

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 2020

IWT Challenge Fund Project Information

Project reference	IWT056
Project title	Strengthening Enforcement against the Illegal Pangolin Trade in Uganda
Country/ies	Uganda
Lead organisation	Environmental Investigation Agency (UK)
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 2019-Mar 2020) and number (e.g. Annual Report 1, 2, 3)	1 April 2019 to 31 March 2020 Annual report 2
Project Leader name	Julian Newman
Project website/blog/social media	https://eia-international.org/our-work/wildlife/pangolins/
Report author(s) and date	EIA (Chris Hamley) with input from NRCN. 29/04/20

1. Project summary

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, despite the recent success of transferring pangolins to CITES Appendix I.

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 0.4 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 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.

Therefore, this project aims to enhance enforcement against the criminal syndicates that are trafficking pangolins in and around Uganda by providing actionable information to enforcement authorities and ensuring they also have the capacity and skills to properly implement the CITES Appendix I listing of pangolins. The gathering, analysis and dissemination of information on criminal networks will be supported by advocacy to raise awareness of the pangolin trade among the judiciary and the provision of training to a new intelligence unit.

The project is being implemented from London, UK, with field activities taking place in Kampala, Uganda and regions of Uganda experiencing pangolin trafficking.

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 Office of the Director 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.

As per the agreed monitoring and evaluation plan, in year 2, working relationships have been maintained and developed between EIA and NRCN through quarterly in-country visits and regular remote communication over WhatsApp and email. Country visits have provided vital opportunities for in-person discussions over strategy development, activity implementation and problem solving. For activities sub-granted to NRCN, oversight and strategic direction has been provided by the NRCN leadership team ([REDACTED])

[REDACTED] EIA’s function with these activities is to provide technical support on work planning, financial management guidance and monitoring and evaluation.

NRCN maintains strong day-to-day working relationships with UWA, DPP and UPF to implement its investigations and prosecution activities. During visits to Uganda, the Senior Pangolin/Principal Campaigner met government officials in the UWA, UPF, Uganda Revenue Authority and Financial Intelligence Authority. NRCN also coordinates with other wildlife trafficking stakeholders in Uganda through the National Wildlife Crime Coordination Task Force (NWCCTF). EIA met with the Wildlife Conservation Society (WCS) Uganda Program [REDACTED] [REDACTED] and WildAid Uganda Representative [REDACTED] to discuss DEFRA project activities and ensure there is no duplication of effort on project activities.

EIA has built informal information-sharing relationships with trusted law enforcement agencies working at the international level on illegal wildlife trade [REDACTED] [REDACTED]

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

[REDACTED]

A 1-month period of desk-based open- and close- source information gathering and processing was completed to identify additional persons of interest involved in pangolin trafficking, and to develop operational terms of references for fieldwork.

[REDACTED]

[REDACTED]

[REDACTED]

Collection of digital open-source intelligence (OSINT) on China's legal domestic market for pangolin scales was initiated by a consultant investigator. This research has produced information on the pangolin scale legal framework in China, on-going pangolin scale trading activity by pharmaceutical companies, and the establishment of captive-breeding facilities.

[REDACTED]

Proposed amendments to Uganda's wildlife regulations to incorporate the CITES Appendix I provisions for pangolins were finalized. In July 2019, the Uganda Wildlife Act was assented by the President of Uganda and this entered force in September 2019. The new act lists all four African pangolin species as protected species in its third schedule and all species listed in any international convention (such as CITES) are treated as protected species. To support engagement efforts to ensure the Bill was assented, NRCN engaged and cooperated with UWA, the Ministry of Tourism, Wildlife and Antiquities and WCS. To build awareness of the Uganda Wildlife Act, NRCN conducted five regional 1-day workshops in September 2019 with the UPF on illegal pangolin trade and the laws relevant to wildlife trafficking in Uganda (including the

Uganda Wildlife Act). The workshops were co-financed by USFWS and The Wildcat Foundation and took place in the Central, Western, Northern, West Nile and Eastern regions. Awareness was also built on the roles and responsibilities of UPF and NRCN in detecting, investigating and prosecuting wildlife crimes. In addition to this, NRCN/EIA produced two posters to raise awareness of pangolins and their products amongst UWA, UPF and URA enforcement officers. The first details pangolin trafficking as a serious offence under the Uganda law, and the penalties associated with it, and the second provides images and information on pangolins to aid enforcement identification.

NRCN have continued to conduct investigations into traffickers involved in sourcing pangolins 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.

To ensure government ownership of the wildlife valuation guideline preparation process, in March 2020, NRCN held a workshop with representatives from UWA, DPP, Ministry of Justice, and Makerere and Busitema Universities. It was agreed that a 'wildlife valuation working group' would be formed to develop the guidelines and that the next step will be to outline a terms of reference for a consultant to facilitate this process.

With co-financing from David Shepherd Wildlife Foundation (DSWF), NRCN and EIA held a 4-day wildlife trafficking financial investigations workshop in April 2019 in Kampala, Uganda. The workshop was delivered by two expert international consultants [REDACTED]. Participants included investigators, analysts, and prosecutors from NRCN, UWA, UPF, DPP and the Financial Intelligence Authority (FIA). It consisted of a mix of theory teaching, an emphasis on practical exercises and local expert input from public and private sectors. Special speakers were drawn from Western Union, Standard Chartered Bank, Airtel Money, URA, Ministry of Justice (Chief Magistrate) and FIA.

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.

To ensure stronger integration of wildlife/pangolin crime into financial investigations in Uganda it was identified that improved multi-agency collaboration was necessary. To address this, EIA/NRCN conducted an exercise in January 2020 (with co-financing from DSWF) through which to build government ownership and capacity for parallel financial investigations on serious wildlife trafficking cases. A series of bi-lateral meetings with UWA, UPF, URA, DPP and FIA were held to discuss challenges government agencies are facing with corruption, multi-agency cooperation and resourcing. The highlight of the exercise was a roundtable meeting in which all agencies presented their financial investigations-related successes, challenges and proposed solutions. At this meeting, there was a preliminary agreement on the formation of a Joint Financial Investigation Team (JFIT) for significant wildlife trafficking cases. Agreement on the need to identify criteria to trigger the need for multi-agency financial investigations was also achieved. The JFIT will bring together the agencies responsible for investigating and prosecuting wildlife crime to initiate parallel financial intelligence gathering and investigation activities. This will overcome barriers such as a lack of multi-agency cooperation, information sharing and investigation strategy development. NRCN have agreed to provide a Secretariat function for the JFIT. As of April 2020, FIA, URA and UWA have endorsed the recommendations from the roundtable meeting, including participation in the JFIT. NRCN plans to further engage with the remaining agencies to obtain commitment for the joint team. [REDACTED]

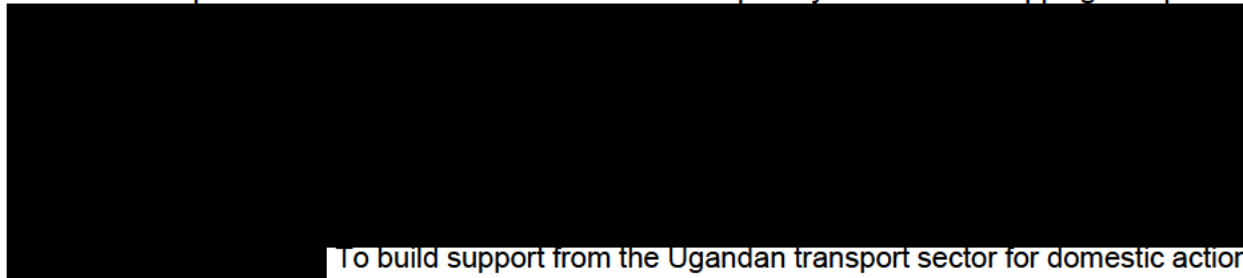
The EIA Intelligence Team collated names of arrested, charged and convicted pangolin traffickers from open-source media reports for twice-monthly submission to Thomson Reuters World-Check by Liberty Shared. Over the reporting period, EIA submitted 182 names for pangolin

trafficking during, 89 of which were accepted and resulted in new or updated profiles (based on World Check and Dow Jones feedback).

A financial typology on the trafficking of pangolin scales and elephant ivory from Uganda to Vietnam was produced by the EIA Intelligence Team. The typology will provide financial institutions and regulators with information on the methods of operation of a Vietnamese wildlife trafficking syndicate which conspired to export 423.7 kg of pangolin scales and 3,299 kg of elephant ivory from Uganda to Vietnam in January 2019. Members of the syndicate are currently under prosecution in Uganda. The typology will assist recipients' understanding of client and transactional risk exposure from such activities, and a final draft will be shared with Liberty Shared for onward distribution to banking institutes in year 3 of the project.

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

EIA has developed a transport sector engagement strategy for 2020 that aims to ensure the transport sector takes necessary actions to minimise the use of its services for wildlife trafficking. Activities completed include desk-based research into priority airline and shipping companies



To build support from the Ugandan transport sector for domestic action to combat the use of their services for wildlife trafficking (including sign-up to the UFW TTF), NRCN has arranged a meeting with the Uganda Freight Forwarders' Association (UFFA). Due to the onset of the COVID-19 crisis and associated social restrictions in Uganda, this meeting has been delayed.

EIA has assessed how wildlife traffickers exploit weaknesses in customs procedures in Uganda to illegally export ivory and pangolin scales. This information has been included in an intelligence assessment (see output 1 - shared with USFWS) and a financial typology (see output 2). This information will be sanitised and shared with the UFW TTF in year 3 to ensure signatories are sensitised to red-flags associated with pangolin scale trafficking from Africa to Asia.

In October 2019, EIA and NRCN met with the URA Joint Port Control Unit team (including UNODC Container Control Programme point of contact [redacted]) in Kampala to highlight pangolin trafficking issues. During this meeting URA confirmed they are on "high-alert" for pangolin trafficking activity and seek to develop risk-profiles for wildlife trafficking activity.

NRCN has maintained regular communication with URA regarding on-going investigations and prosecutions relating to pangolin trafficking, including the Vietnamese defendants currently under prosecution (see output 2 above).

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

To raise awareness of the EIA pangolin campaign 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 government decision-makers.

Between 17 and 28 August 2019, the Senior Pangolin/Principal Campaigner worked with other EIA campaigners to conduct advocacy on pangolin trade issues at CITES CoP-18 in Geneva, Switzerland. To build awareness of key issues amongst decision-makers prior to the conference EIA shared a 37-page briefing document with CITES partners and observers highlighting recommendations to strengthen species protections. A public-facing report to support CITES CoP-18 advocacy titled 'Running Out of Time: Wildlife Crime Justice Failures in Vietnam' was also published in July 2019 and made available on the EIA website.

At CoP-18, there were two agenda items of primary relevance to pangolins, the first was working document 49.1 on the trade in pre-Appendix I specimens, and the second was working document 75 on pangolins species specific matters.

The goal of this was to ensure the proposal of Decision text urging Parties experiencing illegal pangolin trade to strengthen enforcement efforts targeting pangolin trafficking networks using intelligence-led investigations and implementation of legislation aimed at disrupting trans-national organized crime; and to implement targeted measures to eliminate consumer demand for pangolin specimens including closing legal domestic markets. During the committee II meeting on document 75, the EIA Senior Pangolin/Principal Campaigner delivered an intervention, endorsed by a further 6 NGOs, raising the above points.

At CoP-18, the Senior Pangolin/Principal Campaigner conducted extensive networking with representatives from over 30 Party delegations, international organisations and other NGOs, to raise pangolin trafficking issues. He also participated as a speaker and panellist at a side-event organised by China based NGO called China Biodiversity Conservation Green Development Foundation (CBCGDF) and gave a presentation on the role of trans-national organised crime groups in pangolin/ivory trafficking. In September 2019, the Senior Pangolin/Principal Campaigner participated in a panel discussion (alongside pangolin scientist Dr Daniel Ingram) following the private screening of the documentary 'Eye of the Pangolin' at Courthouse Hotel Cinema (Soho, London), which had 50+ attendees.

To build awareness of pangolin trafficking issues amongst the Ugandan public, NRCN has shared information about arrests and prosecutions with media agencies in Uganda (including New Vision and the Independent). EIA has published 23 pangolin-related news articles on its website focusing on pangolin scales seizures, China's domestic wildlife market and Wildlife Protection Law, CITES, captive-breeding and pangolin IUCN Red List status.

EIA has collated information from publicly available and confidential sources (English, French, Vietnamese and Chinese language media articles, and partner reports) on 200 pangolin (including scales and whole live/dead animals) seizure incidents that took place globally during the reporting period (100,000kg of pangolin scales seized). The dataset now includes 1,331 pangolin seizure records globally for the period 2000 to 2020. 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 12 separate journalists, NGOs, researchers or law enforcement agencies. Recipients included Interpol, University of Oxford, Duke University, Junita College, ADM Capital Foundation, UNODC, The Pangolin Reports, WWF Hong Kong, BBC, PanNature - Vietnam and Nigeria customs.

3.2 Progress towards project Outputs

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 intelligence between EIA and NRCN, review of existing EIA intelligence, and open- and closed- source research, persons of interest were identified for targeting through undercover field investigations.



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

NRCN investigates and prosecutes cases under their MoU with UWA. During the reporting period, progress was made by NRCN in cooperation with DPP, URA and UWA on the investigation and prosecution of four Vietnamese [REDACTED] [REDACTED] for the possession of prohibited wildlife goods (424kg pangolin scales and 3,299kg elephant ivory). The case is currently under prosecution in the High Court and as of 31 March 2020 is adjourned. [REDACTED]

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 July 2019, the Uganda Wildlife Act was assented by the President of Uganda and this entered force in September 2019. The new act lists all four African pangolin species as protected species in its third schedule and all species listed in any international convention (such as CITES) are treated as protected species. Under the law pangolin trafficking offences are therefore "liable to a fine not exceeding ten thousand currency points or to life imprisonment or both".

1.4 Uganda Wildlife Authority / NRCN conviction rate for pangolin trafficking offences remains above 2017 baseline of 70% up to March 2021

During the reporting period NRCN supported UWA and UPF to undertake 39 arrests of traffickers involved in the sourcing of pangolin scales in and around Uganda. A total of 24 pangolin traffickers were convicted and received custodial sentences (with 11 of these receiving a fine), an additional 2 were given cautions; 10 cases are currently on trial and 8 are pending trial. On cases that NRCN prosecuted or supported there was a 92% conviction rate. All cases have been prosecuted under the Uganda Wildlife Act and penalties are decided through judicial discretion within the scope of what is permitted under the Act. To ensure sentencing is proportionate to the value and harm caused by those prosecuted, NRCN are currently working with UWA to develop a wildlife valuation guideline. Engagement with UWA has made progress over the last quarter and this will restart once COVID-19 restrictions are lifted so that it can be completed in year 3.

1.5 Minimum of 10 staff from government agencies involved in investigating and prosecuting wildlife crime receive one training session on required intelligence gathering to pursue financial investigation in cooperation with other stakeholders by December 2019

Between 14 and 18 April 2019, 20 individuals from UWA, NRCN, UPF, DPP and FIA participated in a 4-day financial intelligence workshop, 12 participants were drawn from government agencies. The workshop was delivered at the Grand Global Hotel in Kampala. Participants had a variety of roles within their own organisations, including investigators, analysts, and prosecutors. The programme filled an identified capacity gap that investigators and prosecutors of wildlife crimes in Uganda did not have the skills and experience necessary to build cases for associated financial crimes, or to use financial intelligence techniques to assist in their wildlife cases.

Output 2

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

The EIA Intelligence Team has produced a financial typology on a [REDACTED] network involved in the export of elephant ivory and pangolin scales from Uganda in 2019. This 11-page document explains the methods of operation used, financial facilitators (including the use of Western Union transfers), key syndicate members, red-flags and further action. This report will be shared with Liberty Shared in year 3 with the goal of onward sharing with the financial sector to support compliance measures. Over the course of year 3 this typology will be updated as new information is gathered, and further opportunities will be identified to produce a typology on an additional pangolin trafficking network.

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 182 names for pangolin trafficking, 89 of which were accepted and resulted in new or updated profiles (based on World Check and Dow Jones Risk and Compliance feedback). 57 existing profiles were updated. A total of 80 names were not accepted, this was because: 1) the full name was not available, 2) the names were rejected by Liberty Shared, or 3) the names were accepted by Liberty Shared but rejected by World-Check and Dow Jones.

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

In year 3, EIA/NRCN intelligence on money laundering associated with Uganda persons of interests and a sanitised version of the typology produced under output 2.1 will be shared with the FIA. In year 3, a briefing on pangolin trafficking in East Africa will be produced and shared with the Eastern and Southern Africa Anti-Money Laundering Group and UNODC Container Control Programme.

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

EIA has outlined its transport sector engagement strategy that lists campaign activities such as research into the use of transport services for wildlife trafficking, TTF engagement, typology/red-flag development, airline and shipping companies to target through advocacy, and public-facing communications activities. An assessment of the role of Ethiopian Airlines in wildlife trafficking has been completed and a prioritised list of actions developed to ensure this company and others are sensitised to wildlife trafficking and involvement of organised crime. In year 3, EIA plans to produce briefing documents and organise face to face meetings with airlines and shipping companies to advocate for more action on pangolin/wildlife trafficking.

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)

[REDACTED] the UFFA has over 114 members and gaining their commitment to the goals outlined in the UFW TTF declaration will contribute significantly to improving cooperation between law enforcement and the private sector. When COVID-19 restrictions in Uganda are lifted, NRCN will re-initiate engagement. EIA will facilitate contact between the Uganda transport sector and UFW TTF to ensure sign up.

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

UNODC Container Control Programme point of contact [REDACTED] told EIA/NRCN in October 2019 that the URA scanners are currently deployed at the Uganda-Kenya border at Busia (to Kisumu, Kenya) and Malaba (to Eldoret, Kenya) and at these locations the scanners check 100% of containers. In year 3, NRCN will disseminate a pangolin identification poster (see output 2) with law enforcement officers (including URA) at priority wildlife trafficking hubs across Uganda.

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)

In Uganda, as a result of NRCN engagement with media organisations, 4 news stories have been published on pangolin trafficking, including:

- In July 2019, the New Vision newspaper reported on the sentencing of an individual named Johnson Asaba for the possession of 5.38kgs pangolin scales. https://www.newvision.co.ug/new_vision/news/1502865/jailed-sh60m-pangolin-scales

- In September 2019, the New Vision newspaper reported on the prosecution of an individual named Zubair Alahai Dramadi for the possession of 99.16kgs of pangolin scales. https://www.newvision.co.ug/new_vision/news/1507195/charged-remanded-pangolin-scales-worth-sh11b
- In February 2020, the New Vision newspaper reported on two South Sudan security officials who were arrested for pangolin trafficking in Elegu, near the Nimule border crossing. https://www.newvision.co.ug/new_vision/news/1515190/sudan-security-officials-arrested-sales-pangolin

In the international media, Senior Pangolin/Principal Campaigner, Chris Hamley, was quoted in the following articles:

- The Pangolin Reports ('Trafficked to Extinction'). <https://globalstory.pangolinreports.com/#lede>
- Le Figaro Magazine ('Pangolin Un Suspect Victime de Tous Les Traffics'). <https://www.lefigaro.fr/sciences/coronavirus-le-pangolin-une-victime-aux-airs-de-coupable-20200221>

EIA has published 23 pangolin-related news articles on its website focusing on pangolin scales seizures, China's domestic wildlife market and Wildlife Protection Law, CITES, captive-breeding and pangolin IUCN Red List status.

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.

Considerable information on pangolin trafficking networks operating in Uganda was generated from digital and field investigations. This resulted in the production of 188 intelligence reports, three intelligence summaries, and three intelligence assessments (including two network charts).

[REDACTED] his outcome has been achieved; in year 3 significant digital and field investigations work is planned to further document one of these 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 Agency (FIA), 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 produced on pangolin trafficking networks in Uganda, to one by March 2021

[REDACTED] EIA/NRCN met with the Uganda FIA represented by [REDACTED] (FIA Executive Director) and [REDACTED] (FIA NWCCTF Focal Point) in January 2020. At this meeting, discussions focused on the sharing of information between FIA and NRCN to support financial investigations into wildlife/pangolin traffickers. FIA requested that NRCN submit information requests through government agencies with which they currently have MoUs (such as UWA and DPP).

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 red-flag alerts relating to pangolin trafficking in Uganda disseminated to law enforcement agencies or UFW Transport Taskforce increases from a baseline of zero in 2017 to two in March 2021

The EIA Intelligence Team has agreed with the UFW TTF Head of Intelligence and Analysis that EIA will share names of individuals linked to pangolin trafficking for onward dissemination to transport companies and banks. It was also agreed that EIA will submit specific investigations-related intelligence requests to UFW and that they would facilitate the dissemination of fast-time intelligence. Information of transport and customs related pangolin trafficking vulnerabilities have been identified for Uganda and this will be sanitised and shared with the UFW TTF in year 3.

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 39 arrests for pangolin trafficking over the reporting period (project total: 72). A total of 24 suspects were successfully convicted (project total: 39) and 0 were acquitted (project total: 6). Of the 24 convictions, 54% (13) received custodial only sentences, and a total of 202 months of custodial sentences issued, with a mean sentence of 15.54 months. A total of UGX [REDACTED] of revenue was generated for the Ugandan government from fines and the mean fine was UGX [REDACTED]. Two government security staff (1x UPDF, 1x South Sudan Police Service) were convicted and one is currently on trial (Internal Security Organisation - ISO) for pangolin trafficking. Information on case status/outcome is collected by NRCN prosecutors, and managed NRCN Database Officers.

0.5 Increased awareness among Ugandan enforcement, judiciary and wildlife confiscation authorities of the updated protected species status of pangolins from 21 officials (engaged in November-December 2017) to 100 officials by March 2021

To build awareness of the Uganda Wildlife Act, NRCN conducted five regional 1-day workshops in September 2019 with the UPF on illegal pangolin/wildlife trade and the laws relevant to wildlife trafficking in Uganda (including the Uganda Wildlife Act). A total of 92 UPF officers participated in the awareness workshops (14 - West Nile, 16 – North, 21 – Eastern, 18 – Central, 23 – Western). Content of the workshops included: wildlife conservation, laws governing wildlife in Uganda, offences under the wildlife act, CITES, role of UPF in wildlife conservation, mandate of UPF in combating wildlife crime, investigation procedures and methods of concealment.

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

In Uganda there has never been any successful prosecutions of wildlife traffickers for offences under the Anti-money Laundering Act (2013). To reach this outcome, NRCN have initiated engagement with relevant government agencies (UWA, FIA, URA, DPP, UPF) to build the institutional support and structures for effective investigations that lead to prosecutions. During the reporting period, the five agencies have committed to participate in a Joint Financial Investigations Team (JFIT) that will cooperate on cases of serious wildlife/pangolin trafficking. To ensure stronger integration of wildlife/pangolin crime into financial investigations and financial sector regulatory mechanisms NRCN/EIA will work to bring the JFIT together on a practice or real investigation in year 3 (with co-financing from DSWF and COVID-19 restrictions permitting).

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.

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 [REDACTED]. During the reporting period, with co-financing from other donors, NRCN has engaged in various regional initiatives involving governments and NGOs across East Africa to combat wildlife trafficking. [REDACTED]

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

As reported for year 1, 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 Anti-Money Laundering Act 2013. This permits the FIA to make orders in relation to the proceeds of crime, cooperate internationally, 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 UWA, therefore, for financial investigations relating to wildlife trafficking, there is a strong need for cooperation between UWA, NRCN and authorised officers. Furthermore, UWA is mandated to obtain intelligence from the FIA to support financial investigations in cooperation with UPF, DPP and NRCN. [REDACTED]

During a meeting between EIA/NRCN and the Uganda FIA in January 2020, the FIA Executive Director explained that under the Financial Action Task Force’s (FATF’s) International Cooperation Review Group (ICRG) Uganda has been identified to have ‘strategic deficiencies’ and was to be placed on the ‘Other monitored jurisdictions’ list (those that have weak measures to combat money laundering). The FATF website now states that in “February 2020, Uganda made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime”. Under the latest ICRG evaluation of Uganda it performed well on ‘Outcome 6’, which relates to the management, function and capacity of the FIA itself. However, on the other 10 FATF outcome areas, Uganda is required to improve significantly to strengthen its AML regime. [REDACTED]

To resolve capacity gaps in the UPF, the FIA is developing a curriculum on financial investigations for the UPF and although this will take a while to develop, it will ensure the UPF have a greater capacity to conduct financial investigations. This in turn will increase the national capacity to integrate wildlife/pangolin crime into financial investigations. More specifically, under this project EIA/NRCN has taken measures (explained in section 3.1, output 2) to include the FIA, DPP and UPF in a joint team that strengthens multi-agency cooperation on financial investigations for wildlife/pangolin trafficking. This will provide the institutional structure for more effective investigations planning and coordination, and introduce more accountability between government organisations to prevent corruption. [REDACTED]

Law enforcement agencies respond positively to independent findings

As reported for year 1, NRCN has strong relationships with officials from UWA, UPF, DPP and URA. These relationships are the foundation of NRCN’s investigation and prosecution activities and reflect the commitment and motivation exhibited by the relevant law enforcement agencies. [REDACTED]

[REDACTED]

[REDACTED]

The continued law enforcement successes 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 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, Turkish Airlines, KLM Royal Dutch Airlines, Egypt Air, DHL Express and Maersk Group.

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

In 2019, Uganda ranked 137 (compared to 149 for 2018) 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 (see section 3.3, outcome 0.4). 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. However, issues around corruption in the judiciary do remain, this is demonstrated through sometimes lenient sentencing for wildlife offences in relation to the harm caused by those successfully prosecuted. Such judicial failings undermine rule of law and investments by NRCN in conducting investigations and prosecutions. In year 3 (COVID-19 situation permitting), NRCN will be seeking co-financing and invest resources into building awareness amongst the judiciary on the importance of wildlife conservation, the new wildlife act, and the need for integrity in the adjudication of wildlife trafficking cases (see section 9 for more information).

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

As reported for year 1, in 2014, NRCN agreed an MoU with UWA for collaboration on the enforcement of wildlife laws in Uganda. This MoU remains in place and provides NRCN with a mandate to collaborate with UWA on the prosecution of wildlife crime, or to independently prosecute wildlife cases, and support UWA by establishing an intelligence gathering network for tracking poachers and wildlife traffickers. 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

During the reporting period, NRCN have participated as a member in Uganda's National Wildlife Crime Coordination Taskforce (NWCCTF). The taskforce includes the Ministry of Tourism, Wildlife and Antiquities, UWA, UPF, FIA, URA, DPP, ISO, UPDF, External Security Organisation, National Forestry Authority, National Environment Management Authority, Civil Aviation Authority, Directorate of Citizenship and Immigration Control, Interpol and Wildlife Conservation Society. The initial goal of the NWCCTF is to "promote cooperation and coordination among security agencies, law enforcement bodies and other relevant government institutions to combat

[REDACTED]

wildlife crime at national and international level". This includes the development of strategies and actions to combat national and international wildlife crime, building operational links between institutions to facilitate information sharing, implementation of joint operations and awareness raising amongst law enforcement agencies on wildlife trafficking. The terms of reference of the NWCCTF outlines its responsibilities, governance and monitoring.

the existence of the taskforce demonstrates the commitment of the Uganda government to ending IWT.

Output 2

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

Under EIA's DEFRA anti-money laundering project (IWT059), EIA has produced two IWT-related financial typologies, one of which shared with FIUs of 25 countries in the Caribbean Financial Action Task Force. Through the IWT059 project four presentations on IWT typologies were made to banks via online webinars in 2019, and one on pangolin trafficking was presented to banks in North America and East Asia. Under the Chinese presidency of FATF, it has prioritised IWT and made the issue a higher concern for financial institutions. For example, more Chinese banks have now signed up to the UFW FTF. These achievements demonstrate that financial institutions are sufficiently concerned about IWT to accept and act on typologies provided and under this project the typologies produced will contribute to the intended outcomes.

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 and Dow Jones. 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

As covered in section 3.2 (output 3.3), in October 2019 URA confirmed that scanners are currently deployed

[A news report on June 2019](#) also confirmed that a cargo scanner has been used at the Uganda-Rwanda (Gatuna border post). More capacity in the identification and prioritisation of pangolin scale trafficking is required amongst customs and enforcement officers at border posts. In year 3, this will be addressed through the dissemination of pangolin identification posters to URA, URA and UPF.

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

The original application stated the project impact as "The illegal wildlife trade is no longer the primary threat to pangolins; intelligence-led enforcement reduces the impacts of the illegal trade on rural local communities".

Field investigations completed by EIA and NRCN under this project have provided further evidence to demonstrate the role of Uganda as a transit and 'crime hub' for the trafficking of pangolin scales, elephant and hippo ivory and rhino horn from Africa to Asia. It is strategically located for large-scale wildlife trafficking between Africa and Asia. While Uganda has significant wildlife populations, it is also adjacent to rich wildlife habitat areas across the wider region (e.g. Congolian Forests, East Sudanian savannas), and has the air and road infrastructure to facilitate the Asia-bound export of illegal wildlife products (incl. pangolin scales). It is therefore a strategic priority for the information gathering and law enforcement activities implemented through this project.

Wildlife traffickers prioritised for targeting through this project includes those leading and organising the large-scale sourcing, consolidation and exportation of pangolin scales and

elephant ivory. [REDACTED]

[REDACTED] Low-, mid- and high- level traffickers are involved in *commercial* wildlife crime and therefore seek wealth beyond basic household necessities. The law enforcement approach of the project therefore avoids impact on marginalised households that might be pushed into poaching through poverty, perceived injustice, human-wildlife conflict or armed conflict.

[REDACTED] The Global Initiative has [recently reported](#) on the growing volume of heroin trafficked from Afghanistan through Uganda to Europe. Uganda is therefore also a priority for combating wildlife-related trans-national organised crime with regional and international implications for peace, security and poverty reduction.

[REDACTED] Law enforcement actions against leading individuals in this network have the potential to disrupt wildlife trafficking activities that are driving the depletion of pangolin, elephant and rhino populations across a significant area of the African continent. These wildlife populations play important roles in the functioning of forest, grassland and wetland ecosystems on which local communities depend for food, water, non-timber forest products, other livelihood necessities and tourism.

Training and engagement of key government staff in year 2 of the project has ensured that the institutional structures, awareness and support for financial investigations have the potential to make Uganda a more high-risk operating environment for organised wildlife crime groups (see section 3.1, output 2). Especially regarding impunity over the consolidation and retention of the proceeds of wildlife crime. The targeting of UPF officers across all five regions of Uganda by NRCN (see section 3.1, output 1) has expanded the spatial scope of the project's impact beyond Kampala to include areas across the country.

Anecdotal information gathered by EIA suggests that Asian wildlife trafficking networks gravitate to African countries with weaker wildlife-related law enforcement. [REDACTED]

[REDACTED] Therefore, actions under this project are functioning to deter the establishment and operation of pangolin trafficking groups, especially those operating from Asia.

4. 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. During the reporting period, the project has worked to deliver this impact by [REDACTED]

[REDACTED] and 2) through the arrest of 39 offenders for pangolin trafficking, of these, 24 suspects were successfully convicted (including 2 government security sector staff).

Kasane statement:

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 (output 2) and engaging with the transport sector (output 3). In year 2, this project has contributed to these objectives by 1) completing a training on the application of financial investigations techniques to wildlife trafficking cases for 20 participants drawn from relevant government agencies and NRCN; 2) identified transport companies involved in significant wildlife trafficking between Africa and Asia for targeting through advocacy, and initiated engagement with the Uganda Freight Forwarders Association to advocate from UFW TTF sign-up and action on the use of their services for wildlife trafficking.

5. Impact on species in focus

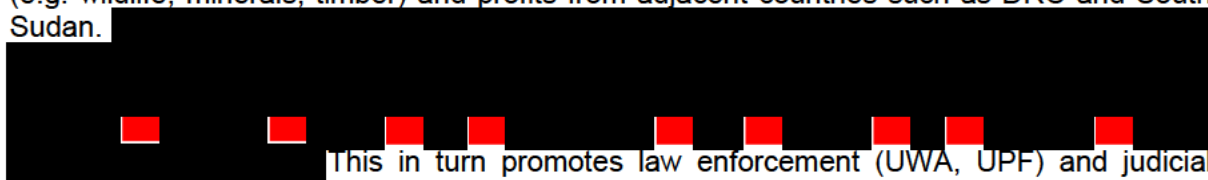
The world is currently facing a wildlife poaching and trafficking crisis, with an estimated USD 8 to 10 billion of illicit wildlife product traded annually (excluding fish and timber). Due to habitat loss, climate change and overharvesting, all pangolin species are classified as globally threatened on the IUCN Red List. The Asian pangolins are either Critically Endangered or Endangered and African pangolins are either Endangered or Vulnerable. In 2019, two African pangolin species (giant and white-bellied) were moved from Vulnerable to Endangered classifications on the IUCN Red List. International trafficking for their scales and habitat loss were listed as the two major factors driving the decline of their populations.

While it is not possible to establish a counter-factual for this project (i.e. what would be happening in the absence of the activities/interventions implemented), NRCN have made significant contributions to the arrest and prosecution of one major pangolin/ivory trafficking network (Vietnamese group). This activity has disrupted and ended the operation of a criminal enterprise that was profiting from the illegal killing of many thousands of individual pangolins. This disruption has broken the supply chains established by this network and very likely reduced the level of pangolin scale sourcing (and therefore killing) by associated individuals, in turn protecting in-situ populations in Uganda and across the wider region.

6. Project support to poverty alleviation

This project does not have any direct poverty alleviation impacts conceived in its design. As highlighted in section 3.5, the project does however have various macro-level impacts that will address issues driving poverty in Uganda and the wider region in the long-term.

- Human capacity and governance: the project is supporting the implementation of activities by a civil society organisation (NRCN, composed 100% of Ugandan staff) in a country affected by major deficits in government accountability and transparency. As has been widely established, weak governance and a lack of government accountability provides the latitude for privileged elites to exploit positions of power to benefit from grand scale illicit natural resource exploitation. Uganda is a well-established hub for the laundering of natural resources (e.g. wildlife, minerals, timber) and profits from adjacent countries such as DRC and South Sudan.



This in turn promotes law enforcement (UWA, UPF) and judicial (DPP) accountability and the prevention of wildlife exploitation that can undermine the livelihood security of resource-dependent rural communities in Uganda and adjacent conflict-affected states such as South Sudan, DRC and CAR.

- Health issues: the COVID-19 pandemic has brought to the forefront the known risks of disease emergence from the exploitation of wildlife and destruction of their habitats. Uganda sits in a global hotspot for zoonotic disease emergence (Allen et al 2017) and has experienced both Ebola (2000, 2007, 2012, 2018) and Marburg (2007, 2012, 2014) haemorrhagic fever epidemics in the recent past. These diseases affect marginalised rural communities and their natural reservoir hosts are bats, but other intermediate wild animal hosts have been identified.

Activities implemented through this project are building disincentives that discourage people from engaging in wildlife exploitation that brings rural communities into closer contact with animals that can potentially be of disease risk. Examples of this during the reporting period include the investigation and prosecution of members of a Vietnamese pangolin trafficking network, and conviction of 24 pangolin traffickers in Uganda.

7. 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. However, monitoring of suspects linked to the pangolin trade shows that out of 72 people arrested over years 1 and 2, 6 of these were women. Of these, two have been cautioned and none have been given custodial sentences. This indicates that while women do engage in pangolin trafficking, it is primarily men who are facilitating the trade and therefore being targeted through investigations. As reported under section 3.2 output 1.5, the financial investigations workshop completed in April 2019 had 20 participants, of these 5 were women. Participants were largely selected by the leadership of the government agency with which they work based on the applicability of their role to the training. However, some key and inspiring women performed influential roles during the training, this included Chief Magistrate HW Patricia Amoko who delivered a special presentation on challenges relating to the prosecution of financial criminal offences.

NRCN has a total of 33 staff of which 14 are women (an increase from 12 out of 34 in year 1). These 14 women fulfil roles as a Project Officer, Wildlife Valuation Officer, Head of Prosecutions (recently promoted), Head of Finance (new staff member), Investigators and Prosecutors, taking a pro-active role in organisation management, project management, investigations and prosecuting cases in court. As highlighted below in section 9, NRCN has worked with WildAid (not funded under this project) to communicate publicly the achievements of Winnie Namayenje (NRCN/DPP Prosecutor) as a role model for wildlife conservation and criminal justice.

8. Monitoring and evaluation

Based on the IWT056 project proposal and logical framework, in year 1 EIA worked with NRCN to develop and implement a M&E framework, which remained in place through year 2. This development process involved several staff including the EIA Project Leader and Senior Pangolin/Principal Campaigner, and NRCN Executive Director, Head of Prosecutions, and Project Officer. The framework is based on the Pangolin Campaign situational model and theories of change (results chains) and clearly link the project's activities, outputs, outcomes and overall impact goals. For example the 'law enforcement' results chain shows how the collection, assessment and dissemination of intelligence on pangolin trafficking networks leads to law enforcement agencies having actionable information to inform investigations that lead to prosecutions, which in turn increase risks and reduce profits for pangolin traffickers and reduce levels of pangolin poaching and trafficking. Along this results chain there are two indicators (1. pangolin trafficking networks mapped and 2. convictions for pangolin trafficking in Uganda), which substantiate that the intermediate results/conditions required for project outcome delivery (reduced profits/pangolin trafficking) are achieved.

The project M&E plan lists indicators for each activity with a baseline condition and target value, and details how this information is being collected. To operationalise the framework, an M&E implementation plan was developed in year 1, this specifies a staff member in both EIA (the Senior Pangolin/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. For the financial investigations workshop completed in April 2019, pre- and post-questionnaires were developed by two financial crime experts to evaluate the knowledge gained by participants. Submission of M&E data from NRCN to EIA is completed on a monthly schedule to quarterly.

In March 2020, a project log-frame change request was submitted and approved, the changes in the log-frame have been reflected in an updated M&E framework/collection plan and in this report.

To facilitate activity implementation and monitor project progress, regular email exchange and Skype/WhatsApp calls have been held between EIA and NRCN. To maintain relationships and hold review and work planning meetings, the EIA Senior Pangolin/Principal Campaigner completed four visits to the NRCN office in Kampala (Apr, Jun, Oct 2019, and Jan 2020). In year 3, depending on the evolution of the COVID-19 situation it is expected the Senior Pangolin/Principal Campaigner will undertake project monitoring visits on at least two occasions.

Project achievements are communicated within EIA through internal newsletters, and a bi-annual strategy away days involving all EIA staff (these took place in July 2019 and January 2020). During these, the Senior Pangolin/Principal Campaigner presented a 6-month update on project achievements and plans for the coming 6 months. Breakaway sessions were used to brainstorm and discuss campaign strategies and tactics according to different cross-cutting themes. Due to the confidential nature of some aspects of the joint EIA-NRCN work (i.e. undercover investigations) EIA has not publicised our relationship and in-country work on the internet. However, topics of relevance to the project and in the public interest are communicated through blog articles, videos, and social media posts.

9. Lessons learnt

Collaboration between EIA and NRCN has continued to function effectively with regular and cordial communications between the two organisations. Four visits to Uganda (April, June, October 2019 and January 2020) by the Senior Pangolin/Principal Campaigner joined by other EIA staff on different occasions [REDACTED] EIA Intelligence Officer on 3 occasions and [REDACTED] EIA Executive Director on 1 occasion) have served to maintain relationships with NRCN staff and Ugandan government representatives. Such visits have proved essential to facilitating strategic and work planning, information sharing, activity implementation, training and M&E.

NRCN investigations and prosecutions have continued to result in a high conviction success rate for pangolin trafficking. This reflects the value of 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 both at the institutional level and with key individuals. NRCN draws on well-established relationships with individuals with a commitment to accountability, transparency and wildlife conservation in these three government agencies. [REDACTED]

As reported for year 1, there continues to a growing government and public understanding of the seriousness of wildlife crime, which contributes to building buy-in for action on trafficking cases. In year 2, this has especially been the case relating to government awareness on the vital role of financial investigations and AML prosecutions to combat serious wildlife trafficking. This has resulted in growing support for improved capacity and resources for financial investigations from key agencies. The financial investigations exercise conducted in January 2020 (see section 3, output 2) was specifically designed to function to build a better understanding of lessons learned, highlight successes and overcome barriers to effective implementation of Uganda's AML Act for wildlife trafficking cases. Bringing the relevant agencies together to discuss issues in the form of a roundtable event proved highly effective in building consensus and support for a solution (joint financial investigation team) that has considerable potential to provide the basis for successful investigations in year 3 of the project.

As reported in section 2, at the request of NRCN, in April 2019 EIA assessed NRCN's internal intelligence processes. [REDACTED]

[REDACTED] In February 2020, based on recommendations from the financial investigations lessons learned exercise, a second phase of intelligence training was completed. [REDACTED]

[REDACTED] Outputs from this work were also shared with RUSI for inclusion in their latest [handbook on financial investigations](#) (DEFRA IWT CF funded and produced in cooperation with EIA).

The passing and assent of the new Uganda Wildlife Act (2019) has been successful in including all four African pangolin species. However, during its development, NRCN raised concerns with UWA over the lack of a minimum penalty in section 71 (1) of the Act. This leaves discretion for penalties with the judiciary on a case-by-case basis. [REDACTED]

[REDACTED] NRCN engagement with UWA on legal process/sentencing issues has focused on the development of the wildlife valuation guidelines, the Commissioner of Wildlife has explained that regulations to ensure minimum penalties to support the Act will be developed as and when the resources are available. To address issues over corruption in the judiciary, NRCN is planning develop booklets on corruption to be licenced by the DPP for dissemination to judicial officers. These booklets will be presented at a workshop for vetted judicial officers that will highlight the negative impacts of wildlife crime corruption on Uganda's judicial system.

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

Comments in year 1 annual report review addressed:

- 1. Inclusion of supporting evidence when available (M&E plan, MoU, etc). A zip file including M&E data will be submitted alongside this report.
- 2. Changes to project log-frame. EIA submitted a log-frame change request to DEFRA in February 2020 that was approved in March 2020. This updated log-frame responded to comments regarding overlap between outcome and output indicators to the best extent possible without changing or expanding the project.
- 3. Conceptualisation of impact and contributions to poverty alleviation (including gender equality issues). This has been addressed in sections 3.5, 6 and 7 of this report.
- 4. Narrative report to clearly identify what is / is not being done as part of the project itself. In this report, all activities reported have been completed as part of the project itself. For activities that have involved a significant amount of co-financing (e.g. from DSWF or NGS) then this has been highlighted.
- 5. Narrative report to explain how the project approach is designed to produce sustainable results. In this report, the long-term impacts of the project are detailed in the sustainability and legacy section (section 12). Long-term multi-sectoral impacts are also explained in sections 3.5 and 6.
- 6. Mention of IWT Challenge Fund or UK Government donors on EIA's webpage and social media. Action on this detailed in year 2 mid-year report and section 13 of this report.
- 7. Ensure financial variance figures are correct. Addressed in budget in section 15.

11. Other comments on progress not covered elsewhere

COVID-19 pandemic project impacts

The Uganda government implemented country-wide restrictions on social interactions and travel from around 22 March, including the closure of Entebbe International Airport and the adjournment of ongoing court cases. As of 28 April 2020, these restrictions remain in place and are expected to be reviewed on [5 May 2020](#). COVID-19 restrictions in the UK and Uganda mean that both EIA and NRCN offices are closed and project staff are working remotely from home. It is not possible for NRCN to implement activities that involve meetings with government (e.g. valuation guidelines, transport sector engagement). Planned implementation of two activity areas (wildlife [REDACTED] [REDACTED])

valuation/transport sector) in March 2020 meant that when COVID-19 restrictions were implemented in Uganda they were delayed. This means that there is an underspend on the 'Other costs' budget line, and a change request will be submitted to move this funding so the activities can be completed in year 3.

[REDACTED] EIA has adapted to the new working arrangements through remote communication between team members and the prioritisation of digital research into wildlife trafficking in Africa and Asia.

The continued COVID-19 pandemic and associated uncertainty with its progression and resolution presents a significant risk to the implementation of project activities in year 3. The restarting of project activities (e.g. valuation guidelines, transport sector engagement, undercover investigations, financial investigations planning) will be dependent on the easing of COVID-19 restrictions. It is expected that international travel restrictions will persist longer than national level restrictions and therefore travel by EIA staff to Uganda will be limited over the first to second quarters of year 3, at a minimum.

12. Sustainability and legacy

The project has delivered several outputs and outcomes that will have a long-term impact on reducing wildlife trafficking in and around Uganda.

With the assent of the updated Uganda Wildlife Act in July 2019, which lists all four African pangolins as protected species, NRCN is now using this legal framework to promote fair and proportionate penalties for pangolin/trafficking in line with the level of harm and culpability linked to the offence. Despite the limitations of the new law raised in section 9, its existence will continue to provide disincentives to pangolin/wildlife crime beyond the lifetime of the project. This project is one of the first in Uganda to start building sustained in-country momentum towards the use of financial investigation techniques for pangolin/wildlife trafficking.

The activities implemented to date (see section 3.1, output 2) have built interest and commitment from relevant government agencies (UWA, UPF, DPP, FIA) to strengthen application of the Anti-Money Laundering Act (2013). The agreement from UWA, URA and FIA (and tentative agreement from UPF and DPP) to collaborate on a 'joint financial investigations team' that forms in response to 'serious' cases of pangolin/wildlife trafficking is a major achievement. This will provide the institutional structure through which money laundering crimes associated with wildlife trafficking can be investigated beyond the lifetime of this project.

Intelligence generated to date has provided insights into how African and Asian organised-crime groups are functioning to source, consolidate and export pangolin scales from a wide area of East, Central and southern Africa. As the project proceeds over its third year, current intelligence gaps will be resolved, and more in-depth understanding of how pangolin scales are being trafficked into China will be built. This will provide a basis upon which governments and NGOs can strategically plan advocacy, law enforcement or demand elimination interventions to disrupt and end the global illegal pangolin trade.

13. IWT Challenge Fund identity

This project is part of a wider pangolin programme that involves deliverables for 3 other donors. Through meetings held by EIA/NRCN with partner organisations and Uganda government officials, awareness of UK government support for project activities has been built. Senior officials in UWA are familiar with the IWT Challenge Fund. For public-facing communications products (e.g. public-facing report) associated with this project we will be including the UKAID logo and/or the IWT Challenge Fund name. In April 2019, a banner used for the financial investigations training workshop held in Kampala included the UKAID logo. The two law enforcement awareness posters produced have also included the UKAID logo. The EIA pangolin webpage has been updated to include mention of the IWT Challenge Fund (see 'Moving Forward' section here: <https://eia-international.org/wildlife/helping-pangolins/>). The EIA website has a 'News' section in pangolin trafficking issues are regularly reported, both EIA and NRCN have social

media accounts (e.g. Facebook, Twitter, Instagram and LinkedIn), that are used to raise awareness of the pangolin project and issues driving the trade.

14. Safeguarding

EIA has the following five safeguarding procedures: 'EIA safeguarding procedure'; 'EIA UK Safeguarding Adults and Children and Young People Policy Statement'; 'Code of Conduct 2018'; 'Anti-Bribery and Corruption Policy'; and 'Whistleblowing Policy'. To ensure application of these principles to all project action, the EIA Operation Manager has disseminated the documents to all EIA staff (they are also available on the EIA Intranet) and this staff member also acts as the focal point for reporting and acting on breaches. If a staff member is found in breach of the code of conduct, then EIA disciplinary procedures are initiated. The need for adherence to these principles has also been discussed in-person with NRCN project management staff, and the five documents have been shared with them. No safeguarding concerns associated with this project have arisen since the start of the project or in the reporting year.

15. Project expenditure

Table 1: Project expenditure during the reporting period (April 2019-March 2020)

Project spend (indicative) since last annual report	2019/20 Grant (£)	2019/20 Total actual IWT Costs (£)	Variance %	Comments (please explain significant variances)
Staff costs (see below)	[REDACTED]	[REDACTED]	[REDACTED]	
Consultancy costs				
Overhead Costs	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Travel and subsistence	[REDACTED]	[REDACTED]	[REDACTED]	
Operating Costs		[REDACTED]		
Capital items (see below)				
Others (see below)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
TOTAL	[REDACTED]	[REDACTED]		


16. 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)


Annex 1: Report of progress and achievements against Logical Framework for Financial Year 2019-2020

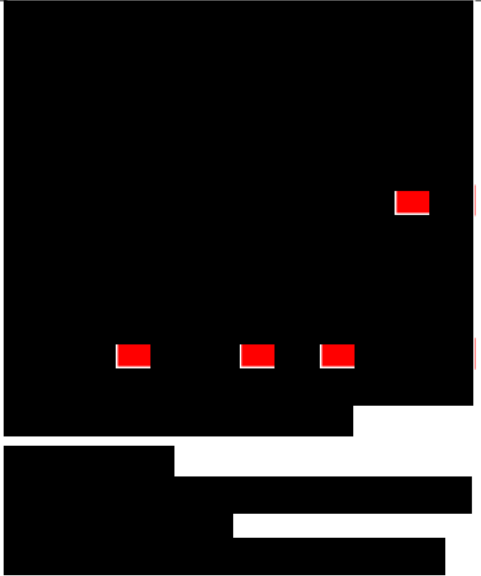
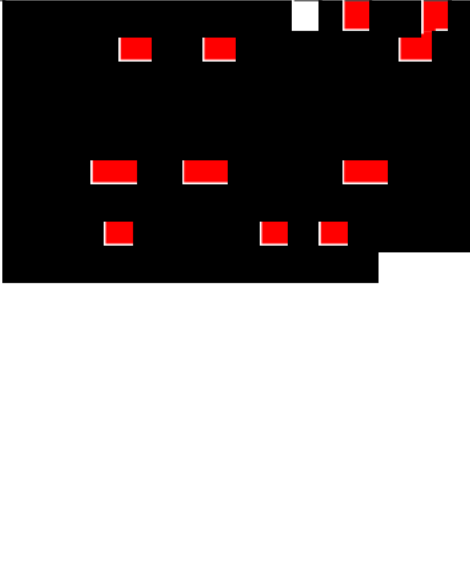

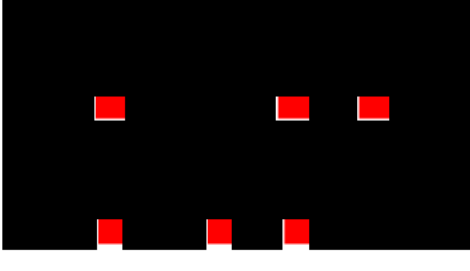
Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
<p>Impact</p> <p>The illegal wildlife trade is no longer the primary threat to pangolins; intelligence-led enforcement reduces the impacts of the illegal trade on rural local communities</p>		<p>In year 2 significant progress has been made by EIA/NRCN to investigate trans-national organised crime groups involved in the sourcing, consolidation and export of pangolin scales from Uganda to Asia. Intelligence generated from field investigations has been processed and analysed, and information has been disseminated to international law enforcement agencies to inform disruption responses. NRCN has continued to successfully investigate and prosecute pangolin traffickers operating between Uganda's rural sourcing areas and urban trading hubs.</p> <p>[REDACTED]</p> <p>[REDACTED] the completion of a training workshop and lessons learned exercise on financial investigations for wildlife trafficking cases has functioned to build government support and institutional structure for the application of Uganda's Anti-Money Launder Act to wildlife crimes. These achievements function to increase the risk of apprehension and prosecution for pangolin-related trafficking offences in Uganda. This is contributing to the conservation of wild pangolin populations by deterring organised crime groups from sourcing pangolins in Uganda and adjacent countries.</p>	

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
<p>Outcome 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.</p>	<p>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.</p> <p>0.2 Increased understanding of how criminal networks are financing their pangolin trafficking operations in Uganda; engagement with financial sector, including national Financial Intelligence Agency (FIA), 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 produced on pangolin trafficking networks in Uganda, to one by March 2021.</p> <p>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 red-flag alerts relating to pangolin trafficking in Uganda disseminated to law enforcement agencies or UFW Transport Taskforce increases from a baseline of zero in 2017 to two in March 2021.</p> <p>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</p> <p>0.5 Increased awareness among Ugandan enforcement, judiciary and wildlife confiscation authorities of the updated protected species status of</p>	<p><i>Note, means of verification are available in the zip folder 'IWT056_m&e_files' shared with this report.</i></p> <p>0.1 Baseline = 1, current status = 3 Information on pangolin trafficking networks operating in Uganda was generated from digital and field investigations. This resulted in the production of 188 intelligence reports, three intelligence summaries, and three intelligence assessments (including two network charts). [Redacted]</p> <p>0.2 Baseline = 0, current status = 1 [Redacted] EIA/NRCN has independently produced a financial typology of this [Redacted] network.</p> <p>0.3 Baseline = 0, current status = 0</p>	<p>0.1 This outcome has been achieved; [Redacted] Note: this will be dependent on the removal of social distancing and travel restrictions associated with the COVID-19 pandemic.</p> <p>0.2 EIA plans to submit the [Redacted] financial typology to Liberty Shared for review and will explore options for this to be shared with relevant financial sector stakeholders. This typology will be developed and expanded as new information is obtained on the trafficking network.</p> <p>0.3 Information of transport and customs related pangolin trafficking vulnerabilities have been identified for Uganda and this will be sanitised and shared with the UFW TTF in year 3.</p> <p>0.4 NRCN will continue to conduct investigations and prosecutions into pangolin trafficking networks operating in Uganda. This will focus on intermediaries who are facilitating the trade of pangolins from poachers to higher-level trans-national traffickers.</p>

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
	<p>pangolins from 21 officials (engaged in November-December 2017) to 100 officials by March 2021</p> <p>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</p>	 <p>0.4 Baseline = 28, current status = 100 UWA and UPF made 39 arrests for pangolin trafficking over the reporting period (project total: 72). A total of 24 suspects were successfully convicted (project total: 39) and 0 were acquitted (project total: 6). Of the 24 convictions, 54% (13) received custodial only sentences, and a total of 202 months of custodial sentences issued, with a mean sentence of 15.54 months.</p> <p>0.5 Baseline = 21, current status = 113 With co-financing from USFWS and Wildcat Foundation, NRCN conducted five regional 1-day workshops in September 2019 with the UPF on illegal pangolin/wildlife trade and the laws relevant to wildlife trafficking in Uganda (including the Uganda Wildlife Act). A total of 92 UPF officers participated in the awareness workshops (14 - West Nile, 16 – North, 21 – Eastern, 18 – Central, 23 – Western).</p> <p>0.6 Baseline = 0, current status = 0 EIA/NRCN have initiated engagement with relevant government agencies</p>	<p>0.5 This outcome has been achieved; however, NRCN will continue to raise awareness of pangolin protections and identification, the Wildlife Act and the new wildlife valuation guidelines in year 3. This will include dissemination of the pangolin ID poster (already produced) to URA, UWA and UPF officers at wildlife trafficking hubs across the country.</p> <p>0.6 To ensure stronger integration of wildlife/pangolin crime into financial investigations and financial sector regulatory mechanisms NRCN/EIA will work to bring the JFIT together on a practice or real investigation in year 3 to progress towards AML prosecutions (with co-financing from DSWF and COVID-19 restrictions permitting).</p>

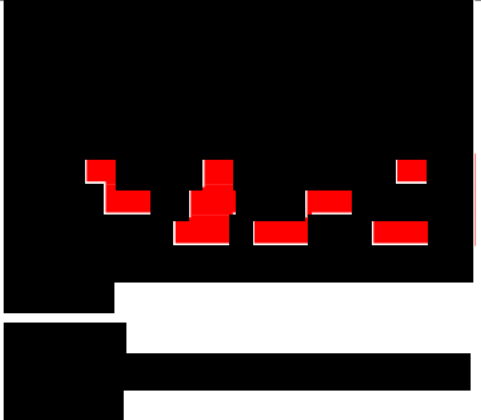
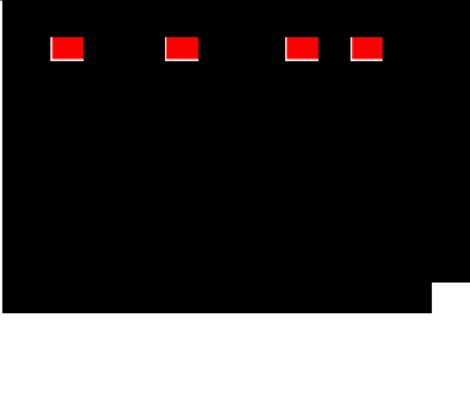
Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
		(UWA, FIA, URA, DPP, UPF) to build the institutional support and structures for effective investigations that lead to prosecutions. During the reporting period, the five agencies have committed to participate in a Joint Financial Investigations Team (JFIT) that will cooperate on cases of serious wildlife/pangolin trafficking.	
<p>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, 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.</p>	<p>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</p> <p>1.2 Number of pangolin trafficking networks that are investigated by Uganda Wildlife Authority/NRCN, increases from one in 2017 to at least two by October 2019 and three by October 2020</p> <p>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</p> <p>1.4 Uganda Wildlife Authority / NRCN conviction rate for pangolin trafficking offences remains above 2017 baseline of 70% up to March 2021</p> <p>1.5 Minimum of 10 staff from government agencies involved in investigating and prosecuting wildlife crime receive one training session on required intelligence gathering to pursue financial investigation in cooperation</p>	<p>1.1 Baseline = 1, current status = 3. Significant progress was delivered under this output, including the completion of digital and field investigations that generated intelligence on 3 networks (see sections 3.1, 3.2, folder 'output_1.1_1.2_intelligence_outputs').</p> <p>1.2 Baseline = 1, current status = 3. [REDACTED] (see sections 3.1, 3.2, folder 'output_1.1_1.2_intelligence_outputs'). The case is currently under prosecution in the High Court and as of 31 March 2020 is adjourned (see folder 'output_1_court_case_records\year_2\vietnamese_charge_docs').</p> <p>[REDACTED]</p> <p>1.3 As a result of engagement by NRCN and other organisations with the Ministry of Tourism, Wildlife and Antiquities, in July 2019, the Uganda Wildlife Act was assented by the President of Uganda and this entered force in September 2019 (see section 3.2 and folder 'output_1.3_new_laws').</p> <p>1.4 Annual target = >70%, year 2 status = 92%. NRCN supported UWA and UPF to undertake 39 arrests of traffickers involved in the sourcing of pangolin scales in and around Uganda. A total of 24 pangolin traffickers were convicted and received custodial sentences (with 11 of these receiving a fine), an additional 2 were given cautions; 10 cases are currently on trial and 8 are pending trial. On cases that NRCN prosecuted or supported there was a 92% conviction rate. See Excel doc 'pangolin_m&e_datasheets' sheet 'OUTPUT_1.4_CONVICT_RATE'</p> <p>1.5. Target = 10 staff, year 2 status = 12 government staff. NRCN and EIA held a 4-day wildlife trafficking financial investigations workshop in April 2019 in Kampala,</p>	

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
	with other stakeholders by December 2019	Uganda. Participants included 20 individuals from UWA, NRCN, UPF, DPP and FIA, 12 of the 20 participants were drawn from government agencies. See folder 'activity_1.10_financial_investigations' for documents relating to the workshop including ToR, schedule, consultant report, and photographs.	
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		At the start of the project, arrangements for regular and confidential sharing of information between NRCN and EIA relating to pangolin trafficking were agreed. The basis for information sharing between the two organisations is a Memorandum of Understanding. Visits by the EIA Senior Intelligence Officer and Intelligence Officer to Uganda (Apr, Jun, Oct 2019, and Feb 2020) functioned to enhance intelligence sharing between the two organisations. See MoU in folder 'pangolin_m&e_files - external\NRCN_processes'	EIA and NRCN will continue to communicate and share information relating to existing and ongoing investigations. This will be a collaborative process to facilitate dissemination of information to law enforcement. EIA will also provide ad-hoc technical support to NRCN on the development of intelligence information systems.
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.		Extensive desk-based processing and analysis of intelligence from digital and field investigations was completed. This included the production of 188 intelligence reports, three intelligence summaries and three intelligence assessments (including two network charts). See folder 'output_1.1_1.2_intelligence_outputs\reports_network_chart_maps' and Excel doc 'pangolin_m&e_datasheets' sheet 'OUTPUT_1.1_1.2_INTEL_REPORTS'. Note confidential intelligence cannot be shared with DEFRA; however, if further verification is required then briefings can be held with nominated National Crime Agency IWT focal points.	In year 3, EIA and NRCN will continue to process and analysis intelligence as it is generated. 
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		In year 2, communications with NRCN over activity implementation, budget	Due to COVID-19 travel restrictions communication between EIA and NRCN

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
		<p>management and M&E data submission continued. Communications took place over email, Skype and WhatsApp. Quarterly M&E missions were completed by the Senior Pangolin/Principal Campaigner to Uganda. Ad-hoc meetings between NRCN/EIA and relevant government stakeholders on pangolin investigations, financial investigations and transport sector involvement were held. See folder 'activity_1.3_EIA_M&E_visits'</p>	<p>will be maintained remotely and M&E visits conducted when restrictions are eased. Meetings with government agencies in Uganda will be held once national level restrictions are eased.</p>
<p>Activity 1.4 Field work to ground-truth desk-based research, gather information on trade incidents, download & transcribe findings</p>			
<p>Activity 1.5 Prepare and disseminate confidential dossiers for Ugandan law enforcement agencies and prosecutors (incl. NRCN) through face-to-face briefings, and to other relevant countries, including transit and destination countries, and intergovernmental bodies electronically</p>			


Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>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</p>		<p>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 (from NRCN and UWA prosecutions), NRCN has conducted prison visits to ensure they complete these.</p> <p>See Excel doc 'pangolin_m&e_datasheets' sheet 'OUTPUT_1.4_NRCN_LE'</p>	<p>NRCN will continue to independently prosecute pangolin trafficking cases, and monitor cases handled by UWA to ensure high standards of transparency.</p>
<p>Activity 1.7 Prepare amendments to national regulations to integrate provisions for CITES Appendix I listing and disseminate to law-makers</p>		<p>In July 2019, the Uganda Wildlife Act was assented by the President of Uganda and this entered force in September 2019 (see section 3.2 and folder 'output_1.3_new_laws').</p>	<p>Activity now completed; however, as highlighted in section 9 limitations existing in the law and NRCN will continue to engage with the Ministry of Tourism, Wildlife and Antiquities and other conservation NGOs in Uganda to resolve these.</p>

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
<p>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</p>		<p>The NRCN Wildlife Valuation Expert initiated project coordination on the development of a valuation guideline for valuing protected wildlife species in Uganda to inform penalties decided by the courts. This has involved developing a terms of reference for the activity, and the completion of a stakeholder mapping exercise to identify institutions and individuals that should participate in the guideline development process. In March 2020, NRCN held a workshop with representatives from UWA, DPP, Ministry of Justice, and Makerere and Busitema Universities. Completion of a second meeting with government stakeholders on the guidelines was delayed due to COVID-19 restrictions.</p> <p>See documents in folder 'activity_1.8_valuation_guidelines'</p>	<p>In year 3, a UWA led 'wildlife valuation working group' will be formed to develop the guidelines and the first step in quarter 1 will be to outline a terms of reference for a consultant to facilitate this process. Meetings with government stakeholders will restart once COVID-19 restrictions are eased. The wildlife valuation guidelines will be prepared by end of quarter 3 for dissemination in quarter 4.</p>
<p>Activity 1.9 Prepare multi-lingual awareness materials and conduct five regional 1-day workshops for Ugandan enforcement authorities regarding pangolin trade and Uganda Wildlife Act (2019)</p>		<p>NRCN conducted five regional 1-day workshops in September 2019 with the UPF on illegal pangolin trade and the laws relevant to wildlife trafficking in Uganda (including the Uganda Wildlife Act). The workshops took place in the Central, Western, Northern, West Nile and Eastern regions. NRCN/EIA produced two posters to raise awareness of pangolins and their products amongst UWA, UPF and URA enforcement officers.</p> <p>See folder 'activity_1.9_LE_awareness' for UPF workshop report and awareness posters.</p>	<p>Workshops with authorities are now complete. In year 3, NRCN will disseminate the pangolin identification poster with law enforcement officers (including URA) at priority wildlife trafficking hubs across Uganda. Activity dependent on easing of COVID-19 related workplace and travel restrictions.</p>
<p>Activity 1.10 Prepare and deliver a training workshop for Ugandan government agencies involved in investigating and prosecuting wildlife crime on how to conduct</p>		<p>NRCN and EIA held a 4-day wildlife trafficking financial investigations workshop in April 2019 in Kampala, Uganda. The workshop was delivered</p>	<p>Training workshop complete, next phase of financial investigations capacity building in Uganda covered under output 2. Activity dependent on</p>

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
financial investigations, and facilitate the development of a multi-agency team for joint financial investigations on wildlife trafficking cases		<p>by two expert international consultants</p> <p>See folder 'activity_1.10_financial_investigations' for documents relating to the workshop including ToR, schedule, consultant report, and photographs.</p>	easing of COVID-19 related workplace and travel restrictions.
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.	<p>2.1 Number of financial typologies relating to pangolin trafficking networks produced and shared with banking institutes (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)</p> <p>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</p> <p>2.3 Number of pangolin crime related financial typologies produced related to pangolin trafficking networks shared with the Ugandan FIA (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)</p>	<p>2.1 Baseline = 0, current status = 1. The EIA Intelligence Team has produced a financial typology on a network involved in the export of elephant ivory and pangolin scales from Uganda in 2019.</p> <p>2.2 Baseline = 57, current status = 238 (baseline + yr 1: 92, yr 2: 89). Over the reporting period, EIA submitted 182 names for pangolin trafficking, 89 of which were accepted and resulted in new or updated profiles (based on World Check and Dow Jones Risk and Compliance feedback). See folder 'output_2.2_LS_submissions' and Excel doc 'Pangolin Submissions between April 1st 2019 - March 31 2020'</p> <p>2.3 Baseline = 0, current status = 0. EIA/NRCN intelligence on money laundering associated with Uganda persons of interests and the typology produced under output 2.1 will be shared with the FIA in year 3.</p>	
Activity 2.1 Prepare anonymised typology for dissemination via Liberty Shared to banks and financial institutions, share non-anonymised version upon request. Disseminate to the Uganda FIA.			

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
Activity 2.2 Regular submission of details of known pangolin traders to Thomson Reuters World-Check		<p>The EIA Intelligence Team supported by a wildlife researcher collated names of arrested, charged and convicted pangolin traffickers from open-source media reports for twice-monthly submission to Liberty Shared.</p> <p>See folder 'output_2.2_LS_submissions' and Excel doc 'Pangolin Submissions between April 1st 2019 - March 31 2020'</p>	In year 3, a newly recruited 'Wildlife Crime Researcher (Pangolins)/Field Operative will work with other wildlife team members to ensure names are submitted to Liberty Shared on a regular basis.
Activity 2.3 Prepare and disseminate briefings on pangolin trade with the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) (a Financial Action Taskforce Style Regional Body) ahead of regional meetings.		To date briefings on pangolin trade have not been prepared for the ESAAMLG. These will be dependent on the more comprehensive understanding of how the pangolin trade is operating across East Africa that will be enhanced in year 3.	In year 3, a briefing on pangolin trade across East Africa will be prepared and attempts will be made to organise in-person briefings with the ESSAAMLG.
<p>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</p>	<p>3.1 An increase in the number of logistics/transport companies or associations (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 four by March 2021.</p> <p>3.2 Increase in the number of Ugandan logistics/transport companies or associations that sign up to the UFW's Transport Taskforce by March 2021 (baseline of zero in 2017 to two by March 2021)</p> <p>3.3 Mobile scanner deployed by the URA (Uganda Revenue Authority) for ivory detection is also used to detect pangolins by June 2019</p>	<p>3.1 Baseline = 0, current status = 0. EIA has outlined its transport sector engagement strategy that lists campaign activities such as research into the use of transport services for wildlife trafficking, TTF engagement, typology/red-flag development, airline and shipping companies to target through advocacy, and public-facing communications activities. See folder 'output_3_transport_sector' Word doc 'EIA Jan 2020 Transport sector engagement strategy'</p> <p>3.2 Baseline = 0, current status = 0. NRCN has initiated engagement with Uganda Freight Forwarders' Association (UFFA) and the newly formed Uganda Airlines to ensure Uganda transport sector companies take action on pangolin/wildlife trafficking. See folder 'output_3_transport_sector' pdf documents 'UGA Transport Talking Points – NRCN' and 'Letter-UFFA'</p> <p>3.3 As reported in the year 1 annual report, 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. See folder 'output_3_transport_sector' photo 'IMG_20190203_002014', and pdf 'UWA to Prosecute 2 Vietnamese Found Smuggling Ivory, Pangolin Scales – Online news from Uganda and the East African region – SoftPower News'.</p>	

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
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		[REDACTED]	[REDACTED]
Activity 3.2 Identify and encourage Ugandan transport / logistics companies and associations to sign the UFW Transport Taskforce Declaration		NRCN has identified the Uganda Freight Forwarders' Association (UFFA) and the newly formed Uganda Airlines as the primary targets to engage. See folder 'output_3_transport_sector' pdf documents 'UGA Transport Talking Points – NRCN' and 'Letter-UFFA'	In year 3, meetings will be held with UFFA and Uganda Airlines to raise awareness of the use of their services by wildlife traffickers and advocate for their sign-up to UFW TTF.
Activity 3.3 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		UNODC Container Control Programme point of contact [REDACTED] told EIA/NRCN in October 2019 that the URA scanners are currently deployed at the Uganda-Kenya border [REDACTED] and at these locations the scanners check 100% of containers. See folder 'output_3_transport_sector' Word doc 'URA_oct19_meeting_minutes'.	[REDACTED]
Activity 3.4 Disseminate briefing prepared under Activity 2.3 to the relevant division of UNODC and urge them to incorporate into the Container Control Programme training		Activity pending completion of Activity 2.3	Once the briefing document is prepared and shared with the ESAAMLG it will be shared with EIA contacts in the UNODC.
Output 4. Public-facing materials to raise awareness of criminality and	4.1 An increase in number of English language media articles and reports that connect pangolin trafficking to	Baseline 0, current status = 33 (yr 1 = 6 + yr 2 = 27). EIA has published 23 pangolin-related news articles on its website focusing on pangolin scales seizures, China's domestic wildlife market and Wildlife Protection Law, CITES, captive-breeding and	

Project summary	Measurable Indicators	Progress and Achievements April 2019 - March 2020	Actions required/planned for next period
corruption associated with the global pangolin trade.	governance issues (including corruption). (baseline to be established in project's first quarter).	pangolin IUCN Red List status. In Uganda, as a result of NRCN engagement with media organisations, 4 news stories have been published on pangolin trafficking See pdfs in folder 'output_4_public_media\year_2'	
Activity 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		To build awareness of key issues amongst decision-makers prior to the conference EIA shared a 37-page briefing document with CITES. A public-facing report to support CITES CoP-18 advocacy titled 'Running Out of Time: Wildlife Crime Justice Failures in Vietnam' was also published in July 2019 and made available on the EIA website. See pdfs in folder 'output_4_public_media\year_2\EIA_CITES'	
Activity 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 2019. https://eia-international.org/wildlife/wildlife-trade-maps/illegal-trade-seizures-pangolins/	EIA is currently updating and enhancing its seizure data internal dashboard and this functionality use Microsoft PowerBI. This added functionality will be used to develop new infographics and an updated online map.
Activity 4.3 Make non-sensitive datasets available to journalists and academic researchers to support other studies and reports on the global pangolin trade		The pangolin global seizure dataset was shared with 12 separate journalists, NGOs, researchers or law enforcement agencies. Recipients included Interpol, University of Oxford, Duke University, Junita College, ADM Capital Foundation, UNODC, The Pangolin Reports, WWF Hong Kong, BBC, PanNature - Vietnam and Nigeria customs.	EIA campaigners and communications team will continue to maintain relationships and contacts with key journalists and researchers. This will involve disseminating the dataset to individuals involved in relevant pangolin research.

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

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

Project summary	Measurable Indicators	Means of verification	Important Assumptions
Impact: (Max 30 words) The illegal wildlife trade is no longer the primary threat to pangolins; intelligence-led enforcement reduces the impacts of the 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.	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. 0.2 Increased understanding of how criminal networks are financing their pangolin trafficking operations in Uganda; engagement with financial sector, including national Financial Intelligence Agency (FIA), 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 produced on pangolin trafficking networks 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 red-flag alerts relating to pangolin trafficking in Uganda disseminated to law enforcement agencies or	0.1 Intelligence summary reports and assessments 0.1. photographs, films, and notes from research 0.2 financial typologies; feedback from banks/banking sector 0.3 meeting minutes with transport sector representatives 0.3 annual report of transportation taskforce 0.3 enforcement alerts 0.3 policy announcements	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. Corruption does not undermine efforts to arrest implicated individuals and obtain successful prosecutions. NRCN’s MoU provides a means to monitor law enforcement response to persons of interest identified by this project

	<p>UFW Transport Taskforce increases from a baseline of zero in 2017 to two in March 2021.</p> <p>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</p> <p>0.5 Increased awareness among Ugandan enforcement, judiciary and wildlife confiscation authorities of the updated protected species status of pangolins from 21 officials (engaged in November-December 2017) to 100 officials by March 2021</p> <p>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</p>	<p>0.3 EIA intelligence disseminations</p> <p>0.4 Uganda Wildlife Authority / NRCN pangolin arrest and prosecution outcome database</p> <p>0.5 NRCN report on workshop implementation (with results from questionnaires) conducted under their UWA MoU</p> <p>0.5 Participant lists from NRCN workshops</p> <p>0.5 Law enforcement awareness posters</p> <p>0.6 Uganda Wildlife Authority / NRCN pangolin arrest and prosecution outcome database</p> <p>0.6 NRCN/ investigation/court case records</p>	
<p>Outputs:</p> <p>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</p>	<p>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</p> <p>1.2 Number of pangolin trafficking networks that are investigated by Uganda Wildlife Authority/NRCN,</p>	<p>1.1 Intelligence assessments (that include criminal network association charts)</p>	<p>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.</p>

<p>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.</p>	<p>increases from one in 2017 to at least two by October 2019 and three by October 2020</p> <p>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</p> <p>1.4 Uganda Wildlife Authority / NRCN conviction rate for pangolin trafficking offences remains above 2017 baseline of 70% up to March 2021</p> <p>1.5 Minimum of 10 staff from government agencies involved in investigating and prosecuting wildlife crime receive one training session on required intelligence gathering to pursue financial investigation in cooperation with other stakeholders by December 2019</p>	<p>1.2 NRCN investigation/court case records 1.2 Seizure records and follow-up actions taken</p> <p>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)</p> <p>1.4 NRCN investigation/court case records 1.4 Uganda Wildlife Authority / NRCN pangolin arrest and prosecution outcome database</p> <p>1.5 and 1.6 Minute meetings with UWA; UWA reports and policy documents</p> <p>1.6 NRCN training workshop report including pre and post training questionnaires for participants</p>	
<p>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.</p>	<p>2.1 Number of financial typologies relating to pangolin trafficking networks produced and shared with banking institutes (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)</p> <p>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</p>	<p>2.1 Anonymised financial typology documents 2.1 Direct feedback from banking sector</p> <p>2.2 Thomson Reuters World-Check feedback via Liberty Shared</p>	<p>Financial institutions are sufficiently concerned about IWT to accept and act on typologies provided</p> <p>Banks avoid offering services to individuals and companies entered into "know your customer" databases</p>

	2.3 Number of pangolin crime related financial typologies produced related to pangolin trafficking networks shared with the Ugandan FIA (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)	2.3 Internal record of engagement with FIA	
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	<p>3.1 An increase in the number of logistics/transport companies or associations (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 four by March 2021.</p> <p>3.2 Increase in the number of Ugandan logistics/transport companies or associations that sign up to the UFW's Transport Taskforce by March 2021 (baseline of zero in 2017 to two by March 2021)</p> <p>3.3 Mobile scanner deployed by the URA (Uganda Revenue Authority) for ivory detection is also used to detect pangolins by June 2019</p>	<p>3.1 Record of alerts sent to transport leaders</p> <p>3.2 Transport sector policy documents 3.2 Annual reports; Transport Taskforce 3.2 Minutes from meetings between NRCN/EIA and transport associations and companies 3.2 UFW Transport Taskforce signatories list</p> <p>3.3 Minutes from meetings with URA</p>	Sufficient resources for mobile scanners to be used for pangolin detection
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).	<p>4.1 Media articles</p> <p>4.2 NGO reports/publications, social media communications</p> <p>4.3 Government reports and submissions to e.g. CITES</p>	
<p>Activities (each activity is numbered according to the output that it will contribute towards, for example 1.1, 1.2 and 1.3 are contributing to Output 1)</p> <p>1.1 Establishment of agreed systems and processes for collecting, managing and sharing information between EIA and NRCN followed by collation of information on pangolin trade</p> <p>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.</p>			

- 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 (incl. NRCN) through face-to-face briefings, and to other relevant countries, including transit and destination countries, and intergovernmental bodies 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 and conduct five regional 1-day workshops for Ugandan enforcement authorities regarding pangolin trade and Uganda Wildlife Act (2019)
 - 1.10 Prepare and deliver a training workshop for Ugandan government agencies involved in investigating and prosecuting wildlife crime on how to conduct financial investigations, and facilitate the development of a multi-agency team for joint financial investigations on wildlife trafficking cases
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- 2.1 Prepare anonymised typology for dissemination via Liberty Shared to banks and financial institutions, share non-anonymised version upon request. Disseminate to the Uganda FIA.
 - 2.2 Regular submission of details of known pangolin traders to Thomson Reuters World-Check
 - 2.3 Prepare and disseminate briefings on pangolin trade with the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) (a Financial Action Taskforce Style Regional Body) ahead of regional meetings.
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- 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 and associations to sign the UFW Transport Taskforce Declaration
 - 3.3 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 the relevant division of UNODC and urge them to incorporate into the Container Control Programme training
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- 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

In future years it is our intention to develop a series of standard measures in order to collate some of the quantitative measures of activity, input and output of IWT projects. These will not be measures of the impact or effectiveness of IWT projects but will contribute to a longer term dataset for Defra to draw upon. The collection of standard measures data will be important as it will allow us to understand the combined impact of all the UK Government funded Challenge Fund projects. This data will therefore provide useful information for the Defra Secretariat and for Defra Ministers regarding the Challenge Fund.

The standard measures for the IWT Challenge Fund are currently under development and it is therefore not necessary, at present, to complete this Annex. Further information and guidance about the IWT standard measures will follow.

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

This may include the Means of Verification material you listed in your project logframe. For example, the abstract of a conference, the summary of a thesis etc. If we feel that reviewing the full document would be useful, we will contact you again to ask for it to be submitted.

It is important, however, that you include enough evidence of project achievement to allow reassurance that the project is continuing to work towards its objectives. Evidence can be provided in many formats (photos, copies of presentations/press releases/press cuttings, publications, minutes of meetings, reports, questionnaires, reports etc.) and you should ensure you include some of these materials to support the annual report text.

If you are attaching separate documents, please list them here with an Annex reference number so that we can clearly identify the correct documents.

Checklist for submission

	Check
Is the report less than 10MB? If so, please email to IWT-Fund@ltsi.co.uk putting the project number in the subject line.	
Is your report more than 10MB? If so, please discuss with IWT-Fund@ltsi.co.uk about the best way to deliver the report, putting the project number in the subject line.	
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.	