

Illegal Wildlife Trade (IWT) Challenge Fund Final Report IWT Challenge Fund Project Information

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 for Defence and Security Studies (RUSI)
Partner institution(s)	Environmental Investigation Agency (EIA), Lilongwe Wildlife Trust, Wildlife Crime Prevention, Wildlife Conservation Society, INTERPOL, Western Union (pro bono), Standard Chartered Bank (pro bono), Barclays (pro bono), DLA Piper (pro bono)
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Project Leader's name	Tom Keatinge
Project website/blog/social media	Specific website N/A (all project documents/information published via http://rusi.org)
Report author(s) and date	Alexandria Reid, Tom Keatinge, Cathy Haenlein

1. Project summary

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. By increasing capacity to conduct financial investigations in IWT cases in East and Southern Africa, this project addressed the low-risk financial environment that allows criminal and corrupt actors to reap vast profits from IWT in six key transit/source countries: Kenya, Tanzania, Uganda, Malawi, Zambia and Mozambique.



The follow the money approach is [urgently needed](#): financial investigations in IWT cases are still extremely rare. As a result, ‘possession’ under respective wildlife acts is the [main offence](#) prosecuted in IWT cases across East and Southern Africa. Drawing on this project’s research, a [2020 study](#) by the Financial Action Task Force (FATF) – the global anti-financial crime standard setter – found that in the majority of wildlife cases, clear financial leads go unfollowed; financiers and supporters go unidentified; and assets remain in the pockets of high-level criminals and corrupt actors. In most IWT cases, opportunities to achieve longer custodial sentences and apply the asset forfeiture provisions offered by anti-money laundering (AML)/ancillary legislation are unused. IWT is often investigated solely by wildlife agencies, who lack the legal authority to conduct financial investigations and/or request financial intelligence from the private sector. In Zambia, one IWT investigator observed that without financial investigations, ‘there is a page missing from the IWT investigators handbook’ and local law enforcement fail to apprehend and disrupt the mid-and-high level criminals and corrupt actors controlling the trade. RUSI identified these issues and established the baseline capacity in Kenya, Uganda and Tanzania in its first Challenge Fund project (IWT021). Under IWT043, RUSI established the baseline in Malawi, Mozambique and Zambia, while also publishing broader policy and technical [research](#) on the global baseline, which has informed implementation.

The urgency of this project's capacity building 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 Financial Taskforce – which [RUSI helped to establish](#) using findings from IWT021 – considers Tanzania, Kenya, Uganda and Mozambique [priority countries](#) for illicit financial flows connected to 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 under 1,000. Pangolins, in turn, are now considered the [world's most trafficked mammal](#), with seizures implicating the six countries included in this project, particularly Uganda.

Accordingly, this project delivered a series of multi-agency public-and-private sector financial investigation trainings in Malawi, Mozambique, and Zambia to increase capacity to enforce anti-money laundering (AML) legislation by investigating and prosecute IWT cases on this basis. Direct beneficiaries of the training included 159 participants, versus the 105 people in the application – a 51% increase on initial targets, with pre/post-course evaluation surveys demonstrating considerable enhanced capacity to track money flows tied to IWT. The long-term sustainability of the project has been achieved through the development and wide adoption of [six legally tailored rapid reference guides](#) (RRGs, or “financial intelligence handbooks”) which provide practical guidance on the techniques and entry points for an IWT financial investigation. The RRGs are partnered with a [16-minute globally relevant e-learning resource](#), available in English, Portuguese and French, hosted on a [platform](#) funded by a non-RUSI Challenge Fund project ([IWT030](#), 2016).

The project contributed to poverty alleviation by building capacity to target the high-level actors financing and controlling IWT networks, thereby reducing the [disproportionate focus](#) on low-level, often (but not always) rural and poor poachers who are easily replaced members of a criminal network. These figures are often [essential financial contributors](#) in their own communities and imprisonment or fines can drive some households into poverty and food insecurity. At the macro-level, the substantial [illicit financial flows](#) generated by IWT damage poverty-alleviation efforts, hollow out national institutions and impede the state's ability to provide public services. Across East and Southern Africa, IWT also dispossesses communities whose livelihoods rely on wildlife tourism. The project therefore most benefitted the directly upskilled local participants trained, followed by those who rely upon wildlife tourism or wildlife resources as a primary source of income or subsistence, followed by the general population more broadly. Improving the investigation skills needed to reach the highest echelons of IWT networks is especially important given the [economic pressure created by Covid-19](#), which has prevented almost all wildlife tourism in the region and significantly impacted the finances of almost all national parks and private conservancies. This has significantly [elevated the risk of IWT](#), due to increased economic privation amongst rural communities and the [loss of ranger patrols](#) through redundancies. The ability to tackle one high-level structural driver of the trade (profit) is an important element of ensuring there is wildlife still available to visit when tourism resumes (see Section 6 for a more in-depth analysis of the project's approach to poverty reduction).

2. Project Partnerships

This project collaborated extensively with informal and 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's most significant, long-running partnership is with EIA, who helped to design and deliver all three project Outputs. EIA participated in the strategic assessment phase (Output 1), contributing in-depth knowledge about the dynamics of IWT in East and Southern Africa. They also helped deliver all three capacity building workshops, providing locally relevant case studies to be used in interactive exercises in throughout the course (Annex 7-21, Output 2). EIA experts designed and delivered sessions which were well received, as indicated by post-training surveys and long form feedback from participants (Annex 18-21). Formal feedback from one investigator 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).

EIA's provision of two expert trainers to each workshop enabled the project to navigate the demands created by high attendance at all three workshops. This was an increase from the 1 member of staff they provided for each workshop in IWT021 and represented a pro bono staff time contribution. EIA also provided an in-house professional graphic designer at a significantly discounted fixed rate for the

production of the RRGs and hosted the e-learning resource on the combattingivorytrade.com platform (IWT030, 2016) free of charge, while also disseminating the resources (Section 3.1, Annex 26; 29-32).

Beyond EIA, one of this project's defining features has been the extent and quality of its partnerships with small, local NGOs working on the ground – all of whom were essential in guiding the content and structure of the workshops and RRGs/e-learning resource. The support of these trusted NGOs enabled the project to guarantee attendance by all relevant local agencies and the uptake of the RRGs by local agencies (Annex 12-14). In Malawi, the project worked with experts from the Lilongwe Wildlife Trust (LWT); in Zambia, with Wildlife Crime Prevention, who audited several sessions in the workshop, helped to deliver invitations, and will incorporate the RRG material into their own printed resources to ensure uptake; and finally, in Mozambique, with WCS who helped to facilitate the attendance of members of their vetted unit within the Administração Nacional das Áreas de Conservação (**confidential**) and contributed significantly to dissemination of Output 3 (Annex 26-27). Each of these partners took an active role in the capacity assessment phase of the project and benefitted from the civil society day.

The project also collaborated extensively with local government and the private sector across the target countries. RUSI directly invited local stakeholders to participate in decision-making, training course design, delivery and the development of the RRGs/e-learning resource. For this reason, RUSI developed relationships with all locally relevant stakeholders during Output 1 (Annex 5-7). Output 2 training agendas were tailored considerably based on partner and stakeholder feedback, and mixed-gender local experts led numerous sessions, sharing local expertise and challenges (Annex 8; Section 7). Notably, these presentations were delivered unpaid by local participants who put considerable time into preparing the content. This consensus-driven approach generated high levels of support, enabling the project to issue joint invitations with local wildlife authorities and FIUs across all countries (Annex 11). These relationships ensured the uptake of the RRGs and e-learning resource, both in the peer review phase – which partners volunteered to help with - and after publication in securing formal letters of support and commitments to use the resources (Annex 11; 26-28). For more information on local government relationships, see Section 3.1. The durability of these relationships with local government and partner NGOs is reflected in their willingness to partner with RUSI in a further Challenge Fund application (July 2020) and engage on [other sensitive financial crime](#) topics such as proliferation financing and counter-terror financing.

3. Project Achievements

3.1 Outputs

The project application and logframe consisted of three Outputs. As verified by this final report and the means of verification (MoV) detailed in Annex 1-32, the project exceeded targets set under the measurable indicators (MI) for each Output. This enabled the project to achieve its intended Outcome.

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.

This output has been achieved. The baseline was one of limited published knowledge on illicit financial flows linked to IWT. Where information was available, it was generic/non-region specific. In completing Output 1, the project employed a combination of desk research, key informant phone interviews, and a 2.5 week research trip to Southern Africa in September 2018; conducting 49 in-person interviews and 11 interviews via telephone with a total of 90 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 and the capacity in place to address them were then mapped and analysed thereby providing a 'clear picture' of existing local capacity in wildlife, law-enforcement, financial and other institutions to tackle wildlife-linked illicit financial flows. In keeping with the findings of project IWT021, the assessment concluded that financial investigations are rarely conducted in suitable IWT cases and there was no understanding of the [gendered quality of these IFFs](#). Malawi had the highest baseline capacity, followed by Zambia and Mozambique respectively. Overall, the baseline capacity to both investigate and prosecute IWT as a financial crime was extremely low, as reflected in pre-training course evaluations conducted in Output 2

(Annex 18-21). Importantly, despite this low baseline, the Output 1 confirmed there was the required buy-in from local government and financial crime architecture needed to carry out Output 2 and 3 and achieve the project Outcome (see Section 3.3).

In line with MI/MoV 1.1, Output 1 was 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 in October 2018, [‘Pangolin Survival: How “Following the Money” Could Save Lives’](#) which received over 276,000 views from an international audience (Annex 22). The project also published several articles on *RUSI.org*, [‘A Missing Page: Strengthening the Response to the Illegal Wildlife Trade’](#) (848 views); [‘Money Laundering and IWT: Financial Action at Last?’](#) (1576 views); [‘RUSI Experts Welcome Renewed Global Commitment to Target Financial Proceeds of Illegal Wildlife Trade’](#) (404 views) (Annex 22; 32). RUSI also wrote a [peer learning article](#) with project findings for the IWT Challenge Fund Newsletter (Annex 22).

The project also disseminated the findings of Output 1 throughout the project by speaking at multiple high-profile events. Tom Keatinge delivered a [keynote speech](#) at the 2018 London Conference; and Cathy Haenlein moderated a panel in the main hall on [‘Corruption and illegal wildlife trade: how to tackle it’](#). In 2020, Alexandria Reid delivered a webinar to over [1850 registered attendees](#) from the private sector and a lunch briefing to leading lawyers from Hogan Lovells LLP (Annex 32). Findings were also shared through regularly updates to the expert working group of the [United for Wildlife Finance Taskforce](#), reaching over 30 global financial institutions at each meeting (Annex 26). In addition, RUSI hosted an event on [‘The Wildlife Trafficking-Security Nexus: Targeting the Organised Crime Threat’](#) (YouTube views: 394) which was chaired by former-UK Foreign Secretary William Hague, with 108 high-level attendees, including seniors from the NCA, US Interior Department and the Director of UK FIU (**confidential**).

In line with MI/MoV 1.2, these pieces were widely shared across social media (Annex 30) and became embedded across several other publications and websites, including a [Reddit thread](#) devoted to pangolin survival, the local radio show [Ghana Waves](#), [The Marshall Centre’s](#) weekly analysis of transnational organised crime trends, [Standard Chartered Bank](#) materials, 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. Project staff also contributed to news reports including [‘Illegal Wildlife Trade’s “Dirty Money” Targeted by Big Banks’](#) on Mongabay; [‘Illicit finance flows must cease to protect our wildlife heritage’](#) in Daily Nation, Kenya; [‘UK Launches Taskforce to Clamp Down on Illegal Wildlife Trade’](#) in The National, the UAE (Annex 22). For statistics on social media impact, see the table in Annex 30.

This feeds into MI/MoV 1.3, whereby findings are recognised by relevant international and governmental agencies and incorporated into planning. From the outset, the project [strategically engaged](#) the FATF and World Bank (both in writing and in face-to-face meetings) to encourage them to incorporate performance against IWT into mandatory [mutual evaluations on anti-money-laundering performance](#), a primary recommendation of the [public report](#) produced during IWT021 (Annex 5; 7). The success of continued engagement under IWT043 was evinced by RUSI’s invitation to privately brief the Chinese President of the FATF on project findings at the UK Treasury in September 2019; and the inclusion of five references to RUSI’s work in the [2020 FATF IWT report](#). The FATF’s engagement with IWT will have an **unprecedented impact** (including in IWT043 countries) because it has [committed to measuring countries’ progress against IWT](#) as a financial crime in 12 months’ time (in June 2021).

In line with MI/MoV 1.3, the project has also successfully influenced the content of other IWT training programmes, including those delivered by the Conference of Western Attorneys General (CWAG) Africa Alliance Partnership, WCS, WWF International, and Traffic, all of whom have been briefed on the findings of the project. Leadership at the Zambia, Malawi and Mozambique FIUs have also expressed interest in including wildlife crime in their typology report. Zambia and Malawi have provided a letter of support to RUSI for follow up funding to complete this activity and further case reviews. For maximum impact, the team also delivered closed door briefings on the findings of the project to funders involved in IWT programming across Africa, including Oak Foundation, U.S. State Department, UK Treasury, DfID and Deutsche Gesellschaft für internationale Zusammenarbeit (GIZ) GmbH. Additionally, team members privately briefed the Director of Revenue and Customs in Mozambique on the state of IWT. This was

followed up by a request to EIA to deliver a further Customs-only training.

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.

This output has been achieved. The baseline condition as established by the project under 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 intelligence gathering was seen as a specialist area beyond the capacity, authority and resources of local wildlife agencies. 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 (Annex 18-21).

Output 2 was achieved through the delivery of 21 days' training across the public, private and civil society sector in Mozambique, Malawi and Zambia (MI/MoV 2.1, Annex 5-22). 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 agenda, 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

The agenda included 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 included locally relevant case studies provided by EIA. These exercises facilitated active learning by requiring trainees to interact and recall the theoretical/technical content learned. All content was designed flexibly, with modifications by country (Annex 8-10; 21). Encouraging 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 7). These course materials then became the basis of products created under Output 3 (Annex 23-24).

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, assisting them with what to include in their presentations and responding to participant 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 and prevent any corruption risks (Annex 11).

To guarantee attendance from all relevant local agencies, the team formed strategic partnerships with the Directors of each local wildlife authority and FIU (Section 2). 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 this support and the number of staff hours devoted to course organisation under Activity 2.2, as reflected in an approved Change Request to reallocate staff time within the budget (Section 9). Overall, the Output 2 workshops trained 159 delegates, versus the 105 delegates (35 per course, MI/MoV 2.1) expected in the application – a 51% increase on initial targets.

The project gave 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 footprint. Engagement (public and private) was highly positive, with clear appetite for the training and excellent feedback (Annex 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-formal 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; 28). 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 3.3). 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-training surveys demonstrated clear learning outcomes (MoV 2.1, Annex 18, 21). Following the training, the trainees demonstrated an increase in awareness, understanding, and knowledge of financial investigation tools and how they can be used in combating IWT (Annex 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%. Mean results for 'knowledge of how asset forfeiture can be used against IWT' rose 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).

In Zambia, *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 was exceeded by 45%, with 51 delegates trained in total across the public and private sector (MI/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 (RBM). The impact of the training was increased by the wide range of geographical portfolios and places of work across the country, in locations including Lilongwe, Mzuzu, and Blantyre. Given the composition of the Malawian financial sector, RUSI consulted with the RBM and FIA to ensure mobile money operators were prioritised participants.

Of the three countries, the strategic assessment (Output 1) 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 (confidential) and [2017/2018 Trends and Typologies](#) report. Nonetheless, there was a lack of familiarity in DNPW with the role of the FIA and how to leverage this knowledge in future investigations. In sum, the architecture lacked the knowledge on how to initiate and conduct a financial investigation.

In this regard, pre- and post-course surveys completed by Malawian *public sector* 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 was exceeded by 42%, with 50 delegates trained in total across the public and private sector (MI/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). Private sector institutions included local, regional and international banks (*ibid.*). 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 – 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; RUSI was approached by the Tribunal Supremo to include participants from the judiciary after they heard about 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 (MI/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 AML 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 compare progress *across* Mozambique, Malawi and Zambia as each country started at a different baseline capacity level (as established in Output 1). 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 (MI/MoV 2.1, see Section 9 for a detailed explanation).

As per an 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 9.1). Instead, in line with the revised MI/MoV 2.2, the project focused 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). The positive impact of this approach also mentioned in Malawi's [National Ivory Action Plan](#) submission to CITES in 2019. The formal quality of the initial MI 2.2 was achieved through Output 3 RRGs, which provide formal SOPs for each country (Annex 23-24, see below). Finally, in line with Indicator and MI/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. The utility of these champions is evinced in the high level of uptake of resources created in Output 3, including formal letters of support (Annex 25-28). These champions (one per institution) can also be verified through email contact with attendees and a review of the post-course participant surveys (Annex 18-21). See also Section 4.

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.

This output has been achieved. The baseline condition was that no best practice existed to transmit country-level tailored understandings of financial investigation of IWT into future enforcement and prosecutions or assist future training and capacity building on IWT-linked financial flows. This situation has changed with the creation of [six individually tailored RRGs](#) and a [16-minute e-learning video](#) (Output 3). These resources were disseminated to local stakeholders via email and telephone due to the physical restrictions on travel/the gathering of groups of people imposed by Covid-19. The local relationships and knowledge gained through Output 1 and 2, as well as the presence of champions in each public sector institution trained (MI 0.3), laid a solid foundation for the successful achievement of Output 3 despite Covid-19, as evinced by the wide adoption and use of the resources (MI/MoV 3.1-3.3, Annex 25-28).

Under Activity 3.1, the project conducted a lengthy design, documentation, peer review and revision phase for the creation of the RRGs/e-learning resource. This involved critical analysis of other RRG-style resources already tailored to each country to minimise any possible duplication, both in writing and in a three-hour in-person team workshop with 8 team members from RUSI/EIA. Once the initial target user and format were internally agreed, the team conducted extensive email and phone consultation with local government agencies and NGO partners to obtain feedback on the most appropriate format and user of the RRGs and e-learning resource (Annex 27). This led to the submission of an approved Change Request to produce one-globally relevant training e-learning resource available in English, Portuguese and French rather than six tailored videos as initially included in the application. This was because local government feedback suggested it would be difficult ensure all stakeholders could reliably access the video given internet restrictions amongst the targeted audience. They suggested project funds would be best spent on a resource of utility to all jurisdictions, given the universal quality of 'follow the money' principles. Local government also preferred the term 'financial intelligence handbooks', because using 'RRGs' could create confusion with other prosecution-only focussed resources (e.g. [UNODC guides](#)).

In line with MI/MoV 3.1, once the format for products was agreed with local partners, the team created a first draft of the RRGs. This draft was then peer reviewed by at least two partners (local government and/or NGO) in Malawi, Zambia and Mozambique, and at least one peer reviewer with knowledge of the

Kenya, Uganda and Tanzania context (Annex 27). This ensured the RRGs were appropriately legally tailored and the material was suitable for the target audience. Peer review by the primary users resulted in significant changes to the material for clarity, style and accuracy (Annex 27-28). The RRGs are composed of six chapters: an introduction; actions at the scene of a seizure or arrest; searches of properties; initial financial analysis; financial interview strategies; and financial investigation strategies and practice (Annex 23). The final text was transformed into an interactive product by an in-house professional graphic designer at EIA, resulting in a high-quality, colourful and locally appropriate product that was well received by the target user (MI/MoV 3.3, Annex 25-28). They are written in plain English and are full interactive e.g. you can click on chapter headings and links in text to take you between sections/to other resources. The Mozambique version is in Portuguese.

At the same time as developing the RRGs, RUSI worked with a [professional film maker](#) to write, edit and shoot materials for the e-learning video. To achieve maximum impact, the project also employed a local filmmaker in Kenya to obtain original footage of interviews/commentary from the former head of the Kenya Wildlife Service and a U.S. Homeland Security Agent (Annex 24). The video captures all the same SOPs shared in the RRGs, but from a global perspective. It is composed of EIA's original footage of wildlife seizures, law enforcement activity and images, as well as stock images and bespoke RUSI graphics (Annex 24). A small amount of project budget was used to buy high-quality external footage like [France News 24's coverage](#) of the "Ivory Queen" prosecution in Tanzania, which used financial evidence in the conviction. In line with DfID's [Digital Strategy 2018-2020](#) and to ensure maximum disability accessibility, the project used a professional voice over artist and closed caption [CC] subtitles are available in English, Portuguese and French (ibid.). In fulfilment of MI/MoV 3.1, all the resources are available online via shoc.rusi.org/IWT and combattingivorytrade.com.

In line with MI/MoV 3.2, the project invested considerable staff time into the local dissemination phase to ensure that local agencies were instructed in how to use both products. This was particularly essential because the video is only available on a password-protected platform combattingivorytrade.com. This platform was developed under [IWT030](#), a non-RUSI Challenge Fund project funded in 2016. The video (Module 18: Best Practice in Financial Investigation) is password protected, which is best practice given the sensitivity of the techniques and some footage in the video. However, the project realises this creates a hurdle for users accessing the video. RUSI therefore sent a direct, first named email to all previous Output 2 trainees providing the RRG and clear details of how to request access to the platform. RUSI also produced an open [trailer for the e-learning resource](#), explaining how to access it (currently: 157 views on Vimeo). High level leadership in each of the public sector institutions were provided with the password/login details directly, alongside a PDF of the RRG, so that they can disseminate the log in details to their own staff. The suitability of this approach is confirmed in the provision of letters of support for the resources (two local government agencies in Malawi, Mozambique, Uganda and Zambia, respectively; one local government agency in Kenya and Tanzania, respectively) and the confirmation of receipt in the form of email correspondence (Annex 26-27). Details on how to access and use the RRGs is included in the first pages of the guide itself and on the website (MI/MoV 3.2, Annex 24-26; 30). The reader of this report can access the combattingivorytrade.com platform using these details:

As a result of these activities and the time invested in the resource development and dissemination stage, in line with MI/MoV 3.3, there has been significant uptake and support for the Output 3 products. In line with MI/MoV 3.2 and 3.3, the project received correspondence acknowledging receipt of the resources from at least two institutions per country (Annex 25-26). The project received formal letters of support from the following institutions: FIU in Mozambique; Prosecutors Office in Mozambique; FIC in Zambia; DNPW in Zambia; FIA in Malawi; DNPW in Malawi; FIU in Tanzania; FIU in Uganda; UWA in Uganda; FRC in Kenya (Annex 25), as well as multiple letters of support from local NGOs (Annex 26).

All of the RRGs are publicly available via the website, which has received over 1072 unique views (Annex 30); EIA's [webpage](#) hosting the resources has received 158 unique views. The team also ran a dedicated social media campaign to disseminate the resources, with Tweets collectively receiving 29000+ impressions and 287 direct engagements (for a full breakdown of project social media, see Annex 30). EIA's email mailshot of the resources to interested parties (n=268) generated an 88% open rate. The resources were included in multiple RUSI mailshots, including and the [Director General's newsletter](#) and

the [weekly newsletter](#). RUSI also printed flyers in English and Portuguese to disseminate the link to the resources. These will be handed out by local NGO partners. RUSI also directly emailed all participants of the trainings (n=159) with the new resources, receiving positive correspondence in return (Annex 27-28).

It should be noted, however, that due to the timeframe when the resources were disseminated (February-March 2020), the e-learning video received fewer views on the platform than expected (n=43, with 32 new sign ups to the platform). Project partners have collectively discussed why, and we are in agreement that this is likely because the local government target audience are working from home during Covid-19, and therefore have limited personal internet data access. This was beyond the control of the project and we are confident viewership will raise when people return to work. It is important to note that the platform receives high annual average views (2018: 1000 unique visits; 2019: 1074 unique visits; in 2020 to date: 542 unique visits), so the project is confident the number of viewers of IWT043's module will increase considerably when formal, agency- and NGO-led training programmes resume. Accordingly, the partners will continue to promote the resources after IWT043 ends in March 2020. In addition, there is evidence that best practice is feeding into planning by domestic agencies and international organisations (MI/MoV 3.3, see above re: formal letters of support). The most compelling evidence is provided in the use of IWT-related best practice in action. See Section 3.2.

3.2 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 project has achieved its stated Outcome in terms of improved local government capacity to investigate and prosecute financial crime tied to IWT domestically and internationally, as evidenced by a range of indicators that reveal a shift from the baseline condition. In considering this achievement, it is important to revisit the baseline condition established in Output 1, [IWT021](#) and a recent [FATF global assessment](#) to which the project contributed extensively. In Zambia, Malawi and Mozambique, 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 (Annex 5-22). In all three countries, no best practice written guidelines or e-learning resources existed, with wildlife agencies and FIUs or AML 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. This baseline condition was hindering current efforts to reduce poaching and protect wildlife tourism revenues for local communities (see Section 3.1; 3.3; 6).

The baseline condition in Kenya, Uganda and Tanzania was comparatively higher (though still relatively low compared to other jurisdictions). Capacity was higher in East Africa because Activities 1.1-3.1 carried out under IWT043 in Southern Africa were implemented by RUSI in East Africa between 2016-2018 (IWT021). Furthermore, East Africa has benefitted from follow-on IWT-linked financial investigations assistance from other organisations in the region, including NRCN, WCS, Basel Institute for Good Governance and UNODC (Section 9.1). Kenya, Uganda and Tanzania were therefore only targeted in Output 3 of this project, principally through the provision of the RRG/e-learning resources to ensure the progress made under IWT021 was sustained and the skills taught in 2016-2018 trainings were made available to new civil servants, thereby minimising the impact of high staff turnover (Annex 23-24).

The low-baseline capacity established under IWT021 and IWT043 is reflected in the overall paucity of the global landscape for the financial investigation of IWT, as confirmed by the [FATF's IWT assessment](#) of 45 jurisdictions in 2020. The assessment concluded that 'financial information is not being regularly or proactively collected, developed, and disseminated to initiate or support financial investigations into wildlife crimes.' Even in the rare cases where financial intelligence is collected and shared with anti-money laundering authorities, it is seldom acted upon. Of the 45 jurisdictions who responded to the FATF's call for evidence (17 European), only 13 had received at least one suspicious transaction report (STR) – a filing made by financial institutions to national law enforcement authorities – related to environmental crime in the past 5 years. Furthermore, the report highlights the poor understanding of the risks posed by IWT financial flows; the weakness of legislative bases to combat IWT as a financial

crime; and the commitment of insufficient resources to its elimination. The result is that jurisdictions are largely prevented ‘from being able to identify and sanction IWT networks.’

In light of this baseline, the progress documented in this report is both significant and demonstrative of the impact that projects like IWT043 can have in building local capacity to target high-level wildlife traffickers. MI/MoV 0.1 was achieved in the 21 days of training provided in Malawi, Mozambique and Zambia, exceeding all expectations in increased capacity and uptake. 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 was exceeded by 65%, with 58 people trained in total across the public and private sector (MI/MoV 0.1). In Malawi, expected attendance was exceeded by 45%, with 51 delegates trained in total across the public and private sector (MI/MoV 0.1). In Mozambique, expected attendance was exceeded by 42%, with 50 delegates trained in total across the public and private sector (MI/MoV 0.1). In each country, participants included the central bank, FIU, revenue and customs, judiciary, prosecutions, anti-corruption authority, the criminal investigations police, wildlife authority and financial institutions (including mobile money operators), amongst others.

In line with MI/MoV 0.1, capacity increased significantly as demonstrated by results of pre- and post-training evaluation surveys and other relevant MoV in Annex 16-21. Participants demonstrated significant learning around tools required for both successful investigation *and* prosecution. In all countries, 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). 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 detailed analysis of MI 0.1, see Section 3.1, Output 2.

In achievement of MI/MoV 0.2, by March 2020, relevant law enforcement agencies in Malawi, Mozambique and Zambia, Kenya, Tanzania and Uganda were able to access to [six individually tailored RRGs](#) and [16-minute e-learning video](#) to guide the use of financial investigation tools in response to IWT at both domestic and international levels (Annex 25-27). The baseline condition was that no best practice existed to transmit country-level tailored understandings of financial investigation of IWT into future enforcement and prosecutions or assist future training and capacity building on IWT-linked financial flows. These resources were disseminated to local stakeholders via email and telephone due to the physical restrictions on travel/the gathering of groups of people imposed by Covid-19. It was essential to achieving the Outcome that the project could draw upon its strong local partnerships and local champions (MI 0.3/MoV). In satisfaction of MI 0.3, all champions are equipped with the slides, handouts and exercises on USB stick so they can continue to disseminate them (Annex 10-12). They also have a contact sheet with the names of all participants and their contact details to facilitate inter-agency working (GDPR compliant). Champions were assigned with continuing agency communication with the project training team and other agencies on the course – to facilitate ongoing collaborative working. The identification of champions is testified by project and M&E notes, detailing both the provision of course materials and the selection of individuals (at least one per institution). In line with MI/MoV 0.2 and 0.3, these “champions” helped to disseminate the RRGs, and so, despite Covid-19, the project received correspondence acknowledging receipt of the resources from at least two institutions per country, as well as formal letters of support from the following institutions: FIU in Mozambique; Prosecutors Office in Mozambique; FIC in Zambia; DNPW in Zambia; FIA in Malawi; DNPW in Malawi; FIU in Tanzania; FIU in Uganda; UWA in Uganda; FRC in Kenya (Annex 25). The project also received multiple letters of support from local NGOs (Annex 26).

Most importantly, in line with the project’s Outcome Statement and MI/MoV 0.1-0.3 (and MI 3.3, see above), there is clear evidence that best practice is feeding into planning and by domestic agencies and international organisations. The most compelling evidence of the impact of the project’s Outcome is provided in the form of financial investigations and best practice documented in the project in action. For example, Malawi, Tanzania and Zambia contributed voluntary responses to the [FATF’s 2020 global evaluation](#) of financial action against IWT. In August 2019, the FIA, police and DNPW initiated a financial investigation against a high-level Asian figure involved in ivory trafficking after a property search uncovered financial intelligence at the scene. Tanzania has also applied the techniques from IWT021 and

IWT043 the so-called “[Ivory Queen](#)” using financial intelligence in a case involving 1.8 tonnes of ivory, and at least three traffickers working across Africa. Uganda recently used financial intelligence in a case involving three Vietnamese nationals linked to timber trafficking (**confidential**) and national authorities assisted the U.S. Fish and Wildlife Service in the arrest of three high-level figures in the Kromah syndicate, an investigation initiated after the IWT021 training (Annual Report IWT021). All three are charged with [money laundering](#) – among other crimes – in the U.S.

In the medium term, WCP in Zambia and NRCN in Uganda have pledged to include the material in the next version of their RRGs, ensuring it will be used in the future. The materials have also been shared with the in-country teams of major NGOs such as Flora and Fauna International and WWF International, not formal partners of the project. The financial approach also has high-level support: in 2020, [President Kenyatta](#) of Kenya advocated for financial techniques against IWT at a meeting of the United for Wildlife Financial Task Force, in RUSI’s presence. This project has also contributed to macro-level changes: the use of ‘follow the money’ approaches is now a [strategic pillar](#) of U.S. counter-wildlife trafficking assistance under the END Act. Evidence for MI 3.3 is also above in Output 1 and Section 3.1. Citing RUSI, FATF’s attention will have an [unprecedented impact](#) on the use of financial investigations against IWT because it has committed to measuring countries’ progress against IWT as a financial crime in 12 months’ time (in June 2021).

In terms of the long term achievement of the Outcome, the translation of improved capacity into the disruption of criminal trafficking networks, a fall in poaching and a rise in tourism, however, is a longer-term process, that requires longer than the project timeline to be evidenced (Sections 3.3, 3.4, 5, 6, 8). This is not least because of the lengthy periods often required for investigations to result in convictions in the focus countries (on average 2-5 years) and the fact that this project is not the only factor which contributes to the achievement (or not) of this aim (Section 9). However, there is clear evidence to show that this process is underway in the form of active or concluded financial investigations in IWT cases Malawi, Tanzania and Uganda (above). Moreover, this is supported by population recovery in some species (Section 5) and the shift of IWT consolidation and shipping from former key hotspots like Kenya and Uganda to countries in West and Central Africa.

3.3 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 held 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) and now FATF, the global standard setter for AML. In September 2018, ESAAMLG convened the 4th Public-Private Sector Dialogue (PPSD), which discussed improving approaches to IWT. Led by Namibia, the group are currently updating the typologies in the 2016 ESAAMLG study on IWT and AML (forthcoming). This has guaranteed a high level of commitment from the partner countries. Although it remains on the grey list, Uganda has engaged substantively with the project. As expected, the project benefitted from high levels of motivation amongst all participants – particularly FIUs – to meet these standards. This assumption is also proven in the introduction of [new legislation](#) in Malawi and Kenya (amongst others) to enable financial responses to IWT.

‘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 held true. Although a limited number of high-level prosecutions have taken place in the region (see Section 3.3), 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 is in [‘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 [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 held 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. 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; ergo 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](#), and now [Covid-19](#). 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 (see Section 5 for more on Covid-19).

‘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 held true and runs both ways (though it may be affected by Covid-19 in the future): 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.’ (see Section 5 for more on Covid-19).

Output-level assumptions:

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

This 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.

‘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 held 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 50 in-person interviews and 11 interviews by telephone with a total of 90 representatives across the public and private sector (Annex 5-7). Local agencies shared official sensitive documents with the project to inform the content of the training, such as unpublished National Risk Assessments (**confidential**) and welcomed new resources in the form of the e-learning video/RRGs.

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

This assumption held true. 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 (Annex 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 held true, as evidenced by the high level of participation in Output 2 and Output 3 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 (Annex 12-14). Despite the disruption posed by Covid-19, the project received peer review comments and formal letters of support from government agencies in all countries for the RRGs and e-learning video (Annex – 25-26).

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

This assumption held true: 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 were often led by local presenters across all three courses, ensuring the most accurate and contemporary interpretation of regulatory and legislative guidance was disseminated (Annex 18-21).

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

This assumption held 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 (Annex 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 held 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 (Annex 12-14). Despite the disruption posed by Covid-19, the project received peer review comments and formal letters of support from government agencies in all countries for the RRGs and e-learning video (Annex 25).

‘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 held true, as evinced by the willingness to perform unpaid peer review of the resources and the receipt of multiple letters of support despite the physical and personal disruption of Covid-19 (Annex 25-28). This was also reaffirmed by correspondence with relevant agencies (Annex 28.)

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

This assumption was a focal point for consistent M&E and did not hold true. 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 but dissemination of the resources created in Output 3 has been minorly affected by Covid-19 (Section 5). Although the resources received wide spread support at the Director level (Annex 25-26), and the RRGs have been used and downloaded (Annex 30), there have been fewer views of the e-learning video module than expected due to internet restrictions amongst local government agency working from home (see Section 3.1).

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

The ambitious project contributed to ending IWT and poverty alleviation in several ways. Firstly, it contributed 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 ultimately control IWT. Without financial

tools, law enforcement is limited to disrupting replaceable poachers on the ground, thus not sustainably reducing IWT or enabling citizens to benefit from revenues derived from wildlife resources (Section 6).

By building capacity to use financial tools, the project contributed to a step-change in how IWT is investigated and prosecuted in the focus countries (Annex 2). The project's contribution is evident in progress on three key areas in East and Southern Africa, each of which have been outlined in various sections in this report, but together contribute to the high-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 (Annex 18-21). Third, it has provided confidence in the potential of using asset recovery in IWT cases in the future (Annex 18-21) – these recovered funds can be used by the state for poverty alleviation.

More detailed evidence for each is given throughout the report and Annex 1-32. Together they further progress towards this high-level Impact, which is unavoidably indirect and long term: in the project's short lifespan, is not possible to track it in measurable terms due to the *substantial* timeframes involved in the translation of project activities into the achievement of an increase in wildlife populations, a corresponding growth in wildlife tourism (which itself contains a time lag as marketing takes hold), a long-term improvement in public finances and a corresponding reduction in poverty. Despite the timelines, however, these impacts are real and project activities have contributed to their achievement, as testified by the robust project assumptions (Section 4) and theory of change that increased high-level investigations and prosecutions will lead to reduced poaching, which will lead to higher elephant and rhino numbers, which will lead to expanded wildlife tourism. The high-level impact on *specific species* is explored in Section 5, while the higher-level impact on *poverty alleviation* is explored in Section 6 below.

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

Evidence that the project is supporting the 2nd and 3rd IWT Challenge Fund objective is throughout this report (Annex 5-32). In contributing to 'strengthening law enforcement and the role of the criminal justice system', including the effective application of existing legislation, 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 is also noteworthy that speeches by senior UK Government figures and the UK Royal Family at the 2014 and 2018 London Conferences have placed [significant emphasis](#) on financial approaches. 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 such as asset confiscation (Annex 18-21). In qualitative terms, this broad participant base allowed for a high-quality inter-agency, cross-sector dialogue, the achievement of clear learning outcomes, and positive trainee feedback (Annex 21). See this report for further evidence.

5. Impact on species in focus

The project will have a long-term impact on elephants and rhinos, as well as pangolins. Across the six target countries, the project will also have secondary effects on other endangered species targeted by IWT, such as African grey parrots and rosewood. 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 and 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. After they were CITES Appendix 1 listed in 2016, [seizures increased dramatically](#).

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 project's impact is likely to be most strongly felt. For example, a count in the Selous-Mikumi area in 2018 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 – particularly Uganda. As such, the greater risk involved in moving wildlife through these countries will positively impact neighbouring source countries too (Section 3.4).

However, aside from current population distributions, this project is only one of a number of factors that will impact upon the species' in focus – including Covid-19 and the impact of subsequent declines in wildlife tourism revenue and ranger patrols. To take one illustrative example, [28% of anti-poaching staff have been laid off](#) in the Enduimet Wildlife Management Area next to Kilimanjaro National Park in Tanzania. Regionally, at least [15 rhinos have been killed](#) in Southern Africa (South Africa and Botswana) since Covid-19 began. Furthermore, 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).

6. Project support to poverty alleviation

Besides Kenya, which is [now classified](#) as a lower middle-income country (2020), all countries involved in the project are Least Developed Countries. 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, 2018), 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 7). Impact on poverty alleviation was 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 directly upskilled local civil servants working in law enforcement in those locations. Secondly, the project improved the resilience of the livelihoods of those 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 providing the knowledge required to target higher level figures rather than pursuing poachers on the ground, this project contributed to poverty alleviation by targeting the unequal economic incentives and vulnerability that underpins IWT. Whilst there is no common profile of the ['average poacher'](#), it is agreed that poachers involved in the actual hunt/killing of an animal on the ground have low-to-lower than average household incomes. Poachers 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 entire families at risk, entrenching the poverty cycle. If a principle income-earner is imprisoned, or incurs a sizable fine, a household in moderate poverty can [slide into absolute poverty](#) (Knapp 2017). Other household members may then be pushed into poaching.

It will also have a macro-economic effect on poverty alleviation by contributing to a growth in wildlife tourism. Tourism was Africa's 2nd fastest growing industry pre-Covid-19, with [projected growth](#) between 55% between 2017-2027. According to one estimate, tourism contributed an [average of 10.3% of GDP](#) in all six countries when accounting for direct and indirect benefits in 2019; with wildlife tourism accounting for around 80% of all tourist activity in Africa. A [2015 survey](#) by the UN World Tourism Organization saw 80% of government agencies (n=46) identify poaching as a serious threat to tourism. Reducing poaching by increasing capacity to disrupt trafficking networks will halt the erosion of these livelihoods, contributing to the local economy. This project works in synergy with national priorities; 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.

Improving the investigation skills needed to reach the highest echelons of IWT networks is especially important given the [economic pressure created by Covid-19](#), which has halted almost all wildlife tourism in the region and significantly impacted the finances of national parks and private conservancies. According to the Basel Institute, this has significantly [elevated the risk of IWT](#) globally, but also in Kenya and Tanzania in particular, due to economic privation and the [loss of ranger patrols](#) through redundancies. The ability to tackle one structural driver of the trade (profit) is an important element of ensuring wildlife and facilities survive for when tourism resumes. In line with a multidimensional approach to measuring poverty alleviation, citizens in and beyond immediate source areas will benefit from the project's contribution to reversing the loss to 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. In turn, this 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 emphasised concepts of good governance, the rule of law and anti-corruption and sharing best practice and raising awareness (Annex 18-21).

This project also increased 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– thereby providing a platform for their perspectives and agency in countering-IWT (Section 7).

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/theory of change (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. Finally, the review of the 2019 Annual Report said '[IWT043 provides] a foundation for community engagement in anti-poaching and IWT trafficking and financial flows longer term through the knowledge sharing and capacity building activities it is undertaking.'

7. 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; 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](#) has made it difficult to break down this limited information in a meaningful way that produces a gendered dataset (Annex 5-7). As such, future data collection should be broken down from a gendered perspective in 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 pre-existing distribution of women in relevant positions, the project was extremely successful: in Zambia, Malawi and Mozambique, 36%, 41% and 39% of participants were women respectively (Annex 12-17). 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 included as many presentations as possible by local female presenters. In Zambia and Malawi, 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 6/8 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 (Annex 12-14). This gender parity was maintained during the development and dissemination of the RRGs and e-learning video, which feature gender-neutral language and show women and men involved in the supply chain and IWT investigations (Annex 24). Crucially, RUSI ensured the resources were disseminated to the Black Mambas, an [ALL-FEMALE anti-poaching unit](#) in South Africa through their capacity building trainer, Rtd UK Army Major Alice Bromage.

8. Sustainability and legacy

A sustainable exit strategy was integral to project design; chiefly reflected in the production of best practice RRGs/e-learning resources in Output 3 and corresponding investment in the dissemination phase (Section 3.1-3.2). These resources will ensure new skills will not be lost as a result of high staff turnover; an issue observed in IWT021. All materials are publicly accessible in line with DfID's Research Open and Enhanced Access Policy. Furthermore, the project asked IWT030 to use their e-learning platform to ensure the resources would be available on a secure server indefinitely. Sustainability is also ensured by upskilling local partner NGOs, who have all committed to further financial crime work (Annex 25-27). Finally, sustainability is secured in the local government relationships that enable RUSI to apply for further funding for follow-up financial projects, something they have formally indicated they would seek in a new project (Section 2; 3.1). See Section 3.1-3.2 for the Outcome-level *legacy & sustainability*.

9. Lessons learnt

Throughout the project, the project team was encouraged by the M&E expert to 'learn while doing' and adapt lessons learned from implementing other projects and research on similar topics. RUSI placed significant emphasis on incorporating lessons learned from IWT021. In the event of such a lengthy delay to the start (1 year), this project would recommend a thorough review of the M&E plan and any changes to assumptions (Section 9). 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 ensure it is tailored to local conditions (Section 2). Encouraging local experts to deliver sessions during the trainings was crucial to peer-to-peer learning. This demanded more staff hours devoted to ensuring presentations were high quality and mutual expectations were fully articulated, but it secured the buy-in to guarantee champions (MI 0.3 and 3.3) were highly motivated to carry out follow up actions like disseminating the RRGs and e-learning resource (Annex 25-32). This collaborative approach should be seen as best practice for creating local ownership over the project (particularly capacity building trainings), as shared in IWT043's contribution to the [IWT CF Newsletter](#). A final recommendation is to adopt a multi-agency, cross-sector approach: beyond the content of the courses, much work is needed to build trust and understanding, with inter-agency cooperation key to financial cases. Multi-agency fora also helps prevent corruption by negating a single point of failure in the investigation of a case. See also Section 9.1.

9.1 Monitoring and evaluation

From the outset, M&E has formed an integral part of project delivery, as evinced by several changes to the logframe to guarantee the effective delivery and evaluation of the project Outcome and Outputs. 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 primarily a consequence of the delays to the project start date, which was caused by factors beyond RUSI's control. The delay was caused by IWT021's

extension after the death of our in-country project partner, Wayne Lotter of PAMS Foundation. A delayed start date to IWT043 enabled the team to deliver IWT021's final activities to a high standard, achieving an A+ rating at evaluation.

RUSI used the delay to complete a 'lessons learned' exercise, and IWT043's project design was subsequently amended in two significant ways. First, an approved Change Request was submitted to eliminate the post-training 'mentoring days' from the project design. Feedback on IWT021 suggested it was difficult for public sector participants to spend a further two days with mentors given their substantial workloads. These days were replaced with a 1-day civil society training for partner NGOs. Partners suggested this would help them to support local participants in the application of the techniques post-project. Second, the original IWT043 project plan was approved in 2017, when there were few other finance-initiatives linked to IWT in East Africa. By March 2018, UNODC had appointed a dedicated regional mentor covering Kenya, 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' went ahead, they would risk wasting project funds through duplication. In November 2018, UNODC convened a regional training event on financial approaches to IWT involving Kenyan, Tanzanian and Ugandan participants trained by RUSI under project IWT021, many of whom the project 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 (MI 1.1-1.3, Annex 5-7). Based on the findings of Output 1, it was clear that this high level of demand was generated by the low level of capacity and awareness regarding how to tackle IWT using financial tools. MI 2.1 and 2.2 were therefore updated to properly capture, measure, evaluate the revised Output design. The number of participants to be trained was increased from 20 to 35 per country (MI 2.1), a target exceeded during project delivery (Section 3.1-3.2, Annex 7-21). The project also amended MI 2.2 to match local capacity: consultation with local leadership made clear it would not be politically possible to produce formally agreed SOPs in the time frame. Instead, SOPs were covered by discussing and agreeing best practice orally in sessions and group exercises and codified in Output 3 (Annex 25-26). This change 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 formal SOPs.

These changes led to a series of expected budgetary reallocations within the financial year. These were discussed with LTS before the submission of approved Change Requests. Specifically, RUSI moved budget between Operating Costs, Travel and Subsistence, and Staff Costs lines within the financial year. Although the project ran workshops in fewer countries, the *scale* of the workshops significantly increased. 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 a good 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 like venue hire. Lower operating costs were further reinforced by the low volume of accommodation requested by additional participants in Mozambique, which confounded expectations based on previous trainings in the region. There was no reallocation across financial years during the project.

After the 2019 Annual Report confirmed the project was on track to meet its Outcome, the evaluator was supportive of a suggestion to change MI 0.3 on the basis that initial capacity as established by Activities 3.1-3.3 was unexpectedly low. The 'inclusion of financial evidence in 50% of new court cases' was not a feasible achievement for the project in the timeframe and resources given. Likewise, the MoV for 0.3, including courtroom monitoring, was not in place in to effectively monitor this MI. A Change Request to use the same 0.3 indicator as IWT021 (Champions) was therefore approved by DEFRA. However, it should be noted from Section 3.2 that the project did make strong contributions to original MI 0.3 despite these challenges. Finally, reflecting the impact of Covid-19, the project submitted an approved Change Request to eliminate the travel and subsistence budget line so that these funds could be invested in remote dissemination of project findings and the RRGs/e-learning resource (Outputs 2, 3).

These Change Requests demonstrate that 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 (at least 4 times a year), the project team have consistently engaged in M&E in practice. This gave the team confidence that the Outputs contributed to the Outcome and Impact, and MoVs were available (Annex 5-33). The project also contributed a [peer learning](#) article with project reflections for the IWT Challenge Fund Newsletter (Annex 22).

9.2 Actions taken in response to annual report reviews

The feedback from the 2019 Annual Report submitted previously was extremely positive with the reviewer noting '[o]verall this project is promising and shows great potential to make a positive contribution to tackling IWT'. The project team has taken proactive steps to ensure that the following 5 comments were considered in the remaining activities and this report.

1. "The project could also note its interactions with each country government in its next AR under partnerships if applicable." *Further details written into this final report, see also Annexes 5-28.*
2. [...] "reviewer suggests the project report split this impact into short, medium- and long-term goals to account for timing and give realistic representation of what success and contribution towards impact will be defined by through each period." *Feedback incorporated into Section 3.2 and 3.4.*
3. The reviewer notes that Output 1 is 'disaggregated by gender', but this disaggregation has not been detailed under Output 1 and should be commented on'. *Feedback incorporated into Section 3.2 (please bear in mind the tight space limitations).*
4. 'Champions' formulate part of the projects exit strategy and could be linked into reporting more for the next AR to clearly highlight and strengthen this. *Feedback incorporated throughout this report.*
5. "The M&E consultant reviewing the projects progress against its logframe is a strong positive. Is the project able to highlight how often this will take place?" *Feedback addressed in Section 9.1.*

10. IWT Challenge Fund Identity

Throughout, the project has recognised the UK Government as the funder and publicised the IWT Challenge Fund using the official language in the Guidelines. The support was acknowledged in launching the project on RUSI.org and throughout all Outputs (see Annex 29). The project has also ensured that UK logos appear on training materials, agendas, delegate lists, RRGs and the attributions in the e-learning video and trailer (Annex 5-29); participants are highly likely to understand this work was funded by UK Aid. The project engaged with the UK High Commission in each country to find synergies with current initiatives and publicise their IWT work. In Mozambique, the project worked closely with the BHC to invite and publicise the training and attended a breakfast with the visiting then Permanent Secretary to DEFRA, Rt Hon Teresa Coffey (Annex 5). Where the source material of the RRGs is to be used in the future, RUSI has attained guarantees that it will also feature the UK aid logo (MoV 3.2, correspondence).

11. Finance and administration

11.1 Project expenditure

Project spend (indicative) since last annual report	2019/20 Grant (£)	2019/20 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				

Staff employed	Cost (£)
David Artingstall, Illicit Finance Expert and Trainer	
Neil Bennett, Illicit Finance Expert and Trainer	
Mary Rice, EIA IWT Expert	
Tom Keatinge, Project Director	
Cathy Haenlein, Project Lead	
Alexandria Reid, Lead Analyst	
TOTAL	

11.2 Additional funds or in-kind contributions secured

Pro bono sources of funding	Total (estimate) (£)
EIA	
Western Union	
Standard Chartered Bank	
TOTAL	

11.3 Value for Money

RUSI believes that this project offered excellent value for money in terms of its immediate activities and long-term impact relative to cost inputs. It is a clear case of an intervention that would not otherwise have occurred in Southern Africa. RUSI's unique convening power, networks and expertise in both financial security and IWT contributed directly to filling this gap through this distinct, targeted project. These factors meant that the project was able to leverage in-kind and pro-bono contributions in all countries in which it operated. Partners such as Interpol contributed to the project remotely, providing 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 (FIU). They 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).

Furthermore, the open access-quality of the project findings, and of the best practice in the RRGs and e-learning resource, presents further value for money in light of the future impact that this will have. Wide uptake of project findings has been in evidence, with the project team consulted by broader initiatives seeking to incorporate a financial angle into their work. Evidence of specific instances of value for money is documented in Section 9.1, but in brief includes the use of a pre-existing e-learning platform funded by IWT030, the solicitation of multiple pro bono contributions (Section 2) and the substantial savings created by the economies of scale created by local enthusiasm in Output 2 (Section 3.1).

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

I agree for the IWT Secretariat to publish the content of this section (please leave this line in to indicate your agreement to use any material you provide here)

- In Malawi, Mozambique, Zambia the project provided bespoke financial investigations training to 159 delegates from 25 government agencies and 38 financial institutions.
- In 2018, RUSI used its Challenge Fund experience to help establish the United for Wildlife Finance Taskforce, launched by HRH Prince William and RUSI Chairman William Hague in 2018. Over 34 financial institutions with a footprint in Asia, Africa, Latin America and Europe have since signed the Taskforce Declaration. In June 2019, US Fish and Wildlife Service noted that the taskforce had provided crucial assistance and intelligence sharing in the Kromah trafficking case.
- In 2020, RUSI launched six tailored 'financial intelligence handbooks' for wildlife investigators in Kenya, Uganda, Tanzania, Zambia, Malawi and Mozambique – resources that are the first of their kind to ensure specialist knowledge on financial investigations against IWT. These are accompanied by a 16-minute financial intelligence training video for law enforcement agencies, available in English, French and Portuguese.

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

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.			
Outcome: 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.	0.1 – By March 2020, 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. 0.2 – By March 2020, relevant law enforcement agencies in Malawi, Mozambique and Zambia, Kenya, Tanzania and Uganda have access to dedicated written rapid reference guides and an e-learning module to guide the use of financial investigation tools in response to IWT at both domestic and international levels. 0.3 – One “champion” for the use of financial intelligence in IWT cases can now be identified within each public-sector agency trained in Malawi, Mozambique and Zambia, with each having agreed to disseminate and sustain knowledge and encourage use and uptake of material covered in training and rapid reference guides across their organisations by March 2020.	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. 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. 0.3 – Project notes and M&E record of implementation and results of training showing appointment of champions; pre- and post-training evaluation surveys; internal agency records; journal articles; news reports.	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. 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. 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. 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.
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	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,	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.	The security situation in target research areas will allow research activities to take place. 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

Project summary	Measurable Indicators	Means of verification	Important Assumptions
<p>Zambia, and the capacity of relevant authorities to tackle them.</p>	<p>Mozambique and Zambia. This research will form a core part of the e-learning course 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>1.2 Citations of the research, as documented in the two articles, one e-learning course 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>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 investigations and prosecutions in each country.</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 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>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 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>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 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>

Project summary	Measurable Indicators	Means of verification	Important Assumptions
<p>Output 3</p> <p>Best-practice in financial investigation of IWT is generated for future use, and documented through one universal e-learning module and six rapid-reference guides, which 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 One universal e-learning module 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 March 2020.</p> <p>3.2 By March 2020, 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 March 2020, 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 capacity on financial investigation of IWT.</p>	<p>3.1 One universal e-learning module 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 access to e-learning module and rapid-reference guides to selected law enforcement agencies; instructions provided by email and in person where appropriate; training records; course feedback.</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 intergovernmental organisations; course feedback; instructions provided by email and at launch events where appropriate.</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>
<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 rapid-reference guides and one universal e-learning module for each country to endure beyond the training’s end. 			

Project summary	Measurable Indicators	Means of verification	Important Assumptions
<ul style="list-style-type: none"> <li data-bbox="98 145 2141 183">• 3.2 – Outreach to all relevant public-sector training departments for the provision of the resources to those institutions. <li data-bbox="98 183 2141 311">• 3.3 – Transferral by email or in person (by the core project team or by project partners) as appropriate of the six tailored rapid-reference guides and one universal e-learning module 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 2 Report of progress and achievements against final project logframe for the life of the project

Project summary	Measurable Indicators	Progress and Achievements
<p>Impact</p> <p>A reduction in 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>The project achieved its impact statement (and contributed to ending IWT and poverty alleviation) by improving local government capacity to investigate and prosecute financial crime tied to IWT domestically and internationally, as evidenced by a range of indicators that reveal a shift from the baseline condition. Including, 1) building capacity to use financial tools to allow more effective investigation and prosecution of <i>mid-</i> and <i>high-level</i> perpetrators (Section 6), 2) raising awareness in the private sector of IWT as a financial crime risk, which they have a legal compliance duty to monitor (Annex 18-21), 3) creating the conditions for asset recovery in IWT cases in the future (Annex 18-21) – these recovered funds can be used by the state for poverty alleviation and development. As a consequence, financial investigations in IWT cases are ongoing in Malawi, Uganda and Tanzania (Section 3.1) – a major development.</p> <p>This project’s high-level impact is unavoidably indirect and long term: in the project’s short lifespan, is not possible to track this impact in measurable terms due to the <i>substantial</i> timeframes involved in the achievement of an increase in wildlife populations, a corresponding growth in wildlife tourism (which itself contains a time lag as marketing takes hold), a long-term improvement in public finances and a corresponding reduction in poverty. Despite the timelines, these impacts are real and project activities have contributed to their achievement, as testified by the robust project assumptions (Section 4) and theory of change that increased high-level investigations and prosecutions will lead to reduced poaching, which will lead to higher elephant and rhino numbers, which will lead to expanded wildlife tourism. The high-level impact on <i>specific species</i> is explored in Section 5, while the higher-level impact on <i>poverty alleviation</i> is explored in Section 6 below.</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>0.1 – By March 2020, 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 March 2020, relevant law enforcement agencies in Malawi, Mozambique and Zambia, Kenya, Tanzania</p>	<p>The project achieved its Outcome in terms of improved local government capacity to investigate and prosecute IWT-related financial crime domestically and internationally. Here, it is important to understand the baseline condition established in Output 1, IWT021 and a recent FATF 2020 global assessment to which IWT043 contributed extensively (Section 3.1). The FATF concluded that ‘financial information is not being regularly or proactively collected, developed, and disseminated to initiate or support financial investigations into wildlife crimes.’</p> <p>In light of this baseline, the progress documented in this report is both significant and demonstrative of the impact of IWT043. MI/MoV 0.1 was achieved in the 21 days of training provided in Malawi, Mozambique and Zambia, exceeding all expectations in increased capacity and uptake. 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 each country, participants included the central bank,</p>

	<p>and Uganda have access to dedicated written rapid reference guides and an e-learning module to guide the use of financial investigation tools in response to IWT at both domestic and international levels.</p> <p>0.3 – One “champion” for the use of financial intelligence in IWT cases can now be identified within each public-sector agency trained in Malawi, Mozambique and Zambia, with each having agreed to disseminate and sustain knowledge and encourage use and uptake of material covered in training and rapid reference guides across their organisations by March 2020.</p>	<p>FIU, revenue and customs, judiciary, prosecutions, anti-corruption authority, the criminal investigations police, wildlife authority and financial institutions (including mobile money operators), amongst others. In line with MI/MoV 0.1, capacity increased significantly as demonstrated by results of pre- and post-training evaluation surveys and other relevant MoV in Annex 16-21.</p> <p>In achievement of MI/MoV 0.2, by March 2020, relevant law enforcement agencies in Malawi, Mozambique and Zambia, Kenya, Tanzania and Uganda were able to access to six individually-tailored RRGs and 16-minute e-learning video to guide the use of financial investigation tools in response to IWT at both domestic and international levels (Annex 25-27).</p> <p>In achieving the Outcome, the project drew on its local partnerships and champions (MI 0.3/MoV). In satisfaction of MI 0.3, the champions are equipped with the slides, handouts and exercises on USB stick so they can disseminate them (Annex 10-12) and a contact sheet with the names of all participants and their contact details to facilitate inter-agency working (GDPR compliant). Champions are testified by the M&E notes, detailing both the provision of course materials, the selection of individuals (at least one per institution) and their voluntary consent. In line with MI/MoV 0.2 and 0.3, these “champions” helped to disseminate the RRGs/e-learning resource. Despite Covid-19, the project received correspondence acknowledging receipt of the resources from at least two institutions per country (MI 0.2), as well as formal letters of support from the following institutions: FIU in Mozambique; Prosecutors Office in Mozambique; FIC in Zambia; DNPW in Zambia; FIA in Malawi; DNPW in Malawi; FIU in Tanzania; FIU in Uganda; UWA in Uganda; FRC in Kenya (Annex 25). The project also received multiple letters of support from local NGOs (Annex 26).</p> <p>Most importantly, in line with the project’s Outcome Statement and MI/MoV 0.1-0.3 (and MI 3.3, see above), there is clear evidence that best practice is feeding into planning and by domestic agencies and international organisations. Malawi, Tanzania and Zambia contributed voluntary responses to the FATF’s 2020 global evaluation of financial action against IWT. In August 2019, the FIA, police and DNPW initiated a financial investigation against a high-level Asian figure involved in ivory trafficking after a property search uncovered financial intelligence at the scene. Tanzania has also applied the techniques from IWT021 and IWT043 the so-called “Ivory queen” using financial intelligence in a case involving 1.8 tonnes of ivory, and at least three traffickers working across Africa. Uganda recently used financial intelligence in a case involving three Vietnamese nationals linked to timber trafficking (confidential) and national authorities assisted the U.S. Fish and Wildlife Service in the arrest of three high-level figures in the Kromah syndicate, an investigation initiated after the IWT021 training (Annual Report IWT021). All three are charged with money laundering – among other crimes - the U.S.</p>
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<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 e-learning course 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>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/MoV 1.1, Output 1 was achieved with the publication of a series of articles containing publishable findings from the strategic assessment (Activities 1.1-1.2), including a BBC News article in October 2018, ‘Pangolin Survival: How “Following the Money” Could Save Lives’ (over 276,000 views). The project also published several well-received articles on RUSI.org, ‘A Missing Page: Strengthening the Response to the Illegal Wildlife Trade’ (848 views); Money Laundering and IWT: Financial Action at Last? (1576 views); RUSI Experts Welcome Renewed Global Commitment to Target Financial Proceeds of Illegal Wildlife Trade (404 views) (Annex 22; 32). RUSI also wrote a peer learning article with project findings for the IWT Challenge Fund Newsletter (Annex 22). The findings were also shared with high profile delegates at least four events.</p> <p>In line with MI/MoV 1.2, the project findings were widely shared across social media and became embedded across several other publications and websites (Annex 22, 30). 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).</p> <p>In line with MI/MoV 1.3, the project strategically engaged the FATF and World Bank (both in writing and in face-to-face meetings) to encourage them to incorporate performance against IWT into mandatory mutual evaluations on anti-money-laundering performance, a primary recommendation of the public report produced during IWT021 (Annex 5; 7). The success of continued engagement under IWT043 was evinced by RUSI’s invitation to privately brief the Chinese President of the FATF on project findings at the UK Treasury in September 2019; and the inclusion of five references to RUSI’s work in the 2020 FATF IWT report. The FATF’s engagement with IWT will have an unprecedented impact (including in IWT043 countries) because it has committed to measuring countries’ progress against IWT as a financial crime in 12 months’ time (in June 2021). The project has also successfully influenced the content of other IWT training programmes, including those delivered by the Conference of Western Attorneys General (CWAG) Africa Alliance Partnership, WCS, WWF International, and Traffic, all are briefed on the findings of the project.</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 11 interviews via telephone with a total of 90 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 5-8, 22). This assessment was conducted with attention to the gendered knowledge and flows</p>

	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>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 IWT021, this assessment concluded that financial investigations are rarely conducted in crimes connected to IWT across Zambia, Malawi and Mozambique (Section 2.3). The findings were shared in outputs produced for Activity 1.3. For more evidence, see Section 3.1.</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 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>
<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>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</p> <p>Output 2 was achieved with the delivery of 21 days of training in Mozambique, Malawi and Zambia as planned. With the completion of Output 2, the baseline has fundamentally changed, and self-reported capacity has grown significantly (MoV 2.1, Annex 18-21). In line with MI/MoV 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/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) - a 51% increase on initial targets.</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.</p> <p>In line with MI/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. The utility of these champions is evinced in the high level of uptake of resources created in Output 3, including formal letters of support (Annex 25-28). These champions (one per institution) can also be verified through email</p>

	<p>coordination between trainees in relation to the training delivered by September 2019.</p>	<p>contact with attendees and a review of the post-course participant surveys (Annex 18-21). See also Section 4.</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 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>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. The team arranged the logistical components of the training courses in Malawi, Mozambique and Zambia, involving 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>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 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>Output 3 Best-practice in financial investigation of IWT is generated for future use, and documented through one universal e-</p>	<p>3.1 One universal e-learning module 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</p>	<p>Output 3 and MI/MoV 3.1 was achieved with the with the creation of six individually tailored RRGs and a 16-minute e-learning video hosted on https://shoc.rusi.org/IWT and combattingivorytrade.com. These resources were disseminated to local stakeholders via email and telephone due to the physical restrictions on travel/the gathering of groups of people imposed by Covid-19. Nonetheless, the local relationships</p>

<p>learning module and six rapid-reference guides, which 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>least 12 training departments of law enforcement agencies (two per country) by March 2020.</p> <p>3.2 By March 2020, 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 March 2020, 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 capacity on financial investigation of IWT.</p>	<p>and knowledge gained through Output 1 and 2, as well as the presence of champions in each public sector institution trained (MI 0.3), laid a solid foundation for the successful achievement of Output 3 despite Covid-19, as evinced by the wide adoption and use of the resources (MI/MoV 3.1-3.3, Annex 25-28).</p> <p>In line with MI/MoV 3.2, the project ensured that local agencies (all those covered by the trainings, more than two per country) were instructed in how to use both products. RUSI sent a direct, first named email to all previous Output 2 trainees providing the RRG and clear details of how to request access to the platform and produced an open trailer for the e-learning resource with instructions (157 views). High level leadership in each of the public sector institutions were provided with the password/login details directly, alongside a PDF of the RRG, so that they can disseminate the log in details to their own staff. Local government provided formal letters of support for the resources (two local government agencies in Malawi, Mozambique, Uganda and Zambia, respectively; one local government agency in Kenya and Tanzania, respectively) and the confirmation of receipt in the form of email correspondence (Annex 26-27). Details on how to access and use the RRGs is included in the first pages of the guide itself and on the website (MI/MoV 3.2, Annex 25-28). Access the http://combattingivorytrade.com/ platform using these details: Login: ENffilm; PW: ELE123 (confidential)</p> <p>In line with MI/MoV 3.3, there has been significant uptake of the Output 3 products. The project received correspondence acknowledging receipt of the resources from at least two institutions per country (Annex 25-26) and formal letters of support from the following institutions: FIU in Mozambique; Prosecutors Office in Mozambique; FIC in Zambia; DNPW in Zambia; FIA in Malawi; DNPW in Malawi; FIU in Tanzania; FIU in Uganda; UWA in Uganda; FRC in Kenya (Annex 25), as well as multiple letters of support from local NGOs (Annex 26). The website hosting the RRGs has received 1072 unique views (Annex 30); EIA's webpage hosting the resources has received 158 unique views. The social media campaign disseminating the resources received 29000+ impressions and 287 direct engagements (Annex 30). EIA's email mailshot of the resources to interested parties (n=268) generated an 88% open rate. The resources were included in multiple RUSI mailshots, including and the Director General's newsletter and the weekly newsletter.</p> <p>Physical flyers were printed in English and Portuguese to disseminate the link to the resources. RUSI directly emailed all participants of the trainings (n=159) with the new resources, receiving positive correspondence (Annex 27-28). However, due to the timeframe when the resources were disseminated (February-March 2020), the e-learning video received fewer views on the platform than expected (n=43, with 32 new sign ups to the platform). This is attributed to the fact that local government are working from home during Covid-19 and have limited personal internet data access; beyond the control of the project. We are confident viewership will raise when people return to work. The platform receives high annual average views (2018: 1000 unique</p>
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		<p>visits; 2019: 1074 unique visits; in 2020 to date: 542 unique visits). The number of views will increase considerably when formal, agency- and NGO-led training programmes resume. Accordingly, the partners will continue to promote the resources after IWT043 ends in March 2020. In addition, there is evidence that best practice is feeding into planning by domestic agencies and international organisations (MI/MoV 3.3, see above re: formal letters of support). The most compelling evidence is provided in the use of IWT-related best practice in action. See Section 3.2.</p>
<p>Activity 3.1– 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 3.1 was completed in the timeframe planned. The project conducted a lengthy design, documentation, peer review and revision phase for the creation of the RRGs/e-learning resource, consulting with local government and NGO partners on the format and content (Annex 27). Feedback suggested it would be difficult ensure all stakeholders could reliably access the video given internet restrictions amongst the targeted audience, resulting in one universally-relevant resource. RRGs were rebranded as ‘financial intelligence handbooks’. All were peer-reviewed by at least two local agencies in each country in Southern Africa; 1 in East Africa.</p>
<p>Activity 3.2 – Outreach to all relevant public-sector training departments for the provision of the resources to those institutions.</p>		<p>Activity 3.2 was completed in the timeframe planned. RUSI sent a direct, first named email to all previous Output 2 trainees providing the RRG (n=159) and details of how to request access to the platform. RUSI also produced an open trailer for the e-learning resource, explaining how to access the resources (157 views). The project provided direct access details to high-level institutional leadership, receiving letters of support in return and positive correspondence (Annex 25-27). For more details, see Section 3.1.</p>
<p>Activity 3.3 – Transferral by email or in person (by the core project team or by project partners) as appropriate of the six tailored rapid-reference guides and one universal e-learning module 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.</p>		<p>Activity 3.3 was completed in the timeframe planned. The project received correspondence acknowledging receipt of the resources from at least two institutions per country (Annex 25-26). The project received formal letters of support from the following institutions: FIU in Mozambique; Prosecutors Office in Mozambique; FIC in Zambia; DNPW in Zambia; FIA in Malawi; DNPW in Malawi; FIU in Tanzania; FIU in Uganda; UWA in Uganda; FRC in Kenya (Annex 25), as well as multiple letters of support from local NGOs (Annex 26). The website hosting the RRGs received 1072 unique views (Annex 30); EIA’s webpage received 158 unique views. A social media campaign received 29000+ impressions and 287 direct engagements (Annex 30). EIA’s email mailshot of the resources to interested parties (n=268) generated an 88% open rate. The resources were included in multiple RUSI mailshots, including and the Director General’s newsletter and the weekly newsletter.</p>

Annex 3 IWT Contacts

Ref No	IWT043
Project Title	Following the Money II: IWT Capacity-Building, East and Southern Africa
Project Leader Details	
Name	Tom Keatinge
Role within IWT Project	Director
Address	
Phone	
Fax/Skype	
Email	
Partner 1	
Name	Mary Rice
Organisation	Environmental Investigation Agency
Role within IWT Project	Subgrantee and partner
Address	
Fax/Skype	
Email	
Partner 2	
Name	Sarah Davies
Organisation	Wildlife Crime Prevention

Role within IWT Project	Local partner
Address	
Fax/Skype	
Email	
Partner 3	
Name	Jonny Vaughan
Organisation	Lilongwe Wildlife Trust
Role within IWT Project	Local partner
Address	
Fax/Skype	
Email	

Partner 4	
Name	Mr Armindo Ubisse
Organisation	FIU, Mozambique
Role within IWT Project	Local partner
Address	
Fax/Skype	
Email	