessons from the training and assessment phases of the project. In doing so, the team reworked the preliminary report (Activity 1.3) into the 17,000-word Occasional Paper ‘Follow the Money: Using Financial Investigation to Combat Wildlife Crime’ (Annex 23).

Under Activity 3.3, the paper underwent formal peer review, editing and production. It was launched at a formal conference on Whitehall on 11 September 2017, where an expert panel discussed its findings (Annex 27). Besides the RUSI project team, the panel included Mary Rice of EIA, Emma McClarkin MEP and Chris Batt of UNODC, with presentations released as an open-source video (Annex 27). The launch was well attended and the paper well received, by the IWT community and the press (see Associated Press, ‘To Fight Wildlife Crime, Experts Say “Follow the Money”’) (Annex 29). RUSI’s Communications team managed dissemination, involving targeted mailouts and promotion via on/offline channels, from RUSI London and Nairobi. Beyond mailout recipients, the paper enjoyed high download rates, and generated wide social-media activity (as detailed above under Output 1 and in Annex 29).

As a result of these activities, in line with Indicator and MoV 3.3, there is evidence that best practice is feeding into planning by domestic agencies and international organisations. Evidence for this is documented above under Output 2. Specifically, the project team has evidence that other projects have engaged with the findings, as testified by requests by the World Bank’s Global Wildlife Programme to discuss them, so as to build them into AML training planning. IFAW has also requested updates from the project, hoping to build findings into a guided financial investigation. Beyond this, project documents and follow-up interviews with Kenyan and Ugandan agencies reveal that recommendations are being actively pursued as part of normal agency working. In Kenya, for example, KWS and the FRC are pursuing an MoU to guide cooperation, (see p. viii of the paper, Annex 26). In Uganda, meanwhile, both the pursuit of an AML charge on the 2017 1.3 ton ivory seizure and the formation of a joint prosecution team between UWA, NRCN, ODPP and FIA reflects the procedures developed, as well as the recommendations made in the Occasional Paper (pp. viii, ix) (Annexes 20, 24, 26, 32).

3.2 Outcome

The project’s stated Outcome is that: ‘Training provided improves Kenyan, Tanzanian and Ugandan agencies’ capacity to investigate and prosecute financial crime tied to IWT. This will deter and disrupt criminal trafficking networks, leading to a fall in poaching and rise in wildlife tourism, benefiting local communities. It will also generate best practice for wildlife-linked financial capacity-building elsewhere.’

The project has achieved its stated Outcome in terms of improved agency capacity to investigate and prosecute financial crime tied to IWT, as evidenced by a range of indicators that reveal a shift from the baseline condition. The project has also generated best practice for IWT-linked financial capacity-building elsewhere, with a number of indicators again revealing a change from the baseline in this regard. The translation of improved capacity into the disruption of criminal trafficking networks, a fall in poaching and a rise in tourism, however, is a longer-term process, that requires longer than the project timeline to be evidenced. This is not least because of the lengthy periods often required for investigations to result in convictions in the focus countries. However, there is clear evidence to show that this process is underway in Uganda, with an AML prosecution for ivory trafficking awaiting hearing at the High Court.

In considering achievements in relation to the stated Outcome, it is useful to revisit the baseline at project start. The baseline condition was one in which no dedicated training had been provided to agencies in any of the three countries on using financial tools to investigate and prosecute IWT, with no best practice existing, to the detriment of efforts to disrupt trafficking and reduce poaching. At this baseline, wildlife agencies and FIUs were found, in the assessment phase, to have limited contact. Most relevant agencies were found to have limited capacity to investigate and prosecute financial crime linked to IWT. Many wildlife and other investigative agencies were found to lack knowledge on the functions of an FIU, let alone the capacity to correctly engage with it. Few agencies were found to have the capacity to engage with the private sector to obtain

financial information. With regard to the private sector, it was found that few financial institutions in the region had collaborated with the FIU in relation to IWT cases, and few had received any training (whether internally or externally) on the need to look at IWT as a risk and report suspicious transactions in this regard. The findings around this baseline are laid out in full in the Occasional Paper (pp. 5-12).

On each front, this situation has changed with the delivery of training to agencies investigating and prosecuting IWT, and to financial crime compliance functions in a wide range of financial institutions (Annexes 7-19). To achieve this, 22 days of training were delivered in Kenya, Tanzania and Uganda. In Kenya, 43 delegates from 8 state agencies and 14 banks participated in training (Annex 8). In Uganda, 51 delegates from 9 state agencies and 10 banks participated in training (Annex 7). In Tanzania, training was provided to 55 delegates from 10 state agencies and 12 banks (Annex 9). This has led to progress on the 3 outcome indicators, as follows.

Outcome Indicator 1 describes a situation in which ‘participants in financial intelligence training have improved understanding of the dynamics of IWT-linked illicit financial flows and enhanced capacity to track, investigate and prosecute on this basis – as judged by pre- and post-training evaluation forms’. This has been achieved, with evidence of learning on these fronts in all three countries, as per project notes, pre-/post-course evaluation surveys and oral feedback from trainees (see Outputs section 3.1 and Annexes 16-18, 21-23). Of note to this indicator is the learning shown around tools required for both successful investigation *and* prosecution. For example, post-course evaluation surveys showed learning not only around the nature of the money flows requiring investigation, but also around financial legislation that can be used in prosecutions (see section 3.1 for greater detail, and Annexes 16-18, 21-23). Meanwhile, as specified in the Outcome, best practice has been generated to guide financial capacity-building elsewhere, in the form of the 17,000-word RUSI Occasional Paper (Annex 26).

Outcome Indicator 2 describes a situation in which ‘concrete measures are taken by individuals trained to enact relevant financial-intelligence tools in all new high-level cases’. As noted, the baseline use of such tools was low: examples of financial prosecution on IWT cases were limited to basic asset forfeiture (cash and phones). Post course, a number of concrete measures have been taken to enact the tools taught (with crucial support from agencies such as Maisha Consulting, Space for Giants and US Fish and Wildlife Service). Evidence lies in the Kromah case, which saw UWA, NRCN, ODPP and FIA form a joint prosecution team and conduct regular meetings to prepare an AML charge. The result has been the pursuit of an AML charge against the accused (Annex 20), using financial analysis tools and charting to generate links and identify bank accounts (Annex 32). Such cooperation had not previously occurred: as shown on the course, the bureaucratic machinations of government had seen confusion in earlier efforts by UWA and FIA to make contact. The deadlock was broken on day 1 of the course, as testified by project notes and follow-on interviews in September 2017 with UWA and FIA trainees, when participants identified the cause of the blockages. In Kenya, similar previous efforts at contact had run into obstacles, with a key next step agreed by KWS and FRC trainees that of establishing MoUs (a process now in progress). In Tanzania, efforts to enact the tools provided are taking place under the banner of the NTAP, which comprises representatives of wildlife agencies and investigators focusing on the financial side, among others.

Outcome Indicator 3 outlines a situation in which ‘all agencies involved in training have in place a ‘champion’ inducted to assist others in the financial intelligence training delivered, with at least 15 individuals receiving the training per country’. In Kenya, Tanzania and Uganda, this has been achieved. In each, respectively, 43, 55 and 51 individuals were trained (Annexes 7-9). Among them, ‘champions’ were appointed to share and store the training within the 8 Kenyan, 10 Tanzanian and 9 Ugandan agencies that took part – including all printed slides, handouts, exercises, and the library of digital slides, resources and exercises provided on a USB stick post course (Annexes 10-12). They were also assigned with continuing agency communication with the project training team and other agencies on the course – to facilitate ongoing collaborative working. The identification of champions is testified by project and M&E notes, detailing both the provision of course materials and the selection of individuals.

3.3 Impact: achievement of positive impact on illegal wildlife trade and poverty alleviation

The project's stated higher-level Impact was included in the application form as follows: 'A reduction in the illegal ivory and rhino-horn trade and poverty alleviation in Kenya, Tanzania and Uganda through more effective investigation and prosecution of financial crime underpinning the IWT'. The project is contributing to this impact in several ways.

Notably, the project is contributing to a higher-level impact on IWT by providing the tools to allow more effective investigation and prosecution of *high-level* perpetrators. This is crucial to disrupting the true beneficiaries, who never physically touch the products. Without these tools, law enforcement is limited to disrupting easily replaceable poachers, thus not sustainably reducing IWT. It is this low-level approach that has been the norm in the target countries, with an under-exploitation of financial tools leading to two main shortcomings. First, as financial approaches can provide evidence of higher-level suspects, these actors remain unidentified. Second, sentencing under wildlife acts is generally more lenient than it could be if harsher penalties on offer under financial statutes were pursued.

By building capacity to use financial tools, the project is contributing to a step-change in how IWT is investigated and prosecuted in focus countries. Its contribution here can be seen in progress on four key areas in Kenya, Tanzania and Uganda, which have been outlined in various sections, but together contribute to the higher-level impact. First, the project has contributed to improved relationships and communication between IWT investigators and prosecutors and financial crime authorities (shown by project notes, post-course interviews in Kenya and Uganda, and the progress of the Kromah case in Uganda – Annexes 17-25, 32). Second, it has raised awareness in the private sector of IWT as a financial crime risk (Annexes 17, 21-23). Third, it has improved understanding of the value and use of financial investigation tools among the public sector (Annexes 17-25, 32). And fourth, it has provided confidence in applying AML charges to key cases, as shown in the Kromah case in Uganda (Annexes 20, 32). More detailed evidence for each of these points is given above and referenced against the logical framework; together this evidence demonstrates significant progress towards the project's stated Impact of contributing to 'more effective investigation and prosecution of financial crime underpinning IWT'.

In the process, the project is also contributing to a higher-level impact on reduction in the illegal ivory and rhino-horn trade and poverty alleviation. This impact is unavoidably indirect and long term: in the project's short lifespan, is not possible to track this impact in measurable terms due to the *substantial* timeframes involved in the translation of project activities into the achievement of a growth of wildlife populations, a corresponding growth in wildlife tourism (which itself contains a time lag as marketing takes hold), a long-term improvement in public finances and a corresponding reduction in poverty. Despite the timelines, however, these impacts are real and project activities are contributing to their achievement, as testified by evidence to support project assumptions (Section 4), namely that increased high-level investigations and prosecutions will lead to reduced poaching, which will lead to higher elephant and rhino numbers, which will lead to expanded wildlife tourism. The high-level impact on *IWT* is explored in greater detail in Section 6 below, while the higher-level impact on *poverty alleviation* is explored in greater detail in Section 7 below.

4. Monitoring of assumptions

Outcome and Output level assumptions were monitored carefully over the course of the project. Each is examined in greater detail as follows.

Outcome-Level:

Assumption 1: The Kenyan, Tanzanian and Ugandan governments remain committed to improving their AML/CFT regimes to meet international standards, and to the fight against IWT.

This assumption held true throughout the project. Worldwide, FATF assesses countries for compliance with AML/CFT standards. Uganda's report was published in 2016; Tanzania and Kenya will be assessed in 2019 and 2020. Poor results lead to FATF calls for remedial action and will likely lead to trouble accessing the global financial system, as global banks respond. Countries are fully aware of this and are thus highly motivated to improve standards. For example, in 2016 Uganda's regime was judged 'not as strong as it should be' (p. 5). Once

such gaps are shown, countries are typically very keen to respond, and are reviewed regularly – a situation that has held true in all three focus countries. In all three countries, meanwhile, IWT is a key financial crime risk; in each, addressing this must be held up as a priority going forward in the push to improve AML/CTF regimes.

Assumption 2: Increased numbers of effective investigations and prosecutions create a sufficiently high-risk environment to result in fewer instances of poaching and trafficking.

This assumption held true throughout the project. Although a limited number of high-level prosecutions have taken place in the region (only one high-level trafficker has been prosecuted in Kenya), where they occur more regularly, the assumption has held true that they impact the risk-reward calculus of traffickers. Indeed, if one country is prosecuting higher-level actors, the risk to these individuals becomes too high, leading to reduced poaching as they move activities to lower-risk locations. Evidence for this responsiveness to shifting risk/reward has been shown by academics and practitioners: ‘The Extinction Market’, 2018, by scholar Vanda Felbab-Brown is the latest publication to demonstrate this.

Assumption 3: Reduced poaching rates will lead to higher numbers of elephants and rhinos in Kenya, Tanzania and Uganda.

This assumption held true throughout the project, as shown by the system used to monitor elephant poaching: the Proportion of Illegally Killed Elephants (PIKE) Index. This ranges from 0 (no illegal killing) to 1 (all carcasses killed illegally): where scores are high and exceed birth rates, net elephant numbers go into decline. Conversely, where scores decline and poaching rates drop below birth rates, elephant numbers increase. The same holds true for rhinos. To illustrate from Kenya’s Samburu-Laikipia site: in 2012, 72% of dead elephants were poached, revealing crisis poaching levels and populations in steep decline. By 2014, this had dropped to 48%, a level at which births exceeded deaths, and populations could start to recover. In Tanzania, reported declines in PIKE values in Ruaha-Rungwa and Selous-Mikumi have been shown for 2015-16, as reported by the Ministry of Natural Resources and Tourism in its 2017 CITES National Ivory Action Plan Progress Report (the most recent available). This report showed a drop in PIKE values of 37% in Ruaha-Rungwa, and of 35% in Selous-Mikumi, allowing populations to begin to recover. However, in many cases, PIKE values still remain higher than the tipping point at which populations can start to recover, with ongoing action thus needed on these fronts.

Assumption 4: Increased numbers of elephants and rhinos will result in an increase in wildlife tourism in Kenya, Tanzania and Uganda.

This assumption held true throughout the project and runs both ways: an increase in animal numbers will result in an increase in wildlife tourism, whilst a decline will result in a drop. The latter situation attracts most concern: tourism experts issue regular warnings on the impacts of poaching on tourist arrivals. In March 2017, for example, WWF warned that Africa’s tourism sector is losing around \$25 million each year to elephant poaching. In large parts of Kenya, Tanzania and Uganda, tourism remains wildlife-driven, with parks the engine of growth. With these countries’ tourism sectors so heavily dependent on wildlife, the health of key species is of critical importance – a situation that remained as true at project end as at project inception.

Output-Level:

The security situation in selected project areas will allow project activities to take place.

This held true in Kenya and Uganda throughout the project, as shown by news monitoring and the safe delivery of training, testified by project records, photos and pre-/post-surveys (Annexes 7–19). In Tanzania, the course was postponed first due to institutional restructuring and second with the murder of Wayne Lotter immediately prior to the scheduled dates. This postponement was guided by the insensitivity of holding a course amid funeral arrangements and a murder investigation. Certainly, a factor was also the lack of information on the security situation in the wake of events. However, with more clarity emerging afterward, the team was able to accurately ascertain that the murder was an isolated incident and did not reflect a broader security threat writ large, that should prevent the Tanzania training from being rescheduled.

As such, the team rescheduled and successfully carried out the Tanzania training in February 2018, confident that the security situation would allow the course to run as planned. The team is very pleased to have been able to demonstrate its commitment to those trainees with whom it had engaged prior to the tragic events of August 2017. The team is grateful to the IWT Challenge Fund administrators for the flexibility shown, as well as to those partners (PAMS Foundation and

the EU AML/CFT HoA programme) who showed their commitment to running the course after these events, and who dedicated substantial resources to allowing it to run.

Beneficiaries of training will have sufficient capacity to absorb and implement new approaches and will be open to public-private, inter-agency training and co-operation.

This assumption held true throughout the project. Trainees' capacity to absorb new approaches and their openness to inter-agency, multi-sector training is testified by high attendance levels in all countries (much higher than the 15-20 anticipated in the project application), as well as project notes and course feedback. In both public and private sectors, trainees expressed a strong desire to cooperate and to obtain tools to actively follow financial leads. Evidence can be found in records of discussions, project notes and feedback in pre-/post-course surveys (Annexes 17-18, 21-23). Meanwhile, capacity to use new approaches is shown by the pursuit of an AML charge in the Kromah case, awaiting hearing in the High Court (Annexes 20, 32).

Relevant financial institutions in Kenya, Tanzania and Uganda see the value of participation in the project and are prepared to engage.

This assumption held true in all countries, as evidenced by the very high training sign-up rates among the private sector. In Kenya, 24 officers from 14 banks attended; in Tanzania, 20 officers from 12 banks attended; in Uganda 16 officers from 10 banks took part (Annexes 7-9). In all cases, many participants held high-level roles in financial crime compliance. In Kenya, participants included Cooperative Bank of Kenya's Head of Compliance, Middle East Bank Kenya's Head of Risk and Compliance and Barclays Kenya's Head of IT Risk and Compliance, among numerous others (Annex 8). In Uganda, they included the Head of Forensics and Fraud at Barclays, the Financial Crime Risk Manager at Finance Trust Bank, and the Country Manager of Standard Chartered Bank, among numerous others (Annex 7). In Tanzania, private-sector delegates included the Head of Enterprise Risk at Bank of Africa, the Head of Risk and Compliance at Commercial Bank of Africa, the Head of Risk at Diamond Trust Bank Tanzania Ltd, and the Executive Director of the Tanzania Bankers' Association, among others (Annex 9).

Capacity-building and training efforts will be sufficiently dynamic to respond to any legislative and regulatory changes at the national and regional levels.

This assumption held true in all three countries: all courses were designed flexibly to allow adaptation should legislative or regulatory changes take effect between design and delivery. In the event, no such changes required amendments. However, RUSI's expert trainers had in place contingency plans to allow for the alteration of legislation-focused sessions, such that any new, relevant law introduced could have been incorporated as a core focus.

In-depth knowledge on the part of project partners allows selection of appropriate participants.

This assumption held true in all three countries. For the private sector, the project attracted high numbers of senior financial crime compliance figures in all three countries – the precise target audience (as described above, and see Annexes 7-9). In the public sector, the ability to attract key staff from a wide range of relevant agencies in all countries exceeded expectations and constituted one of the project's key strengths (as described above, and see also Annexes 7-9).

5. Project support to the IWT Challenge Fund Objectives and commitments under the London Declaration and Kasane Statement

Evidence that the project supported the second IWT Challenge Fund objective can be found in all training activities run (Annexes 7-19). In contributing to 'strengthening law enforcement and the role of the criminal justice system', these activities supported commitments IX, X, XI, XII, XV, XVI of the London Declaration, and 4 and 5 of the Kasane Statement.

Project achievements can be measured quantitatively and qualitatively. In quantitative terms, the project exceeded objectives in the assessment and training phases: in the first phase, the team interviewed over 100 experts – well above the numbers anticipated – allowing 17,000 rather than the planned 10,000 words of analysis (Annexes 5, 26). In terms of training, participant numbers were substantially higher than the 15–20 stated in the proposal – 43 in Kenya, 55 in Tanzania and 51 in Uganda – from a wider range of agencies and banks than anticipated (Annexes 7-9).

In qualitative terms, this allowed for a higher quality of inter-agency, cross-sector dialogue, the achievement of clear learning outcomes, and highly positive trainee feedback (Annexes 17-18, 21-23). Four specific results stemmed from this. First, the project improved relationships between

wildlife and financial crime-focused agencies (shown by project notes, post-course interviews and the Kromah case, see Annexes 17-25, 32). Second, it raised awareness of IWT as a financial crime risk in larger numbers of banks than expected (Annexes 7-9, 17, 21-23). Third, it improved knowledge of financial tools in the public sector (Annexes 17-25, 32). And fourth, it provided confidence in applying AML charges, as in the Kromah case (Annexes 20, 32): a highly positive result (which must be attributed to the efforts of *multiple* supporters) with a potentially tangible outcome.

6. Impact on species in focus

The project has contributed to a longer-term positive impact on elephants and rhinos. This impact is one that will continue to manifest itself over the longer term, but the contribution of the project to this overarching impact has been that of ensuring enhanced capacity to investigate and prosecute high-level traffickers, thus helping to disrupt their activity and reducing the contracting down of poachers to source wildlife. This contributes to a long-term drop in poaching and a rise in elephant and rhino numbers in all three focus countries – and beyond, where these countries act as transit countries for ivory and rhino horn procured elsewhere in the region. This occurs as poaching deaths decline as a proportion of total mortality, and as birth rates exceed poaching rates to an ever-greater degree.

The contribution of the project to this broader impact is felt differently across the three focus countries, based on the distribution of existing populations. These are smallest in Uganda: following the dramatic losses witnessed in the 1960s and 1970s, the country's elephant population remains low but stable at around 5,000 animals, with only around 20 well-guarded rhinos based at a rhino breeding facility. Instead, poaching is largely restricted to bushmeat, pangolin and hippo teeth, with Uganda acting mainly as a transit hub for ivory and rhino horns.

In Kenya and Tanzania, meanwhile, the broader impact is set to be felt more strongly – and is set to be most marked, domestically, where poaching losses are greatest. Here, the project is contributing to a broader, existing downward trend in poaching. In Kenya, for example, the dramatic surge in poaching in 2012-13 (when Kenya lost more elephants and rhinos than at any time in the past two decades) has since waned. Strikingly, from 384 elephants poached in 2012, levels of illegal killing dropped to 302 in 2013, 164 in 2014, 96 in 2015, 86 in 2016, and 60 in 2017 according to most recent KWS figures. From 59 rhinos poached in 2013, levels of illegal killing have similarly dropped to 35 killed in 2014, 11 in 2015, 14 in 2016 and 9 in 2017.

In Tanzania, meanwhile, the project contributes to an overall reported decline in poaching levels. Figures presented by the Ministry of Natural Resources and Tourism in its 2017 CITES National Ivory Action Plan Progress Report (the most recent available) show a drop in Proportion of Illegally Killed Elephant (PIKE) values. Notably, data for 2015–16 show a decline in PIKE values in Ruaha-Rungwa, where the PIKE value dropped by 37%, and Selous-Mikumi, where it dropped by 35%. However, these declines have occurred against a high baseline, with poaching levels nonetheless remaining higher than in many other locations. Indeed, Tanzania's remaining, vulnerable elephant populations continue to make the country a key target and, in some locations, PIKE values remain above the tipping point at which populations can begin to recover.

Meanwhile, all focus countries act not only as source countries, but also as key transit hubs for ivory and rhino horn procured elsewhere. As such, the greater risk involved in moving wildlife through these countries positively impacts elephant and rhino populations in neighbouring countries as well. In Uganda, for example, elephant poaching is lower domestically, but the country serves as a major transit hub for ivory poached in countries such as the Democratic Republic of Congo and Burundi. In such cases, the disruption of organised crime groups has additional benefits in relation to the species in focus, beyond the three focus countries.

7. Project support to poverty alleviation

The project has provided an indirect contribution to longer-term poverty reduction. It has done so by serving a range of beneficiaries, both direct recipients of training, and more indirectly, communities both in source areas, and further afield.

In terms of recipients of training, the project's primary beneficiaries were those who attended the courses through an increase in capacity to investigate and prosecute money laundering linked to

the IWT (as shown by learning in pre/post evaluation surveys, Annexes 21-23). In Kenya, beneficiaries included select individuals from KWS, KFS, the FRC/Central Bank, ODPP, Asset Recovery Agency, Ethics and Anti-Corruption Commission, Transnational Organised Crime Unit and Kenya School of Monetary Studies (Annex 8). In Tanzania, they included individuals from the Bank of Tanzania, Tanzania Police, FIU, NTAP, Ngorongoro Conservation Area Authority, ODPP, Prevention and Combating of Corruption Bureau, Tanzania National Parks, Tanzania Wildlife Authority, Wildlife Division (Annex 9). In Uganda, they included delegates from the Bank of Uganda, FIA, Judiciary, Ministry of Tourism, Wildlife and Antiquities, NRCN, ODPP, Uganda Revenue Authority and UWA (Annex 7). In addition, the courses benefited representatives of 14, 12 and 10 banks in Kenya, Tanzania and Uganda, respectively (Annexes 7-9).

However, benefits from the project extend beyond these direct beneficiaries. Notably, the project makes an indirect contribution to long-term poverty reduction to communities in source areas in all three countries. Here, benefits accrue to these communities as enhanced capacity to investigate and prosecute high-level criminals disrupts trafficking and reduces poaching (Section 6). This benefits citizens in areas where high levels of poverty persist and livelihoods rely on wildlife tourism. In Kenya, around 280,000 people live in community conservancies, with livelihoods based on this tourism-centric wildlife model. Reducing poaching by increasing capacity to disrupt trafficking has the power to halt the erosion of these livelihoods. Evidence lies in studies of the development value of a live versus a dead elephant. According to iworry, alive an elephant can contribute up to \$22,966 annually to the tourism industry – around \$1.6million over its lifetime – versus a one-off \$21,000 for its tusks (in end markets).

In Uganda, meanwhile, poaching of elephants is lower domestically, with the country instead serving as a major transit hub for ivory poached elsewhere. However, organised crime groups operate in and across the country and the disruption of their activities has additional benefits in terms of poverty reduction, for example through the AML charge for the 1.3 ton ivory seizure currently due in the High Court (Annexes 20, 32). Indeed, citizens both in and beyond source areas benefit from the project's longer-term contribution to disrupting criminal operators and reversing the hollowing out of the state engendered by IWT-linked financial flows. This occurs as these flows' negative impacts on governance, rule of law and public finances gradually decline. This, in turn, has the power to enhance public confidence in the state and improve provision of public services – to the benefit of all citizens, particularly the most vulnerable. Such processes, however, do not manifest themselves immediately; the fact that tangible evidence of this change cannot yet be seen is inevitable given the timelines for such change.

8. Consideration of gender equality issues

In the proposal, it was noted that the project would contribute to gender equality in several ways: by analysing existing knowledge on IWT-linked financial flows through a gender lens; by selecting training participants mindful of the gender makeup of relevant agencies; and by building gender considerations into M&E. The first has been the most challenging. As per the proposal, the team has made efforts to conduct analysis with a gender lens. However, the dearth of knowledge on IWT-linked illicit financial flows has made it difficult to break information down by gender. As such, the team can only recommend, as new knowledge is generated and new analysis takes place, that this is considered from a gendered perspective.

The project has had greater ability to place gender at the heart of its selection of training participants. Although complete parity could not be assured given the lack of qualified female staff in certain positions, participants were selected while ensuring that the benefits of training accrued as equally as possible. As such, the project team is pleased that almost one third of trainees were female in Tanzania (16/55) and in Uganda (16/51) and just under half were female in Kenya (21/43) (Annexes 7-9). The team sees this as a notable achievement in light of the continued male dominance of many of the agencies in question. M&E conducted over the reporting period has incorporated gender considerations, with training beneficiaries disaggregated by gender (Annexes 7-9). Finally, the project considered gender issues carefully in selecting trainers, including those at a local level invited to run sessions (Annex 11). For example, in Uganda, two female representatives of UWA delivered the session on IWT at a national level (Annex 11); in Tanzania and Kenya, female representatives delivered sessions, on both public and private courses, on the functions of an FIU, with numerous other female presenters appointed.

9. Lessons learnt

Throughout, the project has been highly conscious of the need to learn while doing, and adapt to lessons learnt. This owes to the project's status as a form of pilot – this is the first of its kind carried out. Much learning has already been detailed – in Q1, the team ensured it was able to adapt to lessons around the value to be gained from including Uganda, as well as lessons around the lower-than-anticipated capacity in the agencies concerned. The project adapted to incorporate these lessons early on, requesting a change to cater for them (see Section 9.1).

A further lesson concerned residential courses. This was not the format the project team had intended to run, but demand in all three countries convinced the team that this would add significant value. As such, the team adapted and ran residential courses in Kenya, Tanzania and Uganda (with allowances made for participant choice: in some cases, participants preferred not to take up accommodation). To allow this, other donors have been ready to assist, notably PAMS Foundation and the EU AML/CFT HoA programme.

A further lesson from Kenya has been the potential difficulty of running mentoring after trainees have spent a full week training, and are needed on urgent operational tasks. In response to local demand, in November 2017 a change request was submitted for RUSI's follow-on Challenge Fund project, proposing replacing mentoring with training for NGOs supporting the relevant agencies. Beyond this, the Round 3 project follows the same model, maintaining all aspects that worked well. A particular recommendation for other projects seeking to do similar work is to adopt a multi-agency, cross-sector approach: beyond content taught, much work is needed in fora such as these to build trust and understanding, with inter-agency cooperation key to more complex financial cases. The inclusion of the private sector also stood out as particularly important, with highly positive feedback on the value of this from both private and public sector participants.

Another lesson learned, when conducting such multi-agency, multi-sector training, is the need to cater for the very different backgrounds and areas of expertise of participants, and to design courses mindful of these differences. For example, when running courses that include both financial experts (e.g. from banks and FIUs) and wildlife experts (e.g. from wildlife agencies), it is essential that courses cover each area from scratch, leveraging the expertise of participants in their respective areas to teach those from different backgrounds about their operations and priorities. For example, FIUs and wildlife agencies were given responsibility for running particular sessions during the courses, which proved a very successful strategy.

A final lesson to be born in mind by those seeking to conduct similar work concerns the need for flexibility, as demonstrated by the project's experience in Tanzania. This includes the flexibility to adapt timelines, including in relation to M&E, to allow for such unexpected events. In Tanzania, the team's greatest priority was to demonstrate its commitment to running the training in the face of such tragic events, which the flexibility of design of the project and donor willingness allowed.

9.1 Monitoring and evaluation

From the start, M&E has formed an integral part of project delivery. At inception, the M&E expert reviewed the logframe and pre-project indicators; no changes were made, and the M&E plan was taken forward. In June, however, following learning in the research phase, M&E led the team to submit a change request, seeking interlinked changes deemed crucial for activities to contribute as fully as possible to the Outcome and Impact. Specifically, the team proposed extending training to Uganda and providing only domestic (rather than cross-border) training, totalling 8 days in each country. These changes were proposed given, first, the links found between IWT routes and actors in Kenya, Tanzania and Uganda and, second, the much lower-than-expected baseline of capacity and awareness of financial tools. Finally, the team suggested modifying certain outputs/indicators to reflect this lower-than-expected baseline of capacity (see change request for full rationale). The changes were authorised in June 2016, and M&E continued per the updated logframe.

Since then, the project was run in an adaptive manner to ensure outputs and outcomes are achieved, based on continuous M&E. Beyond regular reviews of progress against the logframe, systems to monitor progress included the creation of check lists for the assessment phase, in the form of targets for numbers of interviews and questions to be posed (Annexes 5, 31), and pre-

/post-course surveys (Annexes 16, 21-23). The latter were designed to allow measurement not only of feedback and perceptions, but also of *learning* on key topics. The results have allowed the team to show that activities and outputs actually contribute to the Outcome and Impact (see Section 3 above, and Annexes 16, 21-23). As such, the learning rates and feedback have been measured as a qualitative achievement of the project, alongside the quantitative achievement seen in the significantly higher-than-planned participation (Annexes 7-9, 13-15).

A notable achievement was the fact that the priority placed on ongoing M&E allowed the project to adapt to repeated obstacles in Tanzania. By flexibly re-establishing timelines with each postponement and communicating clearly with the IWT Challenge Fund, progress was allowed to continue. Specifically, postponements to the Tanzania training were requested through change forms submitted in March 2017 and November 2017, which extended the project end date to March 2018. This also required the budget to be reallocated across two financial years rather than one, as foreseen in the original application form. These changes were managed flexibly and the M&E system proved practical and helpful in handling these changes.

In addition, two change requests were submitted over the project to reallocate budget between lines. The first was submitted to allow the project team to respond to the local demand expressed, in all countries, for residential courses – which was also advised by external stakeholders to ensure maximum participation. The second was submitted to cater for the last-minute postponement of the Tanzania course in August 2017. As noted, the team is pleased to have been able to adapt to this highly unexpected event and deliver the training at a later date. This, however, required rearranging existing plans, including financial planning, with the loss of funds from the last-minute postponement of booked flights (participants and trainers) and venues. To allow the team to reschedule the training, financial contributions were stepped up from the EU AML/CFT HoA programme and PAMS Foundation in particular areas, and existing budget within the Challenge Fund budget lines was rearranged to cater for these contributions.

Lastly, it is important to note that the M&E carried out continuously throughout the project contributed in large part to a core project output – the generation of guidance and best practices for capacity building on IWT-linked financial flows (Output 3). These lessons learned and best practices were included in the Occasional Paper (Annex 26) and relied in large part on the M&E conducted throughout the project. In conducting this, the team ensured that it sought feedback and updates from trainees *after* courses had concluded (as shown in Annexes 20, 32).

9.2 Actions taken in response to annual report reviews

The feedback from the annual report submitted previously was overall very positive. The four suggestions made referred to points that the reviewer asked to see in the final report, with no suggestion requiring discussion with the Challenge Fund. The project team has taken proactive steps to ensure that the points made on the annual report are considered in this report. To show how the team has done so, each comment on the annual report is covered below.

Comment 1: It would be good to have more evidence (if such exists) presented of improved capacity leading to increased prosecutions – beyond the ‘Kromah case’ highlighted in this report.

Response: In East Africa, it is common for cases to suffer numerous delays and to take a significant amount of time to progress, during the investigation and prosecution stages. As such, significant time lag exists over the course of investigations and prosecutions – an unavoidable reality. The Kromah case itself continues to be due in court at the time of the final report, to allow the team to undertake a range of investigation strategies. Beyond this, the project team is not aware of another case that is nearing prosecution stage; as such, it is difficult at this stage to point to the evidence requested in a region where the timelines required for such evidence to manifest itself are significantly longer.

Comment 2: It would be useful to have more recent statistics on (for example) poaching – in support of project claims of impact / monitoring of assumptions. Many of the figures used in the Grant Application and in this report predate project start-up.

Response: The project team has included more recent statistics in Section 6 (Impact on species in focus) and Section 4 (Monitoring of Assumptions), including elephant and rhino losses in Kenya in 2017. In the other focus countries, however, more recent statistics are harder to come by. The most recent figures the team has been able to find, for example, were given by the Ministry of

Natural Resources and Tourism in its National Ivory Action Plan Progress Report for the period January–December 2017, which refer to an earlier period. However, these most recently released statistics have been included in the report, with more detail on them supplied.

Comment 3: The report narrative is quite ‘heavy’ with acronyms, not all of which are spelt out at first occurrence. Ensure all acronyms are spelled out in future reporting.

Response: The final report has been edited to ensure that acronyms are spelt out on first use. Given the tight space limitations, it is not possible to spell out the long acronyms multiple times.

Comment 4: It would be interesting to learn something of the JIGZAW analysis tool: how it works, the sort of information it provides etc.

Response: The final report has provided additional information in Section 2 on project partnerships, again bearing in mind the tight space limitations.

10. Other comments on achievements not covered elsewhere

To abide by the 20-page limit, all comments have been included within the core sections.

11. Sustainability and legacy

The project has gained significant profile with relevant agencies, the private sector and external actors in each country. This owes to the far-reaching consultation in the research phase and the wide participation in training: as noted, significantly larger numbers could be trained than had been anticipated. In Kenya, Tanzania and Uganda, evidence of higher interest and capacity can be seen in the use of Whatsapp channels to discuss financial tools (Annexes 17-18, 21-23, 25); in Uganda this can also be seen in the pursuit of AML charges in a major IWT case (Annex 20).

The project’s open-access plan has ensured that lessons learned and research outputs are made available online, to maximise visibility and impact. In line with DfID’s Research Open and Enhanced Access Policy, the plan has ensured that all project research is freely available to all whom can benefit, with a multi-dimensional dissemination strategy ensuring visibility and reach (Annex 29).

In addition, the project’s exit strategy has remained valid. As planned, the technical content taught has been documented into concise SOPs, which will endure beyond project end (Annex 24). Similarly, emphasis was placed on the need to establish enduring cooperative frameworks between wildlife agencies and FIUs: although in Tanzania these are in place in light of the multi-agency frameworks that already exist, in both Kenya and Uganda, these are being pursued, with UWA-FIA cooperation now occurring regularly in Uganda. The informal inter-agency channels established in all countries (e.g. Whatsapp groups) will also endure beyond project end (Annex 25), while the presence of ‘champions’ in each agency is an enduring initiative designed to ensure, beyond project end, that a point of contact can offer material to new staff, support internal training, and contribute to the mainstreaming of best practice.

Now that project funding has ceased, many of the project staff have begun working on the follow-on project funded under Challenge Fund Round 3. As well as extending the work carried out under the current project to three further countries (Malawi, Zambia, Mozambique), the Round 3 project will reinforce the results achieved by the project in Kenya, Tanzania and Uganda. It will do so in two ways. First, it will provide two days of training in each country to both revise content covered and address any issues arising through its use in practice in the interim, and to extend knowledge of the use of financial tools from the domestic to the international level. Second, the next project will expand the availability of this training further through the production of e-learning courses and rapid-reference guides for practitioners, that are tailored to the legislative and institutional environment of each country. As such, engagement on the areas covered in this project will continue on through 2019 in the form of active project work under Challenge Fund Round 3, and through the lasting nature of the relationships created under the current project.

Finally, engagement with informal partners will continue both within the scope of the new project and beyond it. In this respect, the project team regards the collaborative relationships built during the project as key to its sustainability and legacy. For example, the collaboration with UNODC in Tanzania was critical, and came a month after UNODC had appointed an expert to a two-year position based in Nairobi with sole responsibility for enhancing the use of financial tools in two of

the countries covered by the project: Kenya and Tanzania (as well as Botswana). The inclusion of this expert (alongside another UNODC expert) in the Tanzania training meant that this individual was able to witness first hand and build on the IWT Challenge Fund work already done over the rest of her two-year assignment – a process that is already underway. The project team have remained in close and regular contact with this expert, who has already engaged with many of the individuals trained under the IWT Challenge Fund project in Kenya and Tanzania, through the organisation of meetings and events, and the provision of ongoing mentoring and support on the use of financial tools. This example shows the importance to the project's legacy of collaboration – an emphasis that will be maintained during the IWT Challenge Fund Round 3 project.

12. IWT Challenge Fund Identity

Throughout, the project recognised the UK Government as the funder and publicised the IWT Challenge Fund. IWT Challenge Fund funding was recognised as enabling this stand-alone project to take place, but it was noted (upon approval) that a follow-on project under IWT Challenge Fund Round 3 would also be continuing the work begun under this project from April 2018.

At project start, Government support was acknowledged through a post on RUSI.org to launch the project ('New Research Project Funded By UK Government to Track Funds from Illegal Wildlife Trade'). During research and training, UK Government support has been explained in full, to all participants. Many had not previously known about the IWT Challenge Fund – with team members ensuring that understanding of the Fund existed among all those interviewed and trained, from public and private sectors. These included representatives of financial institutions, central banks, financial intelligence units, wildlife agencies, anti-corruption authorities and prosecutors, among others. The project also ensured that UK logos appeared on all training materials, agendas, delegate lists etc (Annexes 10-12, 26). In Uganda and Kenya, the British High Commission attended key sessions, which assisted in publicising the Government's role. While this was planned in Tanzania, the repeated delays to the delivery of training complicated British High Commission attendance in Tanzania. The role of the UK Government was also recognised in writing in the Occasional Paper itself, which also featured the relevant logo, and UK Government funding was recognised orally at the Paper's official launch (Annexes 26-27).

13. OPTIONAL: Outstanding achievements of your project during the (300-400 words maximum). This section may be used for publicity purposes

In order to abide by the stated maximum 20-page limit, the authors have opted not to include a section under 13. If a section can be included separately, the authors would be grateful to be informed, so that they can prepare this without violating page limits.

The authors would also like to note that the full version of this final report contains repeated reference to a number of sensitive details, including those relating to the Kromah case in Uganda and the events of 2017 in Tanzania. **In the event that the Challenge Fund wishes to publicise details relating to this project, the authors would therefore kindly request that they be consulted before any content from this report is publicly released, so that appropriate sanitisation may take place.**

14. Finance and administration

14.1 Project expenditure

Project spend (indicative since last annual report)	2017/18 Grant (£)	2017/18 Total actual IWT Costs (£)	Variance %	Comments (please explain significant variances)
Staff costs (see below)				
Consultancy costs				
Overhead Costs				
Travel and subsistence				
Operating Costs				
Capital items (see below)				
Monitoring and Evaluation				
Others (see below)				
TOTAL				

Staff employed (Name and position)	Cost (£)
Tom Keatinge, Project Lead	
Cathy Haenlein, Project Manager	
Lieke Bos, Events Coordinator	
Mercy Buku	
Neil Bennett	
David Artingstall	
Julian Newman	
TOTAL	
Andrew Glazzard, M&E (NB different budget line to Staff Costs, therefore not included in Staff Costs total in previous line, of £	

Capital items – description <i>Please detail what items were purchased with fund money, and where these will remain once the project finishes</i>	Capital items – cost (£)
N/A	
TOTAL	

Other items – description <i>Please provide a detailed breakdown for any single item over £1000</i>	Other items – cost (£)
Uganda Conservation Foundation Training Convening	
Tom Keatinge return flight Heathrow to Dar Es Salaam	
David Artingstall return flight Heathrow to Dar Es Salaam	
Neil Bennett return flight Heathrow to Dar Es Salaam	
New Africa Hotel Tanzania Training	
TOTAL	

14.2 Additional funds or in-kind contributions secured

Source of funding for project lifetime	Total

	(£)
INTERPOL	
Standard Chartered Bank	
EU AML/CFT Horn of Africa programme	
PAMS Foundation	
UNODC	
TOTAL	

Source of funding for additional work after project lifetime	Total (£)
IWT Challenge Fund Round 3 project (in Kenya, Tanzania and Uganda, as well as Malawi, Mozambique and Zambia)	
TOTAL	

14.3 Value for Money

RUSI believes that this project offered excellent value for money in terms of the importance of the work and its contribution to long-term impact relative to cost inputs. It is a clear case of an intervention that would not otherwise have occurred given the absence of other programmes building financial capacity to disrupt IWT – and other agencies’ lack of capacity to deliver specialist AML training.

The project team’s joint convening power, networks and expertise in both financial security and IWT contributed directly to filling this gap through this distinct, targeted project. These factors meant that the project was able to leverage in-kind and pro-bono contributions in all countries in which it operated. This brought not only a financial benefit to the project beyond the IWT Challenge Fund funding provided, but also brought to bear an expanded range of perspectives and niche expertise, created synergies and ensured collaborative working between numerous organisations working in this field.

Beyond the in-kind funding provided by Standard Chartered and Interpol, as outlined in the application form, the project benefited from substantial additional in-kind and direct financial contributions from the EU AML/CFT HoA programme, PAMS Foundation, IFAW, UNODC and individual expert Courtney Brown – totalling £ (£ more than the £ foreseen in the application). These organisations and experts operate at the top of their fields – collaboration with the EU AML/CFT HoA programme, for example, enabled participants to benefit from training provided by the EU Team Leader, a renowned expert in AML and financial investigation, with extensive experience training FIUs across the region. Collaboration with PAMS Foundation ensured that the project benefited those operating at the forefront of efforts to counter IWT in Tanzania, via the inclusion of the multi-agency National Taskforce Anti-Poaching. UNODC provided two experts to the Tanzania course, who covered the use of SOPs by prosecutors, UNODC’s container control programme, and collaboration with the private sector. Together, these contributions further increased the project’s value for money, indicating the high value with which the project is viewed by formal and informal partners at the front of their fields. Evidence lies in the financial arrangements made with PAMS Foundation and the EU AML/CFT HoA programme (Section 14.2; more details on request).

Finally, the in-depth assessment of IFFs linked to IWT presents value for money not just in the vital input it provides to the design of training under this project. It also addresses a significant knowledge gap that prevents broader efforts – both national and external – from effectively addressing these flows. The publication and sharing of the findings, and of the best practice developed during training, thus presents further value for money in light of the future impact that this will have. Wider uptake of project findings has been in evidence, with the project team consulted by broader initiatives seeking to incorporate a financial angle into their work. The project team has also been consulted extensively for their expertise and learning from the project, including by the FCO in their plans for the London Conference on IWT.

Annex 1 Project’s original (or most recently approved) logframe, including indicators, means of verification and assumptions.

Note: Insert your full logframe. If your logframe was changed since your application and was approved by a Change Request the newest approved version should be inserted here, otherwise insert application logframe.

Project summary	Measurable Indicators	Means of verification	Important Assumptions
<p>Impact: A reduction in the illegal ivory and rhino-horn trade and poverty alleviation in Kenya, Tanzania and Uganda through more effective investigation and prosecution of financial crime underpinning the IWT.</p>			
<p>Outcome: Training provided improves Kenyan, Tanzanian and Ugandan agencies’ capacity to investigate and prosecute financial crime tied to IWT. This will deter and disrupt criminal trafficking networks, leading to a fall in poaching and rise in wildlife tourism, benefiting local communities. It will also generate best-practice for wildlife-linked financial capacity-building elsewhere.</p>	<p>Indicator 1: By March 2018, participants in financial intelligence training in Kenya, Tanzania and Uganda have improved understanding of the dynamics of wildlife-linked illicit financial flows and enhanced capacity to track, investigate and prosecute on this basis – as judged by pre- and post-training evaluation forms.</p> <p>Indicator 2: By March 2018, concrete measures are taken by individuals trained through the project to enact relevant financial-intelligence tools in 100% of appropriate new high-level cases (baseline = zero).</p> <p>Indicator 3: By March 2018, 100% of departments of organisations involved in training have in place a ‘champion’ inducted to use and assist others in the new financial intelligence training delivered, with at least 15 individuals receiving the training per country.</p>	<p>Results of pre- and post-training evaluation forms completed by participants; usage records of systems put in place during training; project notes and M&E record of implementation and results of training; participant contribution and feedback.</p> <p>Results of pre- and post-training surveys of participants to measure the impact of the training on operating procedures and investigations; records of law-enforcement agencies engaged in training; external surveys, analyses and needs assessments; usage records of systems put in place during training.</p> <p>Internal records of law-enforcement agencies; external surveys, analyses and needs assessments; usage records of systems put in place during training; court records; records of courtroom monitors; newspaper articles; assessments by external research institutes and NGOs; articles on cases in law and environmentally focused journals.</p>	<p>The Kenyan, Tanzanian and Ugandan governments remain committed to improving their AML/CFT regimes to meet international standards, and remain committed to the fight against wildlife crime.</p> <p>Increased numbers of effective investigations and prosecutions in Kenya, Tanzania and Uganda create a sufficiently high-risk environment to result in fewer instances of poaching and trafficking.</p> <p>Reduced poaching rates will lead to higher numbers of elephants and rhinos in Kenya, Tanzania and Uganda.</p> <p>Increased numbers of elephants and rhinos will result in an increase in wildlife tourism in Kenya, Tanzania and Uganda.</p>

<p>Outputs:</p> <p>1. A strategic assessment provides an overview of knowledge of the problem to be tackled, in terms of the scale and dynamics of illicit financial flows deriving from the IWT in Kenya, Tanzania and Uganda, and documents the capacity of relevant authorities to tackle these.</p>	<p>1.1 The current limited, scattered and incoherent sources of information on the shape of illicit financial flows connected to the IWT are assessed through a clear and consistent multi-source analysis of wildlife-linked IFFs and the capacity that exists to tackle them in Kenya and Tanzania – with the results formally published and shared as an accessible open-source resource by March 2018.</p> <p>1.2 The resource developed is referenced and cited by other domestic and international studies, and other projects have incorporated its findings and sought to address them by March 2018.</p> <p>1.3. The outcomes of the assessment are recognised by relevant international and governmental agencies and incorporated into planning by March 2018, where there had previously been little in the way of evidence or recommendations to feed into priority setting and policy making.</p>	<p>1.1 Results of the analysis of IFFs and the capacity to assess them formally published and made accessible online as part of the final report; newspaper articles and coverage of the report’s launch by wildlife, organised crime, security and law-focused organisations; download and accessed rates from open-access platforms.</p> <p>1.2 Citations of the report in wildlife, organised crime, security and law-focused journals, publications and websites; citations of the report in other research and practical projects implemented in East Africa and beyond; newspaper articles.</p> <p>1.3 Kenyan, Tanzanian, Ugandan policy documents; reports of the relevant agencies; project documentation and reports of intergovernmental organisations; newspaper articles; journal articles.</p>	<p>The security situation in selected project areas will allow project activities to take place.</p> <p>Beneficiaries of training will have sufficient capacity to absorb and implement new approaches and will be open to public-private, inter-agency and cross-border training and co-operation.</p> <p>Relevant financial institutions in Kenya, Tanzania and Uganda see the value of participation in the project and are prepared to engage.</p> <p>Capacity-building and training efforts will be sufficiently dynamic to respond to any legislative and regulatory changes at the national and regional levels.</p> <p>In-depth knowledge on the part of project partners allows for the selection of appropriate participants.</p>
<p>2. Relevant financial, field and other officers from law-enforcement agencies and the private sector in Kenya, Tanzania and Uganda are specifically trained to more effectively collect and share financial intelligence to facilitate high-level investigations and prosecutions.</p>	<p>2.1 24 days-worth of multi-agency training (8 days per country) is conducted which provides relevant actors from law-enforcement agencies, as well as financial institutions, in Kenya, Tanzania and Uganda with the skills to investigate IFFs linked to the IWT by March 2018, as judged by results of pre- and post-training and other indicators (see below).</p> <p>2.2 Standard operating procedures (SOPs) are set up and formally documented by March 2018, where formerly these processes were patchy and unstandardised.</p>	<p>2.1 Number of days of multi-agency training provided on IFFs linked to the IWT in Kenya in 2016/17 (baseline = zero); number of days of multi-agency training provided on IFFs linked to the IWT in Tanzania in 2016/17 (baseline = zero); number of days of multi-agency training provided on IFFs linked to the IWT in Uganda in 2016/17 (baseline = zero); project notes and M&E record of implementation and results of training; final report on lessons learned and recommendations; participant feedback; internal agency reports; investigation and prosecution rates; relevant agencies’ reports.</p>	

	<p>2.3 Participating agencies involved in training identify a 'champion' to guide the use of, and assist others in the use of, the training delivered.</p>	<p>2.2 Standard operating procedures set up; internal agency reports on implementation and usage; usage records of procedures put in place during training.</p> <p>2.3 Project notes and M&E record of implementation and results of training showing appointment of champions; internal agency records; journal articles; newspaper articles and news reports.</p>	
<p>3. Best-practice and lessons learned are generated, and recommendations made, for building capacity in investigating illicit financial flows linked to the IWT – to feed into effective future programming.</p>	<p>3.1 By March 2018, a final formally published end report documents and communicates best practice and lessons learned, with recommendations made for building financial intelligence capacity around the IWT in East Africa and beyond.</p> <p>3.2 By March 2018, training provided, best-practice and lessons learned are incorporated into accessible and effective operating procedures for ongoing and future internal use by participating agencies, as well as by international bodies such as INTERPOL.</p> <p>3.3 The collaborative production of best-practices and lessons learned feeds into planning and prioritisation by the agencies engaged and by relevant international agencies by March 2018, where there had previously been little evidence to feed into priority setting.</p>	<p>3.1 Project report documenting best-practices, lessons learned and recommendations formally published and made accessible open access; newspaper articles and coverage of the report's launch by wildlife, organised crime, security and law-focused organisations; download and accessed rates from open-access platforms.</p> <p>3.2 Internal reports and records of participating law-enforcement agencies in Kenya, Tanzania and Uganda; reports of international organisations; newspaper articles and reports.</p> <p>3.3 Internal reports and records of Kenyan, Tanzanian and Ugandan agencies involved in training; policy documents; reports of relevant government departments; project documentation and reports of intergovernmental organisations; newspaper articles and reports; journal articles.</p>	
<p>Activities (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 Strategic assessment of the scale and dynamics of illicit financial flows linked to the IWT based on desk-based research, fieldwork and interviews, using JIGZAW analysis tool.</p> <p>1.2 Mapping exercise analysing and documenting capacity in wildlife, law-enforcement, customs, financial and justice institutions in Kenya, Tanzania and Uganda to tackle wildlife-linked illicit financial flows – based on desk-based research, fieldwork and interviews.</p> <p>1.3 Analysis and documentation of findings in preliminary research report, for later publication within the project's final report.</p>			

- 2.1 Collaborative design, production and sharing of training modules with all partners involved in training development and delivery, and relevant Kenyan, Tanzanian and Ugandan agencies.
- 2.2 Delivery of 24 days of hands-on multi-agency training in Kenya, Tanzania and Uganda to participants from both the public and private sectors.
- 2.3 During the training courses, design and collaborative production of standard operating procedures to endure beyond the project's end.
- 3.1 Analysis of lessons learned and best practice derived from project reporting, monitoring and evaluation over the course of activities 2.2 and 2.3 in collaboration with partner organisations and participants.
- 3.2 Drafting of full report – expanding upon the preliminary report produced in Activity 1.3 and incorporating best-practice, lessons learned and recommendations for investigating and prosecuting illicit financial flows linked to the IWT in the region and beyond in future programming.
- 3.3 Formal professional editing, production and printing of the report as a RUSI Occasional Paper, organisation of its launch at a dedicated and publicised major conference, and distribution via a multidimensional inter-regional dissemination strategy.

Annex 2 Report of progress and achievements against final project logframe for the life of the project

Project summary	Measurable Indicators	Progress and Achievements
<p>Impact</p> <p>A reduction in the illegal ivory and rhino-horn trade and poverty alleviation in Kenya, Tanzania and Uganda through more effective investigation and prosecution of financial crime underpinning the IWT.</p>		<p>An AML charge is being pursued in Uganda for the 1.3 ton ivory seizure of 17 February 2017 (Kromah case – Annex 20). This has taken place following assistance by project mentors on the financial leads found during a house search – attributable also to crucial support and ongoing high-level input from various other supporters. Annex 32 shows charts produced by UWA following analysis of the documents: the team (and other mentors) provided assistance prior to this analysis, which has now linked transactions to 2 AML charges, included on the High Court Indictment sheet for this case (Annexes 20, 32). Investigations into the bank accounts concerned and the leads generated are ongoing. Where tangible developments such as these have derived and will continue to derive from the project, they will contribute to the overarching impact of reducing the illegal ivory and rhino-horn trade, and alleviating poverty through the more effective investigation and prosecution of financial crime underpinning IWT.</p>
<p>Outcome Training provided improves Kenyan, Tanzanian and Ugandan agencies' capacity to investigate and prosecute financial crime tied to IWT. This will deter and disrupt criminal trafficking networks, leading to a fall in poaching and rise in wildlife tourism, benefiting local communities. It will also generate best-practice for wildlife-linked financial capacity-building elsewhere.</p>	<p>Indicator 1: By March 2018, participants in financial intelligence training in Kenya, Tanzania and Uganda have improved understanding of the dynamics of wildlife-linked illicit financial flows and enhanced capacity to track, investigate and prosecute on this basis – as judged by pre- and post-training evaluation forms.</p> <p>Indicator 2: By March 2018, concrete measures are taken by individuals trained through the project to enact relevant financial-intelligence tools in 100% of appropriate new high-level cases (baseline = zero).</p> <p>Indicator 3: By March 2018, 100% of departments of organisations involved in training have in place a 'champion' inducted to use and assist others in the new financial intelligence training</p>	<p>Indicator 1: There is clear evidence of learning around the dynamics of wildlife-linked financial flows and the tools available to address them in Kenya, Tanzania and Uganda, as per project notes, pre- and post-course surveys and oral feedback from participants (Annexes 17-18, 21-23). Such learning has been shown around tools required for both successful investigation <i>and</i> prosecution: in Kenya, Tanzania and Uganda, for example, post-surveys showed learning not only around the money flows requiring investigation, but also around financial legislation available (Annexes 21-23). For more on this evidence and indicator, see Section 3.2.</p> <p>Indicator 2: Post course, concrete measures have been taken to enact tools taught (with additional critical support from Maisha Consulting, Space for Giants and US Fish and Wildlife Service). Evidence lies in the Kromah case, on which UWA, NRCN, ODPP and FIA agreed a joint prosecution team and conducted regular meetings to prepare an AML charge (Annex 20) and conducted extensive financial analysis (Annex 32). Such cooperation had not previously occurred: the bureaucratic machinations of government had seen confusion in previous efforts by UWA and FIA to make contact. The deadlock was broken on day 1 of the course, as testified by project notes and follow-on interviews. For more on this evidence and indicator, see Section 3.2.</p> <p>Indicator 3: In Kenya, Tanzania and Uganda, this has been achieved, with 43, 55 and 51 individuals trained in each respectively (Annexes 7-9, 13-15). 'Champions' were appointed to share the training within the 8 Kenyan, 10 Tanzanian and 9 Ugandan agencies that took part, and to store course materials in a central repository – including all printed slides, handouts, exercises, and the</p>

	delivered, with at least 15 individuals receiving the training per country.	library of digital slides, resources and exercises provided on a USB stick post course (Annexes 10-11). Finally, as specified in the Outcome, best practice has been generated to guide financial capacity-building elsewhere, in the September 2017 RUSI Occasional Paper (Annex 26). For more on this evidence and indicator, see Section 3.2.
<p>Output 1. A strategic assessment provides an overview of knowledge of the problem to be tackled, in terms of the scale and dynamics of illicit financial flows deriving from the IWT in Kenya, Tanzania and Uganda, and documents the capacity of relevant authorities to tackle these.</p>	<p>1.1 The current limited, scattered and incoherent sources of information on the shape of illicit financial flows connected to the IWT are assessed through a clear and consistent multi-source analysis of wildlife-linked IFFs and the capacity that exists to tackle them in Kenya and Tanzania – with the results formally published and shared as an accessible open-source resource by March 2018.</p> <p>1.2 The resource developed is referenced and cited by other domestic and international studies, and other projects have incorporated its findings and sought to address them by March 2018.</p> <p>1.3. The outcomes of the assessment are recognised by relevant international and governmental agencies and incorporated into planning by March 2018, where there had previously been little in the way of evidence or recommendations to feed into priority setting and policy making.</p>	<p>Output 1 was achieved with the production of an assessment of knowledge on IWT-linked financial flows and capacity to address them in focus countries. In line with Indicator 1, this sits in the Occasional Paper ‘Follow the Money: Using Financial Investigation to Combat Wildlife Crime’ (Annex 26) and in 2 interim articles: ‘Follow the Money: How Financial Investigation Can Combat Poaching in Kenya’ and ‘Wildlife Crime is Financial Crime: The Response Needs to Reflect This’ (Annex 28). Further evidence lies in coverage of the paper’s launch (Annex 27), accessed rates (Annex 29), social-media activity and google hits (Annex 29). For more on this evidence and indicator, see Section 3.1.</p> <p>In line with Indicator 1.2, the paper and interim articles have been cited by domestic and international studies, and other projects have incorporated their findings. Evidence lies in media citations, e.g. ‘To Fight Wildlife Crime, Experts Say “Follow the Money”’, run by 128 outlets, including regional outlets across the supply chain (Annex 29). Evidence of citation in other studies lies in Asia/Pacific Group and UNODC, ‘Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime’. Evidence of other projects engaging with findings is testified by interactions with the World Bank and IFAW. For more on this evidence and indicator, see Section 3.1.</p> <p>In line with Indicator 1.3, findings have been recognised by international and governmental agencies and incorporated into planning. Project documents and follow-up interviews with Kenyan and Ugandan agencies reveal that project recommendations are being actively pursued as part of agency strategy. In Kenya, for example, KWS and the FRC are pursuing an MoU to guide cooperation, (see p. viii of the paper, Annex 26). In Uganda, the pursuit of an AML charge on the latest large-scale case and the formation of a joint prosecution team echoes the Paper’s recommendations (pp. viii, ix) (Annexes 20, 32). For more on this evidence and indicator, see Section 3.1.</p>
<p>Activity 1.1 Strategic assessment of the scale and dynamics of illicit financial flows linked to the IWT based on desk-based research, fieldwork and interviews, using JIGZAW analysis tool.</p>		<p>Activity 1.1 was completed in the timescale planned. This involved desk research and a research trip to Kenya, Tanzania and Uganda in May-June 2016, whereby two team members conducted 80 interviews with ministries, wildlife agencies, anti-corruption bodies, financial intelligence units (FIUs), central banks, FATF-style regional bodies, commercial banks, prosecution services, international organisations and NGOs (Annexes 5-6). These were followed by phone interviews with experts elsewhere, bringing the total to 100 interviews (Annex 5). JIGZAW was used to collate findings from all sources. For more on this evidence and indicator, see Section 3.1.</p>

<p>Activity 1.2 Mapping exercise analysing and documenting capacity in wildlife, law-enforcement, customs, financial and justice institutions in Kenya, Tanzania and Uganda to tackle wildlife-linked illicit financial flows – based on desk-based research, fieldwork and interviews.</p>	<p>Activity 1.2 was completed in the timescale planned. Data for this mapping exercise was similarly collected through desk research and the research trip in May-June 2016, with interviews with law enforcement agencies particularly crucial to this exercise. Beyond this, however, all 100 interviews conducted in Kenya, Tanzania and Uganda, and by phone, were used to gather data to contribute to the mapping exercise (Annexes 5-6). For more on this evidence and indicator, see Section 3.1.</p>
<p>Activity 1.3 Analysis and documentation of findings in preliminary research report, for later publication within the project’s final report.</p>	<p>Activity 1.3 was completed in the timescale planned. This involved mapping and analysing findings from Activities 1.1 (on the scale and dynamics of illicit money flows tied to IWT) and 1.2 (on the capacity in place to address them). In doing so, findings were laid out in a preliminary report (Output 1.3), which was later developed into a RUSI Occasional Paper (Activity 3.3 – see Annex 26). For more on this evidence and indicator, see Section 3.1.</p>
<p>Output 2. Relevant financial, field and other officers from law-enforcement agencies and the private sector in Kenya, Tanzania and Uganda are specifically trained to more effectively collect and share financial intelligence to facilitate high-level investigations and prosecutions.</p>	<p>2.1 24 days-worth of multi-agency training (8 days per country) is conducted which provides relevant actors from law-enforcement agencies, as well as financial institutions, in Kenya, Tanzania and Uganda with the skills to investigate IFFs linked to the IWT by March 2018, as judged by results of pre- and post-training and other indicators (see below).</p> <p>2.2 Standard operating procedures (SOPs) are set up and formally documented by March 2018, where formerly these processes were patchy and unstandardised.</p> <p>2.3 Participating agencies involved in training identify a ‘champion’ to guide the use of, and assist others in the use of, the training delivered.</p> <p>Output 2 has been achieved with the delivery of 22 days’ training (2 by email in Kenya) to financial, field and other officers. These 22 days are two lower than the 24 noted in Indicator 2.1 – this was a change that was requested formally as the project progressed. Specifically, a change request was submitted in November 2017 to reduce the training in Tanzania from 8 to 6 days (and thus the total to 22 days) due to costs incurred in the last-minute postponement of the training with the tragic death of the co-director of the Pams Foundation days before the training was due to take place. Means of verifying the 22 days’ training delivered include project notes, photos, agendas, delegate lists and pre-/post-surveys (Annexes 7-19). For more on this evidence and indicator, see Section 3.1.</p> <p>In line with Indicator 2.2, SOPs have been set up and documented, where formerly processes to guide financial investigation of IWT were patchy. This result can be verified in the SOPs themselves (Annex 24). Though to date no internal agency reports verify implementation, the pursuit of an AML charge in the Kromah case in Uganda testifies that many are being effectively used. For more on this evidence and indicator, see Section 3.1.</p> <p>In line with Indicator 2.3, all public-sector agencies that took part in training have assigned a ‘champion’ to assist others to access and use the content delivered. Means of Verification include project notes on the assignment of champions. For more on this indicator, see Section 3.1.</p>
<p>Activity 2.1 Collaborative design, production and sharing of training modules with all partners involved in training development and delivery, and relevant Kenyan, Tanzanian and Ugandan agencies.</p>	<p>Activity 2.1 was completed in the timeframe planned. Courses were developed collaboratively, with project partners, technical experts and local partners designing key modules and circulating for feedback (see Annex 11). The course was designed as an 8-day curriculum, for delivery to public- and private-sector bodies. Days 1-4 constituted the public-sector course, day 5 the private-sector course and day 6 a mixed public-private course. Days 7-8 were assigned to mentoring of select trainees. For more on this indicator, see Section 3.1.</p>

<p>Activity 2.2 Delivery of 24 days of hands-on multi-agency training in Kenya, Tanzania and Uganda to participants from both the public and private sectors.</p>	<p>Under Activity 2.2, training courses were run in Kenya in January 2017, in Uganda in March 2017, and in Tanzania in February 2018 (Annexes 7-19). In Uganda, training was delivered to 51 delegates from 9 state agencies and 10 banks (Annex 7), totalling 8 days. In Kenya, training was delivered to a 43 delegates from 8 state agencies and 14 banks (Annex 7), totalling 8 days. In Tanzania, training was delivered to 55 delegates from 10 state agencies and 12 banks (Annex 9), totalling 6 days (approved via formal change request in November 2017). For more on this indicator, see Section 3.1.</p>
<p>Activity 2.3 During the training courses, design and collaborative production of standard operating procedures to endure beyond the project's end.</p>	<p>Under Activity 2.3, courses run in Kenya, Tanzania and Uganda contained modules dedicated to the collaborative design of SOPs (Annex 24). The rapid reference guide 'Wildlife Offences In Kenya: Points to Prove' was used as a model to facilitate the exercise; the guide contains a series of SOPs but none, as yet, on financial investigation (these are also absent in Tanzania and Uganda). For more on this indicator, see Section 3.1.</p>
<p>Output 3. Best-practice and lessons learned are generated, and recommendations made, for building capacity in investigating illicit financial flows linked to the IWT – to feed into effective future programming.</p>	<p>3.1 By March 2018, a final formally published end report documents and communicates best practice and lessons learned, with recommendations made for building financial intelligence capacity around the IWT in East Africa and beyond.</p> <p>3.2 By March 2018, training provided, best-practice and lessons learned are incorporated into accessible and effective operating procedures for ongoing and future internal use by participating agencies, as well as by international bodies such as INTERPOL.</p> <p>3.3 The collaborative production of best-practices and lessons learned feeds into planning and prioritisation by the agencies engaged and by relevant international agencies by March 2018, where there had previously been little evidence to feed into priority setting.</p> <p>Output 3 has been achieved with the publication of the RUSI Occasional Paper: in addition to the strategic assessment of knowledge on IWT-linked illicit financial flows and capacity to address them in the 3 focus countries, the paper outlines lessons learned from the training and recommendations for future capacity-building (Annex 26). In line with Indicator 3.1, evidence includes the paper citations, accessed rates and coverage of the paper's launch (Annexes 27, 29). For more on this indicator, see Section 3.1.</p> <p>In line with Indicator 3.2, SOPs have been documented for future internal use by government agencies and international bodies, evidence for which lies in the documentation of the SOPs themselves (Annex 24). For more on this indicator, see Section 3.1.</p> <p>In line with Indicator 3.3, best practice now feeds into planning and prioritisation by a number of domestic agencies and international organisations. Evidence lies in the pursuit of an AML charge following many of the procedures and systems developed in Uganda (Annex 20), and in requests for updates and conversations by bodies such as the World Bank and IFAW. For more on this indicator, see Section 3.1.</p>
<p>Activity 3.1 Analysis of lessons learned and best practice derived from project reporting, monitoring and evaluation over the course of activities 2.2 and 2.3 in collaboration with partner organisations and participants.</p>	<p>RUSI sought approval to proceed with Activities 3.1–3.3 despite delays under Output 2. All activities were completed by 30 September 2017. Under Activity 3.1, the project team analysed and collated findings and lessons from the training and research, building on findings and analysis conducted under Activities 1.1–1.3. For more on this indicator, see Section 3.1.</p>

<p>Activity 3.2 Drafting of full report – expanding upon the preliminary report produced in Activity 1.3 and incorporating best-practice, lessons learned and recommendations for investigating and prosecuting illicit financial flows linked to the IWT in the region and beyond in future programming.</p>	<p>Under Activity 1.2, the team reworked the preliminary report (Activity 1.3) to incorporate analysis and best practice developed under Activity 3.1. A full report was drafted, in the form of the 17,000-word Occasional Paper ‘Follow the Money: Using Financial Investigation to Combat Wildlife Crime’ (Annex 26). For more on this indicator, see Section 3.1.</p>
<p>Activity 3.3 Formal professional editing, production and printing of the report as a RUSI Occasional Paper, organisation of its launch at a dedicated and publicised major conference, and distribution via a multidimensional inter-regional dissemination strategy.</p>	<p>Under Activity 3.3, the paper underwent formal peer review, editing and production. It was launched at a conference on Whitehall in September 2017, where an expert panel discussed its findings. Besides RUSI, the panel included Mary Rice of EIA, Emma McClarkin MEP and Chris Batt of UNODC, with presentations released as an open-source You-Tube video (Annex 27). RUSI’s Comms team managed dissemination, involving targeted mailouts and promotion via on/offline channels, from RUSI London and Nairobi. The paper enjoyed high download rates, and generated wide social-media activity (Annex 29). For more on this indicator, see Sections 3.1 and 3.2.</p>

Annex 3 IWT Contacts

Ref No	IWT021: Following the Money: Disrupting Wildlife-Linked Illicit Financial Flows in Kenya/Tanzania/Uganda
Project Title	Following the Money: Disrupting Wildlife-Linked Illicit Financial Flows in Kenya/Tanzania/Uganda
Project Leader Details	
Name	Tom Keatinge
Role within IWT Project	Project Leader
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Phone	
Fax/Skype	
Email	
Partner 1	
Name	Mary Rice
Organisation	Environmental Investigation Agency
Role within IWT Project	Partner
Address	
Fax/Skype	
Email	
Partner 2	
Name	Warren Sweeney (Warren Sweeney has now left Interpol, but had the most direct experience of the training course in Kenya. In addition, Henri Fournel - H.FOURNEL@interpol.int)
Organisation	Interpol
Role within IWT Project	Partner
Address	
Fax/Skype	
Email	
Partner 3	
Name	Helena Wood
Organisation	Standard Chartered Bank
Role within IWT Project	Partner
Address	
Fax/Skype	
Email	
Partner 4	
Name	Chris Holtom

Organisation	Mars Omega
Role within IWT Project	Partner
Address	
Fax/Skype	
Email	
Partner 5 – informal project partner, if useful to contact	
Name	Anne-Marie Weeden (NB Anne-Marie Weeden has now left Uganda Conservation Foundation, but can testify to the Uganda portion of the course. The email address below is current).
Organisation	Uganda Conservation Foundation
Role within IWT Project	Informal partner – Uganda training
Address	
Fax/Skype	
Email	
Partner 6 – informal project partner, if useful to contact	
Name	David Hotte
Organisation	EU Anti-Money Laundering/Countering the Financing of Terrorism in the Horn of Africa Programme
Role within IWT Project	Pro bono trainer
Address	
Fax/Skype	
Email	
Partner 7 – informal project partner, if useful to contact	
Name	Amanda Gore / Steve Thurlow
Organisation	UNODC
Role within IWT Project	UNODC pro bono trainers
Address	
Fax/Skype	
Email	

Checklist for submission

	Check
Is the report less than 10MB? If so, please email to IWT-Fund@ltsi.co.uk putting the project number in the subject line.	NO
Is your report more than 10MB? If so, please discuss with IWT-Fund@ltsi.co.uk about the best way to deliver the report, putting the project number in the subject line.	YES
Have you included means of verification? You need not submit every project document, but the main outputs and a selection of the others would strengthen the report.	YES
Do you have hard copies of material you want to submit with the report? If so, please make this clear in the covering email and ensure all material is marked with the project number.	NO
Have you involved your partners in preparation of the report and named the main contributors	YES
Have you completed the Project Expenditure table fully?	YES
Do not include claim forms or other communications with this report.	