

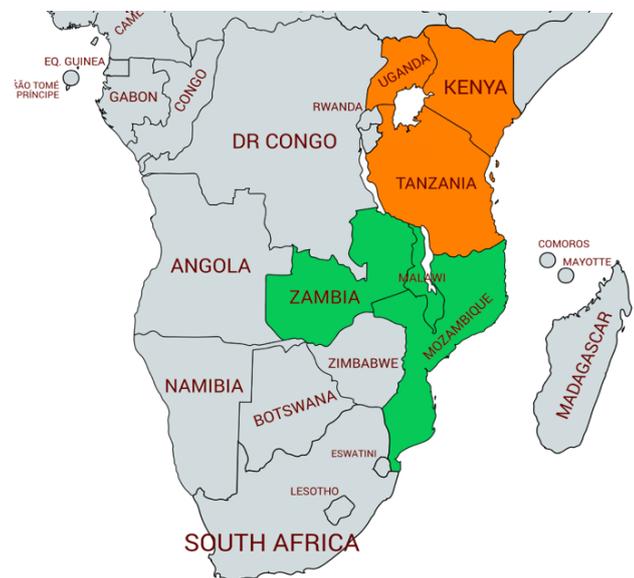


IWT Challenge Fund Project Information

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| Project reference | IWT043 |
| Project title | Following the Money II: IWT Capacity-Building, East and Southern Africa |
| Country/ies | Malawi, Zambia, Mozambique, Kenya, Uganda, Tanzania |
| Lead organisation | Royal United Services Institute |
| Partner institution(s) | Environmental Investigations Agency, Space for Giants, Strathmore University Law School, Jomo Kenyatta University of Agriculture and Technology (JKUAT), Lilongwe Wildlife Trust, INTERPOL, Standard Chartered Bank (pro bono), DLA Piper (pro bono) |
| IWT grant value | £254,900 |
| Start/end dates of project | 1 st April 2018 - 30 September 2019 |
| Reporting period (e.g. April 2018-Mar 2019) and number (e.g. Annual Report 1,2,3) | April 2018 - March 2019; Annual Report 1 |
| Project leader name | Tom Keatinge |
| Project website/blog/social media | N/A |
| Report author(s) and date | Tom Keatinge, Cathy Haenlein, Alexandria Reid |

1. Project Rationale

Illegal wildlife trade (IWT) is not only a crime against nature: it is organised crime conducted for profit. To catch the most prolific wildlife criminals, we must follow the money. Building upon RUSI's first Challenge Fund project *Follow the Money I (IWT021)* – conducted in Kenya, Tanzania and Uganda – this project continues to target the low-risk financial environment across the region that allows criminal actors to reap vast profits from IWT. It does so by delivering a series of multi-agency training workshops across in Malawi, Mozambique, and Zambia which will increase capacity to enforce IWT-linked anti-money laundering (AML) legislation, and to investigate and prosecute on this basis. These workshops will be complemented by the development of six individually tailored rapid reference guides to provide further practical guidance on the lifecycle and entry points for a wildlife-linked financial investigation.



This is urgently needed: compared to other types of organised crime such as drug and arms trafficking, financial investigations in IWT cases are rare. To date, a lack of local capacity to conduct financial investigations means that the baseline situation across East and Southern Africa is one where ‘possession’ is the main offence prosecuted in IWT cases. In the majority of wildlife cases, clear financial leads go unfollowed, financiers and supporters go unidentified, and assets go unfrozen and unconfiscated. In these regions, IWT is often investigated solely by wildlife agencies, who lack the capacity or sole legal authority to conduct financial investigations. Without a multi-agency financial approach, local law enforcement fails to apprehend and disrupt the mid-and-high level criminals controlling the trade. By reducing the threat of IWT, this project will therefore benefit not just the directly upskilled local law enforcement, but also those who rely upon wildlife tourism as a primary source of income.

The urgency of this assistance is increased by the level of threat to the multiple species trafficked through and from East and Southern Africa. The United for Wildlife IWT Finance Taskforce considers Tanzania, Kenya, Uganda and Mozambique priority countries for illicit exports of ivory, pangolin and other endangered wildlife. This assessment is supported by evidence such as DNA testing, which traced 85% of savannah elephant ivory seized between 2006-14 to the region, mainly from Selous in Tanzania and Niassa in Mozambique. Meanwhile, remaining rhino populations are low – Kenya and Tanzania together possess little over 1,000. Pangolins, in turn, are now considered the world’s most trafficked mammal, with regular seizures implicating the six countries included in this project.

RUSI’s two Challenge Fund projects have demonstrated that there is a strong local demand for these capacity building activities and rapid reference guides. One IWT investigator interviewed by the authors observed that without parallel financial investigations, ‘there is a page missing from the IWT investigators handbook’. To date, global responses have typically comprised anti-poaching measures, the promotion of sustainable livelihoods, and initiatives to reduce demand for wildlife products. Whilst these measures are crucial, until the responses include a financial crime-related element, this low-risk, high-reward crime will continue to thrive. To follow the money globally, we must upskill locally.

2. Project partnerships

To date, this project has collaborated extensively with formally named project partners, local stakeholders and technical experts. The extent and quality of these partnerships has been one of the project’s core strengths. The project has worked particularly closely with the Environmental Investigation Agency (EIA), and in-country partners including the Lilongwe Wildlife Trust (Malawi), Wildlife Crime Prevention (Zambia) and Wildlife Conservation Society (Mozambique). It has also capitalised upon the pro bono contributions made by Interpol, Standard Chartered Bank (SCB), Barclays and Western Union (Annex 7). Finally, because of the emphasis on demand driven, evidence-based programming, the project has collaborated extensively with local law enforcement agencies and the private sector across target countries (Annexes 5-21).

The project’s most significant, long-running partnership is with EIA, who helped to design and deliver the content for all three capacity building workshops. EIA also participated in the strategic assessment phase, contributing in-depth knowledge about the dynamics of IWT in East and Southern Africa. Most prominently, EIA provided locally relevant case studies to be used in interactive exercises in throughout the course (Annex 7). EIA’s provision of two expert trainers to each workshop enabled the project to navigate the demands created by high attendance across all three workshops. This was an increase from the one member of staff they provided to each workshop in Project IWT021 and represented a pro bono staff time contribution by EIA to the project.

These experts designed and delivered sessions to both public- and private-sector audiences, including sessions such as ‘IWT: Setting the Regional and Global Scene’, ‘How Trade and Shipping Works with Case Study’, and ‘Public-Private Partnerships: Global and Regional Experiences’ (Annex 10). These sessions were very well received, as indicated by post-training surveys and long form feedback from participants (Annex 18-21). For example, formal feedback from one investigator at the Department of Parks and Wildlife in Malawi noted that ‘The most

interesting topic was “how shipping works in illegal wildlife trade syndicate disruption”, (...) because shipping documents can help wildlife officer on how to identify suspicious cargo.’ (Annex 21).

Beyond EIA, one of this project’s core strengths has been the extent and quality of its partnerships with small local NGOs working on the ground – all of whom have been essential in guiding the content and structure of the workshops. The support of these trusted NGOs has enabled the project to guarantee attendance by all relevant local agencies (Annexes 12-14). In Malawi, the project worked with a small team of dedicated experts from the Lilongwe Wildlife Trust (LWT); in Zambia, the project worked with Wildlife Crime Prevention, who audited several sessions in the workshop and helped to deliver invitations; and finally, in Mozambique, the project worked with Wildlife Conservation Society who helped to facilitate the attendance of members of their vetted unit within the Administração Nacional das Áreas de Conservação (**confidential**). Each of these partners also took an active role in the capacity assessment phase of the project and benefitted from the civil society day held by RUSI as part of the training programme.

The project further benefitted from other several pro bono contributions. Partners such as Interpol contributed to the project remotely, providing their expertise during the assessment phase and advising on the design of the training course agenda. In Zambia and Mozambique, the project received support from two members of the United for Wildlife Financial Taskforce, namely Standard Chartered Bank and Barclays. These pro bono contributions enabled the project to navigate the demands created by high attendance across all three workshops. This demand was particularly high in Mozambique, where RUSI secured additional pro bono support from a Senior Manager from the regional Western Union Financial Intelligence Unit. This Senior Manager provided three full days of pro bono support to facilitate successful workshop delivery, worth an additional £ in pro bono funding. Here, it should also be noted that the project also secured additional pro bono staff hours from EIA to support delivery (see above).

The project has collaborated extensively with local agencies and the private sector across the target countries. RUSI has consistently welcomed involvement by all stakeholders in decision-making, course design and delivery. For this reason, RUSI conducted as many meetings as possible with all locally relevant stakeholders during Output 1 (Annexes 5-7). Furthermore, courses have been tailored considerably based on partner and stakeholder feedback, and mixed-gender local experts have led numerous sessions, sharing local expertise and challenges (Annex 8, Section 8). Notably, these presentations were delivered unpaid by local participants who put considerable time into preparing the content using individually tailored guidance from RUSI. This consensus-driven approach generated high levels of support and endorsement, enabling the project to issue joint invitations with the formal support of local wildlife authorities and financial intelligence units across all countries (Annex 11).

3. Project progress

3.1 Progress in carrying out project Activities

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| Activity 1.1: Assessment of current evidence around the scale, dynamics and impacts of IFFs linked to IWT in Malawi, Mozambique and Zambia based on desk-based research, fieldwork and interviews. |
| Activity 1.2: Mapping exercise documenting capacity in wildlife, law-enforcement, customs, financial and justice institutions in Malawi, Mozambique and Zambia to tackle wildlife-linked illicit financial flows – based on desk-based research, fieldwork and interviews. |
| Activity 1.3: Analysis and documentation of findings in an internal written report, to guide all project team members in the design of training and in the invitation of particular agencies to participate in training during Work Package 2. Publication of at least two publicly available articles transmitting the findings of the assessment. |

Activities 1.1–1.3 were completed in the timescale planned. The team completed Activities 1.1 and 1.2 using desk research, key informant phone interviews, and a two-and-a-half-week

research trip to Southern Africa in September 2018, conducting 49 in-person interviews and 10 interviews via telephone with a total of 89 representatives from government ministries, wildlife authorities, anti-corruption commissions, financial intelligence units, central banks, commercial bank compliance officers, international organisations, NGOs and major donors (Annex 5-7). Findings on the scale, dynamics and impacts of illicit money flows tied to IWT in Malawi, Zambia and Mozambique (1.1) and the capacity in place to address them were then mapped and analysed thereby completing Activity 1.2.

This mapping exercise documented and analysed existing local capacity in wildlife, law-enforcement, financial and other institutions to tackle wildlife-linked illicit financial flows in each country, thereby completing Activity 1.1-1.2. In keeping with the findings of project Follow the Money I (IWT021), this assessment concluded that financial investigations are rarely conducted in crimes connected to IWT across Zambia, Malawi and Mozambique. Indeed, the baseline capacity to both investigate and prosecute IWT as a financial crime is extremely low, although it should be noted Malawi’s Financial Intelligence Authority does conduct typology monitoring on IWT as a financial crime. This assessment confirmed that the required enthusiasm and financial crime architecture needed to carry out such prosecutions and the training programmes would be useful if tailored to local requirements.

These findings were then shared in accordance with the deliverables detailed in Activity 1.3. The findings were made possible through the publication of a series of articles on IWT and financial investigations; an internal research report made available to trainers; at least two high profile speaking engagements publicly disseminating the findings, and a series of closed-door briefings with a strategic selection of in-country donors and organisations working on illicit financial flows more broadly, and IWT specifically (Annex 21). See specifically *BBC News*, ‘[Pangolin Survival: How “Following the Money” Could Save Lives](#)’ (over 230,000 views), and *RUSI.org*, ‘[A Missing Page: Strengthening the Response to the Illegal Wildlife Trade](#)’ (MoV 1.1-1.3, Annex 22), alongside other dissemination activities documented in Section 3.2. Each of these outputs used and publicised evidence from Activities 1.1-1.2, thereby completing Activity 1.3 in the expected timeframe.

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| 2.1 – Collaborative design and elaboration of tailored domestic- and transnational-level training modules for Malawi, Mozambique and Zambia, and sharing of modules with all project partners and relevant Malawian, Mozambican and Zambian agencies. |
| 2.2 – Convening of all relevant public-sector agencies and private-sector institutions for the training courses in Malawi, Mozambique and Zambia, confirming exact participants, venues and all other logistics. |
| 2.3 – Delivery of three, 7-day hands-on multi-agency training courses in Malawi, Mozambique and Zambia – involving both public and private sectors in each country. |

Activities 2.1-2.3 were completed in the time planned. Under Activity 2.1-2.2, project partners, technical experts and local in-country partners provided input and feedback on the design and content of modules, which were circulated and amended multiple times based on feedback (Annex 8-10). Based upon this feedback, the course was designed as a 7-day curriculum, as follows:

- Days 1-4: Public-sector only
- Day 5: 1-day private-sector workshop (with attendance of FIU and Central Bank)
- Day 6: 1-day mixed public-private workshop
- Days 7: Civil society/partner day

Under Activity 2.1, the training agenda was designed to include theoretical sessions on the fundamentals of AML, local AML regimes and dynamics of IWT, as well as practical sessions on investigative tactics and strategies and how to handle financial evidence. Group exercises were designed to include locally relevant case studies provided by EIA. These exercises facilitated active learning by requiring trainees to interact, and to enact and recall the theoretical/technical content learned. All content was designed flexibly, with modifications by country (see Annexes 8-10, 21). To facilitate peer-to-peer learning and knowledge exchange, the course included as many presentations as possible by local presenters of a mixed-gender (Annex 8-10, Section 8).

Under Activity 2.2, the project team arranged the logistical components of the training courses in Malawi, Mozambique and Zambia. This process involved venue selection, financial negotiation

to achieve money-saving economies of scale, and arrangements for participant transport. It also involved significant speaker liaison with local participants, coaching them on what to include in their presentations and responding to participant and partner queries within a 24-hour timeframe (Annex 9). The project allocated significant resources to consultation with local partners in order to set a locally appropriate per diem rate for participants (Annex 11).

To guarantee attendance from all relevant local agencies, the team formed strategic partnerships with the Directors of each local wildlife authority and financial intelligence unit. These local leaders felt the course would be very useful, and therefore endorsed the training by co-sponsoring and delivering the invitations (Annex 11). High levels of attendance were the result of the number of staff hours devoted to course organisation under Activity 2.2, as reflected in approved change requests to reallocate staff time within the budget (Section 9). Overall, the three workshops in Activity 2.3 trained 159 delegates, versus the 105 delegates (35 per course, MoV 2.1) expected in the application – a 51% increase on initial targets.

Activity 2.3 was completed in the timeframe as expected, with three 7-day courses over an intensive 8-week period between January-March 2019. In Zambia, expected attendance (35 people total) was exceeded by 65%, with 58 people trained in total across the public and private sector (MoV 2.1). In total, the training was delivered to 38 delegates from 9 government agencies and 20 delegates from 11 banks in Zambia (Annex 12). Public-sector trainees hailed from the Anti-Corruption Commission, Drug Enforcement Commission (DEC), National Prosecution Authority, Financial Intelligence Centre (FIC), Department of National Parks and Wildlife (DNPW), Zambia Revenue Authority (ZRA), Zambia Police Service and Bank of Zambia. Private sector trainees came from financial institutions with a global, regional and local-only footprint, from the Bank of China through to ZANACO. Engagement (public and private) was highly positive, with clear appetite for the training and excellent feedback (Annexes 18, 21).

The impact of the training was also increased by the broad geographical spread of participants, whose places of work originated across Zambia, in locations including North Luangwa National Park, South Luangwa National Park, Lusaka and Chilanga. In Zambia, the project also secured a notable achievement by working with Rooikat, a non-partner NGO based in Namibia, to facilitate two Namibian participants to attend; one from the FIU and the other from the Namibian Police Service (Annex 12). This added considerable value to the course: Namibia's FIU is regional a leader on IWT as a financial crime and is in charge of preparing the next iteration of the ESAAMLG regional typologies report (Section 3.4). These participants shared cross border best practices and standard operating procedures, providing excellent feedback about the utility of the course (Annex 18, 21, MoV 2.2).

In Zambia, public sector pre- and post-surveys demonstrated clear learning outcomes (MoV 2.1, Annex 18, 21). Following the training, the responses demonstrated an increase in awareness, understanding, and knowledge of financial investigation tools and how they can be used in combating IWT (Annexes 18, 21): on average, self-reported understanding of the financial investigation tools available to combat IWT jumped from 2.6/5 pre-course to 4.1/5 post-course. Participants also demonstrated new understanding around the methods used to launder proceeds of IWT; notably, awareness of the use of mobile money to move proceeds grew by 27%, from 44% pre-course to 71% post-course. Awareness of the obligation of lawyers and accountants to report to the FIC also grew substantially from 47% to 70%.

Public sector participants also showed signs of advanced learning, with mean results for 'knowledge of how asset forfeiture can be used against IWT' rising from an average of 2.5/5 pre-course to 4.4/5 post-course. Finally, aggregate course satisfaction ratings (measured variables included: training topics, content, discussion quality, quality of group exercises, quality of presentations and clear and effective communication) were high: averaging 4.79/ 5 for the public sector. Long form comments mirrored these findings (Annex 21).

Private sector pre- and post-surveys also demonstrated clear learning outcomes (MoV 2.1). On average, self-reported understanding of the financial investigation tools/financial flows related to IWT increased from 3.6 to 4.1 out of 5. Participants also demonstrated new understanding around the methods used to launder proceeds of IWT; awareness of the use of mobile money to launder

IWT profits increased from 71% to 100%; awareness of the use of cash from 88% to 93%; and awareness of use of informal money transfers remained the same at 71%. Overall satisfaction rates were high, with an average rating of 4.73/5 (Annex 18, 21).

In Malawi, expected attendance (35 people total) was exceeded by 45%, with 51 delegates trained in total across the public and private sector (MoV 2.1). In total, the training was delivered to 34 delegates from 7 government agencies and 17 delegates from 11 financial institutions in Malawi (Annex 13). Public-sector trainees hailed from the Anti-Corruption Bureau, Financial Intelligence Authority, Department of National Parks and Wildlife, Department of Forestry, Department of Public Prosecutions, Malawi Revenue Authority and the Reserve Bank of Malawi. The impact of the training was increased by the fact that participants' geographical portfolios and places of work ranged across the country, in locations including Lilongwe, Mzuzu, and Blantyre.

Of the three countries, the strategic assessment (Activity 1.1-1.2) established that Malawi had the highest base level of institutional capacity to combat IWT: a multi-agency taskforce was set up in 2014, and Malawi's Financial Intelligence Authority has included typologies related to IWT in its National Risk Assessment (unpublished) and [2017/2018 Trends and Typologies](#) report. Nonetheless, there was a clear lack of familiarity in DNPW and with the role of the FIA and how to leverage this knowledge in future investigations. In sum, this architecture lacked the knowledge on how to initiate and conduct a financial investigation.

In this regard, pre- and post-course surveys completed by Malawian delegates demonstrated clear learning outcomes that will contribute to deploying this architecture in future IWT investigations (Annex 19, 21): in particular, the differences between self-reported responses before and after training reveal an improvement in participants' understanding of the functions of a FIU, and the entities that are required to report to a FIU, as well as the role of financial intelligence in IWT investigations. Awareness of the duty of the FIA to respond to law enforcement requests rose from 80% to 100%. Likewise, awareness that the FIA could advise on what makes a transaction suspicious rose from 40% pre-course to 79% post-course. Knowledge of the need for bodies other than banks to report to an FIU also rose: in the case of money remittance companies from 63% to 88% and for bureaux de change from 67% to 85%. Finally, aggregate course satisfaction ratings (measured variables consistent across all courses including: training topics, content, discussion quality, quality of group exercises, quality of presentations and clear and effective communication) were high: averaging 4.42/5 for the public sector. Long form comments mirrored these findings (Annex 21).

Private sector pre- and post-surveys in Malawi also demonstrated clear learning outcomes (MoV 2.1, Section 19, 21). Self-reported understanding of how the public and private sector can work together against IWT rose from 2.6 to 4.5 out of 5. Likewise, awareness of the challenges facing the public sector in responding to IWT – a key component of building understanding between the two sectors – rose from 2.4 to 4.6/5 in pre- and post-course questionnaires. Participants also showed increased awareness of the methods used to move the proceeds of crime generated by IWT; a 35% increase in number of participants were able to identify cash as a key source of illicit financial flows. Meanwhile, awareness of the potential to detect IWT-proceeds in the formal banking system rose from 53% to 63%. Qualitative feedback from the private sector in Malawi was consistently positive (Annex 21).

In Mozambique, expected attendance (35 people total) was exceeded by 42%, with 50 delegates trained in total across the public and private sector (MoV 2.1). In total, the training was delivered to 24 participants from 9 government agencies and 26 participants from 16 financial institutions (Annex 14). Public-sector trainees hailed from the central bank, FIU, revenue and customs, judiciary, prosecutions, marine investigations and the criminal investigations police (see Annex 14 for relevant institute names in Portuguese).

In Mozambique, the training was particularly successful in attracting high level attendees, including the Governor of the Banco de Moçambique, who delivered a keynote speech on Day 6, and the Director of Revenue and Customs, who attended for a full afternoon of the course on Day 4 (Annex 14, 17). The U.S. Embassy Environment, Science, Technology, and Health Officer also audited the course, providing positive verbal feedback. Notably, the course was

attended by three judges (Zvika Cossa, Samuel Artur and Acácio Mitilage) – a major achievement as the judiciary are essential in the success of financial prosecutions. It is also evidence of the demand-driven nature of this project, because RUSI was approached by the Tribunal Supremo to include participants from the judiciary after they heard about the comprehensive content of the course. The impact of the training was increased by the fact that participants’ geographical portfolios and places of work in locations including Maputo, Matutuine District and Matola.

In Mozambique, public sector pre- and post-surveys demonstrated clear learning outcomes (MoV 2.1, Annex 20, 21): on average, self-reported understanding of the financial investigation tools/financial flows available to combat IWT jumped from 2.8/5 pre-course to 4.0/5 post-course. Notably, self-reported awareness of the potential utility to use anti-money laundering tools in IWT investigations increased from 2.85/5 pre-course to 4.3/5 post-course. Participants showed clear learning objectives around the functions of an FIU. Awareness of the duty of an FIU to respond to law enforcement requests rose from 46% to 54%. Awareness of the capacity of the FIU to evaluate and analyse STRs rose from 71% to 96%.

Of the three countries, Mozambique was assessed as having the lowest capacity and least developed knowledge base regarding illicit financial flows linked to IWT (Activity 1.1-1.2), so these results are considered highly significant. Finally, aggregate course satisfaction ratings (measured variables including: training topics, content, discussion quality, quality of group exercises, quality of presentations and clear and effective communication) were high: averaging 4.42 out of 5 for the public sector. Long form comments mirrored these findings (Annex 21).

Private sector participants in Mozambique also demonstrated learning outcomes on their pre- and post-course surveys and provided excellent long form feedback on the utility of the course (Annex 20, 21): self-reported understanding of how the public and private sector can work together against IWT rose from 2.8 to 4.15 out of 5. Following the training, the responses demonstrated an increase in awareness, understanding, and knowledge of financial investigation tools and how they can be used in combating IWT. Self-reported understanding of the financial flows and trends associated with IWT rose from 2.55 to 4.05 out of 5; following the Barclays presentation, the role of the formal banking system in handling the proceeds of IWT increased considerably from 22% to 47.5%.

It should be noted, however, that this survey data should not be used to compared progress across Mozambique, Malawi and Zambia as each country started at a different baseline capacity level (as established in Activities 1.1-1.3). The data is also incomparable because the questions are translated differently across Portuguese and English. Nonetheless, across each country individually, these pre- and post-course surveys have internal validity and reliability. As a result, pre- and post-surveys can be used to assess progress before and after the training (MoV 2.1, see Section 9 for a detailed explanation).

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| 3.1 – Collaborative design and documentation of six tailored e-learning courses and six rapid-reference guides for each country to endure beyond the training’s end. |
| 3.2 – Outreach to all relevant public-sector training departments for the provision of the resources to those institutions. |
| 3.3 – Transferral by email or in person (by the core project team or by project partners) as appropriate of the six tailored e-learning courses and six rapid-reference guides to key public-sector training departments, with information provided in the way in which the resources should be used, thereby reaching staff of law enforcement agencies not directly involved in training. |

Activities 3.1-3.3 are scheduled for the second year of the project, running from April 2019 to September 2019. Under an approved change request submitted in March 2019, this Annual Report has been submitted by May 31th 2019. This extension was approved because the project only finished implementing Activities 2.1-2.3 at the end of March. As a result, at the time of writing, progress is underway on Activity 3.1 but is not documented in this Annual Report, which only covers the period between April 2018-March 2019.

3.2 Progress towards project Outputs

Output 1: A detailed strategic assessment provides a clear picture of existing knowledge of the problem to be tackled, in terms of the scale, dynamics and impacts (disaggregated by gender) of illicit financial flows deriving from IWT in Malawi, Mozambique and Zambia, and the capacity of relevant authorities to tackle them.

The baseline was one of limited published knowledge on financial flows linked to IWT in Southern Africa. No academic papers covered the topic explicitly and where information was available, it was touched upon only in generic terms. One notable exception was the work performed by Malawi's Financial Intelligence Authority on the money laundering and terrorist financing risk posed by IWT, documented in both their National Risk Assessment (not publicly available) and [Typologies Report 2017/18](#). These documents identified wildlife crime, and environmental crime more broadly, as a medium level 'emergent threat'.

In line with MoV 1.1, Output 1 has been achieved with the publication of a series of articles containing publishable findings from the strategic assessment (Activities 1.1-1.2). This includes the publication of a *BBC News* article ahead of the London Conference on Wildlife Trafficking in October 2018, '[Pangolin Survival: How "Following the Money" Could Save Lives](#)' which received over 276,000 views from a diverse national audience (Annex 22). The project also published a well-received Commentary on these findings published on *RUSI.org*, '[A Missing Page: Strengthening the Response to the Illegal Wildlife Trade](#)' which received 636 views to date (ibid).

The project team has also disseminated the findings by speaking at two high profile events. Tom Keatinge delivered a [keynote speech](#) at the London Conference on IWT, whilst Cathy Haenlein moderated a panel in the main hall on '[Corruption and illegal wildlife trade: how to tackle it](#)' which covered financial approaches extensively with evidence from the project. In addition, RUSI hosted an event on '[The Wildlife Trafficking-Security Nexus: Targeting the Organised Crime Threat](#)' ([YouTube views: 285](#)) which was chaired by former-Foreign Secretary William Hague and welcomed 108 high-level attendees, including senior figures from the National Crime Agency, US Department for the Interior and the Director of the UK Financial Intelligence Unit (**attendees confidential**).

In line with Indicator and MoV 1.2, these pieces were widely shared across social media and became embedded across several other publications and websites, including a [Reddit thread](#) devoted to pangolin survival, the local radio show [Ghana Waves](#) (audio programme expired), [The Marshall Centre's](#) weekly analysis of transnational organised crime trends, the [U.S. Congress Task Force on Anti-Terrorism and Proliferation Finance](#) website, and an [MSN news article](#) detailing this approach in the context of the seizure of 1000 elephant tusks and eight tonnes of pangolin scales in Hong Kong in February 2019. Based on the findings of Activity 1.1 and the wider findings of project IWT021, the project staff also contributed to news reports such as '[Illegal Wildlife Trade's "Dirty Money" Targeted by Big Banks](#)' on Mongabay and '[UK Launches Taskforce to Clamp Down on Illegal Wildlife Trade](#)' in *The National* (based in UAE) (Annex 22).

This feeds into Indicator and MoV 1.3, whereby findings are recognised by relevant international and governmental agencies and incorporated into planning. The project has been particularly successful in influencing the content of IWT training programme delivered by [the Conference of Western Attorneys General \(CWAG\) Africa Alliance Partnership](#), who have begun to think about how to incorporate a financial approach in their trainings in locations including Malawi, Uganda and Zambia. This is significant progress as the CWAG AAP team have in-country offices with year-round programming on IWT, which helps to secure the longevity of this project's results. Leadership at the *Zambian Financial Intelligence Centre* have also expressed interest in including wildlife crime in their typology report and have provided a letter of support to RUSI for follow up funding to complete this activity and further case reviews (letter available upon request).

The team have also delivered closed door briefings on the findings of the strategic assessment to funders involved in IWT programming in Southern Africa, including Oak Foundation and Deutsche Gesellschaft für internationale Zusammenarbeit (GIZ) GmbH. RUSI has also shared the findings of the strategic assessment with the United for Wildlife Financial Taskforce. Additionally, two members of the project team were invited to privately brief the Director of

Revenue and Customs in Mozambique on the state of IWT and financial approaches during the training course. During Activity 1.1, the project team also engaged with the Country Director of the World Bank in Zambia to encourage the office to incorporate wildlife trafficking into the upcoming assistance provided as part of the next mutual evaluation on money-laundering, a key recommendation of the Occasional Paper produced during IWT021 (Annex 5, 7).

Output 2. Relevant financial, field and other officers from law-enforcement agencies, the private sector and NGOs in Malawi, Mozambique and Zambia are specifically trained to more effectively collect, share and report on financial intelligence, facilitating high-level domestic and transnational investigations and prosecutions in each country.

The baseline condition as assessed by the project team under Activities 1.1-1.3 (Output 1) was one in which local law enforcement officers lacked the capacity, skills and knowledge required to conduct financial investigations in IWT cases. In particular, local law enforcement lacked confidence in their capacity to learn how to collect, disseminate and report financial intelligence. They also lacked the multi-agency co-working practices to conduct financial investigations effectively, including in Malawi where an inter-agency taskforce exists. Financial investigations and prosecutions were commonly seen as a specialist area beyond the capacity, authority and resourcing of local wildlife agencies. With the completion of Output 2, this has fundamentally improved and self-reported capacity has grown significantly, as demonstrated by written feedback and the results of pre- and post-course surveys in all three countries (MoV 2.1, Annexes 18-21).

Output 2 has been achieved through the delivery of 21 days' training across the public, private and civil society sector in Mozambique, Malawi and Zambia (MoV 2.1). Under Indicator and MoV 2.1, the project committed to training at least 35 individuals from three public-sector agencies and five financial institutions in each country. This target was met and exceeded, with 159 participants trained in total, from 25 public sector agencies and 38 financial institutions across the three countries (Annexes 12-14). In line with MoV 2.1, capacity has increased significantly as demonstrated by results of pre- and post-training evaluation surveys completed by participants to measure impact of the training (Annex 18-21). For a detailed discussion of the results of these survey results, please see Section 3.1 of this report. Other MoV for the 21 days' training delivered include project notes, photos, agendas, delegate lists and pre-/post-surveys, which can be seen in Annexes 8-21.

As per the approved Change Request submitted in February 2019, the project's consultation with local partners established that it would not be feasible to produce Standard Operating Procedures within the project's timeframe (Section 9). Instead, in line with the revised Indicator 2.2, the project therefore focussed on potential options for standardised procedures and the dissemination of best practice through the training (Annex 8, 10, 18-21.) Based on MoV 2.2, this was judged to be a successful approach, with long-form feedback from participants reflecting the utility of discussions around these topics (Annex 21). Finally, in line with Indicator and MoV 2.3, all public-sector agencies that took part in training have assigned a 'champion' to ensure continued inter-agency collaboration in relation to the topic after the end of the courses. These appointments can be verified through email contact with attendees and a review of the post-course participant surveys (Annex 18-21).

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.

Activities 3.1-3.3 are scheduled for the second year of the project, running between April 2019 to September 2019. At the time of writing, progress is underway on Activity 3.1 but is not documented in this Annual Report as it falls outside of the April 2018-2019 reporting period. The project is confident that the highly successful nature of activities carried out to achieve Output 1 and 2 has laid an excellent foundation for the achievement of Output 3.

3.3 Progress towards the project Outcome

Training delivered in Malawi, Mozambique and Zambia, and written outputs produced in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda improve capacity to investigate

and prosecute financial crime linked to IWT, domestically and internationally. This disrupts trafficking networks, resulting in a fall in poaching and rise in wildlife tourism, benefiting communities.

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. In all three countries, no best practice written guidelines existed, with wildlife agencies and FIUs or anti-money laundering units found to have no effective or regular contact. Local law enforcement officers lacked the capacity, skills and knowledge required to conduct financial investigations in IWT cases. They also lacked the multi-agency co-working practices to conduct financial investigations effectively. This baseline condition was hindering current efforts to reduce poaching and protect wildlife tourism revenues for local communities.

This situation has been positively transformed by the project: to date, 21 days of training have been provided in Malawi, Mozambique and Zambia, leading to significant progress on Outcome Indicator 0.1. This outcome has been achieved and results have exceeded expectations. In line with MI and MoV 0.1, capacity has increased significantly as demonstrated by results of pre- and post-training evaluation surveys completed by participants in order to measure the impact of the training (Annexes 18-21). Overall, the three workshops trained 159 delegates, versus the 105 delegates expected in the application (35 per course, MI/MoV 0.1) – exceeding the target by 51%. In Zambia, expected attendance (35 people total) was exceeded by 65%, with 58 people trained in total across the public and private sector (MI/MoV 0.1). In Malawi, expected attendance (35 people total) was exceeded by 45%, with 51 delegates trained in total across the public and private sector (MI/MoV 0.1). In Mozambique, expected attendance (35 people total) was exceeded by 42%, with 50 delegates trained in total across the public and private sector (MI/MoV 0.1).

MI/MoV 0.1 demonstrated significant learning around tools required for both successful investigation *and* prosecution, helping to achieve Outcome 0.1. In Malawi and Zambia, post-course surveys showed learning around the methods and money flows requiring investigation, as well as the financial legislation that can be used to prosecute IWT cases (Annex 18-19, 21). In Zambia, for example, participants showed signs of advanced learning, with mean results for ‘knowledge of how asset forfeiture can be used against IWT’ rising from an average of 2.5/5 pre-course to 4.4/5 post-course. For a detailed discussion of the results of these survey results, please see Section 3.1-3.2 of this report. Progress demonstrated by the post-course survey results in Mozambique were considered extremely positive, as Mozambique was assessed as having the lowest capacity and least developed knowledge base regarding illicit financial flows linked to IWT (Annexes 20-21). For a detailed discussion of Outcome MI 0.1, see Section 3.1-3.2. It should be noted, however, that this survey data should not be used to compare progress across Mozambique, Malawi and Zambia as each country started at a different baseline capacity level (see Section 9 for a detailed explanation).

Measurable Indicators and MoV 0.2 and 0.3 are longer term indicators for the project outcome, which require the completion of Output 3 and Activities 3.1-3.3 in the second year. Activities 3.1-3.3 will produce outputs in the form of six tailored rapid reference guides and e-learning resource available to law enforcement in Tanzania, Kenya, Uganda, Mozambique, Zambia and Malawi. At the time of writing, project work has begun on the production of the rapid reference guides, and the project is confident that it will meet Measurable Indicator and MoV 0.2 and provide ‘access to dedicated written rapid reference guides and e-learning courses to guide the use of financial investigation tools in response to IWT at both domestic and international levels.’ The project is therefore on track to meet its ultimate outcome, although it may wish to amend MI 0.3 in the second year of the project, as the ‘presentation and inclusion of financial evidence gathered in 50% of new court cases’ is not a feasible achievement for the project given unexpectedly low capacity amongst local agencies. Please see Section 9 for a discussion of whether MI 0.3 is appropriate for the project.

3.4 Monitoring of assumptions

‘The Malawian, Mozambican, Zambian, Kenyan, Tanzanian and Ugandan governments remain committed to improving their anti-money laundering regimes to meet international standards,

and remain committed to the fight against IWT.'

This assumption holds true. The expected commitment of all parties involved in this project has been reinforced by the presence of IWT on the agenda of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG). ESAAMLG met in the Seychelles in September 2018, where a session of the 4th ESAAMLG Public-Private Sector Dialogue (PPSD) discussed improving approaches to IWT. Led by Namibia, the group are currently updating the typologies in the 2016 ESAAMLG study on Poaching and Illegal Trade in Wildlife and Wildlife Products and Associated Money Laundering in the ESAAMLG Region. As the regional FATF body responsible for coordinating the mutual evaluations of the six countries, this has guaranteed a high level of commitment from the partner countries. As expected, this project has benefitted from high levels of motivation amongst all participants to meet these standards.

'Increased numbers of effective investigations and prosecutions in Malawi, Mozambique Zambia, Kenya, Tanzania and Uganda create a sufficiently high-risk environment to result in fewer instances of poaching and wildlife trafficking.'

This assumption holds true. Although a limited number of high-level prosecutions have taken place in the region (only 1 high-level trafficker has been prosecuted in Kenya and the [Kromah case](#) is ongoing in Uganda), where they occur more regularly, they will impact the risk-reward calculus of traffickers. When one country begins to consistently prosecute 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: see ['The Extinction Market' by scholar Vanda Felbab-Brown](#) and recent analysis of heroin [trafficking](#) in East and Southern Africa by the Global Initiative. Furthermore, Traffic have noted that increased IWT enforcement action in East Africa has recently [displaced](#) smuggling activity to West Africa. This is corroborated by [UNODC](#), who also observe relate this displacement effect to the methodologies used by wildlife traffickers.

'Reduced poaching rates will lead to higher numbers of elephants, rhinos and pangolins in the relevant areas of Malawi, Mozambique Zambia, Kenya, Tanzania and Uganda.'

This assumption holds partially true but varies across the six countries involved in the project, as shown by the most reliable system 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. Where scores decline and poaching rates drop below birth rates, elephant numbers increase. The same holds true for rhinos, however, further research is required on pangolins. The 2018 report to the CITES Standing Committee noted that the reported levels of illegal killing across Africa remain of concern, with a PIKE value of more than 0.5 at the continental level. This means that in 2017 a greater number of elephant carcasses were attributed to illegal killing than to natural causes. At the [sub-regional level](#), the PIKE estimate in Eastern Africa declined whilst it rose in Southern Africa during the same period. It must be noted, however, that poaching is not an independent variable for population recovery rates. These are co-dependent on other factors including [habitat destruction and climate change](#). Burn et al. (2011) found that if adverse environmental conditions cause high mortality while the true poaching rate remains constant, the PIKE will be lower. This can independently impact recovery rates regardless of a fall in poaching due to more effect law enforcement activity.

'Increased numbers of wildlife, particularly of elephants and rhinos, will result in an increase in wildlife tourism in Malawi, Mozambique Zambia, Kenya, Tanzania and Uganda.'

This assumption holds true 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. Countries in East and Southern Africa are known as the world's top destinations for the so-called "Big Five" (African Elephant, Cape Buffalo, leopard, lion and rhinoceros). Apart from the Cape Buffalo, all of these are threatened by poaching. Tourists visit this area specifically to see these Big Five charismatic animals, therefore tourism experts issue regular warnings on the impacts of poaching on tourist visits. In March 2017, WWF warned that Africa's [tourism sector is losing around \\$25 million each year](#) to elephant poaching and the World Tourism Organisation notes that 'poaching is

seen as a serious problem that has negative impacts on tourism that threatens the sector's long-term sustainability and its development opportunities.'

Output-level assumptions:

'The security situation in target research areas will allow training activities to take place.'

This has held true in all three countries, evidenced by the safe delivery of 21-days of training across Mozambique, Malawi and Zambia. Nonetheless, the project made several decisions based on mitigating any potential security risks to participants and project staff. As a result, the civil society/partner training day was heavily tailored by jurisdiction to minimise any risks to the participants. Based upon the security advice of project partners and RUSI's experience delivering IWT021 with Wayne Lotter of PAMS Foundation, it was decided to limit the civil society day of training to partner organisations only. This was decided because of the sensitive nature of the topic under discussion, including findings from Activities 1.1-1.2.

'Researchers are able to engage with experts, policy-makers and practitioners in each target country who are sufficiently open and honest as to allow researchers to deliver an accurate assessment of wildlife-linked illicit financial flows and the capacity that exists to tackle them.'

This assumption holds true, as evidenced by the high level of participation in Activities 1.1-1.3 across all major relevant agencies in the three countries. The project completed 49 in-person interviews and 10 interviews by telephone with a total of 89 representatives across government ministries, wildlife authorities, anti-corruption commissions, financial intelligence units, central banks, commercial bank compliance officers, international organisations, NGOs and major donors (Annex 5-7). Local agencies also shared official sensitive documents with the project to inform the content of the training, such as unpublished National Risk Assessments (**confidential**).

'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 holds true. The capacity of trainees to absorb new approaches and their openness to inter-agency, multi-sector training is testified by high attendance levels, project notes and course feedback. Across all three sectors, trainees expressed a strong desire to cooperate and to gain the tools to actively follow financial leads. Evidence can be found in records of discussions and feedback in pre-/post-surveys (Annexes 18-21).

'Relevant public-sector agencies, financial institutions and NGOs in Malawi, Mozambique and Zambia see the value of participation in the project and are prepared to engage.'

This assumption holds true, as evidenced by the high level of participation in Output 2 across all major relevant agencies in the three countries. Overall, the three workshops trained 159 delegates, versus the 105 delegates (35 per course, MoV 2.1) expected in the application – a 51% increase on initial expectations (Annexes 12-14).

'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 holds true: all courses have been designed flexibly to allow adaptation should legislative or regulatory changes take effect between design and delivery. Any risks to this assumption were mitigated by involving local stakeholders in both the design and delivery of the course. For this reason, key sessions on local anti-money laundering regimes, or SOPs in IWT prosecutions were led by local agencies across all three courses, ensuring the most accurate and contemporary interpretation of regulatory and legislative guidance was disseminated to the participants (Annexes 18-21).

'In-depth knowledge on the part of project leaders and partners allows selection of suitable participants.'

This assumption holds true, as evidenced by the fact all participants at the training were suitably qualified, interested and an appropriate mixture of seniority to guarantee operational, tactical and strategic impact (Annexes 12-14, 21).

'Relevant departments of at least 12 law enforcement agencies (2 per country) in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda see the value of participation in the project and are prepared to engage.'

This assumption holds true and expected engagement levels were exceeded. In Zambia, training was delivered to 19 delegates from 5 law enforcement agencies; in Malawi, training was delivered to 16 delegates from 4 law enforcement agencies; in Mozambique, training was delivered to 6 delegates from 3 law enforcement agencies. Please note that does not include government bodies/agencies that are not categorised as 'law enforcement agencies' such as department of public prosecutions, financial intelligence units, central banks or other institutions without the power of arrest (Annexes 12-14).

'Law-enforcement agencies, both at a national and international level, welcome the production, documentation and launch of best practice via the e-learning course and rapid-reference guide.'

This assumption holds true but will be subject to progress on Output 3 which begins after the submission of this report. All correspondence with relevant agencies to date has supported this assumption.

'The security situation in target countries allows the uptake and use of the materials developed.'

This assumption holds true and is a focal point for consistent M&E. Correspondence with trained delegates and continued engagement with leaders of local agencies suggest that the security situation in the target countries has allowed for the uptake of the skills and principles delivered during Output 2. The uptake of the materials developed in the form of the rapid reference guides will be subject to progress on Output 3 which begins following the submission of this report, however, all correspondence with relevant agencies to date has supported this.

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

The project contributes to ending IWT and poverty alleviation in several ways. Firstly, it contributes to a higher-level impact on IWT by providing the tools to allow more effective investigation and prosecution of *mid-* and *high-level* perpetrators. This is crucial to disrupting the true beneficiaries of IWT, who never physically touch the products but profit from and therefore ultimately perpetuate the trade. Without these tools, law enforcement is limited to disrupting easily replaceable poachers on the ground, thus not sustainably reducing IWT and enabling citizens to benefit from revenues derived from local wildlife resources (Section 3.4, Section 7).

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 4 key areas in East and Southern Africa, which have been outlined in various sections in this report, but together contribute to the higher-level impact. First, the project has contributed to improving relationships and communications between wildlife investigators/prosecutors, financial crime authorities and the private sector (Annex 18-21). Second, it has contributed to raising awareness in the private sector of IWT as a financial crime risk, which they have a legal compliance duty to monitor (Annexes 18-21). Third, it has contributed to improving understanding of the value and use of financial investigation tools among the public sector (Annexes 18-21). Fourth, it has provided confidence in the potential of using asset recovery in IWT cases in the future (Annexes 18-21) – these recovered funds can be recovered by the state and used to contribute significantly to poverty alleviation and development. More detailed evidence for each is given throughout the report and annexes; together they further progress towards this Impact.

Such processes, however, do not manifest themselves immediately; the fact that no notable achievements can yet be seen is inevitable given the timelines for such change. The project is confident that it can contribute to such long-lasting change through the production of Output 3, in the form of e-learning and reference guides detailing best-practice for policy and practitioner communities. This will produce further beneficiaries beyond the individuals trained, their colleagues in enforcement and other agencies, and those in other source countries who could benefit from the resources and the embedding into national planning of their recommendations.

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

Evidence that the project is supporting the second IWT Challenge Fund objective can be found in all training activities run to date (Annexes 5-22). In contributing to 'strengthening law enforcement and the role of the criminal justice system', these activities support commitments IX, X, XI, XII, XV, XVI of the London Declaration on IWT and 4 and 5 of the Kasane Statement. It should also be noted that discussions and speeches by senior figures at the 2014 and 2018 London Conferences on the Illegal Wildlife Trade placed significant emphasis on encouraging the uptake of financial approaches to IWT.

Achievements against these commitments can be measured quantitatively and qualitatively. In quantitative terms, the project exceeded objectives in the assessment and training phases: in the first phase, courses were attended by substantially more than the 35 delegates targeted in the proposal (MoV 2.1) – 58 in Zambia, 51 in Malawi, and 50 in Mozambique – from a broader range of agencies and financial institutions than anticipated. This resulted in excellent participant feedback and self-reported learning outcomes, including advanced learning around techniques and concepts such as asset confiscation (Annex 18-21).

In qualitative terms, this broad participant base allowed for a higher quality of inter-agency, cross-sector dialogue, the achievement of clear learning outcomes, and positive trainee feedback (Annex 21). Four specific results can be attributed to this in the six countries served by the project. First, the project has contributed to improving relationships between wildlife and financial crime agencies (Annex 18-21). Second, it has contributed to raising awareness of IWT as a financial crime risk in a larger number of financial institutions than expected, including mobile money operators and deposit taking micro-finance institutions (Annexes 12-14, 18-21). Third, it has contributed to improving knowledge of the value of financial tools in the public sector (ibid.) Fourth, the project has engaged and upskilled their partner NGO institutions in how they can support their local partners in the use of financial tools.

6. Impact on species in focus

The project will have a long-term impact on elephants and rhinos, as well as pangolins. Please note that across the six target countries, the project will also have secondary effects on other endangered species targeted by IWT such as African grey parrots or rosewood trafficking. This will occur as enhanced capacity to investigate and prosecute high-level traffickers disrupts organised criminal activity at a higher level, resulting in fewer contracted killings by poachers at the source level. This will lead to a decreased level of poaching and a rise in elephant, rhino and pangolin numbers. This will occur as deaths from poaching decline as a proportion of total mortality, and as birth rates exceed poaching rates in affected species (Section 3.4).

These impacts will be felt differently across the six focus countries. This is in part because of the distribution of existing wildlife populations and other concomitant threats to these species. For example, whilst [Uganda has only 20 rhinos](#), [Kenya's 1,140-strong population](#) is the third largest after South Africa and Namibia. Population distributions also differ considerably across single countries: in Zambia, the most recent Great Elephant Census confirmed elephant numbers were [stable or increasing](#) in the two largest elephant landscapes, Luangwa and Kafue. Sioma Ngwezi National Park, by comparison, showed a carcass ratio of 85 percent during the same time period (2-8% is considered normal for a stable or increasing population).

The diversity of this baseline is replicated for pangolins. There are 4 species of African pangolin which live across the several of the countries targeted by this project, including Zambia, Mozambique, Tanzania and Uganda. All four species of African pangolin are listed as Critically Endangered, Endangered or Vulnerable in the [IUCN Red List of Threatened Species](#). Based on reported global seizures between 2011 and 2013, an estimated [116,990-233,980 pangolins](#) were killed.

In terms of rhino, pangolin and elephant numbers, the project's impact on species recovery will be most significant where poaching losses are greatest. In 2015, for example, a University of

Washington study identified Selous/Niassa in Tanzania and Mozambique as the largest savannah elephant poaching hotspot in Africa. In 2018, Mozambique's Niassa nature reserve had an estimated [1,500 elephants](#), down from a population of 12,000 in 2011. The [Great Elephant Census](#) (GEC) established a 48% decline in Mozambican elephant populations between 2010-2015. It is in this dire situation that the the project's impact is likely to be most strongly felt. For example, a count in the Selous-Mikumi area [last year](#) added up 23 carcasses of poached elephants, just 20 percent of the number found four years earlier. 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 will positively impact populations in neighbouring source countries too (Section 3.4).

Aside from current population distributions, it should also be noted that this project is only one of a number of factors that will impact upon the species in focus. Poaching rates, as measured by the PIKE index for example, are not an independent variable for measuring a species' population health and recovery. There are other threats to species recovery, such as habitat destruction and climate change that impact upon this health/recovery. This is true of rhinos, pangolins and elephants (Section 3.4).

7. Project support to poverty alleviation

This project's impacts on poverty are indirect, but there is evidence that it will contribute to poverty alleviation in the long term. In line with academic research conducted by political ecologists such as [Rosaleen Duffy et al](#) (2016), this project takes a multidimensional approach to poverty, moving beyond interpretations of poverty defined solely by material deprivation to incorporate concepts of structure and agency around decision-making in conservation. It does so by considering the impact of the project on governance and gender equality objectives as well alternative metrics for measuring impact on poverty (Section 8).

Impact on poverty alleviation will be achieved by serving a range of beneficiaries across several levels of society, including the direct recipients of training, communities in source and transit areas, and the general population. Firstly, the project will directly upskill local civil servants working in law enforcement in those locations. Secondly, the project will have a significant effect on community members living in close proximity to national wildlife resources, especially those reliant upon wildlife-derived incomes, including nature-based tourism. Owing to the geo-location of wildlife resources in rural areas, these communities often score high on vulnerability and risk matrices related to the effect of environmental degradation, including the loss of biodiversity through IWT.

By dismantling higher level figures rather than pursuing poachers on the ground, this project contributes to poverty alleviation by targeting the unequal economic incentives and vulnerability that underpins IWT. Whilst the [academic evidence](#) shows there is no common profile of the 'average poacher', it is commonly agreed that poachers involved in the actual hunt/killing of an animal on the ground have low-to-lower than average household incomes. They also commonly originate from rural areas with greater proximity to wildlife resources. The arrest and imprisonment (or worse, death) of these figures can deprive low-income households of a key economic contributor to the household. This places the food and physical security of an entire families at risk, entrenching the poverty cycle. If a principle income-earner for a household is imprisoned for a significant amount of time, or incurs a sizable fine, a household in moderate poverty could [slide into absolute poverty](#) (Knapp 2017). Deprived of capabilities, other household members may be pushed into poaching who otherwise would not be.

It will also have a macro-economic effect on poverty alleviation by contributing to a growth in wildlife tourism. In Malawi, nature-based tourism contributes 2.7% of GDP and is one of the principal foreign exchange earners for the country according to the [UNDP-UN Environment Poverty-Environment Initiative](#). Reducing poaching by increasing capacity to disrupt trafficking networks will halt the erosion of these livelihoods, contributing to the local economy, with macro-economic impacts too. According to iworry, alive an elephant can contribute up to \$ annually to the tourism industry – around \$ over its lifetime – versus a one- for its tusks (in end markets). This project works in synergy with national priorities, noting that the protection and growth rates

in wildlife resources are a baseline condition for many of the goals articulated in [five year national action plans](#) that incorporate nature-based tourism as a major source of GDP.

In line with a multidimensional approach to measuring poverty alleviation, citizens both in and beyond such immediate source areas will also benefit from the project's contribution to reversing the hollowing out of the state engendered by IWT-linked financial flows. This will [occur](#) as these flows' negative impacts on governance, rule of law and public finances gradually decline and financial integrity increases. This, in turn, will enhance public confidence in the state and improve provision of public services – to the benefit of all citizens, but particularly the most vulnerable. With this in mind, all courses emphasise concepts of good governance, the rule of law and anti-corruption and sharing best practice and raising awareness (Annex 18-21).

This project also increases structural agency as a measure of poverty alleviation by including an ambitious gender equality component to its activities. It does so with an awareness that conservation must move away from poverty defined solely by material deprivation to incorporate concepts of structure and agency around decision-making in conservation. By including a significant number of female presenters and participants in the training -- in Zambia, Malawi and Mozambique, 36%, 41% and 39% of participants were women, respectively – this project also contributes to platforming their perspectives and agency in the approach to IWT (Section 8).

In the project's lifespan however, it is not possible to track such impacts *directly* due to the substantial timeframes involved in the translation of project activities into the achievement of the higher-level impact on IWT. Despite the challenging timelines, these impacts are real and project activities will contribute to their achievement, as testified by evidence to support project assumptions (Section 3.4), namely that increased high-level investigations and prosecutions will lead to reduced poaching, which will lead to higher elephant, rhino and pangolin numbers, which will lead to expanded wildlife tourism. Where evidence for these assumptions continues to apply in future, a higher-level impact of the project will be poverty alleviation in all focus countries.

8. Consideration of gender equality issues

The project has contributed to gender equality in several ways: by analysing existing knowledge on IWT-linked financial flows through a gendered lens; by selecting training participants mindful of the gender makeup of relevant agencies; and by mainstreaming gender considerations into the project's M&E. The first of these has been the most challenging. As per the proposal, the team conducted their analysis of wildlife-linked IFFs with a gendered lens, however, the dearth of knowledge on IWT-linked IFFs in a general sense has made it difficult to break down this limited information in a meaningful way that produces a gendered dataset (Annex 5-7). As such, the team recommends that data is broken down from a gendered perspective in future analysis and typologies created by national FIUs. To compensate for this, the project team ensured that gendered knowledge was captured by interviewing a significant number of women in the strategic assessment phase. In total, women represented 30% of individuals interviewed for Output 1 (Annex 6-7).

With regards to the training, although complete parity could not be assured given the lack of qualified female staff in relevant positions, participants were selected to ensure that the benefits of training accrue as equally as possible. Here, the project was extremely successful: in Zambia, Malawi and Mozambique, 36%, 41% and 39% of participants were women respectively (Annexes 12-17). To ensure the gendered perspectives of participants in the room were widely shared, participants were required to sit on gender-mixed tables and facilitators asked for a mixture of rapporteurs from each table during group exercises (Annex 14-17).

The project also actively solicited contributions by a diversity of voices by ensuring as many presentations as possible were made by local female presenters. Trainings in Zambia and Malawi were very successful in this regard, where 25% and 40% of the local presenters were women respectively (Annex 12-17). In Mozambique, only 14% of the local presenters were women, but the project was satisfied that there were other notable achievements at the training such as the fact that 6 out of 8 attendees from the public prosecutor's office in Mozambique were women (Annex 14). Overall, RUSI sees this as a notable achievement, in light of the continued male dominance of many of these agencies.

Finally, the project also led by example by ensuring gender parity in staff its in-country frontline roles. In Zambia, 60% of the project training staff identified as women, followed by 40% in Malawi and 50% in Mozambique (Annexes 12-14).

9. Monitoring and evaluation

From the outset, M&E has formed an integral part of project delivery. This is evidenced by changes made to the logframe to guarantee the effective delivery and evaluation of the project Outcome and Outputs. It should be noted that at inception, the M&E expert reviewed the logframe and pre-project indicators and no changes were made. Subsequent changes to the logframe are therefore a consequence of the delays to the project start date, which was caused by factors beyond RUSI's control in the implementation of IWT021.

Owing to delays in implementing IWT021, the project's start date was subsequently delayed to 1 April 2018. This delay was essential in order to complete the Tanzanian training funded under IWT021 in February 2018. The delay to the Tanzanian training was caused by the death of our in-country project partner, Wayne Lotter of PAMS Foundation, which caused the postponement of the IWT021 course. This delay enabled the team to deliver IWT021 to a high standard, in accordance with the indicators outlined in logframe. The team were also encouraged to delay the start to IWT043 in order to complete a 'lessons learned' exercise looking at the activities undertaken in IWT021. This decision to postpone the training was reaffirmed by IWT021's final evaluation, which achieved an A+ rating.

As a result of this delayed start date, IWT043's project design was amended in two significant ways. The first significant change to the project design concerned the composition of the training days. After reflecting upon the lessons of IWT021, an approved Change Request was submitted to eliminate the post-training 'mentoring days' from the project design. This is because results from IWT021 showed that it was difficult for public sector participants to spend a further 2 days with mentors, rather than catching up with their substantial workloads – often involving active and time-sensitive cases.

A Change Request was approved to eliminate these days and replace them with a 1-day training for partner NGOs that support the public sector in the fight against wildlife crime. This change was also demand driven, as on the ground NGO partners suggested this day of training would help them to support local participants in the application of the techniques once the course finished. The final composition of the 7-training days was therefore as follows: 4-days public sector only, 1-day private sector only, 1-day public-private sector and 1-day with the partner NGO.

The second significant change to the project design eliminated the Output 3 from project IWT043. Originally, under Output 3 the project was to deliver additional top-up trainings in Kenya, Uganda and Tanzania. This Change Request was submitted because when the IWT043 project plan was originally approved in 2017, few other initiatives were in operation around 'following the money' linked to IWT in East Africa. By March 2018, however, the UN Office on Drugs and Crime (UNODC) had appointed a dedicated regional mentor on financial approaches to IWT. This mentor is based in Kenya, with a mandate covering Tanzania and Uganda.

After extensive consultation with UNODC in Nairobi, RUSI was confident that the elimination of original Output 3 would not affect the project's Outcome. If the top-up trainings were to go ahead, they would risk wasting project funds by duplicating other efforts in these countries. This was reinforced by the fact that in November 2018, UNODC convened a major regional training event on financial approaches to IWT in Kenya, involving a number of Kenyan, Tanzanian and Ugandan participants previously trained by RUSI under project IWT021, many of whom RUSI had planned to re-engage through its follow-on training under IWT043.

Given these changes to the operating environment, the project focussed on delivering larger-scale training courses to match the high levels of demand expressed by local leadership interviewed in Malawi, Zambia and Mozambique during Activity 1.1 (Annex 5-7). Based on these interviews, it was clear that this high level of demand was motivated by the low level of capacity and awareness amongst relevant public and private sector agencies regarding how to tackle IWT using financial tools.

Based on the findings of Output 1, Measurable Indicators 2.1 and 2.2 were updated to properly capture, measure, evaluate the revised outputs as captured in the logframe. Firstly, the number of participants to be trained was increased from 20 to 35 per country (MI 2.1). This target was exceeded during project delivery, confirming that this was an appropriate change request decision and accurate measure of the impact of this change to the project design (Section 3.1-3.2, Annex 18-21). The project also amended Mov 2.2 to match local capacity. Upon consultation with local leadership, it was agreed that it would not be politically possible to produce formally agreed Standard Operating Procedures (SOPs) in the time frame. Instead, SOPs were covered by discussing and agreeing best practice orally in sessions and group exercises. This was positively received by local leadership, who felt concerned about their ability to take part in the training if they had to conform to such a tight timetable for achieving these agreed SOPs.

These changes led to a series of expected budgetary reallocations within the financial year. This was discussed with LTS International before the submission of the Change Request eliminating Output 3 from the original application. Specifically, RUSI moved budget between Operating Costs, Travel and Subsistence, and Staff Costs lines within the financial year. This was justified because although the project was now running workshops in fewer countries, the *scale* of the workshops that RUSI ran significantly increased. As a result, in the final accounts the Overhead Costs line has been increased to the 10% contingency (Section 15).

This high attendance required increased staff time to be spent on coordination, logistics, invitations, as well as requiring additional trainers to facilitate sessions. This was considered a successful use of project funds, as contact time and resourcing in the workshop itself helped public and private sector participants to consistently achieve advanced level learning outcomes (MoV 2.1, Annex 18-21). Increased staff and travel and subsistence costs were recovered from the Operating Costs line, where larger workshops achieved better economies of scale and substantial savings were made on items such as venue hire. Lower operating costs were further reinforced by unanticipated participant demands, like the lower volume of accommodation requested by additional participants in Mozambique, which confounded expectations based on previous trainings in the region. It should be noted, however, that the total budget for the financial year of the project continued to stand at £ and there has been no reallocation across financial years.

As these Change Requests demonstrate, the project has been run in an adaptive manner to ensure outputs and outcomes are achieved, based on continuous M&E using the adapted logframe. Beyond regular reviews of progress against the logframe, systems used to monitor progress include the creation of an interview protocol for consistency in Output 1 (Annex 6) and pre-/post-surveys (Annex 18-20). These surveys 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 and are considered useful MoVs (Annexes 18-21). As such, the learning rates and feedback registered have been measured both qualitatively and quantitatively, as seen in the higher than planned levels of participation (Annexes 12-21).

It should be noted, however, that this survey data should not be used to compare progress across the three countries as each country started at a different baseline capacity level (as established in Activities 1.1-1.3). The data is also incomparable because the questions are translated differently across Portuguese and English. Nonetheless, across each country individually, these pre- and post-course surveys have internal validity and reliability. As a result, pre- and post-surveys can be used to assess progress before and after the training (MoV 2.1, see Section 9 for a detailed explanation).

At the time of writing, project work has begun on the production of the rapid reference guides, and the project is confident that it will meet Measurable Indicator and MoV 0.2 and provide 'access to dedicated written rapid reference guides and e-learning courses to guide the use of financial investigation tools in response to IWT at both domestic and international levels.' However, whilst the project is on track to meeting its outcome, there may be the need to change Outcome MI 0.3 on the basis that initial capacity as established by Activities 3.1-3.3 was unexpectedly low. As a result, the 'presentation and inclusion of financial evidence gathered in 50% of new court cases' is not a feasible achievement for the project in the timeframe and resources given. Likewise, the MoV for 0.3, including courtroom monitoring, is

not in place in all of the countries to effectively monitor this MI. A change request will likely be submitted by the team in due course, once consultation with partners about alternative MoV have concluded.

10. Lessons learnt

Throughout the project, the project team has been encouraged by the M&E expert to 'learn while doing' and adapt lessons learned from implementing other projects and research on similar topics. In particular, RUSI has placed significant emphasis on incorporating lessons learned from its previous Challenge Fund Project IWT021. Based on the results of this project, RUSI changed the design of the training to eliminate the 2 small-group mentoring days for the public sector, as carried out in Kenya and Uganda. This decision was based on the fact that it was difficult for public-sector participants to spend a further 2 days with mentors, rather than catching up with their substantial workloads – which often involving active and time-sensitive cases (Section 9). Instead, IWT043 project opted to capitalise on the high level of demand from project partners to use this time to provide a 1-day training for project partner NGOs working with the local public sector in the fight against wildlife crime.

A consistent lesson across IWT021 and IWT043 was the fact that capacity – particularly amongst local law enforcement – is generally extremely poor with regards to the knowledge and skills required to conduct a financial investigation. By contrast, the enthusiasm to learn these skills is very high, but only when key local stakeholders feel they have the agency to shape the project and offer advice on the project design to ensure it is highly tailored to local conditions. Encouraging local experts to deliver sessions during the curriculum was crucial to facilitating peer-to-peer learning. Whilst this demands large number of staff hours devoted to ensuring activities are properly carried out and mutual expectations are fully articulated, it secures the political buy-in to guarantee the success of such trainings and follow up actions (Annex 7-17). This collaborative approach should be seen as best practice for creating local ownership over such trainings.

A further lesson concerned the difficulty of predictable budgeting across countries within the same sub-region. For example, whilst it was expected that there would be the same level of uptake for residential accommodation amongst Mozambican participants as in Zambia and Malawi, this expectation was not fulfilled, resulting in minor adjustments to the budget. As conducted, this project would highly recommend a thorough review of the M&E plan and any changes to assumptions in the event of such a lengthy delay (more detail in Section 9).

A final key recommendation for other projects is to adopt a multi-agency, cross-sector approach: beyond the content of the courses, much work is needed in fora such as these to build trust and understanding, with inter-agency cooperation key to more complex financial cases. It should be noted that public-private partnerships are also an important [model for conservation](#) success outside of purely investigative areas. This should be considered when programming future projects in Southern Africa. For further information on, learning has already been detailed throughout this report, see especially Section 9.

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

Not applicable – due to the earlier extensions, this is the first annual report submitted.

12. Other comments on progress not covered elsewhere

Not applicable – authors have tried to answer all questions as fully as indicated length permits.

13. Sustainability and legacy

In line with the proposed exit strategy, 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 the trainings (Annex 4-10, 11-17).

In accordance with MoV 1.1-1.2 for Output 1, 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 22).

Finally, the original project's exit strategy remains valid: the presence of 'champions' within each agency is an enduring initiative designed to ensure, beyond project end, that a single point of contact can offer material to new staff, support internal training, and contribute to the mainstreaming of best practice (Output 2, MI 2.3). The team will also continue to share its experience and outputs with the broader anti-wildlife trafficking community, as it has done with the [Conference of Western Attorneys General \(CWAG\) Africa Alliance Partnership](#), who have begun to think about incorporating a financial approach in their trainings in locations including Malawi, Uganda and Zambia (MoV 1.3). This is significant as the CWAG AAP team have in-country offices with year-round programming, which helps to secure the longevity of this project's results. Most importantly, the technical content taught in Kenya, Uganda, Tanzania, Mozambique, Malawi and Zambia will be documented into concise, easy to use and tailored rapid reference guides, which will endure beyond project end (Output 3).

14. IWT Challenge Fund Identity

Throughout, the project has recognised the UK Government as the funder and publicised the IWT Challenge Fund. At project start, Government support was acknowledged through a post on [RUSI.org](#) to launch the project. During research and training, UK Government support has been explained in full. The project has also ensured that UK logos appear on training materials, agendas, delegate lists etc (Annex 4-22). At all events where RUSI has publicised the findings of the project, it has acknowledged the funding of the UK Government (Section 3.2). Wherever possible, the project has engaged with British High Commission's abroad to find synergies with their current initiatives and publicise the UK Government's work in this area. In Mozambique in particular, the project worked closely with the BHC to invite and publicise the training. Finally, the rapid reference guides produced under Output 3 are anticipated to be branded with the UK Aid symbol, further publicising the UK Government and the IWT Challenge Fund.

15. Project expenditure

Table 1: Project expenditure during the reporting period (April 2018-March 2019)

| Project spend (indicative) since last annual report | 2018/19 Grant (£) | 2018/19 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) | | | | |
| Others (see below) | | | | |
| TOTAL | 199 466 | 199 466 | | |

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

Annex 1: Report of progress and achievements against Logical Framework for Financial Year 2018-2019

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|--|---|---|--|
| <p>Impact</p> <p>A reduction in illegal wildlife trade (IWT) and poverty alleviation in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda through more effective investigation and prosecution of the financial crimes underpinning IWT.</p> | | | |
| <p>Outcome</p> <p>Training delivered in Malawi, Mozambique, Zambia, and written outputs produced in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda improve capacity to investigate and prosecute financial crime linked to IWT, domestically and internationally. This disrupts trafficking networks, resulting in a fall in poaching and a rise in wildlife tourism, benefiting communities.</p> | <p>Indicator 0.1 – By September 2019, all participants in financial-investigation training in Malawi, Mozambique and Zambia (at least 35 per country) have improved understanding of the dynamics of wildlife-linked illicit financial flows and enhanced capacity to effectively investigate and prosecute wildlife crime on this basis, as judged by pre- and post-training evaluation surveys.</p> <p>Indicator 0.2 – By September 2019, relevant law enforcement agencies in Malawi, Mozambique and Zambia, Kenya, Tanzania and Uganda have access to dedicated written rapid reference guides and e-learning courses to guide the use of financial investigation tools in response to IWT at both domestic and international levels.</p> <p>Indicator 0.3 – The use of financial intelligence in prosecutions of high-level traffickers in the focus countries rises from the current negligible level to a situation in September 2019</p> | <p>The project is on track to achieve the project outcome. The baseline condition was one in which no dedicated training had been provided to agencies in any of the 3 countries on using financial tools to investigate and prosecute IWT, with no best practice guidelines, to the detriment of efforts to disrupt trafficking and reduce poaching. In all three countries, wildlife agencies and FIUs or anti-money laundering units were found to have no effective or regular contact.</p> <p>With the completion of Outputs 1 and 2, this situation has been transformed by the project: to date, 21 days of training have been provided in Malawi, Mozambique and Zambia (MI 0.1). Results measured against Indicator 0.1 how the project has exceeded its targets. Overall, the three workshops trained 159 delegates, versus the 105 delegates expected in the application (35 per course, MoV 2.1) – exceeding the participant target by 51%. In Zambia, expected attendance (35 people total) was exceeded by 65%, with 58 people trained in total across the public and private sector (MI 0.1). In Malawi, expected attendance (35 people total) was exceeded by 45%, with 51 delegates trained in total across the public and private sector (MI 0.1). In Mozambique, expected attendance (35 people total) was</p> | <p>Measurable Indicators and MoV 0.2 and 0.3 are longer term indicators for the project outcome, which require the completion of Output 3 and Activities 3.1-3.3 in the second year. Activities 3.1-3.3 will produce outputs in the form of six tailored rapid reference guides and e-learning resource available to law enforcement in Tanzania, Kenya, Uganda, Mozambique, Zambia and Malawi. At the time of writing, project work has begun on the production of the rapid reference guides (but is not covered by this period of reporting).</p> |

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|-----------------|---|--|--|
| | <p>where evidence gathered through effective financial investigations is presented and used in court in 50% of new cases.</p> | <p>exceeded by 42%, with 50 delegates trained in total across the public and private sector (MI 0.1). In line with MI and MoV 1, capacity has also increased significantly as demonstrated by results of pre- and post-training evaluation surveys completed by participants in order to measure the impact of the training (Annex 14-21).</p> <p>As judged by pre- and post-training evaluation surveys, capacity to effectively investigate and prosecute the illicit financial flows related to wildlife crime increased significantly (Annexes 18-21). Success measured against MI 0.1 is that learning is shown around tools required for both successful investigation <i>and</i> prosecution. For a detailed discussion see Section 3.1 in this report.</p> <p>MI and MoV 0.2 and 0.3 are longer term indicators for the project outcome, which require the completion of Output 3 and Activities 3.1-3.3 in the second year. Activities 3.1-3.3 will produce outputs in the form of six tailored rapid reference guides and e-learning resource available to law enforcement in Tanzania, Kenya, Uganda, Mozambique, Zambia and Malawi. At the time of writing, project work has begun on the production of the rapid reference guides (but is not covered by this period of reporting). The project is confident that it will meet MI 0.2 and provide 'access to dedicated written rapid reference guides and e-learning courses to guide the use of financial investigation tools in response to IWT at both domestic and international levels.' Please see Section 9 for a discussion of the appropriateness of MI 0.3. The project is nonetheless on track to meet its ultimate outcome.</p> | |

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|--|---|---|---|
| <p>Output 1. A detailed strategic assessment provides a clear picture of existing knowledge of the problem to be tackled, in terms of the scale, dynamics and impacts (disaggregated by gender) of illicit financial flows deriving from IWT in Malawi, Mozambique and Zambia, and the capacity of relevant authorities to tackle them.</p> | <p>Indicator 1.1 The current limited, scattered and incoherent sources of information on the shape of illicit financial flows connected to IWT are assessed through a clear and consistent multi-source analysis of wildlife-linked illicit financial flows and the capacity that exists to tackle them in Malawi, Mozambique and Zambia. This research will form a core part of the six e-learning courses and six rapid-reference guides (Output 3) delivered by September 2019 and will be published through at least two publicly available articles.</p> <p>Indicator 1.2 The research produced feeds into and is referenced by other domestic and international studies, and other projects have incorporated its findings and sought to address them by September 2019.</p> <p>Indicator 1.3 The outcomes of the assessment are recognised by all relevant national and international agencies by September 2019, 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. The baseline condition as assessed by the project team under Activities 1.1-1.3 was one in which local law enforcement officers lacked the capacity, skills and knowledge required to conduct financial investigations in IWT cases.</p> <p>In line with MI and MoV 1.1, Output 1 has been achieved with the publication of two articles containing publishable findings from the strategic assessment (Activity 1.1): a BBC News article in October 2018, 'Pangolin Survival: How "Following the Money" Could Save Lives' (over 276,000 views) and second, a Commentary on <i>RUSI.org</i>, 'A Missing Page: Strengthening the Response to the Illegal Wildlife Trade' which received 636 views to date (Annex 22).</p> <p>The findings were also shared with high profile delegates at least two events (see Section 3.1-3.2).</p> <p>In line with MI and MoV 1.2, the two articles were widely shared across social media and became embedded across several other publications and websites (Section 3.1-3.2). Based on the findings of Activity 1.1 and the wider findings of project IWT021, the project staff also contributed to additional news reports (Annex 22). In line with Indicator and MoV 1.2 and 1.3 the project has influenced the content of IWT training programme delivered by the Conference of Western Attorneys General (CWAG) Africa Alliance Partnership, who have begun to think about how to incorporate a financial approach in their trainings in locations including Malawi, Uganda and Zambia. This is significant progress as the CWAG AAP team have in-country offices with year-round programming on IWT, which helps to secure the longevity of this project's results. For more on this evidence and indicator, see Section 3.2.</p> | |
| <p>Activity 1.1 – Assessment of current evidence around the scale, dynamics and impacts of IFFs linked to IWT in Malawi, Mozambique and Zambia based on desk-based research, fieldwork and interviews</p> | | <p>Activity 1.1 was completed in the timescale planned. This involved desk research and a research trip to Malawi, Zambia and Mozambique in September 2018. The project team conducted 49 in-person interviews and 10 interviews via telephone with a total of 89 representatives from government ministries, wildlife authorities, anti-corruption commissions, financial intelligence units,</p> | <p>This activity has been fully completed, but the project will continue to monitor the Measurable Indicators and MoV related to the activity as part of the M&E plan. This data collection will ensure the project's impact and progress towards the outcome is properly recorded for future M&E reporting requirements.</p> |

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|--|-----------------------|--|---|
| | | <p>central banks, commercial bank compliance officers, international organisations, NGOs and major donors (Annex 5-8, 22). This assessment was conducted with attention to the gendered knowledge and flows associated with IFFs related to IWT (Annex 5-8, 22, Section 9). For more on this evidence and indicator, see Section 3.1 and Section 8.</p> | <p>The assessment exercise performed for Activity 1.2 will be used in the completion of the tailored rapid reference guides and e-learning resource (Activity 3.1-3.3).</p> |
| <p>Activity 1.2 – Mapping exercise documenting capacity in wildlife, law-enforcement, customs, financial and justice institutions in Malawi, Mozambique and Zambia 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. This mapping exercise analysed the literature review and interview notes from the 89 key informant interviews (Annex 5-8). With input from local agencies and partner NGOs, this mapping exercise established the invitation list and priority figures for the training course in Activity 2.1-2.3 (Annex 5-8, 11-17). In keeping with the findings of project Follow the Money I (IWT021), this assessment concluded that financial investigations are rarely conducted in crimes connected to IWT across Zambia, Malawi and Mozambique (Section 2.3). These findings were shared in outputs produced for Activity 1.3. For more evidence, see Section 3.1.</p> | <p>This activity has been fully completed, but the project will continue to monitor the Measurable Indicators and MoV related to the activity as part of the M&E plan. This data collection will ensure the project’s impact and progress towards the outcome is properly recorded for future M&E reporting requirements.</p> <p>The capacity mapping exercise performed for Activity 1.2 will be used in the completion of the tailored rapid reference guides and e-learning resource (Activity 3.1-3.3).</p> |
| <p>Activity 1.3 – Analysis and documentation of findings in an internal written report, to guide all project team members in the design of training and in the invitation of particular agencies to participate in training during Work Package 2. Publication of at least two publicly available articles transmitting the findings of the assessment.</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). As planned, findings have been shared through the publication of two articles on IWT and financial investigations; an internal research report made available to trainers; at least two high profile speaking engagements publicly disseminating the findings, and a series of closed-door briefings with a strategic selection of in-country donors and organisations working on illicit financial flows more broadly, and IWT specifically. This</p> | <p>This activity has been fully completed, but the project will continue to monitor the Measurable Indicators and MoV related to the activity as part of the M&E plan. This data collection will ensure the project’s impact and progress towards the outcome is properly recorded for future M&E reporting requirements.</p> <p>The information and analysis performed for Activity 1.3 will be used in the completion of the tailored rapid reference guides and e-learning resource (Activity 3.1-3.3).</p> |

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|--|---|--|--|
| | | analysis was used internally to tailor the training program agenda (MoV 1.1-1.3, Annexes 8-10). See other dissemination activities documented in Section 3.1-3.2. | |
| <p>Output 2. Relevant financial, field and other officers from law-enforcement agencies, the private sector and NGOs in Malawi, Mozambique and Zambia are specifically trained to more effectively collect, share and report on financial intelligence, facilitating high-level domestic and transnational investigations and prosecutions in each country.</p> | <p>Indicator 2.1 - 21 days-worth of multi-agency domestic-level training (7 days per country) is conducted which provides at least 35 relevant actors from at least three law-enforcement agencies, as well as at least five financial institutions, in Malawi, Mozambique and Zambia with the skills to effectively investigate illicit financial flows linked to IWT by September 2019.</p> <p>Indicator 2.2 – Best practice and potential options for standardised procedures are covered orally in workshops by trainers by September 2019 with at least three law-enforcement and other agencies, where formerly guidance on these processes was patchy and unstandardized.</p> <p>Indicator 2.3 – All agencies involved in training identify and assign a “champion” to guide ongoing collaboration and coordination between trainees in relation to the training delivered by September 2019.</p> | <p>Output 2 has been achieved with the delivery of 21 days of training in Mozambique, Malawi and Zambia as planned. With the completion of Output 2, this has fundamentally changed, and self-reported capacity has grown significantly (MoV 2.1, Annex 18-21). In line with Indicator 2.1, the project delivered 21 days of training across the public, private and civil society sector in Mozambique, Malawi and Zambia (Annex10-21). Under MI and MoV 2.1’s target of 35 individuals from at least 3 law enforcement agencies and 5 financial was met and exceeded, with 159 participants trained in total, from 25 public sector agencies and 38 financial institutions across the three countries (Annex 12-17).</p> <p>In line with MI 2.2, capacity has increased significantly as a result of shared best practice and standard operating procedures, as demonstrated by the results of pre- and post-training evaluation surveys completed by participants to measure the impact of the training (MoV 2.2, Annex 18-21). For a thorough and detailed discussion of the results of these survey results, see Section 3.1 of this report. Finally, in line with Indicator and MoV 2.3, all public-sector agencies that took part in training have assigned a ‘champion’ to ensure continued inter-agency collaboration in relation to the topic after the end of the courses. These appointments can be verified through email contact with attendees and a full review of the post-course participant surveys available upon request.</p> | |
| <p>Activity 2.1– Collaborative design and elaboration of tailored domestic- and transnational-level training modules for Malawi, Mozambique and Zambia, and sharing of modules with all project partners and relevant Malawian, Mozambican and Zambian agencies.</p> | | <p>Activity 2.1 was completed in the time planned. The course was designed as a 7-day curriculum, as follows: 4-days public-sector only, 1-day private sector only, 1-day public-private sector, 1 day civil society/partner day. Project partners, technical experts and local in-country partners provided key input on the design and content of modules, which were</p> | <p>This activity has been fully completed, but the project will continue to monitor the Measurable Indicators and MoV related to the activity as part of the M&E plan. This data collection will ensure the project’s impact and progress towards the outcome is</p> |

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|---|-----------------------|---|---|
| | | <p>circulated and amended multiple times based on feedback (Annex 8). This collaborative approach led to co-sponsored invitations by local agencies, guaranteeing high attendance (Annex 11). Tailoring is evident in the delivery of presentations by local presenters in all three countries (Annex 8-10). Inclusion of locally tailored case studies by EIA were highly rated in quantitative and qualitative feedback (Annex 18-21).</p> | <p>properly recorded for future M&E reporting requirements.</p> |
| <p>Activity 2.2 – Convening of all relevant public-sector agencies and private-sector institutions for the training courses in Malawi, Mozambique and Zambia, confirming exact participants, venues and all other logistics.</p> | | <p>Activity 2.2 was completed in the timeframe planned. Under this activity project team arranged the logistical components of the training courses in Malawi, Mozambique and Zambia. This process involved venue selection, financial negotiation to achieve money-saving economies of scale, and arrangements for participant transport. It also involved significant speaker liaison with local participants, coaching them on what to include in their presentations and responding to participant and partner queries within a 24-hour timeframe (Annex 8-10). To guarantee achieved attendance from all relevant agencies, the team negotiated strategic partnerships with several local agencies, whose Directors endorsed the course by co-sponsoring and delivering the invitations (Annex 8). High levels of attendance were also the result of the dedication the number of staff hours devoted to course organisation under Activity 2.2, as reflected in approved change requests to reallocate staff time within the budget (Section 9). Overall, the three workshops in Activity 2.3 trained 159 delegates, versus the 105 delegates (35 per course, MoV 2.1) expected in the application – a 51% increase on initial targets.</p> | <p>This activity has been fully completed, but the project will continue to monitor the Measurable Indicators and MoV related to the activity as part of the M&E plan. This data collection will ensure the project’s impact and progress towards the outcome is properly recorded for future M&E reporting requirements.</p> |
| <p>Activity 2.3 – Delivery of three, 7-day hands-on multi-agency training courses in Malawi, Mozambique and Zambia – involving both public and private sectors in each country.</p> | | <p>Activity 2.3 was completed in the timeframe planned. The project team delivered the three 7-day courses over an intensive 8-week period</p> | <p>This activity has been fully completed, but the project will continue to monitor the Measurable Indicators and MoV</p> |

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|--|---|---|--|
| | | <p>between January-March 2019. Overall, the three workshops in Activity 2.3 trained 159 delegates, versus the 105 delegates (35 per course, MoV 2.1) expected in the application – a 51% increase on initial targets. In line with Indicator 2.2, capacity has increased significantly as a result of shared best practice and standard operating procedures, as demonstrated by the results of pre- and post-training evaluation surveys completed by participants to measure the impact of the training (MoV 2.2, Annex 18-21). See Section 3.1 for further discussion of detailed results.</p> | <p>related to the activity as part of the M&E plan. This data collection will ensure the project's impact and progress towards the outcome is properly recorded for future M&E reporting requirements.</p> |
| <p>Output 3. Best-practice in financial investigation of IWT is generated for future use, and documented through six tailored and comprehensive e-learning courses and six rapid-reference guides are transferred as tools for transmitting understanding of financial investigation of IWT on an ongoing basis to training bodies of 12 law enforcement agencies (and where judged appropriate, universities) in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda.</p> | <p>Indicator 3.1 – Six formally produced e-learning courses and six rapid-reference guides document best practice in financial investigation of IWT in East Africa, both domestically and internationally, and are transferred to at least 12 training departments of law enforcement agencies (two per country) by September 2019.</p> <p>Indicator 3.2 – By September 2019, specialised departments of at least twelve training bodies of law enforcement agencies in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda (two per country) are equipped with information to instruct students in the use of the e-learning course and reference guide.</p> <p>Indicator 3.3 – By September 2019, the six rapid-reference guides are embedded in and used by law-enforcement agencies, both at a national and international level, to guide operations and to further build</p> | <p>Activities 3.1-3.3 are scheduled for the second year of the project, running from April 2019 to September 2019. Under an approved change request submitted in March 2019, this Annual Report is submitted on May 30th 2019. This extension was granted because the project only finished implementing Activities 2.1-2.3 at the end of March 2019. As a result, at the time of writing, progress is underway on Activities 3.1-3.3 but is not documented in this Annual Report, which only covers the period between April 2018-March 2019.</p> | |

| Project summary | Measurable Indicators | Progress and Achievements April 2018 - March 2019 | Actions required/planned for next period |
|-----------------|---|---|--|
| | capacity on financial investigation of IWT. | | |

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

N.B. if your application's logframe is presented in a different format in your application, please transpose into the below template. Please feel free to contact IWT-Fund@ltsi.co.uk if you have any questions regarding this.

| Project summary | Measurable Indicators | Means of verification | Important Assumptions |
|---|---|--|---|
| Impact: A reduction in illegal wildlife trade (IWT) and poverty alleviation in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda through more effective investigation and prosecution of the financial crimes underpinning IWT. | | | |
| <p>Outcome:</p> <p>Training delivered in Malawi, Mozambique, Zambia, and written outputs produced in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda improve capacity to investigate and prosecute financial crime linked to IWT, domestically and internationally. This disrupts trafficking networks, resulting in a fall in poaching and a rise in wildlife tourism, benefiting communities.</p> | <p>0.1 – By September 2019, all participants in financial-investigation training in Malawi, Mozambique and Zambia (at least 35 per country) have improved understanding of the dynamics of wildlife-linked illicit financial flows and enhanced capacity to effectively investigate and prosecute wildlife crime on this basis, as judged by pre- and post-training evaluation surveys.</p> <p>0.2 – By September 2019, relevant law enforcement agencies in Malawi, Mozambique and Zambia, Kenya, Tanzania and Uganda have access to dedicated written rapid reference guides and e-learning courses to guide the use of financial investigation tools in response to IWT at both domestic and international levels.</p> <p>0.3 – The use of financial intelligence in prosecutions of high-level traffickers in the focus countries rises from the current negligible level to a situation in</p> | <p>0.1 – Results of pre- and post-training evaluation surveys completed by participants; usage records of systems put in place during training; project notes and M&E record of training and implementation; participant contribution and feedback; courtroom monitoring records.</p> <p>0.2 – Correspondence with relevant law enforcement agencies, records of agencies engaged in training; external surveys, analyses and needs assessments; usage records of systems put in place.</p> <p>0.3 – Prosecution rates; court records; courtroom monitoring reports; records and reports of law-enforcement agencies; newspaper articles; assessments by external research institutes and NGOs; journal articles on successful prosecutions in law and environmentally focused journals.</p> | <p>The Malawian, Mozambican, Zambian, Kenyan, Tanzanian and Ugandan governments remain committed to improving their anti-money laundering regimes to meet international standards, and remain committed to the fight against IWT.</p> <p>Increased numbers of effective investigations and prosecutions in Malawi, Mozambique Zambia, Kenya, Tanzania and Uganda create a sufficiently high-risk environment to result in fewer instances of poaching and wildlife trafficking.</p> <p>Reduced poaching rates will lead to higher numbers of elephants, rhinos and pangolins in the relevant areas of Malawi, Mozambique Zambia, Kenya, Tanzania and Uganda.</p> <p>Increased numbers of wildlife, particularly of elephants and rhinos, will result in an increase in wildlife tourism</p> |

| Project summary | Measurable Indicators | Means of verification | Important Assumptions |
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| | September 2018 where evidence gathered through effective financial investigations is presented and used in court in 50% of new cases. | | in Malawi, Mozambique Zambia, Kenya, Tanzania and Uganda. |
| <p>Output 1</p> <p>A detailed strategic assessment provides a clear picture of existing knowledge of the problem to be tackled, in terms of the scale, dynamics and impacts (disaggregated by gender) of illicit financial flows deriving from IWT in Malawi, Mozambique and Zambia, and the capacity of relevant authorities to tackle them.</p> | <p>1.1 The current limited, scattered and incoherent sources of information on the shape of illicit financial flows connected to IWT are assessed through a clear and consistent multi-source analysis of wildlife-linked illicit financial flows and the capacity that exists to tackle them in Malawi, Mozambique and Zambia. This research will form a core part of the six e-learning courses and six rapid-reference guides (Output 3) delivered by September 2019, and will be published through at least two publicly available articles.</p> <p>1.2 The research produced feeds into and is referenced by other domestic and international studies, and other projects have incorporated its findings and sought to address them by September 2019.</p> <p>1.3 The outcomes of the assessment are recognised by all relevant national and international agencies by September 2019, 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 illicit financial flows and the capacity to address them are made available to partners; newspaper articles and coverage of the research by wildlife, organised crime, security and law-focused organisations; record of publication of two articles in various media.</p> <p>1.2 Citations of the research, as documented in the two articles, six e-learning courses and six rapid-reference guides, in wildlife, organised crime, security and law-focused journals; citations in materials produced by other projects implemented in East Africa.</p> <p>1.3 Malawian, Mozambican and Zambian policy documents; reports of the relevant agencies; project documentation and reports of intergovernmental organisations; newspaper articles; journal articles.</p> | <p>The security situation in target research areas will allow research activities to take place.</p> <p>Researchers are able to engage with experts, policy-makers and practitioners in each target country who are sufficiently open and honest as to allow researchers to deliver an accurate assessment of wildlife-linked illicit financial flows and the capacity that exists to tackle them.</p> |
| <p>Output 2 Relevant financial, field and other officers from law-enforcement agencies, the private sector and NGOs in Malawi, Mozambique and Zambia are specifically trained to more effectively collect, share and report on financial intelligence, facilitating high-level domestic and transnational</p> | <p>2.1 21 days-worth of multi-agency domestic-level training (7 days per country) is conducted which provides at least 35 relevant actors from at least three law-enforcement agencies, as well as at least five financial institutions, in Malawi, Mozambique and Zambia with the skills to effectively investigate</p> | <p>2.1 Number of days of multi-agency training provided on illicit financial flows linked to IWT in Malawi, Mozambique and Zambia (baseline = zero) to at least 35 individuals in at least three public-sector agencies and five financial institutions; project notes and M&E record of implementation and results of</p> | <p>The security situation in target research areas will allow training activities to take place.</p> <p>Beneficiaries of training will have sufficient capacity to absorb and implement new approaches and will be</p> |

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| <p>investigations and prosecutions in each country.</p> | <p>illicit financial flows linked to IWT by September 2019.</p> <p>Indicator 2.2 – Best practice and potential options for standardised procedures are covered orally in workshops by trainers by September 2019 with at least three law-enforcement and other agencies, where formerly guidance on these processes was patchy and unstandardized.</p> <p>Indicator 2.3 – All agencies involved in training identify and assign a “champion” to guide ongoing collaboration and coordination between trainees in relation to the training delivered by September 2019.</p> | <p>training; participant feedback; internal agency reports; results of pre- and post-training evaluation surveys completed by participants to measure impact of the training.</p> <p>2.2 Standardised procedures produced; internal agency reports on implementation and usage; project notes and M&E record of implementation and results of 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; news reports.</p> | <p>open to public-private, inter-agency training and co-operation.</p> <p>Relevant public-sector agencies, financial institutions and NGOs in Malawi, Mozambique and Zambia 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 leaders and partners allows selection of suitable participants.</p> |
| <p>Output 3</p> <p>Best-practice in financial investigation of IWT is generated for future use, and documented through six tailored and comprehensive e-learning courses and six rapid-reference guides are transferred as tools for transmitting understanding of financial investigation of IWT on an ongoing basis to training bodies of 12 law enforcement agencies (and where judged appropriate, universities) in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda.</p> | <p>3.1 Six formally produced e-learning courses and six rapid-reference guides document best practice in financial investigation of IWT in East Africa, both domestically and internationally, and are transferred to at least 12 training departments of law enforcement agencies (two per country) by September 2019.</p> <p>3.2 By September 2019, specialised departments of at least twelve training bodies of law enforcement agencies in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda (two per country) are equipped with information to instruct students in the use of the e-learning course and reference guide.</p> <p>3.3 By September 2019, the six rapid-reference guides are embedded in and used by law-enforcement agencies, both at a national and international</p> | <p>3.1 Six formally produced e-learning courses and six rapid-reference guides documenting best-practices; coverage and reports by wildlife, organised crime, security and law-focused organisations.</p> <p>3.2 Documentation establishing agreements to deliver e-learning courses and rapid-reference guides to selected law enforcement agencies; instructions provided by email and in person where appropriate; training records; course feedback; coverage of launch events in each country where appropriate.</p> <p>3.3 Internal reports and records of Malawian, Mozambican, Zambian, Kenyan, Tanzanian and Ugandan agencies involved in training; policy documents; reports of relevant government departments; project documentation and reports of</p> | <p>Relevant departments of at least 12 law enforcement agencies (2 per country) in Malawi, Mozambique, Zambia, Kenya, Tanzania and Uganda see the value of participation in the project and are prepared to engage.</p> <p>Law-enforcement agencies, both at a national and international level, welcome the production, documentation and launch of best practice via the e-learning course and rapid-reference guide.</p> <p>The security situation in target countries allows the uptake and use of the materials developed.</p> |

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| | level, to guide operations and to further build capacity on financial investigation of IWT. | intergovernmental organisations; course feedback; instructions provided by email and at launch events where appropriate. | |
| <p>Activities</p> <ul style="list-style-type: none"> • 1.1 – Assessment of current evidence around the scale, dynamics and impacts of IFFs linked to IWT in Malawi, Mozambique and Zambia based on desk-based research, fieldwork and interviews • 1.2 – Mapping exercise documenting capacity in wildlife, law-enforcement, customs, financial and justice institutions in Malawi, Mozambique and Zambia to tackle wildlife-linked illicit financial flows – based on desk-based research, fieldwork and interviews • 1.3 – Analysis and documentation of findings in an internal written report, to guide all project team members in the design of training and in the invitation of particular agencies to participate in training during Work Package 2. Publication of at least two publicly available articles transmitting the findings of the assessment. • 2.1 – Collaborative design and elaboration of tailored domestic- and transnational-level training modules for Malawi, Mozambique and Zambia, and sharing of modules with all project partners and relevant Malawian, Mozambican and Zambian agencies. • 2.2 – Convening of all relevant public-sector agencies and private-sector institutions for the training courses in Malawi, Mozambique and Zambia, confirming exact participants, venues and all other logistics. • 2.3 – Delivery of three, 7-day hands-on multi-agency training courses in Malawi, Mozambique and Zambia – involving both public and private sectors in each country. • 3.1 – Collaborative design and documentation of six tailored e-learning courses and six rapid-reference guides for each country to endure beyond the training’s end. • 3.2 – Outreach to all relevant public-sector training departments for the provision of the resources to those institutions. • 3.3 – Transferral by email or in person (by the core project team or by project partners) as appropriate of the six tailored e-learning courses and six rapid-reference guides to key public-sector training departments, with information provided in the way in which the resources should be used, thereby reaching staff of law enforcement agencies not directly involved in training. | | | |

Annex 3 Standard Measures

N/A

Annex 4 Onwards – supplementary material (optional but encouraged as evidence of project achievement):

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 - DropBox |
| 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. However, we would expect that most material will now be electronic. | 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. | |