



Illegal Wildlife Trade (IWT) Challenge Fund Annual Report

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

Submission Deadline: 30th April 2019

IWT Challenge Fund Project Information

Project reference	IWT 056
Project title	Strengthening Enforcement against the Illegal Pangolin Trade in Uganda
Country/ies	Uganda
Lead organisation	Environmental Investigation Agency (UK) Ltd
Partner institution(s)	Natural Resource Conservation Network (NRCN)
IWT grant value	£399,203
Start/end dates of project	1 July 2018 to 31 March 2021
Reporting period (e.g. April 2018-Mar 2019) and number (e.g. Annual Report 1,2,3)	1 July 2018 to 31 March 2019 Annual Report 1
Project leader name	Julian Newman
Project website/blog/social media	https://eia-international.org/our-work/wildlife/pangolins/
Report author(s) and date	EIA with input from NRCN 30th April 2019

1. Project rationale

The primary threat to pangolins is poaching for the illegal trade in scales and meat consumed in Asia, and this project will address the need for more targeted enforcement against the criminal syndicates responsible. Seizure data shows an increase in illegal trafficking of scales from Africa to Asia (see map). Despite the recent success of transferring pangolins to CITES Appendix I, there have been several large seizures of African pangolin scales including 11.9 tonnes seized in November 2017.

All four of Africa's globally threatened pangolin species are found in Uganda, where awareness of the CITES Appendix I listing among enforcement agencies remains low. It also functions as a major transit country in the illegal trade; pangolins sourced in Central Africa are trafficked through Uganda as these illegal shipments make their way to the ports of eastern Africa. Recent estimates suggest between 400,000 and 2.7 million pangolins are poached annually from Central African forests.

Investigations by EIA on the ivory trade during 2016–2017, have shown that organised wildlife crime groups that operate in Africa and Asia are shifting to pangolin scales. These are easier than rhino horn or elephant ivory to conceal and traffic, and according to traffickers, are increasingly profitable.

Organised crime networks corrupt state actors along the length of the trade chain, undermining the rule of law, and impacting all levels of society. Low-level poachers are often from marginalised rural communities in Uganda and are exploited by the higher-level actors.

The lives of marginalised rural communities sharing the ecosystem with pangolins may be further impacted by wide-spread poaching of pangolins leading to the degradation of crops and vegetation important for livestock. Pangolins play an important role in the ecosystem by eating termites and other pest insects, while their habit of burrowing improves soil quality.

2. Project partnerships

In this project, the Environmental Investigation Agency UK (EIA) based in London, UK is the lead institution and the main partner is Natural Resource Conservation Network (NRCN) based in Kampala, Uganda. NRCN is a Ugandan NGO with a mission to ensure the robust investigation, prosecution and reporting of wildlife crime in Uganda to reduce wildlife poaching and promote wildlife conservation. Since 2013, NRCN has delivered a high rate of prosecution for wildlife trafficking offences in Uganda through a formal mandate from the Uganda Wildlife Authority (UWA).

The partnership between EIA and NRCN emerged through engagement between the Executive Directors of both organisations, when it was identified that collaboration on pangolin anti-trafficking would deliver mutual benefits. NRCN brings its capacity in investigating and prosecuting wildlife trafficking, relationships with local partners such as UWA, Uganda Police Force (UPF) and Department of Public Prosecutions (DPP), while EIA brings its capacity in investigating trans-national wildlife trafficking, relationships with global wildlife conservation and law enforcement institutions, and grant management capability. The EIA-NRCN partnership was formalised through a Memorandum of Understanding (MoU) that was signed by representatives of each organisation at the onset of this project. The MoU specifies the details of the DEFRA IWT056 sub-grant, compliance requirements, and procedures for collaboration on project implementation, monitoring and evaluation, and information sharing.

In January/February 2019, the EIA Campaigns Director/DEFRA Project Leader (Julian Newman) and EIA Senior Pangolin Campaigner/DEFRA Principal Campaigner (Chris Hamley) conducted a 6-day overt scoping mission to Uganda. Through this mission, EIA built relationships with the NRCN team (incl. Executive Director, Prosecutors, Investigators, Project/Finance and communications staff) and introduced the pangolin project to relevant government stakeholders.

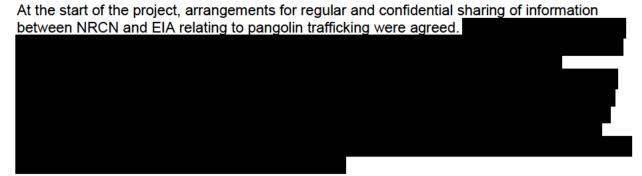
As per the agreed monitoring and evaluation plan, the Senior Pangolin/Principal Campaigner maintained regular communication with NRCN staff to coordinate on project implementation, progress review, information sharing and M&E data submission. This has involved weekly voice over internet calls with the NRCN Project Officer (Joan Namuddu), and very regular communications over WhatsApp and email with the NRCN team.

The EIA has also conducted networking activities with stakeholders (academics, NGOs, donors) involved in pangolin conservation and research in more broadly in Africa, Asia and Europe. This have included meetings or Skype calls with (Research Associate, UCL), Tikki Hywood Foundation (Zimbabwe), David Shepherd Wildlife Foundation, National Geographic and WildAid (December 2019). Through this, EIA has built awareness of the pangolin project amongst other actors and developed our own understanding of on-going pangolin conservation, anti-trafficking and research efforts so that duplication of effort can be avoided, or potential partnership/fundraising opportunities identified.

3. Project progress

3.1 Progress in carrying out project Activities

Output 1: Law enforcement agencies, specialist investigation units (including FIUs) and prosecutors in Uganda, are provided with the information they need to conduct intelligence-led enforcement and financial investigations, and the UWA Intelligence Unit is provided with the skills required to conduct financial investigations



An intelligence/situational assessment (31-pages) was completed, it synthesised trends on the global illegal pangolin trade between 2010 and 2018, including the role of African countries. Desk-based research included an analysis of EIA's pangolin seizures dataset; an overview of relevant findings from other research into pangolin trafficking; review of existing EIA intelligence on pangolin traffickers and wildlife traffickers linked to Uganda; and future priorities for research. This confidential document formed the basis for discussions with EIA's Uganda partner, Natural Resource Conservation Network (NRCN).

Open-source intelligence (OSINT) research was initiated by the Researcher/Field Operative with the aim of informing research fieldwork. Initial outputs from this work have included an intelligence report (shared with NRCN), and data on the activities of operators linked to the January seizure of ivory and pangolin by Uganda Revenue Authority. All incoming intelligence from OSINT, partners and other sources has been stored in EIA's i2 iBase database by the EIA intelligence team.

During the EIA scoping mission to Uganda in January/February (covered in section 2) the activities of other organisations working on wildlife crime in Uganda were mapped, and characteristics of the pangolin trade in Uganda documented. A total of 8 internal meetings were held with NRCN staff to collaboratively assess project activity progress, update a 2019 workplan and finalize a monitoring and evaluation plan. A further 4 external meetings were held with project stakeholders including UWA, UPF, DPP, Interpol and Uganda Conservation Foundation (UCF). During these meetings EIA explained the pangolin project, discussed transnational pangolin trafficking, and built an understanding of government processes for wildlife law enforcement in Uganda.

Proposed amendments to Uganda's wildlife regulations to incorporate the CITES Appendix I provisions for pangolins commenced with two stakeholder consultation engagements, one with UWA and the second with a select of judicial personnel on the possible amendments. The bill was then tabled in parliament for further debate and on the 19th February 2019, it was passed and is now awaiting on the president to assent.

NRCN have conducted investigations into pangolin traffickers operating in Uganda, evidence gathered through these has been used by NRCN/UWA to prosecute cases at the Utilities, Standard and Wildlife Court at the High Court in Kampala. Pangolin/wildlife trafficking cases handled only by UWA have been monitored by NRCN so that prosecution support can be provided if required. For pangolin/wildlife trafficking offenders given custodial sentences, NRCN has conducted prison visits to ensure they complete these.

Recruitment of the Wildlife Valuation Expert by NRCN was completed in February 2019, and the incumbent started work in March 2019. This position was advertised in November 2018 following the disbursement of funds to NRCN, the delay in recruitment was due to a lack of suitably qualified candidates applying for the role. Due to the delayed recruitment, the production of pangolin specific multi-lingual awareness materials for Uganda law enforcement agencies is pending.

Preparations were finalised by EIA and NRCN for a 4-day workshop on applying financial investigation techniques to disrupt organised wildlife trafficking networks in Uganda. The workshop will be delivered at Grand Global Hotel, Kampala between 15 h and 18th April 2019 by two financial crime experts from the UK, Participants will include key officials who are actively working on financial and wildlife investigations and prosecutions in Uganda. They will be drawn from UWA, UPF, NRCN, DPP and the Uganda Financial Intelligence Authority (FIA). The training will include sessions delivered by special

speakers from Western Union, Uganda Revenue Authority (URA) and Standard Chartered. The URA focal point for the World Customs Organisation-UNODC Container Control Programme will also be in attendance. While the preparation for this activity took place in year 1, its actual implementation was delayed to the first quarter or year 2 due to consultancy availability.

Output 2: The financial sector (including public and private sector institutions) have the information they need to produce policies and other actions that combat the link between illicit financial flows and pangolin crime/trafficking.

The EIA Intelligence Team collated names of arrested, charged and convicted pangolin traffickers from open-source media reports for twice-monthly submission to Thomson Reuters World-Check by Liberty Asia. Over the reporting period, EIA submitted 107 names for pangolin trafficking during, 92 of which were accepted and resulted in new or updated profiles (based on World Check and Dow Jones feedback).

In January 2019, URA seized 3,299kg of ivory and 423.7kg pangolin and 3 Vietnamese nationals were arrested. Consequently, the URA released a wanted poster with information on 18 Vietnamese suspects.

Open source data on pangolin seizures was shared with the UNODC as part of a West and Central Africa Transnational Organised Crime Threat Assessment. It was also shared with KPMG who ran a visualisation exercise in partnership with the Royal United Services Institute on Illegal Wildlife Trade.

The production of a financial typology based on findings from investigations into pangolin traffickers is pending based on the outcomes of upcoming training and investigations activities. The completion of a financial investigations training in Kampala in April 2019 will provide the technical basis from which Uganda authorities can undertake more rigorous financial investigations. The information from these can then be used to characterise the money laundering techniques in use by pangolin/wildlife traffickers operating in Uganda.

Output 3: The transport sector (including private and state companies) has integrated the methods used to traffic pangolins into their risk analyses and have become effective partners in combatting the illegal wildlife trade in Uganda

NRCN, through its engagements with Uganda government agencies has cooperated with URA. This has involved submission of quarterly briefings that describe red-flags relating to the characteristics/modus operandi of pangolin (and other wildlife) seizures. In response to this, URA has begun to consider wildlife trafficking red-flags when monitoring cargo crossing the border from South Sudan and DRC (see output 3.3 in section 3.2 for more information).

EIA is currently preparing an intelligence assessment on the use of the services of private and state transport/logistics services in Uganda and Africa more generally for organised pangolin/wildlife trafficking.

Bole International

Airport is a major transit hub between the African continent, the Middle East and East Asia. In 2016, Ethiopian Airlines was used to traffic ivory from Entebbe through Juba, South Sudan, and this airline has regular flights between Entebbe and Addis Ababa. Ethiopian Airlines has not

made any public commitments, such as joining the United for Wildlife Transport Taskforce, neither has Bole International Airport.

Output 4. Public-facing materials to raise awareness of criminality and corruption associated with the global pangolin trade

A cross-campaign (i.e. pangolin, elephants, rhino, Asian big cats) public-facing briefing/report has been produced on the rapid proliferation of organised Vietnamese wildlife trafficking networks in trans-national wildlife trafficking. This report highlights findings from EIA's investigations over recent years, which has identified the role of Vietnam as a major consumer of wildlife products and transit hub for the trafficking of wildlife into China. This will be published for CITES CoP 18, it will target CITES parties (including Vietnam) and observers, and policy makers.

To raise awareness of the EIA pangolin project and the decline of pangolin populations due to trafficking and illegal trade, a range of pangolin-specific communications products have been produced targeting both the public and policy makers. These included a dedicated EIA pangolin project web-page¹, a new video on EIAs pangolin project (posted to YouTube and Facebook for World Pangolin Day) in addition to a total of 14 Facebook, 17 Twitter, 14 Instagram, and 3 LinkedIn posts, and 2 EIA website news stories/blog articles. Questions about the illegal pangolin trade from journalists (South East Asia Globe and Bloomberg Environment) were answered, this resulted in guotes from the Senior Pangolin Campaigner being included in a story by South East Asia Globe.

EIA has collated information from publicly available and confidential sources (English, French and Chinese language media articles, and partner reports) on 102 pangolin (including scales and whole live/dead animals) seizure incidents that took place globally during the reporting period. The dataset now includes 1,010 pangolin seizure records globally for the period 2000 to 2019. The data is accessible to the public through EIA's website, on which there is a map of the world with points for each publicly reported seizure.

Information from the pangolin global seizure dataset was shared with 8 separate journalists. researchers and law enforcement agencies. Recipients included the South Asian pangolin project, UNODC, National Geographic Magazine, UNDP, US Fish and Wildlife Service, and Global Initiative Against Transnational Organized Crime. The information has subsequently been used to for law enforcement investigations, global wildlife crime assessments, magazine cartographic products, and journalistic research relating to the global pangolin trade.

Progress towards project Outputs 3.2

Output 1

1.1 An increase in the number of pangolin trafficking networks that are mapped out using network analysis software (baseline of one in 2017 to at least two by October 2019 and three in total by October 2020); intervention points identified

Through the exchange of investigations findings and intelligence between NRCN and EIA, progress has been made in identifying intervention points for the future mapping of transnational pangolin networks. Preliminary information attained indicates potential linkages between wildlife traffickers operating in Uganda and those known through EIA's ongoing investigations in south east Asia. An intelligence exchange mission taking place in April 2019 will support the planning of research work to map pangolin trafficking networks in year 2 of the project.

1.2 Number of pangolin trafficking networks that are investigated by Uganda Wildlife Authority, increases from one in 2017 to at least two by October 2019 and three by October 2020

https://eia-international.org/our-work/wildlife/pangolins/ IWT Annual Report Template 2019

The Uganda Wildlife Authority has supported Uganda Revenue Authority investigations into a Vietnamese wildlife trafficking network, 3 members of which were arrested trafficking ivory and pangolin from South Sudan in to Uganda in January 2019. The suspects in this case have been bailed and the case is still undergoing investigation, including money laundering components.

1.3 Transfer of all pangolins to CITES Appendix I is included within Uganda's recent orders and regulations enabling CITES provisions to be incorporated into domestic legislation by January 2019

In February 2019, the Ugandan parliament passed the amended Uganda Wildlife Act (2017), which includes an updated schedule of protected species. All four African pangolin species are now listed, including white-bellied, black-bellied, giant and Temminck's pangolin. Penalties for wildlife trafficking offences were also increased. The Bill is now awaiting Assent by the President, as per the Acts of Parliament Act (2000).

1.4 An increase in the number of prosecutors and judges referring to judicial guidelines that reflect the CITES Appendix I listing of pangolins from zero in 2017 to at least in 50% of cases by March 2021

The production of the judicial guidelines for pangolin is pending and will be completed in year 2. Further, since the updated Uganda Wildlife Bill has not been given Presidential Assent it is not possible for prosecutors and judges to refer to this yet. However, of 33 arrests for pangolin trafficking over the reporting period, 13 cases were convicted, 5 are on trial and 15 are pending trial. Court case documents are often not made available to NRCN, it is therefore not possible to confirm whether judges have referred to secondary material. However, conviction rate provides an alternative means through which to monitor the seriousness taken on pangolin cases by judges.

1.5 New UWA Intelligence Unit confirms inclusion of pangolin trafficking on their agenda by January 2019

In February 2019, EIA and NRCN met with the Head of the UWA Intelligence Unit who confirmed the inclusion of pangolin trafficking on their operational agenda. The official explained that trans-boundary areas with DRC and South Sudan are priorities for anti-pangolin trafficking work, and the need to target trans-continental traffickers from Asia. The official also confirmed the importance of following the money relating to wildlife trafficking and raising awareness amongst the police, judiciary and customs of the importance of pangolin law enforcement.

1.6 50% of UWA Intelligence Unit staff receive one training session on required intelligence gathering to pursue financial investigation in cooperation with other stakeholders by December 2019

Between 14th and 18th April 2019, 19 government officials and NRCN staff will participate in a financial investigations training. This will include 2 of 3 investigators (66%) from the UWA Intelligence Unit team, and 5 investigators from the police force, 2 prosecutors from the Department of Public Prosecutions, and 2 analysts from the Financial Intelligence Authority.

Output 2

2.1 Number of financial typologies produced related to pangolin trafficking networks by partners and accepted by banking institutes (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)

This project has not yet gathered sufficient information to generate financial typologies relating to pangolin trafficking networks. It is anticipated that following the financial investigations training workshop in April 2019, a greater awareness of anti-money laundering techniques amongst relevant Uganda government agencies will lead to the gathering of more information IWT Annual Report Template 2019

on the financial crimes of pangolin traffickers. The training will also include an explicit component on building collaboration between government and the private sector.

2.2 Number of accepted submissions to Thomson Reuters World-Check increases from a baseline of 57 pangolin specific submissions accepted in 2017 to 120 by March 2021

Over the reporting period, EIA submitted 107 names for pangolin trafficking during, 92 of which were accepted and resulted in new or updated profiles (based on World Check and Dow Jones feedback). A total of 15 names were not accepted, this was because: 1) the full name was not available, 2) the names were rejected by Liberty Asia, or 3) the names were accepted by Liberty Asia by rejected by World-Check and Dow Jones.

2.3 Number of pangolin crime related financial typologies produced related to pangolin trafficking networks for FIU (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)

As stated above, the project has not yet produced outputs with which to engage the Uganda FIA. However, following the financial investigations training workshop in April 2019 it is anticipated that resources will be allocated in the first instance to reviewing existing wildlife/pangolin trafficking cases to identify sources of evidence for money laundering cases.

Output 3

3.1 An increase in the number of transport leaders that are sensitised to the threats to pangolins and the involvement of organised criminals in the trafficking of pangolins from none in 2017 to 100% sensitised by the end of the project

Based on the January 2019 (covered above) of ivory and pangolin in Uganda by the URA, the United for Wildlife (UFW) Transport Taskforce produced a confidential alert for the transport sector and law enforcement.

Once pangolin trade field research has been completed, we expect to have a more comprehensive understanding of the wildlife trafficking vulnerabilities in the transport network that would warrant advocacy efforts (i.e. encouragement to sign the UFW Transport Taskforce) and the submission of alerts and briefings to transport leaders (including the UFW Transport Taskforce).

3.2 Increase in the number of Ugandan logistic/transport companies that sign up to the UFW's Transport Taskforce by March 2021 (baseline of zero in 2017 to two by October 2019. Goal for March 2021 to be determined following review of how many transport companies appear to be involved)

Preliminary progress on this output was achieved. EIA is currently preparing an intelligence assessment drawing on existing information on the use of transport sector services for pangolin trafficking. This will provide a means through which EIA and NRCN can begin targeted engagements with transport companies on signing up to the UFW Transport Taskforce. This will involve identifying companies that are being used by traffickers to transport pangolin between Uganda (and Africa more generally) and East Asia.

3.3 Mobile scanner deployed by the URA (Uganda Revenue Authority) for ivory detection is also used to detect pangolins by June 2019

In January 2019, URA deployed its cargo container scanner in the north of Uganda (near the border with South Sudan) and detected 3,299kg of ivory and 423.7kg pangolin concealed in wax stored inside carved out timber.

The case was widely reported by Ugandan and international English-language media.

3.4 Logistics companies are sensitised under the UNODC-WCO Container Control Programme of pangolin trafficking out of Uganda

Preliminary contact has been made with URA Customs Supervisor who is the UNODC-WCO CCP JPCU Kampala Team Leader. In year 2, further discussions will focus on sensitising logistics companies on pangolin trafficking issues.

Output 4

4.1 An increase in number of English language media articles and reports that connect pangolin trafficking to governance issues (including corruption) (baseline to be established in project's first quarter)

While there has been progress in ensuring the issue of pangolin trade is reported on and awareness is raised via the media, not all reports have focused on the governance issues (i.e. corruption) associated with the trade. There have been several print and online reports in English generated by the project and partners in this reporting period.

A sample of recent examples are included below:

- In January 2019, an article was published in the East Africa news website 'ChimpReports.com' covering an operation conducted by NRCN on pangolin traffickers from Soroti district. A house search was conducted and the live pangolin handed over to the UWA officer in the region. The article drew attention to the high-value nature of the pangolin trade. https://chimpreports.com/soroti-suspected-pangolin-black-market-dealers-arrested/
- In February 2019, a seizure of ivory and pangolin hidden in timber on route through
 Uganda to Vietnam was widely reported in the Ugandan and international English
 language media. Reports highlighted the link between a Vietnamese organise wildlife
 trafficking group and pangolins. 1) https://www.softpower.ug/uwa-to-prosecute-2-vietnamese-found-smuggling-ivory-pangolin-scales/
- In February 2019, the South East Asia Globe published an article on pangolin trafficking
 for World Pangolin Day. The article quoted the Principal Campaigner and drew attention
 to the role of China's domestic market for traditional Chinese medicine containing
 pangolin products in driving the global illegal trade. http://sea-globe.com/everything-you-need-to-know-about-protecting-pangolins/
- In March 2019, a case involving the trafficking of 47.96kg of pangolin scales was reported in the Ugandan newspaper 'New Vision'. The article drew attention to the punishments for pangolin trafficking under Ugandan law. https://www.newvision.co.ug/new-vision/news/1497015/charged-illegal-possession-pangolin-scales-worth-sh444m

3.3 Progress towards the project Outcome

0.1 An increase, from a baseline of one known pangolin trafficking network that operates in and around Uganda, to at least two by October 2019, and three in total by October 2020.

As stated in section 3.2 (output 1.1), progress has been made in identifying intervention points for the future mapping of pangolin networks.

0.2 Increased understanding of how criminal networks are financing their pangolin trafficking operations in Uganda; engagement with financial sector, including national Financial Intelligence Unit (FIU), leads to stronger integration of wildlife/pangolin crime into financial investigations and financial sector regulatory mechanisms. From a baseline of zero official wildlife-related typologies proactively produced by authorities in Uganda, to one by March 2021

As stated in section 3.2 (output 2.1), the planned financial investigations training taking place in April 2019 will facilitate improved collaboration between government stakeholders involved in wildlife and financial related law enforcement. NRCN has recently been certified by the Uganda FIA to cooperate on financial investigations and discussions are on-going over the finalization of an MoU between UWA and the FIA, and NRCN and the FIA. In June 2019, the Uganda National Wildlife Crime Coordination Task Force (NWCCTF) will meet. In the run up and during this meeting, NRCN will advocate for the inclusion of financial investigations in their strategy and workplans.

0.3 Increased understanding of transport methods used by pangolin trafficking networks in and around Uganda; engagement with transport sector leads to better integration of pangolin trafficking methods into risk analysis systems and associated policies; number of Ugandan companies signed up to the UFW Transport Taskforce increases (baseline of zero in 2017 to two by October 2019. Goal for March 2021 to be determined following review of how many transport companies appear to be involved)

Based on an early preliminary review of transport companies involved in pangolin/wildlife trafficking, the services of at least one international airline and one freight/logistics company have been used for wildlife trafficking over the past 3 years.

Following the completion of research fieldwork in year 2

a more comprehensive understanding transportation methods used will be established.

0.4 Increased number of arrests of individuals implicated in the illegal pangolin trade in Uganda from 28 in 2017 to 40 by March 2021

Based on investigations, UWA and UPF have made 33 arrests for pangolin trafficking over the reporting period. Of these, 15 suspects were successfully convicted (including 2 police officers and 1 army officer) and 6 were acquitted. Of the 15 convictions, 80% (12) received custodial only sentences with no fine option, and a total of 85 months of custodial sentences issues, with a mean sentence of 7.08 months. A total of UGX (GBP) of revenue was generated for the Ugandan government from fines and the mean fine was UGX.

Information on case status and outcome is collected by NRCN prosecutors, and managed and stored by the NRCN Database Officer.

0.5 Increased awareness among Ugandan enforcement, judiciary and wildlife confiscation authorities of the CITES Appendix I listing for pangolins to 30% aware of the listing by December 2018, 50% by December 2019, and 75% by December 2020, from a baseline of 20% of 21 officials engaged in November-December 2017

Production and dissemination of judicial guidelines is pending the assent by the Uganda president of the amended Uganda Wildlife Act. This deliverable will be completed in year 2,

when a pre and post assessment of awareness among Uganda enforcement and judicial authorities will be conducted.

0.6 Increase in prosecutions of individuals arrested for pangolin trafficking using ancillary legislation such as anti-money laundering laws increases from zero in 2017 to two by March 2021

Deliverable pending investigations into pangolin traffickers.

3.4 Monitoring of assumptions

Outcome assumptions

Governments in the region remain committed to ending the illegal pangolin trade

Uganda is a member of the eight-country Intergovernmental Authority on Development (IGAD) trade bloc, and the six-country East African Community (EAC) intergovernmental organization. It is also a member of the Lusaka Agreement Taskforce (LATF), which entered force in 1996.

In 2017, IGAD Ministers established a regional illegal wildlife trade network, the Horn of Africa Wildlife Enforcement Network (HAWEN). This reflected an acknowledgement of the illegal wildlife trade as a common trans-boundary threat requiring active cross-border law enforcement cooperation. It also supports implementation of the African Union Strategy on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa (2015). The HAWEN has potential to significantly improve regional information sharing, development of uniform wildlife enforcement standards, develop investigations collaboration, and channel capacity building initiatives. The network also links IGAD member states to other global WENs and partners in the International Consortium on Combating Wildlife Crime (ICCWC). Through this project, significant potential exists to engage with the HAWEN on trans-national pangolin trafficking issues and this will be explored further.

Under Article 116 of the Treaty for the Establishment of the EAC, member states have committed to undertaking conservation actions to protect wildlife populations, and collaborate with each other in the implementation of these actions. This was reflected in the 2016 collaboration, facilitated by the LATF, between the Ugandan and Tanzania authorities in the arrest and extradition of the high-level Malian pangolin trafficker and extradition of the high-level Malian pangolin trafficker will be made to channel investigation findings on trans-national pangolin traffickers through LATF for further collaborative enforcement action between nations.

National FIUs have the mandate and capacity to include pangolin/wildlife crime in their work

Under Uganda's national money laundering and terrorist financing national risk assessment report (2017), wildlife crime was assessed to cost Uganda USD 588,235 per year and given a medium-high threat rating. Wildlife crime is considered a predicate offence for money laundering in Uganda. The Uganda Financial Intelligence Agency (FIA) has a mandate to combat money laundering activities in Uganda under the Money Laundering Act of 2013. This permits the FIA to make orders in relation to the proceeds of crime, cooperate international, prosecute cases of money laundering, and designate money laundering as an extraditable offence. These financial investigation powers are restricted to authorised officers from the FIA, DPP, or UPF. It does not include the Uganda Wildlife Authority. Therefore, for financial investigations relating to wildlife trafficking, there is a strong need for cooperation between UWA, and authorised officers

Law enforcement agencies respond positively to independent findings

In Uganda, NRCN has strong relationships with reliable officials from UWA, UPF and DPP. These relationships are the foundation of NRCN's investigation and prosecution activities, and are a reflection of the commitment and motivation exhibited by the relevant law enforcement agencies. On a monthly basis, NRCN selectively shares investigation findings and prosecution outcomes with UWA and UPF. The success delivered by NRCN has raised the profile of wildlife anti-trafficking efforts in Uganda, and the UPF increasingly recognises the value in channelling resources into wildlife cases. Ultimately, when successful prosecutions are achieved, it reflects positively on the UWA and UPF, which acts as an incentive for them to respond positively to independent findings.

Transport companies that are engaged with initiatives such as the Transportation Taskforce have commercial operations in Uganda or will do so in the future

UFW transport taskforce companies with current operations in Uganda include Emirates Airline, Kenya Airways, Qatar Airways, Etihad Airways and Maersk Group.

Corruption does not undermine efforts to arrest implicated individuals and obtain successful prosecutions

In 2018, Uganda ranked 149 out of 180 countries on the global Transparency International corruption perceptions index. Uganda is a country with systemic corruption issues, which affect many aspects of government function, including wildlife law enforcement. This can be manifest in the actual involvement of government elites, officials and armed forces in organised wildlife trafficking, enforcement shortfalls at ports of entry and exit, and at checkpoints, wildlife stock thefts or judicial failings (CITES CoP17 Doc. 57.6). A core element of NRCN's approach in combating wildlife crime is the robust monitoring of cases so that opportunities for corruption are minimised. This has involved NRCN pro-actively investigating and prosecuting government officials for complicity in wildlife crime. The establishment of a dedicated Standards, Utilities and Wildlife Court (at Buganda Road Court, Kampala) in 2017 has contributed significantly to addressing impunity associated with wildlife crime in Uganda.

NRCN's MoU provides a means to monitor law enforcement response to persons of interest identified by this project

In 2014, NRCN agreed an MoU with UWA for collaboration on the enforcement of wildlife laws in Uganda. This MoU provides NRCN with a mandate to collaborate with UWA on the prosecution of wildlife crime, or to independently prosecute wildlife cases, and support UWA

This

MoU continues to garner substantial support from the UWA leadership.

Output assumptions

Output 1

As implementation rests with government agencies, assumes that governments are genuinely committed to ending illegal wildlife trade and will respond appropriately to the independent research findings from the project

As stated above, governments in the region have developed actions plans on collaboration to address wildlife trafficking. Through meetings with senior UWA officials, commitments to address the illegal wildlife trade in Uganda have been stated to NRCN and EIA. This reflects the recent establishment of an intelligence unit in UWA to collate and process information on wildlife traffickers for investigations. While UWA's strategic plan for 2013 to 2018 has not been

updated, "wildlife trafficking and ivory trade" was identified as a key threat to wildlife in the country. To address this the following strategies were included in the plan: Strengthen Intelligence, law enforcement and security operations; Build capacity for prosecution of offenders; Strengthen trans-boundary collaboration initiatives. This IWT056 project will contribute to the achievement of these goals.

Output 2

Financial institutions are sufficiently concerned about IWT to accept and act on typologies provided

Over 30 financial institutions have signed up to the UFW financial taskforce. Through this they have signed a declaration with 6 commitments on taking measures to reduce the use of financial services to facilitate illegal wildlife trade activities. Signatories include Standard Chartered and Western Union, both of which this project will engage through the financial investigations training workshop in April 2019.

Banks avoid offering services to individuals and companies entered into "know your customer" databases

Financial institutions are increasingly required to comply with anti-money laundering laws (i.e. the UK Money Laundering Regulations 2017), which mandates them to implement know-your-customer checks on new and existing customers. Sources for these checks include databases such as Thomson Reuters World Check. Reports suggests that companies are utilising new software that enables faster know-your-customer checks to be completed.

Output 3

Sufficient resources for mobile scanners to be used for pangolin detection

URA currently have three mobile cargo scanners stationed	1
Media reports suggest that they are in the process of acquire more mobile so	anners

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

By protecting these ecosystems, Uganda will continue to maintain in-tact natural systems which support up to 250,000 tourist visits to its national parks every year, generating significant revenue through park entry fees. Tourist visits to national parks have benefits to adjacent local communities since 20% of park entry fees are channelled through community development funds. NRCN is currently engaging with the UWA Department of Community Conservation to change its policy so that households affected by human-wildlife conflict receive direct payments from park revenue.

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

Strengthening law enforcement:

The project is providing law enforcement agencies with information on the modus operandi, logistics, structures, offender characteristics and interrelations on pangolin trafficking networks. This will be used to strategically disrupt these networks through arrests and prosecutions, and creating a situation in which wildlife traffickers face greater risks of arrest and prosecution. To date, this project has worked to deliver this impact by 1) identifying intervention points for the future mapping of transnational pangolin networks, and 2) through the arrest of 33 offenders for pangolin trafficking, of these, 15 suspects were successfully convicted (including 2 police officers and 1 army officer) and 6 were acquitted.

The Republic of Uganda is a signatory of the Kasane statement and this project is working to support several of its objectives, including those on investigating and prosecuting financial crimes (obj. 5) and engaging with the transport sector (obj. 8). To date this project has contributed to these objectives by 1) making final arrangements for a financial investigations training taking place in April 2019 that will facilitate improved collaboration between government stakeholders involved in wildlife and financial related law enforcement; 2) conducting a preliminary review of transport companies involved in pangolin/wildlife trafficking, this will be used to identify wildlife trafficking vulnerabilities in the transport network and inform advocacy efforts.

6. Impact on species in focus

The world is currently facing a wildlife poaching and trafficking crisis, with an estimated USD 8 to 10 billion of illicit wildlife product traded annually (excluding fish and timber). Due to habitat loss, climate change and overharvesting, all pangolin species are classified as globally threatened on the IUCN Red List. The Asian pangolins are either Critically Endangered or Endangered and all African pangolins are Vulnerable. In the past 10 years alone, more than a million pangolins are believed to have been taken from the wild in Asia and Africa. The trade is enabled by a range of factors, but legal domestic markets in demand countries, involvement of trans-national crime groups, corruption and weak law enforcement play a major role.

The overall goal of EIA's pangolin campaign/project is that by the end of 2021, populations of wild African pangolins have stabilised or are increasing, and their down-listing on the IUCN Red List to endangered or critically endangered is prevented. Pangolins perform a key role in the functioning of tropical and sub-tropical forest and grassland ecosystems by improving soil fertility and regulating the populations of ant and termite species. This function is essential to the long-term integrity and existence of ecosystems across the African continent that support rich and abundant wildlife populations. While this project is not monitoring in-situ pangolin populations, it is addressing one of the key threats to pangolin populations, illegal trade, by building law enforcement capacity in Uganda and disrupting the organised crime groups that are facilitating the trans-national pangolin trade. This project will prevent the reduction of wild pangolin populations by deterring organised crime groups from sourcing pangolins in Uganda and adjacent countries.

7. Project support to poverty alleviation

The main beneficiaries of the project are government agencies in the project countries responsible for law enforcement and criminal justice. As mentioned under outputs 1 and 2, there has been sharing of information with national and international authorities which has been valued and is expected to progress as field activities intensify.

Since the project is not working directly with communities, the poverty impacts are anticipated as being indirect through reduced corruption, improved rule of law and good governance. As mentioned under reporting for Outcome 0.4 members of the Uganda army and police force have been prosecuted for engaging in pangolin crime. As the investigations proceed NRCN will seek to identify persons of interest and individuals of political influence involved in pangolin crime. This information will be verified and used publicly to expose the links between corruption and wildlife crime.

8. Consideration of gender equality issues

There are not expected to be any direct gender equality impacts from this project and there are no gender related indicators in the log-frame. We advocate for intelligence led enforcement to tackle those involved in pangolin trade regardless of gender. In the first year of the project both men and women have been identified as involved in pangolin trade. Following further verification as required, more information will be shared with law enforcement and can be followed up on in the Year 2 report. NRCN has a total of 34 staff of which 12 are women. These 12 women fulfil roles as a Project Officer, and as Prosecutors, taking a pro-active role in planning project activities and prosecuting cases in court.

9. Monitoring and evaluation

Based on the IWT056 project proposal and logical framework, EIA worked with NRCN to develop and review a M&E framework. This development process involved a number of staff including the EIA Project Leader and Principal Campaigner, and NRCN Executive Director. Head of Prosecutions, and Project Officer. The framework is based on the Pangolin Project situational model and theories of change (results chains) and clearly links the project's activities, outputs, outcomes and overall impact goal. It lists indicators for each activity with a baseline condition and target value, and details how this information is to be collected. To operationalise the framework, an M&E implementation plan was developed, this specifies a staff member in both EIA (the Principal Campaigner) and NRCN (the Project Officer), who is responsible for collating data and information from the government or colleagues and storing it in an M&E Windows folder and Excel database (managed by EIA). NRCN has a standardised database for tracking pangolin trafficking cases that includes information on offence, quantity of pangolin product seized, case status, prosecution outcomes (i.e. fines, custodial sentences), and legal team. Pre- and post- questionnaires have been developed by two financial crime experts to evaluate the knowledge gained by participants of the planned financial investigations training workshop. Submission of M&E data from NRCN to EIA is completed on a monthly schedule. Results from M&E processes are communicated internally within EIA through 2weekly newsletters, and an annual strategy away day (which last took place in January 2019). Project achievements are to be communicated to the public through blog articles, videos, and social media posts.

To facilitate activity implementation and monitor project progress, regular email exchange and Skype calls have been completed between EIA and NRCN. To maintain relationships and hold review and work planning meetings, the EIA Project Leader and Principal Campaigner completed a visit to the NRCN office in Kampala in January/February 2019. In year 2, the Principal Campaigner intends to complete quarterly M&E visits to meet with NRCN in Kampala.

10. Lessons learnt

The start-up phase of the project (July to December 2018) took longer than anticipated, these primarily related to recruitment of the Principal Campaigner, Field Operative and Wildlife Valuation Expert. Effort has been made to catch-up with the activity workplan, however, the production of judicial guidelines for the Ugandan authorities by NRCN has been delayed as has the financial investigations training workshop. The budget requested for this training workshop was £ less than the actual amount required. This reflected the unanticipated costs of involving two expert financial investigations consultants from the UK. It was therefore necessary to raise additional funds from David Shepherd Wildlife Foundation (DSWF) to cover the shortfall, and since preparations for the training had to start in early February 2019 it was not possible to wait for approval of a DEFRA change request for this. Therefore, the costs were accrued in March, although the training was delivered in April 2019 (and will be reported in year 2).

Collaboration between EIA and NRCN has functioned effectively with regular and cordial communications between the two organisations. Two visits to Uganda by the Project Leader (January/February 2019) and Principal Campaigner (January/February, and April 2019) have served to build relationships with NRCN staff and Ugandan government representatives. Continued visits by the EIA team on at least a quarterly basis as the project continues will be essential to facilitating activity implementation and M&E.

NRCN investigations and prosecutions have led to a high conviction success rate for pangolin trafficking crimes (100%). This reflects the intelligence-led approach adopted, strong understanding of evidence requirements for wildlife prosecutions, and the existence of a special wildlife court (with judges sensitised to the provisions of the Uganda Wildlife Act). Essential to this work has been the development and maintenance of good relations between NRCN and UWA, UPF, and DPP. There is also a growing government and public understanding of the seriousness of wildlife crime, which contributes to building buy-in for action on trafficking cases. Challenges relating to investigations and prosecutions have included chain of custody development needs, a lack of rescue systems and facilities to deal with seizures of live

pangolins, and lack of evidence management protocols. While dealing with rescued pangolins is beyond the scope of this project, the Uganda Conservation Foundation (UCF) is working to build capacity for pangolin rescue and rehabilitation. NRCN is currently working to build more awareness of procedures to manage evidence amongst wildlife and police officers by providing them with a document called "Points to Prove - A guide for prosecutors and investigators, including sample charges and standard operating procedures".

Over the reporting period, most pangolin trafficking prosecutions have been for low- to midlevel trafficking activity (suppliers and intermediaries).

Over year 2, NRCN will prioritize certain organizational development needs including finalising the recruitment of a project manager (not funded by DEFRA) to coordinate cross-organisational workplan implementation and financial management. NRCN will also facilitate refresher courses for NRCN prosecutors and investigators

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

Not applicable, this annual report is for year one of the project.

12. Other comments on progress not covered elsewhere

Under the original recruitment schedule the intention was for the Principal Campaigner to have started in July, meaning that the salary allocation for July to November (5 months) has remained unutilised. Likewise, the Field Operative was initially intended to have started in October 2018. Due to these delays, we forecast an underspend by end of financial year 2018 of To resolve this, a financial change request was submitted (and subsequently approved) so that salary coverage for the Principal Campaigner and Field Operative in FY20/21 is moved from 'other' funding sources to IWT Challenge Fund.

13. Sustainability and legacy

The reports and interactive maps associated with the project have been shared with key government officials but there is scope to do more as the project progresses. The partners are well-established and have a strong media profile in-country. As some of the work requires an initial low profile and we are the early stages, we can expect a higher profile for the project as it progresses. Regarding an exit strategy, EIA and partners will consult as we approach the end of Year 2 Quarter 3 on whether there are outstanding lines of enquiry that we think will require further investment beyond the end of the project.

14. IWT Challenge Fund Identity

This project is part of a wider pangolin programme that involves deliverables for 3 other donors. Through EIA/NRCN's engagements with partner organisations and Uganda government officials, and awareness of UK government support for project activities has been built. Various upcoming outputs associated with the project will follow UK Aid / IWT Challenge Fund branding protocols to build identity. This will include the April 2019 financial investigations training, judicial guidelines on pangolin laws, an awareness poster on for police. EIA maintains Facebook, Twitter, Instagram and LinkedIn accounts (see section 3.1, output 4), that are used to raise awareness of the pangolin project and issues driving the trade.

15. Project expenditure

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

Project spend (indicative) since last annual report Staff costs (see below)	2018/19 Grant (£)	2018/19 Total actual IWT Costs (£)	Variance %	Comments (please explain significant variances)
Consultancy costs				
Overhead Costs				
Travel and subsistence				
Operating Costs				
Capital items (see below)				
Others (see below)				
TOTAL				

OPTIONAL: Outstanding achievements of your project during the reporting period (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)

None

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

Project summary	Measurable Indicators	Progress and Achievements April 2018 - March 2019	Actions required/planned for next period
Impact The illegal wildlife trade is no longer the intelligence-led enforcement reduce local communities	primary threat to pangolins; es the impacts of the illegal trade on rural	Significant progress has been made by NRCN on investigating and prosecuting pangolin traffickers operating between Uganda's rural sourcing areas and urban trading hubs. With the recruitment of the Principal Campaigner and Field Operative, key activities such as the scoping trip, pangolin intelligence/situational assessment, and Chinese-language open source research has been completed. The relationships built, and information collated now provides a solid basis for the implementation of the financial investigations workshop, field-based research into pangolin trafficking networks, and the integration of anti-money laundering techniques in year 2. These activities will function to increase the risk of apprehension and prosecution for pangolin-related trafficking offences. This is contributing to the conservation of wild pangolin populations by deterring organised crime groups from sourcing pangolins in Uganda and adjacent countries. By protecting these pangolin populations, Uganda will continue to maintain in-tact natural systems which support up to 250,000 tourist visits to its national parks every year, generating significant revenue through park entry fees.	
Outcome Enforcement against the illegal pangolin trafficking networks that operate in and around Uganda is improved, reducing the impacts of this	0.1 An increase, from a baseline of one known pangolin trafficking network that operates in and around Uganda, to at least two by October 2019, and three in total by October 2020.	0.1 Baseline = 1, current status = 0.	0.1

illegal trade on wild pangolin populations and local communities

- 0.2 Increased understanding of how criminal networks are financing their pangolin trafficking operations in Uganda; engagement with financial sector, including national Financial Intelligence Unit (FIU), leads to stronger integration of wildlife/pangolin crime into financial investigations and financial sector regulatory mechanisms. From a baseline of zero official wildliferelated typologies proactively produced by authorities in Uganda, to one by March 2021
- 0.3 Increased understanding of transport methods used by pangolin trafficking networks in and around Uganda; engagement with transport sector leads to better integration of pangolin trafficking methods into risk analysis systems and associated policies; number of Ugandan companies signed up to the UFW Transport Taskforce increases (baseline of zero in 2017 to two by October 2019. Goal for March 2021 to be determined following review of how many transport companies appear to be involved)
- 0.4 Increased number of arrests of individuals implicated in the illegal pangolin trade in Uganda from 28 in 2017 to 40 by March 2021
- 0.5 Increased awareness among Ugandan enforcement, judiciary and wildlife confiscation authorities of the CITES Appendix I listing for pangolins



0.3 Baseline = 0, current status = 0.
Based on an early preliminary
review of transport companies
involved in pangolin/wildlife
trafficking, the services of at least
one international airline and one
freight/logistics company have
been used for wildlife trafficking
over the past 3 years.



- investigations training taking place in April 2019 will facilitate improved collaboration between government stakeholders involved in wildlife and financial related law enforcement. In June 2019, the Uganda National Wildlife Crime Coordination Task Force (NWCCTF) will meet. In the run up and during this meeting, NRCN will advocate for the inclusion of financial investigations in their strategy and workplans. Under cofinancing from David Shepherd Wildlife Foundation, mentoring support in financial investigations for NRCN staff.
- 0.3 Following the completion of research fieldwork in year 2 a more comprehensive understanding of transportation methods used will be established. This will be used to inform targeted engagements with the transport sector companies operating in Uganda.



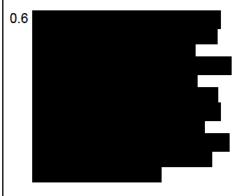
0.5 Judicial guidelines will be completed in year 2, when a pre

to 30% aware of the listing by December 2018, 50% by December 2019, and 75% by December 2020, from a baseline of 20% of 21 officials engaged in November-December 2017

0.6 Increase in prosecutions of individuals arrested for pangolin trafficking using ancillary legislation such as anti-money laundering laws increases from zero in 2017 to two by March 2021

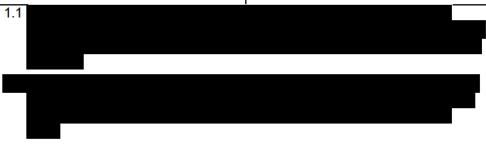
- 0.4 Baseline = 28, current status = 61. UWA and UPF have made 33 arrests for pangolin trafficking over the reporting period. Of these, 15 suspects were successfully convicted (including 2 police officers and 1 army officer) and 6 were acquitted.
- 0.5 Baseline = 0, current status = unknown. NRCN Wildlife Valuation Expert started in March 2019. Production and dissemination of judicial guidelines is pending the assent by the Uganda president of the amended Uganda Wildlife Act.
- 0.6 Baseline = 0, current status = 0.
 Deliverable pending investigations into pangolin traffickers.

and post assessment of awareness among Uganda enforcement and judicial authorities will be conducted.



Output 1.

- 1. Law enforcement agencies. specialist investigation units (including FIUs) and prosecutors in Uganda, are provided with the information they need to conduct intelligence-led enforcement and financial investigations, and the UWA Intelligence Unit is provided with the skills required to conduct financial investigations, so that collectively they can detect and disrupt the pangolin trafficking networks that operate in the country. Intelligence-led enforcement is focused on the criminal networks and not low-level local poachers, reducing potential negative impacts of enforcement action on marginalised rural communities.
- 1.1 An increase in the number of pangolin trafficking networks that are mapped out using network analysis software (baseline of one in 2017 to at least two by October 2019 and three in total by October 2020); intervention points identified
- 1.2 Number of pangolin trafficking networks that are investigated by Uganda Wildlife Authority, increases from one in 2017 to at least two by October 2019 and three by October 2020
- 1.3 Transfer of all pangolins to CITES Appendix I is included within Uganda's recent orders and regulations enabling CITES provisions to be incorporated into domestic legislation by January 2019



- 1.3 In February 2019, the Ugandan parliament passed the amended Uganda Wildlife Act (2017), which includes an updated schedule of protected species. All four African pangolin species are now listed. Penalties for wildlife trafficking offences were also increased.
- 1.4 Baseline = 0, current status = unknown. The production of the judicial guidelines for pangolin is pending and will be completed in year 2. Further, since the updated Uganda Wildlife Bill has not been given Presidential Assent it is not possible for prosecutors and judges to refer to this yet. Court case documents are often not made available to NRCN, it is therefore not possible to confirm whether judges have referred to secondary material. A more appropriate indicator of prosecutor and judicial understanding of strengthened pangolin protections is the conviction rate for pangolin offences. Of 33 arrests for pangolin trafficking over the reporting period, 13 cases were convicted, 5 are on trial and 15 are pending trial.

Activity 1.1 Establishment of agreed systems and processes for collecting, managing and sharing information between EIA and NRCN followed by collation of information on pangolin trade Activity 1.2 Activity 1.2 Analysis and mapping of criminal networks, points of intervention identified, new desk-based and field research tasks determined including desk-based research and correspondence relating to networks in demand countries in Asia. Activity 1.3 Scoping trip to liaise with NRCN, national law enforcement agencies and brief them following initial analyses. Conduct a review of M&E processes Activity 1.3 Scoping trip to liaise with NRCN, national law enforcement agencies and rangement of agreed systems and processes for collecting, managing and arrangements for regular and confidential sharing of information between the roughland confidential sharing of information between NRCN and EIA relating to existing and ongoing investigations. This will be a collaborative process to facilitate dissemination of information to law enforcement. Activity 1.2 An intelligence/situational assessment (31-pages) was completed, it synthesised trends on the global illegal pangolin trade between 2010 and 2018. Desk-based research included an analysis of EIA's pangolin seizures dataset; an overview of relevant findings from other research into pangolin traffickers and wildlife traffickers linked to Uganda; and future priorities for research. Activity 1.3 Scoping trip to liaise with NRCN, national law enforcement agencies and brief them following initial analyses. Conduct a review of M&E processes Between 28th January and 1st February 2019, the Project Leader and Principal		 1.4 An increase in the number of prosecutors and judges referring to judicial guidelines that reflect the CITES Appendix I listing of pangolins from zero in 2017 to at least in 50% of cases by March 2021 1.5 New UWA Intelligence Unit confirms inclusion of pangolin trafficking on their agenda by January 2019 1.6 50% of UWA Intelligence Unit staff receive one training session on required intelligence gathering to pursue financial investigation in cooperation with other stakeholders by December 2019 	agenda. 1.6 Baseline = 0%, current status = 66% government officials and NRCN staff investigations training. This will included UWA Intelligence Unit team, and 5 in prosecutors from the Department of the Financial Intelligence Authority.	eangolin trafficking on their operational Between 14th and 18th April 2019, 19 will participate in a financial de 2 of 3 investigators (66%) from the expressigators from the police force, 2 Public Prosecutions, and 2 analysts from
Analysis and mapping of criminal networks, points of intervention identified, new desk-based and field research tasks determined including desk-based research and correspondence relating to networks in demand countries in Asia. (31-pages) was completed, it synthesised trends on the global illegal pangolin trade between 2010 and 2018. Desk-based research included an analysis of EIA's pangolin seizures dataset; an overview of relevant findings from other research into pangolin trafficking; review of existing EIA intelligence on pangolin traffickers and wildlife traffickers linked to Uganda; and future priorities for research. Activity 1.3 Scoping trip to liaise with NRCN, national law enforcement agencies Between 28th January and 1st February Continued communications with NRCN	sharing information between EIA and NR		confidential sharing of information between NRCN and EIA relating to pangolin trafficking were agreed. The basis for information sharing between the two organisations is an	relating to existing and ongoing investigations. This will be a collaborative process to facilitate dissemination of information to law
	Analysis and mapping of criminal networks, points of intervention identified, new desk-based and field research tasks determined including desk-based research and correspondence relating to networks in demand countries in Asia.		(31-pages) was completed, it synthesised trends on the global illegal pangolin trade between 2010 and 2018. Desk-based research included an analysis of EIA's pangolin seizures dataset; an overview of relevant findings from other research into pangolin trafficking; review of existing EIA intelligence on pangolin traffickers and wildlife traffickers linked to Uganda; and future priorities for research.	

	Campaigner completed a scoping trip to Uganda. A total of 8 internal meetings were held with NRCN staff to collaboratively assess project activity progress, update a 2019 workplan and finalize a monitoring and evaluation plan. A further 4 external meetings were held with project stakeholders including UWA, UPF, DPP, Interpol and Uganda Conservation Foundation (UCF). A M&E implementation plan was developed and agreed with NRCN senior management.	management and M&E data submission (monthly). Communications will take place over email, Skype and WhatsApp. Quarterly M&E missions will be completed by the Principal Campaigners to Uganda. Ad-hoc meetings between NRCN/EIA and relevant government stakeholders on pangolin investigations, financial investigations and transport sector involvement will be held.
Activity 1.4 Field work to ground-truth desk-based research, gather information on trade incidents, download & transcribe findings	Activity not completed in year 1.	
Activity 1.5 Prepare and disseminate confidential dossiers for Ugandan law enforcement agencies and prosecutors through face-to-face briefings, and to other relevant countries, including transit and destination countries, and intergovernmental bodies such as INTERPOL and World Customs Organisation electronically		
Activity 1.6 Liaise with the UWA and other enforcement agencies to monitor law enforcement response and provide additional information generated by further desk and field research	Pangolin/wildlife trafficking cases handled only by UWA have been monitored by NRCN so that prosecution support can be provided if required. For pangolin/wildlife trafficking offenders given custodial sentences, NRCN has conducted prison visits to ensure they complete these.	NRCN will continue to independently prosecute pangolin trafficking cases, and monitor cases handled by UWA to ensure high standards of transparency.

Activity 1.7		Updated Uganda Wildlife Act bill was	NRCN will continue to monitor status of
Appendix I listing and disseminate to law-makers		tabled in parliament for debate and on the 19th February 2019 was passed and is now awaiting on the president to assent.	Bill, regarding presidential Assent.
Activity 1.8 Commission a wildlife valuation expert to prepare judicial guidelines, and disseminate guidelines electronically and physically to prosecutors and judiciary through face-to-face briefings as part of a briefing on the role of serious organised crime in pangolin trade		Recruitment of the Wildlife Valuation Expert by NRCN was completed in February 2019, and the incumbent started work in March 2019. Due to the delayed recruitment, the production of pangolin specific multi-lingual awareness materials for Uganda law enforcement agencies is pending.	The Wildlife Valuation Expert has initiated desk-based research into wildlife/pangolin valuation with a goal of finalising the judicial guidelines by end of quarter 3 of year 2.
Activity 1.9 Prepare multi-lingual awareness materials for Ugandan enforcement authorities regarding pangolin trade and CITES listing and measure change in awareness through questionnaire surveys		Production of awareness materials is pending Assent of amended Uganda Wildlife Act	One the amended Uganda Wildlife Act obtains presidential assent, a poster (in multiple languages) targeting police officers across the country with messaging on wildlife trafficking as a serious crime and relevant legal provisions will be distributed.
Activity 1.10 Prepare and deliver a training workshop to the UWA Intelligence Unit on how to conduct financial investigations		Workshop was delayed due to need to raise co-financing to cover higher than expected consultant trainer costs.	Financial investigations workshop will take place between 15 th and 19 th April 2019, involving 19 participants from relevant government agencies. Preliminary preparations have been completed, including consultant recruitment and travel booking, training programme development, participant invitations, venue hire, and printing of materials.
Output 2.	2.1 Number of financial typologies	(Report against the indicators on progress towards achieving the Output)	
The financial sector (including public and private sector institutions) have the information they need to produce policies and other actions that combat the link between illicit financial flows and pangolin crime/trafficking. produced related to pangolin trafficking networks by partners and accepted by banking institutes (baseline of zero in 2017 to target of one by December 2019 and two by December 2020) 2.2 Number of accepted submissions to Thomson Reuters World-Check increases from a baseline of 57		2.1 Baseline = 0, current status = 0. Fina trafficking networks are pending complet 2.2. Over the reporting period, EIA subm to Liberty Asia, 92 of which were accepted profiles (based on World Check and Down	ion of further investigations work. nitted 107 names for pangolin trafficking ed and resulted in new or updated

	pangolin specific submissions accepted in 2017 to 120 by March 2021 2.3 Number of pangolin crime related financial typologies produced related to pangolin trafficking networks for FIU (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)	information from these can then be used techniques in use by pangolin/wildlife traf	
Activity 2.1. Prepare anonymised typology for dissemfinancial institutions, share non-anonymisthe Uganda FIU.	nination via Liberty Asia to banks and sed version upon request. Disseminate to		Following the financial investigations training workshop in April 2019 it is anticipated that resources will be allocated to reviewing existing wildlife/pangolin trafficking cases to identify sources of evidence for money laundering cases.
Activity 2.2. Regular submission of details of known p World-Check	pangolin traders to Thomson Reuters	The EIA Intelligence Team collated names of arrested, charged and convicted pangolin traffickers from open-source media reports for twice-monthly submission to Thomson Reuters World-Check by Liberty Asia.	EIA has a 3-person intelligence team (Senior Intelligence Officer, and two Intelligence Officers) who will continue this work on a regular basis in year 2.
Activity 2.3 Prepare and disseminate briefings on pa and Crime (UNODC) ahead of regional numbers.		Open source data on pangolin seizures was shared with the UNODC as part of a West and Central Africa Transnational Organised Crime Threat Assessment.	As intelligence is developed through investigations reports will be produced and disseminated to UNODC and other relevant international organisations as appropriate.
Output 3. The transport sector (including private and state companies) has integrated the methods used to traffic pangolins into their risk analyses and have become effective partners in combatting the illegal wildlife trade in Uganda	3.1 An increase in the number of transport leaders (including those signed up to United for Wildlife (UFW)Transport Taskforce) that are sensitised to the threats to pangolins and the involvement of organised criminals in the trafficking of pangolins from none in 2017 to 100% sensitised by the end of the project	Central and West Africa. < <confidential <<<="" td=""></confidential>	

	3.2 Increase in the number of Ugandan logistic/transport companies that sign up to the UFW's Transport Taskforce by March 2021 (baseline of zero in 2017 to two by October 2019. Goal for March 2021 to be determined following review of how many transport companies appear to be involved) 3.3 Mobile scanner deployed by the	assessment drawing on existing information on the use of transport sector services for pangolin trafficking. < <confidential<< td=""> 3.3 In January 2019, URA deployed its cargo container scanner in the north of Uganda (near the border with South Sudan) and detected 3,299kg of ivory and 423.7kg pangolin concealed in wax stored inside carved out timber. 3.4 Preliminary contact has been made with</confidential<<>	
	URA (Uganda Revenue Authority) for ivory detection is also used to detect pangolins by June 2019 3.4 Logistics companies are sensitised under the UNODC-WCO Container Control Programme of pangolin trafficking out of Uganda	3.4 Preliminary contact has been made with Supervisor who is the UNODC-WCO CCP JPCU Kampala Team Leader.	
Activity 3.1 Prepare and issue an alert to transport leaders, including the UFW Transport Taskforce, and associations to raise awareness about the role of organised crime in pangolin trade and transportation methods		Based on the January 2019 (covered above) of ivory and pangolin in Uganda by the URA, the United for Wildlife (UFW) Transport Taskforce produced a confidential alert for the transport sector and law enforcement. The production of a IWT056 specific alert is pending.	Once pangolin trade field research (Activity 1.4) has been completed, we expect to have a more comprehensive understanding of the wildlife trafficking vulnerabilities in the transport network that would warrant advocacy efforts (i.e. encouragement to sign the UFW Transport Taskforce) and the submission of alerts and briefings to transport leaders (including the UFW Transport Taskforce).
Activity 3.2 Identify and encourage Ugandan transport / logistics companies to sign the UFW Transport Taskforce Declaration		Preliminary progress on this output was achieved.	Once pangolin trade field research (Activity 1.4) has been completed, we expect to have a more comprehensive understanding of the wildlife trafficking vulnerabilities in the transport network that would warrant advocacy efforts (i.e. encouragement to sign the UFW Transport Taskforce) and the submission of alerts and briefings to transport leaders (including the UFW Transport Taskforce).

Activity 3.3 Prepare a "red flag" briefing for the Uganda Revenue Authority, and encourage URA and the clearing and forwarding firms to treat pangolin cases with same urgency as elephant tusks through use of mobile scanner to detect pangolin shipments		Production of "red-flag" briefing for URA is pending completion of Activity 1.4	Once field research has been completed we expect to have a more comprehensive understanding of the typologies of the use of transport services for pangolin trafficking. We expect to complete this deliverable in quarter 4 of year 2.
Activity 3.4 Disseminate briefing prepared under Acti and urge them to incorporate into the Co		Activity pending completion of Activity 2.3	In year 2, further discussions with (URA Customs Supervisor) will focus on sensitising logistics companies on pangolin trafficking issues.
Output 4. Public-facing materials to raise awareness of criminality and corruption associated with the global pangolin trade. 4.1 An increase in number of English language media articles and reports that connect pangolin trafficking to governance issues (including corruption). (baseline to be established in project's first quarter).		Baseline = 0, current status = 6. Two EIA website news articles were published (https://eia-international.org/chinese-lawmakers-propose-ban-sale-pangolin-products-traditional-medicine/, and https://eia-international.org/latest-30-tonne-haul-shows-pangolins-continue-illegally-traded-massive-quantities/). In addition to a SEA-Global article (http://sea-globe.com/everything-you-need-to-know-about-protecting-pangolins/), and 3 Uganda newspaper articles on pangolin trafficking.	
4.1 Prepare and disseminate a public-facing report on the role of organised crime and corruption in the global pangolin trade that advocates for sustained investment in intelligence-led enforcement in Uganda and other countries identified through the project		Activity pending completion of Activity 1.4 and 2.1	A public-facing report will be produced in quarter 1 of year 3. This will be the product of various ongoing activities including investigations underway by NRCN and EIA.
4.2 Update and circulate interactive online maps and infographics to raise the public profile of the role of organised crime and corruption in the global pangolin trade		The intelligence team has updated the EIA online pangolin trade map (hosted on CartoMap) with incidences of trafficking over 2018/2019.	The updated pangolin trade map will be publicly available when EIA launches its new website in May/June 2019.
4.3 Make non-sensitive datasets available to journalists and academic researchers to support other studies and reports on the global pangolin trade		Information from the pangolin global seizure dataset was shared with 8 separate journalists, researchers and law enforcement agencies. Recipients included the South Asian pangolin project, UNODC, National Geographic Magazine, UNDP, US Fish and Wildlife	EIA campaigners and communications team will continue to maintain relationships and contacts with key journalists and researchers. This will involve disseminating the dataset to

	Service, and Global Initiative Against Transnational Organized Crime.	individuals involved in relevant pangolin research.
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Annex 2: Project's full current logframe as presented in the application form (unless changes have been agreed)

N.B. if your application's logframe is presented in a different format in your application, please transpose into the below template. Please feel free to contact <a href="https://www.nwindows.new.number.new.number.new.number.new.number.new.number.new.number.new.number.new.number.new.number.new.number.new.number.new.new.number.ne

Project summary	Measurable Indicators	Means of verification	Important Assumptions
Impact:			
(Max 30 words) The illegal wild	dlife trade is no longer the primary thre	at to pangolins; intelligence-led enforce	ment reduces the impacts of the
illegal trade on rural local communities	S		
illegal trade on rural local communities Outcome: (Max 30 words) Enforcement against the illegal pangolin trafficking networks that operate in and around Uganda is improved, reducing the impacts of this illegal trade on wild pangolin populations and local communities.	O.1 An increase, from a baseline of one known pangolin trafficking network that operates in and around Uganda, to at least two by October 2019. and three in total by October 2020. O.2 Increased understanding of how criminal networks are financing their pangolin trafficking operations in Uganda; engagement with financial sector, including national Financial Intelligence Unit (FIU), leads to stronger integration of wildlife/pangolin crime into	0.1 Government reports; including submissions to CITES 0.1 media articles on role of organised crime and pangolin trafficking 0.1. photographs, films, and notes from research 0.2 meeting minutes with FIUs 0.2 financial typologies; feedback from banks/banking sector 0.2 Thomson Reuters World-check; feedback on submissions via Liberty Asia	Governments in the region remain committed to ending the illegal pangolin trade National FIUs have the mandate and capacity to include pangolin/wildlife crime in their work Law enforcement agencies respond positively to independent findings. Transport companies that are engaged with initiatives such as the Transportation Taskforce have commercial operations in Uganda or will do so in the future.
	financial investigations and financial sector regulatory		Corruption does not undermine efforts to arrest implicated
	mechanisms. From a baseline of		individuals and obtain successful
	zero official wildlife-related typologies proactively produced		prosecutions.

by authorities in Uganda, to one by March 2021 0.3 Increased understanding of transport methods used by pangolin trafficking networks in and around Uganda; engagement with transport sector leads to better integration of pangolin trafficking methods into risk analysis systems and associated policies; number of Ugandan companies signed up to the UFW Transport Taskforce increases (baseline of zero in 2017 to two by October 2019. Goal for March 2021 to be determined following review of how many transport companies appear to be involved) 0.4 Increased number of arrests of individuals implicated in the illegal pangolin trade in Uganda from 28 in 2017 to 40 by March	0.3 meeting minutes with transport sector representatives 0.3 annual report of transportation taskforce 0.3 enforcement alerts 0.3 policy announcements 0.4 Uganda Wildlife Authority reports and correspondence with NRCN under their MoU	NRCN's MoU provides a means to monitor law enforcement response to persons of interest identified by this project
Goal for March 2021 to be determined following review of how many transport companies appear to be involved) 0.4 Increased number of arrests of individuals implicated in the illegal pangolin trade in Uganda from 28 in 2017 to 40 by March 2021	reports and correspondence with NRCN under their MoU	
0.5 Increased awareness among Ugandan enforcement, judiciary and wildlife confiscation authorities of the CITES Appendix I listing for pangolins to 30% aware of the listing by December 2018, 50% by December 2019, and 75% by December 2020, from a baseline of 20% of 21 officials engaged in November-December 2017	0.5 questionnaires during NRCN workshops conducted under their UWA MoU	
	0.6 Court case records	

	0.6 Increase in prosecutions of individuals arrested for pangolin trafficking using ancillary legislation such as anti-money laundering laws increases from zero in 2017 to two by March 2021		
Outputs: 1. Law enforcement agencies, specialist investigation units (including FIUs) and prosecutors in Uganda, are provided with the information they need to conduct intelligence-led enforcement and financial investigations, and the UWA Intelligence Unit is provided	1.1 An increase in the number of pangolin trafficking networks that are mapped out using network analysis software (baseline of one in 2017 to at least two by October 2019 and three in total by October 2020); intervention points identified	1.1 Network chart maps	As implementation rests with government agencies, assumes that governments are genuinely committed to ending illegal wildlife trade and will respond appropriately to the independent research findings from the project.
with the skills required to conduct financial investigations, so that collectively they can detect and disrupt the pangolin trafficking networks that operate in the country. Intelligence-led enforcement is focused on the criminal networks	1.2 Number of pangolin trafficking networks that are investigated by Uganda Wildlife Authority, increases from one in 2017 to at least two by October 2019 and three by October 2020	1.2 Court case records 1.2 Seizure records and follow-up actions taken	
and not low-level local poachers, reducing potential negative impacts of enforcement action on marginalised rural communities.	1.3 Transfer of all pangolins to CITES Appendix I is included within Uganda's recent orders and regulations enabling CITES provisions to be incorporated into domestic legislation by January 2019	1.3 Media articles 1.3 Government reports to CITES (particularly those submitted to support resolution Conf. 17.10 Conservation of and trade in pangolins)	
	1.4 An increase in the number of prosecutors and judges referring to judicial guidelines that reflect the CITES Appendix I listing of pangolins from zero in 2017 to at least in 50% of cases by March 2021	1.4 Court case records	
IMT Appual Papart Tampleto 2010	1.5 New UWA Intelligence Unit confirms inclusion of pangolin	0	

	trafficking on their agenda by January 2019 1.6 50% of UWA Intelligence Unit staff receive one training session on required intelligence gathering to pursue financial investigation in cooperation with other stakeholders by December 2019	 1.5 and 1.6 Minute meetings with UWA; UWA reports and policy documents 1.6 NRCN training workshop report including pre and post training questionnaires for participants 	
2. The financial sector (including public and private sector institutions) have the information they need to produce policies and other actions that combat the link between illicit financial flows and pangolin crime/trafficking.	2.1 Number of financial typologies produced related to pangolin trafficking networks by partners and accepted by banking institutes (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)	2.1 Direct feedback from banking sector 2.1 Financial Action Taskforce and UNODC reports 2.1 and 2.2 Banking Sector policy documents	Financial institutions are sufficiently concerned about IWT to accept and act on typologies provided Banks avoid offering services to individuals and companies entered into "know your customer" databases
	2.2 Number of accepted submissions to Thomson Reuters World-Check increases from a baseline of 57 pangolin specific submissions accepted in 2017 to 120 by March 2021	2.2 Thomson Reuters World-Check feedback via Liberty Asia	
	2.3 Number of pangolin crime related financial typologies produced related to pangolin trafficking networks for FIU (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)	2.3 Internal record of engagement with FIU	
3. The transport sector (including private and state companies) has integrated the methods used to traffic pangolins into their risk analyses and have become effective	3.1 An increase in the number of transport leaders (including those signed up to United for Wildlife (UFW)Transport Taskforce) that are sensitised to the threats to pangolins and the involvement of	3.1 Record of alerts sent to transport leaders	Sufficient resources for mobile scanners to be used for pangolin detection

partners in combatting the illegal wildlife trade in Uganda	organised criminals in the trafficking of pangolins from none in 2017 to 100% sensitised by the end of the project		
	3.2 Increase in the number of Ugandan logistic/transport companies that sign up to the UFW's Transport Taskforce by March 2021 (baseline of zero in 2017 to two by October 2019. Goal for March 2021 to be determined following review of how many transport companies appear to be involved)	3.2 Transport sector policy documents 3.2 Annual reports; Transport Taskforce	
	3.3 Mobile scanner deployed by the URA (Uganda Revenue Authority) for ivory detection is also used to detect pangolins by June 2019	2.4 LIVA/A maliay da ayya anta and	
	3.4 Logistics companies are sensitised under the UNODC-WCO Container Control Programme of pangolin trafficking out of Uganda	3.4 UWA policy documents and reports	
4. Public-facing materials to raise	4.1 An increase in number of	4.1 Media articles	
awareness of criminality and corruption associated with the global	English language media articles and reports that connect pangolin	4.2 NGO reports/publications, 4.3 Government reports and	
pangolin trade.	trafficking to governance issues (including corruption). (baseline to be established in project's first quarter).	submissions to e.g. CITES	

Activities (each activity is numbered according to the output that it will contribute towards, for example 1.1, 1.2 and 1.3 are contributing to Output 1)

- 1.1 Establishment of agreed systems and processes for collecting, managing and sharing information between EIA and NRCN followed by collation of information on pangolin trade
- 1.2 Analysis and mapping of criminal networks, points of intervention identified, new desk-based and field research tasks determined including desk based research and correspondence relating to networks in demand countries in Asia.
- 1.3 Scoping trip to liaise with NRCN, national law enforcement agencies and brief them following initial analyses. Conduct a review of M&E processes
- 1.4 Field work to ground-truth desk-based research, gather information on trade incidents, download & transcribe findings

- 1.5 Prepare and disseminate confidential dossiers for Ugandan law enforcement agencies and prosecutors through face-to-face briefings, and to other relevant countries, including transit and destination countries, and intergovernmental bodies such as INTERPOL and World Customs Organisation electronically
- 1.6 Liaise with the UWA and other enforcement agencies to monitor law enforcement response and provide additional information generated by further desk and field research
- 1.7 Prepare amendments to national regulations to integrate provisions for CITES Appendix I listing and disseminate to law-makers
- 1.8 Commission a wildlife valuation expert to prepare judicial guidelines, and disseminate guidelines electronically and physically to prosecutors and judiciary through face-to-face briefings as part of a briefing on the role of serious organised crime in pangolin trade
- 1.9 Prepare multi-lingual awareness materials for Ugandan enforcement authorities regarding pangolin trade and CITES listing and measure change in awareness through questionnaire surveys
- 1.10 Prepare and deliver a training workshop to the UWA Intelligence Unit on how to conduct financial investigations
- 2.1 Prepare anonymised typology for dissemination via Liberty Asia to banks and financial institutions, share non-anonymised version upon request. Disseminate to the Uganda FIU.
- 2.2 Regular submission of details of known pangolin traders to Thomson Reuters World-Check
- 2.3 Prepare and disseminate briefings on pangolin trade to the UN Office on Drugs and Crime (UNODC) ahead of regional meetings of the Financial Action Task Force
- 3.1 Prepare and issue an alert to transport leaders, including the UFW Transport Taskforce, and associations to raise awareness about the role of organised crime in pangolin trade and transportation methods
- 3.2 Identify and encourage Ugandan transport / logistics companies to sign the UFW Transport Taskforce Declaration
- 3.3 Prepare a "red flag" briefing for the Uganda Revenue Authority, and encourage URA and the clearing and forwarding firms to treat pangolin cases with same urgency as elephant tusks through use of mobile scanner to detect pangolin shipments
- 3.4 Disseminate briefing prepared under Activity 2.3 to relevant division of UNODC and urge them to incorporate into the Container Control Programme training
- 4.1 Prepare and disseminate a public-facing report on the role of organised crime and corruption in the global pangolin trade that advocates for sustained investment in intelligence-led enforcement in Uganda and other countries identified through the project
- 4.2 Update and circulate interactive online maps and infographics to raise the public profile of the role of organised crime and corruption in the global pangolin trade
- 4.3 Make non-sensitive datasets available to journalists and academic researchers to support other studies and reports on the global pangolin trade

Annex 3 Standard Measures

n/a

Checklist for submission

	Check
Is the report less than 10MB? If so, please email to <a href="https://www.lwt.number.n</td><td></td></tr><tr><td>Is your report more than 10MB? If so, please discuss with lWT-Fund@ltsi.co.uk about the best way to deliver the report, putting the project number in the subject line.	
Have you included means of verification? You need not submit every project document, but the main outputs and a selection of the others would strengthen the report.	
Do you have hard copies of material you want to submit with the report? If so, please make this clear in the covering email and ensure all material is marked with the project number. However, we would expect that most material will now be electronic.	
Have you involved your partners in preparation of the report and named the main contributors	
Have you completed the Project Expenditure table fully?	
Do not include claim forms or other communications with this report.	I