



Illegal Wildlife Trade (IWT) Challenge Fund Annual Report

To be completed with reference to the “Writing a Darwin/IWT Report” Information Note: (<https://iwt.challengefund.org.uk/resources/reporting-forms-change-request-forms-and-conditions/>). It is expected that this report will be a **maximum** of 20 pages in length, excluding annexes)

Submission Deadline: 30th April 2021

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 (EIA)
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 (no-cost extension to 30 September 2021)
Reporting period (e.g. April 2020-Mar 2021) and number (e.g. Annual Report 1, 2, 3)	1 April 2019 to 31 March 2020 Annual report 3
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. 07/05/20

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.

In year 3, the agreed monitoring and evaluation plan has been adapted to the COVID-19 situation to maintain working relationships between EIA and NRCN solely through regular remote communication over WhatsApp and email. In-country visits have not been possible, which has affected direct monitoring by EIA and in-person engagement. For activities sub-granted to NRCN, oversight and strategic direction has been provided by the NRCN leadership team (Executive Director Vincent Opyene and Deputy Director Lenard Massa). 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. Due to COVID-19, EIA has been unable to undertake any in-person engagements with Ugandan government officials. However, there have been email exchanges with UWA and the Uganda Financial Intelligence Authority (FIA). NRCN has coordinated with other wildlife trafficking stakeholders in Uganda through the National Wildlife Crime Coordination Task Force (NWCCTF). This includes WCS through the existing DEFRA IWT project (IWT073) and the new USAID Combating Wildlife Trafficking in Uganda project. NRCN has also conducted and coordinated law enforcement investigations into pangolin traffickers in cooperation with Focus Conservation Solutions (FCS). EIA and NRCN have coordinated with Lilongwe Wildlife Trust based in Malawi on information sharing and capacity building of NRCN staff in investigations techniques (funded by a separate donor). EIA has participated in

coordination calls with the Royal United Services Institute (RUSI) to ensure coherence in the planning of activities of financial investigations support.

EIA has maintained informal information-sharing relationships with trusted law enforcement agencies and other institutions working at the international level on illegal wildlife trade. These include US Fish and Wildlife Service (USFWS) Office of Law Enforcement (OLE), US Department of Homeland Security - Homeland Security Investigations (HSI), the CITES Secretariat and the UN Office on Drugs and Crime (UNODC).

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

EIA has maintained remote contact with priority Uganda based persons of interest to collect information on their activities, associates and links with various government actors. Relationships with the person of interest were maintained to ensure the possibility of future in-person meetings. New information collected demonstrates the key role of the eastern Democratic Republic of Congo (DRC) in the trafficking of pangolins into Uganda. Throughout 2020, EIA maintained tentative plans to conduct an investigative trip to Uganda, however travel restrictions relating to the COVID-19 situation prevented this from taking place.

In 2019, EIA collected information on the trafficking activities of two priority persons of interest and consequently information on these individuals was shared with USFWS OLE. In 2020, new Special Agents were assigned to investigate one of these persons of interest, in November 2020 EIA briefed these individuals on the case and shared latest information. It is understood that USFWS continues with the investigation with the aim of working with law enforcement partners in Uganda to disrupt a wider wildlife trafficking network. For the second person of interest an updated version of an intelligence assessment has been completed and this will form the basis of a public-facing report on the links between China's Belt and Road Initiative and the sourcing of pangolin scales from Africa.

A 16-page intelligence summary on pangolin scale and elephant ivory trends during COVID-19 based on information collected through remote undercover investigations was produced. This covered the impacts of the pandemic on sourcing and stockpiling, wildlife product prices, export logistics, and seizures in Africa and Asia between January and July 2020. EIA shared this summary with contacts in the UK and US governments, including DEFRA, UK National Crime Agency/Border Force, and US State Department.

To fully assess the situation relating to pangolin trafficking and COVID-19 impacts on wildlife trafficking in Uganda, in December 2020 EIA recruited a consultant. This individual will draw on existing EIA information sources and conduct interviews with key stakeholders to complete a technical assessment. This will be used to draw lessons learned, inform future project planning and support public advocacy.

EIA completed extensive open-source research into China's legal pangolin scale market including laws, sale of patented medicines containing pangolin scales by pharmaceutical companies and the regulated transfers of pangolin scales by entities in China. The findings from this were published in a public facing report in October 2020 (see output 4). Drawing on intelligence generated over the past two years, a list of pangolin product price quotes from traffickers have been produced to provide an indication of prices across the supply chain and fluctuations in these. This will feed into a project EIA is implementing with UNODC looking into illicit financial flows related to pangolin trafficking.

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.

NRCN held meetings with the UWA led 'wildlife valuation working group' to develop a draft Terms of Reference (ToR) for a consultant to produce the wildlife valuation guidelines. This ToR was developed with inputs from relevant stakeholders through a meeting held in September 2020. Due to COVID-19 related delays, an extension was granted by DEFRA for this activity to be completed between April and September 2021.

Activities under this objective have been enhanced through the award of 'CV19RR06 - Responding to COVID-19 impacts on wildlife trafficking in Uganda/DRC'. With this co-financing NRCN has initiated cross-border wildlife trafficking investigation collaboration activities with Conserv Congo in DRC. The grant also supported prosecution efforts and the targeting of wildlife traffickers linked to poaching in Uganda's protected areas.

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

As reported in the year 2 annual report, in January 2020, EIA worked with NRCN to hold a roundtable meeting at which financial investigation stakeholders formed the Joint Financial Investigation Team (JFIT). The JFIT was established to coordinate multi-agency investigations on serious wildlife trafficking cases. NRCN has maintained contact with joint financial investigation team members (DPP, FIA, UWA, UPF, and URA). EIA obtained co-financing from David Shepherd Wildlife Foundation (DSWF) to provide continued support to the JFIT and NRCN to conduct effective financial investigations. This was to include engagement with JFIT members, a 2nd roundtable meeting and case mentoring support to NRCN. Due to COVID-19, this capacity building activity has been delayed to May/June 2021.

Information collected through EIA/NRCN investigations in Uganda was compiled into a financial sector red-flag document on the notable characteristics and patterns associated with pangolin and ivory trafficking in Uganda. This included information on concealment, transport, nationalities, business activities, corruption, money laundering techniques and destination locations. This document can be used by private sector stakeholders to screen their customers for money laundering risks associated with wildlife trafficking and the production of suspicious transaction reports. The document was shared with the Uganda FIA Director and IWT Focal Point, as well as the United for Wildlife Intelligence Unit. The Uganda FIA is currently developing red-flag indicators to share with partners (such as banks, NGOs) and the documents prepared by EIA will feed into this process. EIA facilitated the involvement of NRCN and the FIA in a webinar held by UfW on 10 November to discuss the East Africa Chapter of the Taskforce. Through this process, Vincent Opyene (NRCN CEO) joined as a member of the steering committee for the East Africa Chapter.

NRCN has continued to monitor the government-led prosecution of three Vietnamese nationals for the trafficking of 423.7kg of pangolin scales and 3,299kg of elephant ivory. The investigation and prosecution of the defendants faced many obstacles, and the case was adjourned in early 2021. To evaluate the challenges that have led to poor performance on this case, EIA and NRCN have recruited a consultant to conduct a comprehensive review of the investigation, international cooperation, links between the suspects and wider criminal networks, the use of financial investigation techniques, and the prosecution/court hearings. This work will feed into advocacy activities in Uganda on law enforcement effectiveness and corruption and inform future project design.

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 250 names for pangolin trafficking during, 61 of which were accepted and resulted in new or updated profiles (based on World Check and Dow Jones feedback).

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

To build support from the Ugandan transport sector for domestic action to combat the use of their services for wildlife trafficking, NRCN conducted outreach activities with relevant stakeholders. In March 2021, NRCN organised and facilitated a roundtable event involving participants from 7 Uganda government agencies, the UfW Transport Taskforce, Vodafone, as well as the Wildlife Conservation Society and RUSI. During this roundtable event, presentations were given by EIA, NRCN and United for Wildlife Transport Sector Taskforce representatives. To sensitise transport companies and associations, presentation topics covered Uganda's global wildlife/pangolin trafficking context, the abuse of Uganda's transport sector by wildlife/pangolin traffickers, and wildlife/pangolin trafficking routes through Uganda. The UfW Transport Taskforce Manager, Ian Cruickshank, gave an overview of the Transport Taskforce and explained how participants can sign up to the Buckingham Palace Declaration. Participants discussed and identified potential actions to be taken by the Ugandan transport sector including awareness building, improved coordination at national and regional levels, and information sharing.

A Uganda transport sector red-flag document was prepared based on findings from EIA/NRCN investigations. This contains information on routes used to transport illegal wildlife products, methods of transport (road, air, maritime), role of transport companies, and transport specific red-flags. The document was shared with the UfW Transport Taskforce Intelligence Unit.

Under a separate project funded by the Foreign, Commonwealth and Development Office (FCDO), EIA produced a 96-page transport and wildlife/timber trafficking assessment. This identified the main international transport companies used to transport illegal wildlife commodities and illegal timber. In addition, the assessment identified the key routes used to transport illegal wildlife and timber commodities, with a focus on transport between Africa and Asia and within Asia. Intelligence on pangolin trafficking generated through research and investigations conducted in Uganda under this project fed into this transport assessment. A summary of information contained in the assessment that is relevant to Uganda was compiled in a briefing document titled 'Information Briefing for Uganda Transport Sector on Illegal Wildlife Trade Risks'. This was shared with participants of the March 2021 roundtable event to build awareness of transport sector wildlife trafficking risks.

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

EIA has conducted a range of public communications and campaigning activities to raise the profile of global pangolin trafficking issues and encourage action by governments in source, transit and consumer countries.

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 Chimp Reports). EIA has published 22 pangolin-related news articles and blogs on its website focusing on China's domestic wildlife market and Wildlife Protection Law, EIA intelligence work, a lack of action by governments to address pangolin trafficking and corruption, World Pangolin Day, and pangolin trafficking Nigeria.

In August 2020, EIA joined the Center for Biological Diversity and International Environmental Law Project, both based in the US, in filing a Pelly petition calling on the US Government to formally sanction China for illegally trading in critically endangered pangolins. The petition outlines how widespread demand in China and the Chinese government's failure to adopt and fully enforce bans on pangolin trade, possession, and use is driving illegal trade and, in turn, pushing pangolins toward extinction. It explains how the Chinese government's inaction on the pangolin trade is diminishing the effectiveness of the CITES Appendix I listing of pangolins.

To build awareness amongst government, inter-governmental institutions, researchers, journalists and NGOs at the international level a public-facing report on the role of China's legal pangolin scale medicine market in driving transnational trafficking (including from Uganda) was published. The report titled "Smoke and Mirrors: China's complicity on the global illegal pangolin trade" was published on 13 October 2020 in English and Mandarin Chinese. It details the

international and historical context of global pangolin trafficking, China's legislative framework relevant to pangolins, pangolin stockpile management, and the pharmaceutical companies involved in the production and sale of legal pangolin medicines. The report was accompanied with a press release and received significant media attention.

With funding from other donors such as the US State Department Bureau of International Narcotics and Law Enforcement Affairs (INL) and FCDO three additional public facing reports were produced. This included the following: 'Out of Africa: How West and Central Africa have become the epicentre of ivory and pangolin scale trafficking to Asia', 'Double Impact: The nexus where wildlife and forest crime overlap'; and 'Off the Hook: The need for transparency and accountability in tackling wildlife crime'.

EIA has collated information from publicly available and confidential sources (English, French, Vietnamese and Chinese language media articles, and partner reports) on pangolin (including scales and whole live/dead animals) seizure incidents that took place globally during the reporting period. The EIA Intelligence Team developed and introduced a new Microsoft PowerBI database to enter, manage and analyse pangolin, ivory, Asian big cat, rhino and other species seizure data. This new database has standardised the seizure data fields across species and allows for the data to be visualised in an online dashboard. The dataset now includes 1,798 pangolin incident records globally for the period 2000 to 2021. The updated dataset will be accessible to the public through EIA's website. Information from the pangolin global seizure dataset was shared with 10 separate journalists, NGOs, researchers and government agencies. Recipients included TRAFFIC, Monitor Conservation Research Society, UNODC, CITES Secretariat, InfoNile, The Independent, Wall Street Journal and CitiBank.

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

Output target delivered in year 2. In year 3, EIA has continued to maintain communication with two persons of interest to gather information about methods of operation related to pangolin trafficking. To integrate newly obtained information one of the intelligence assessments on a pangolin trafficking network produced in year 2 was updated. This document is currently being used to produce a public facing report that will be produced and published in year 4, quarter 2.

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

Output target delivered in years 1 and 2. NRCN investigates and prosecutes cases under their MoU with UWA. During the reporting period, NRCN prosecutors monitored the UWA/URA prosecution of Nguyen Son Dong, Pham Van Chieu, Phung Thi Lien and Dinh Van Chung) for the possession of prohibited wildlife goods (424kg pangolin scales and 3,299kg elephant ivory seized in January 2019 by URA). This case was adjourned in early 2021 due to the abscondment of Pham Van Chieu, he is understood to have illegally travelled out of Uganda in 2020.

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

Output target delivered in years 1 and 2. NRCN have supported UWA and the DPP to undertake prosecutions based on the Uganda Wildlife Act 2019. NRCN have also conducted advocacy engagements with government and NGO partners to build awareness of the limitations associated with the Act, such as the discretionary decision-making authority granted to Magistrate courts on wildlife penalties.

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 32 operations that led to the arrest of 60 traffickers involved in the sourcing of pangolins and their products in and around Uganda. Of the 60 traffickers arrested, 25 traffickers were convicted, with 2 receiving a caution, 18 receiving a custodial sentence with a fine, and 5 receiving only a custodial sentence. As of 04/05/21, a total of 10 traffickers are still on trial, and 25 suspects were either released on police bond, had their cases closed, or are under warrant of arrest.

On cases that NRCN prosecuted or supported there was a 72% conviction rate (25 convicted / (convicted + closed = 32) *100). 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, this will be finalised in year 4, quarter 2.

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

Output target delivered in years 1 and 2. Continued coordination and mentoring support for multi-agency financial investigations was scheduled to take place in year 3 but due to COVID-19 these were postponed to year 4, quarter 1.

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 finalised a financial typology on Vietnamese network involved in the export of elephant ivory and pangolin scales from Uganda in 2019. This has been shared with the Uganda FIA. Due to limitations in the information available on this case and major flaws in the investigation and prosecution a full and accurate typology could not be produced. To review the challenges faced with the Vietnamese case, EIA has recruited a consultant to conduct interviews and produce a technical assessment. In addition to the financial typology, a financial red-flag document was produced detailing notable characteristics and patterns associated with pangolin and ivory trafficking in Uganda.

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 250 names for pangolin trafficking, 61 of which were accepted and resulted in new or updated profiles (based on World Check and Dow Jones Risk and Compliance feedback). 157 existing profiles were updated. A total of 32 names were not accepted, this was because: 1) the full name was not available, 2) the names were rejected by EIA/Liberty Shared, or 3) the names were accepted by EIA/Liberty Shared but rejected by World-Check and Dow Jones.

Previously, EIA was sharing Know Your Customer (KYC) data with Liberty Shared for submission to Thomson Reuters World Check, Dow Jones Risk Compliance and to various financial institutions such as banking groups and money service providers. In January 2021, EIA took over management of the wildlife crime reporting aspect of the KYC Media Monitoring system from Liberty Shared.

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)

The financial typology on the Vietnamese trafficking network produced under Output 2.1 was shared with Sydney Asubo (FIA Executive Director) and Benjamin Wesonga (FIA IWT Focal Point). The financial red-flag document also produced under Output 2.1 was shared with the FIA and UfW intelligence unit. In April 2021, specific red-flags relating to wildlife trafficking in Uganda contained in EIA's red-flag document was shared by UfW to Transport Taskforce members in their monthly Intelligence Bulletin.

Output 3

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.

EIA engaged with major transport companies such as Maersk, Pacific International Lines and Ethiopian Airways to push for better screening and black-listing procedures. EIA is one of the NGOs invited to draft guidelines for the International Maritime Organisation, in collaboration with other stakeholders, for tackling wildlife trafficking. In March 2021, NRCN worked with UWA to engage 7 Uganda government agencies and associations in a roundtable meeting held at the Protea Hotel on 23 March in Kampala to sensitise them on the threats to pangolins and involvement of criminal networks. The roundtable included 15 participants from NRCN, the Uganda Civil Aviation Authority, Ministry of Works and Transport, Uganda Railway Commission Service, Uganda Communication Commission, Uganda National Roads Authority, Directorate of Citizenship and Immigration Control, and Uganda Freight Forwarders Association.

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)

During the transport sector roundtable held in March 2021, UfW Transport Taskforce Manager Ian Cruickshank presented information on how participants can sign up to the UfW taskforces. Many participants demonstrated an interest in sign-up and NRCN plans to follow up with the participants to facilitate sign-up in year 4, quarter 1. In March 2021, the FIA signed up to the UfW Financial Taskforce Mansion House Declaration as a result of facilitation provided by EIA.

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

In year 2, URA informed EIA/NRCN that scanners were in use at the Uganda-Kenya border at Busia (to Kisumu, Kenya) and Malaba (to Eldoret, Kenya). In year 3, no information has been obtained on URA use and deployment of the scanners, it is understood that COVID-19 impacted border inspections between March and July 2020.

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 organisation 3 news stories have been published on pangolin trafficking, including:

- In May 2020, Chimp Reports reported on the arrest of three suspects for the possession of 300kg of pangolin scales in Arua. <https://chimpreports.com/pangolin-scales-smuggling-a-wildlife-crime-uganda-continues-to-battle/>
- In June 2020, Chimp Reports reported on the arrest of two suspects for the possession of a live pangolin. <https://chimpreports.com/two-men-arrested-with-live-pangolin-worth-shs-10m/>
- In February 2021, Uganda Radio Network reported on the arrest of three suspects for the possession of a live pangolin. <https://ugandaradionetwork.net/a/story/five-arrested-in-possession-of-ivory-live-pangolin-in-northern-uganda->

In the international media, Senior Pangolin/Principal Campaigner, Chris Hamley, was quoted in at least 15 articles on pangolin trafficking, many of which have been republished on other news websites globally, including:

- National Geographic “Pangolins receive surprising lifeline with new protections in China” <https://www.nationalgeographic.com/animals/2020/06/pangolins-receive-new-protections-traditional-medicine-in-china/>
- CNN “China removes pangolin scales from traditional medicine list, helping protect world's most trafficked mammal” <https://edition.cnn.com/2020/06/10/asia/china-pangolin-protection-medicine-intl-hnk/index.html>
- Mongabay “Did China really ban the pangolin trade? Not quite, investigators say” <https://news.mongabay.com/2020/06/did-china-really-ban-the-pangolin-trade-not-quite-investigators-say/>
- National Geographic “Update, June, 23, 2020: Pangolin scales have not been entirely eliminated from China’s official traditional Chinese medicine pharmacopoeia” <https://www.nationalgeographic.com/animals/2020/06/pangolins-receive-new-protections-traditional-medicine-in-china/>
- Al Jazeera “Primates, pangolin scales, leopard bones: The perils of poaching” <https://www.aljazeera.com/indepth/features/primates-pangolin-scales-leopard-bones-perils-poaching-200624111921181.html>
- BBC Discover Wildlife “Pangolin scales can still be legally traded and used in China” <https://www.discoverwildlife.com/news/pangolin-scales-can-still-be-legally-traded-and-used-in-china/>
- Daily Express “‘Not banned it at all!’ China's latest medicine list STILL includes wildlife ingredients” <https://www.express.co.uk/news/world/1308762/china-wildlife-trade-traditional-medicine-pangolin-scales-illegal-trade-coronavirus-spt>
- The Independent UK “Stop the Illegal Wildlife Trade: How pangolins became the ultimate luxury good” <https://www.independent.co.uk/environment/pangolin-scales-trafficking-africa-stop-illegal-wildlife-trade-ivory-drugs-a9696041.html>
- National Geographic “Pangolin scale seizures at all-time high in 2019, showing illegal trade still booming” <https://www.nationalgeographic.com/animals/2020/09/pangolin-scale-seizures-all-time-high-2019/>
- The Guardian “China still allowing use of pangolin scales in traditional medicine” <https://www.theguardian.com/environment/2020/oct/13/china-still-allowing-use-of-pangolin-scales-in-traditional-medicine>
- Oxpeckers “Wildlife has no part in TCM, say Chinese doctors” <https://oxpeckers.org/2020/10/wildlife-has-no-part-in-tcm/>
- The Telegraph “China using pangolin scales in traditional medicine despite claiming the contrary, says environment report” <https://www.independent.co.uk/environment/chinese-government-pangolin-traditional-medicine-illegal-wildlife-trade-b1015080.html>
- The Independent UK “Revealed: How global financial giants invest in firm that makes medicines from endangered pangolin parts” <https://www.independent.co.uk/news/world/financial-firms-invest-medicines-pangolins-b1765722.html>
- The Independent Nigeria “Pangolins: Experts Call For Stringent Penalties Against Wildlife Poaching, Trading” <https://www.independent.ng/pangolins-experts-call-for-stringent-penalties-against-wildlife-poaching-trading/>
- The Independent UK “Stop the Illegal Wildlife Trade: Pangolin scales worth £5m seized in Cameroon on ‘major trafficking route’” <https://www.independent.co.uk/stop-the-illegal-wildlife-trade/pangolin-scales-cameroon-seized-smuggling-b1824464.html>

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.

Outcome delivered in year 2. In year 3, considerable information on pangolin trafficking networks operating in Uganda was generated from digital and remote investigations. This resulted in the production of 43 intelligence reports and one updated intelligence assessment (including network charts). NRCN conducted investigations into pangolin trafficking networks operating in Uganda. Intelligence on pangolin trafficking networks has been shared with a range of agencies, including UNODC, Interpol, US State Department, and USFWS. EIA has recruited a consultant to produce a final situational assessment on pangolin trafficking in Uganda that will draw on information collected through EIA investigations and interviews with government, NGOs and individuals involved in pangolin crime. This assessment will be completed in year 4, quarter 2.

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.

In year 3, engagement with the FIA was affected by COVID-19 and the Uganda national election, which was held in January 2021. In November 2020, EIA facilitated the involvement of NRCN and the FIA in a webinar held by UfW to discuss the East Africa Chapter of the Taskforce. The financial typology on the Vietnamese trafficking network produced under Output 2.1 was shared with Sydney Asubo (FIA Executive Director) and Benjamin Wesonga (FIA IWT Focal Point). Information collected through EIA/NRCN investigations in Uganda was compiled into a financial sector red-flag document and shared with the Uganda FIA Director and IWT Focal Point, as well as the United for Wildlife Intelligence Unit.

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.

A 6-page Uganda transport sector red-flag document was prepared based on findings from EIA/NRCN investigations. This contains information on routes used to transport illegal wildlife products, methods of transport (road, air, maritime), role of transport companies, and transport specific red-flags. The document was shared with the UfW Transport Taskforce Intelligence Unit and can be used by transport sector companies to assess wildlife trafficking risks associated with Uganda. A briefing document titled 'Information Briefing for Uganda Transport Sector on Illegal Wildlife Trade Risks' was prepared. This was shared with participants of the March 2021 roundtable event to build awareness of transport sector wildlife trafficking risks. At this workshop, participants made recommendations for future actions to prevent the abuse of transport sector services in Uganda by wildlife traffickers.

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 60 arrests for pangolin trafficking over the reporting period (project total: 132). A total of 25 suspects were successfully convicted (project total: 65, including cautions) and 7 were acquitted due to insufficient evidence/poor investigation (project total: 16). Of the 25 convictions, 18 received custodial sentences, and a total of 268 months of custodial sentences issued, with a mean sentence of 12.18 months. A total of UGX of revenue was generated for the Ugandan government from fines and the mean fine was UGX. One Uganda military police Corporal was arrested for pangolin trafficking is currently on trial. 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

Outcome delivered in year 2. In year 3, NRCN initiated distribution of the poster produced in year 2 to raise awareness of pangolin trafficking, pangolin products and concealment methods amongst Ugandan law enforcement stakeholders. A total of 2000 copies of the poster were printed, and it has been distributed to UWA stations, police stations/posts, and court premises across Uganda. Example of legal protections of pangolins recognised in this article: <https://ugandaradionetwork.net/story/five-arrested-in-possession-of-ivory-live-pangolin-in-northern-uganda->

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, to date there has never been any successful prosecutions of wildlife traffickers for offences under the Anti-money Laundering Act (2013). In year 2, to overcome challenges associated with the need for multi-agency financial investigations and corruption, EIA and NRCN facilitated the establishment of the Joint Financial Investigation Team (JFIT). The mandate of the JFIT was to cooperate on financial investigations on cases of serious wildlife/pangolin trafficking. In year 3, EIA and NRCN obtained funding from DSWF to bring JFIT members together on an active case. Due to COVID-19 impacts this activity was postponed and will be implemented in year 4, quarter 1.

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 Gakou Fodie.

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.

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

As reported for years 1 and 2, 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.

During the campaigning period for Uganda's national elections held in January 2021, on 2 December 2020 local media reported that the FIA had directed commercial banks to freeze the bank accounts of four human rights civil society organizations over suspicions that they were supporting political opposition¹.

Law enforcement agencies respond positively to independent findings

As reported for years 1 and 2, 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.

On a monthly basis, NRCN selectively shares investigation findings and prosecution outcomes with UWA and UPF. 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. In year 3, EIA has engaged with Ethiopian Airlines, Pacific International Lines and Maersk at the international level on reducing risk associated with wildlife trafficking. EIA has been invited to draft guidelines for the International Maritime Organisation to tackle wildlife trafficking.

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

In 2020, Uganda ranked 142 (compared to 137 for 2019, and 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.

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

As reported in years 1 and 2, 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

¹ <https://www.monitor.co.ug/uganda/special-reports/elections/govt-freezes-accounts-of-4-ngos-doing-poll-work-3216360>

<https://www.state.gov/reports/2020-country-reports-on-human-rights-practices/uganda/>

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

In 2020, Uganda's Ministry of Tourism, Wildlife and Antiquities developed its 'National Strategy to Combat Poaching, Illegal Trade and Trafficking of Wildlife and Wildlife Products 2020-2029'. This was developed under a separate project implemented by the Wildlife Conservation Society through an IWT Challenge Fund grant (IWT073). In this document the Ministry has committed to enhancing the capacity of law enforcement to combat wildlife trafficking, promote inter-agency and cross-border collaboration. The strategy demonstrates the Ugandan government's high-level political will to implement actions to address the role of Uganda as a source country and major transit hub for the trafficking of illicit wildlife products. The strategy is to be implemented by the National Wildlife Crime Coordination Taskforce (NWCCTF).

Output 2

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

In July 2020, the Financial Action Taskforce (FATF) published a report titled 'Money Laundering and the Illegal Wildlife Trade'. This was the first FATF global report on IWT and it draws attention to the links between wildlife and financial crime and outlines how jurisdictions should apply the FATF standards to combat IWT. The study highlights how jurisdictions should view the proceeds generated by IWT as a global threat and the important role that financial institutions can play in detecting suspicious activity. It also recommends that countries ensure relevant financial institutions and non-financial institutions are required to identify and assess their exposure to ML risks relating to IWT and take appropriate mitigating measures.

Under EIA's DEFRA anti-money laundering project (IWT059), EIA has utilized its membership of the UfW Financial Taskforce to disseminate project typologies to some of the 42 financial institutions which have joined the taskforce. For example, two ivory trafficking typologies have been translated into Chinese and provided to six banks in China. In addition, three project typologies have been provided to a major regional bank covering Southern and Eastern Africa. A briefing on IWT in Mozambique was provided to the East and Southern Africa Anti-Money Laundering Group (ESAAMLG) in July, ahead of a site visit by assessors as part of the Mutual Evaluation Report Process.

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.

Through Liberty Shared, EIA has had direct communication with banks, many of which have mentioned they are experiencing more demand from their customers for content on wildlife trafficking and environmental crime. Many also mentioned to EIA that they would be interested in more information in the form of typologies and red flags.

Output 3

Sufficient resources for mobile scanners to be used for pangolin detection

As covered in section 3.2 (output 3.3), in year 3, no information has been obtained on URA use and deployment of the scanners, it is understood that COVID-19 impacted border inspections between March and July 2020. In year 3, URA have not made any notable seizures of pangolins of other globally trafficked wildlife. Nonetheless, NRCN has worked with its partners

in Uganda, including UWA, UPF and Focused Conservation Solutions to pro-actively investigate pangolin trafficking networks with the goal of intercepting pangolin scale shipments.

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. 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.

The Global Initiative has recently reported on the [growing volume of heroin trafficked from Afghanistan through Uganda to Europe](#) and the [growing organised crime and corruption risks associated with the charcoal trade](#). 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.

Intelligence generated through this project has contributed to international-level investigations into a pangolin trafficking network with a sourcing footprint that extends across Central, East and southern Africa. 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.

During the course of year 3, EIA/NRCN have adapted project implementation to the COVID-19 situation including the emergence of new pangolin/wildlife poaching and trafficking threats. This included a successful application to the IWT Challenge Fund Covid Rapid Response funding stream (CV19RR06). This grant enabled NRCN to ensure continued impact on IWT and poverty alleviation by respond to escalating rates of poaching in Uganda’s protected areas, addressing DRC to Uganda cross-border trafficking, and clearing a court case back-log. Uganda’s protected areas are a significant revenue source for communities, the government, and the private sector. Channelling investigations and prosecutions efforts on these emerging threats served to prevent the undermining of poverty alleviation objectives associated with wildlife tourism.

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 and 2) through the arrest of 60 offenders for pangolin trafficking, 25 suspects were successfully convicted (including 1 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 3, this project has contributed to these objectives by 1) sharing a number of intelligence documents with the Uganda FIA, including a financial typology, and two wildlife trafficking red-flag documents, in addition to facilitating the FIA's sign-up to the UfW Financial Taskforce. Preliminary arrangements have been made to engage the Joint Financial Investigation Taskforce in year 4, quarter 1; 2) Uganda's public transport sector stakeholders were engaged through a roundtable event to sensitise them on the pangolin/wildlife trafficking risks associated with the transportation system in Uganda. At this meeting efforts were made to encourage stakeholders to sign-up to the UfW Transport Taskforce.

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), this project has built capacity of government and NGO actors in Uganda to better combat pangolin trafficking. It has done this by building a better understanding of the national and transnational pangolin trafficking situation, involvement of organised crime groups in pangolin trafficking, and built capacity to utilise intelligence-led techniques and financial investigations. By linking information on pangolin trafficking networks with ongoing criminal investigations being implemented by NRCN and UWA, the project has effectively disrupted and ended the operation of a criminal enterprises that were 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. With co-financing from the DEFRA COVID Rapid Response grant (CV19RR06), EIA, working in partnership with NRCN and Conserv Congo (in DRC) have initiated research into the zoonotic disease risks associated with wildlife trade in Uganda and DRC. To complete this research, a consultant, Dr DeeAnn Reeder, based at the University of Bucknell in the USA has completed a technical assessment that will provide recommendations to reduce the zoonotic disease risks associated with wildlife trafficking.

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 133 people arrested over years 1, 2 and 3, 8 of these were women. Of these, two have been cautioned, one released on police bond, 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 3.1, the transport sector wildlife trafficking sensitisation roundtable completed in March 2021 had 15 participants, of these only 2 were a woman. During the meeting participants acknowledged that lack of representation by women and committed to resolving this in future transport sector meetings. 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.

NRCN has a total of 29 staff of which 11 are women. These 11 women fulfil roles as a Project Officer, Wildlife Valuation Officer, Head of Prosecutions, Head of Finance, Investigators and Prosecutors, taking a pro-active role in organisation management, project management, investigations and prosecuting cases in court.

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 3. 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. 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.

In year 3, full implementation of the M&E plan has not been possible due to COVID-19 travel restrictions. This has meant that it has not been possible for EIA project staff to travel to Uganda to meet with project partners. To overcome this limitation there has been a greater reliance on regular email exchange and Zoom/WhatsApp calls between EIA and NRCN to facilitate activity implementation and monitor project progress, maintain relationships and hold review and work planning meetings.

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 2020 and January 2021). 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.

9. Lessons learnt

Through year 3, using remote communication methods, collaboration between EIA and NRCN has continued to function effectively with regular and cordial communications between the two organisations. In years 1 and 2, in-country visits by EIA Campaigners, Intelligence and Investigations team members were essential to facilitating strategic and work planning, information sharing, activity implementation, training and M&E. While remote/online communication has served to ensure continued project implementation it has not replicated the benefits of physical meetings and in-person communication. Internet connections between Uganda and the UK are sometimes poor, and this was particularly the case during the national election period (December 2020 and January 2021). Security issues are also a factor were communicating online since third-party entities can potentially monitor or intercept conversations, this has acted as an impediment to important conversations around sensitive topics (particularly relating to investigations). A lack of visits to Uganda has also prevented in-person engagement with government and NGO stakeholders by EIA, and limited our ability to coordinate with other actors.

To ensure that lessons learned and the pangolin trafficking and wildlife criminal justice situation in Uganda are fully assessed. In year 3, EIA recruited a consultant, Justin Gosling, to complete a series of three assessments relating to the project. This work will involve interviews with relevant stakeholders and a review of existing information held by EIA and NRCN. The three assessment areas are:

- The impact of the COVID-19 crisis on domestic and transnational wildlife trafficking in Uganda
- Status of domestic and transnational wildlife trafficking in Uganda (with a focus on pangolins and elephant ivory)
- A case review of the investigation/prosecution into a Vietnamese criminal network involved in elephant ivory and pangolin scale trafficking in 2019

Justin Gosling initiated implementation of this consultancy in early 2021 but due to COVID-19 related travel constraints the delivery deadline has been extended to August 2021. The outputs from this work will include a series of technical reports and briefing documents that will be shared with Ugandan stakeholders (government and NGO), and released publicly by EIA and NRCN.

The outputs from this work will feed into to future project design and planning, capacity building and investigations activities to ensure they effectively address the driving factors of pangolin/wildlife trafficking in Uganda.

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

Comments in year 2 annual report review addressed:

- 1. How many 'persons of interest' are under indicator 1.2? Covered under section 3.1, output 1.2, 10 persons of interest have been investigated.
- 2. Can you provide the course evaluation document relating to the workshop on financial investigation? Included in supporting documents file "Evaluation report EIA NRCN FI training April 2019.pdf" (m&e\pangolin_m&e_files - external - year 3\activity_1.10_financial_investigations\year_2\NRCN_finance_intel_training_report-apr19)
- 3. Are you satisfied that the mobile scanners (mentioned under Output 3) are being fully used? AR2 reports in terms of information from a third party rather than direct observation. The mobile scanners are under management by URA, which is responsible for their deployment and use. NRCN and EIA have not been able to confirm use at border points first-hand. We do know that URA used a container scanner during the January 2019 seizure of pangolin scales and ivory in Kampala (in the vicinity of Mandela National Stadium), and this was an intelligence-based seizure. See log-frame output 3.3.
- 4. Is there any cooperation between this project and IWT073 (Strengthening anti-poaching techniques and countering wildlife trafficking in Uganda) being implemented by the Wildlife Conservation Society, Uganda Wildlife Authority and the National Wildlife Crime Coordination Task Force? Covered in section 2, NRCN has participated in NWCCTF meetings and works in close coordination with WCS and other NWCCTF members to implement anti-wildlife trafficking activities in Uganda. In year 4, quarter 1, EIA/NRCN will host a financial investigation (JFIT) roundtable and seek to ensure it is fully integrated into the NWCCTF.

11. Other comments on progress not covered elsewhere

During year 3 NRCN has begun implementing activities as a sub-grantee on a USAID project titled 'Uganda Combating Wildlife Crime (CWC) Activity'. This is implemented by Wildlife Conservation Society (WCS) working in collaboration with African Wildlife Foundation, The Royal United Services Institute and Natural Resource Conservation Network. This USAID project has provided NRCN with training and resources that have enhanced implementation of the IWT056 project and leveraged its results. This includes areas such as crime scene investigations, awareness raising on wildlife laws, sensitisation of the judiciary and court case monitoring.

Despite best efforts, the effective investigation, arrest, and prosecution of mid- to high- level pangolin/wildlife traffickers by government authorities in Uganda remains elusive. Underlying causes of this impunity include constraints around multi-agency coordination, institutional and low-level corruption, and resourcing. This situation is exemplified by the investigation and prosecution of the Vietnamese network linked to the January 2019 pangolin scale/ivory seizure. The case has faced a range of challenges that have meant those most culpable for the seizure have evaded justice and departed Uganda, possibly to engage in wildlife trafficking elsewhere in Africa. Despite the establishment of the JFIT, which sought to overcome some of these challenges in relation to the targeting of other high-/mid- level pangolin traffickers' delivery of outcome 0.6 has faced obstacles. This aimed to deliver an increase in prosecutions for individuals arrested for pangolin trafficking using ancillary legislation such as anti-money laundering laws.

12. Sustainability and legacy

The project has delivered several outputs and outcomes that will have a long-term impact on reducing pangolin/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 of the year 2 annual report, 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, FIA, UPF and DPP to collaborate on a Joint Financial Investigations Team (JFIT) 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. In year 4, quarter 1, EIA and NRCN will undertake efforts to ensure the JFIT is fully integrated into the work of the NWCCTF and the activities of WCS/RUSI under the USAID Combating Wildlife Crime project.

Intelligence generated 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 African. In year 4 quarters 1 and 2, EIA plans to consolidate information collected through investigations in a series of technical reports and public-facing outputs. These will include a report on the links between China's Belt and Road Initiative and pangolin trafficking, and assessments on the status of pangolin trafficking in Uganda, impacts of COVID-19 on wildlife trafficking, and the effectiveness of investigations into the Vietnamese network associated with the January 2019 seizure. These outputs 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 beyond the end of the project.

13. IWT Challenge Fund identity

This project is part of a wider pangolin campaign 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 and the Uganda FIA are familiar with the IWT Challenge Fund. For the public-facing report 'Smoke and Mirrors' (section 3.1 output 4) the UK government Illegal Wildlife Trade Challenge Fund was acknowledged on page 2. The Uganda transport sector briefing document shared with participants of the March 2021 workshop included the UKAID logo and participants were made aware that the DEFRA IWT Challenge Fund funded the event. The EIA pangolin webpage continues 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. Impact of COVID-19 on project delivery

Year 3 of the project has been heavily shaped by the impact of COVID-19. Where possible, EIA and NRCN have adapted activity implementation to overcome challenges and counter emerging pangolin/wildlife trafficking related threats. However, activities have faced planning uncertainties and significant delays to implementation, this led to a successful change request submission in January 2021 to extend the project to September 2021. As of April 2021, it is expected that outstanding activities will be completed within the extension period.

Between March and July 2020, Uganda implemented COVID-19 control measures. These included restrictions on public gatherings, meetings, workplaces and transportation services, as

well as the closure of Entebbe International Airport for incoming and outgoing commercial flights. This situation resulted in several impacts on the implementation of the project, including the temporary closure of NRCN's offices in Kampala, barriers to organising meetings with government departments, difficulties in conducting field investigations and prosecutions in Uganda, and a reduction in cross-border collaborations with DRC, Tanzania and Malawi. Travel restrictions in Uganda have increased the costs associated with transport and demanded more resources to gather intelligence and transfer suspects. Furthermore, EIA staff have been unable to travel to Uganda to collaborate with NRCN in-person and conduct capacity building, investigations, and M&E activities. EIA's COVID-19 response has followed the laws and guidelines set by the UK government and the Senior Management Team meets regularly to review the COVID-19 situation. The EIA office in London has reopened on occasion for a minimum number of staff, however, the majority of EIA staff continue to work from home.

To adapt to the situation, EIA and NRCN have maintained regular communication over email, WhatsApp and Zoom to coordinate project activities and share information. NRCN has obtained special authorisations from UWA to conduct field investigations and EIA has conducted remote/online engagement with pangolin traffickers. EIA prioritised the production of public facing outputs to raise the profile of pangolin trafficking issues amongst key decision-makers at the international level. Once COVID-19 restrictions were released, NRCN/EIA reinitiated efforts to engage the Uganda transport sector and finalise the wildlife valuation guidelines. Uganda's national elections periods between December 2020 and January 2021 also impacted project implementation (see section 11). The main outstanding activities to be completed in year 4 quarters 1 and 2, include the following: follow-up with Uganda transport sector stakeholders on UfW Transport Sector Taskforce sign-up; completion of the wildlife valuation guidelines by a consultant; finalisation of end of project trafficking/lessons learned assessments (under completion by Justin Gosling), and hosting of a JFIT roundtable on financial investigations.

With the onset of COVID-19, Uganda's ten national parks experienced a rapidly escalating poaching crisis. As international tourist numbers diminished due to global transportation restrictions, Uganda's national parks became more vulnerable to poaching. Wildlife traffickers operating between eastern DRC and Uganda also capitalised on a reduction in law enforcement effort to smuggle illicit wildlife products through Uganda undetected. Reduced tourist revenue for the Uganda Wildlife Authority (UWA) undermined resourcing for ranger patrols. The reduced tourist presence in protected areas eliminated the poaching deterrent affect associated with safaris and dramatically reduced ecotourism employment opportunities. There was a doubling in wildlife poaching associated with communities that previously benefited from ecotourism. By June 2020, UWA had recorded 367 poaching cases compared to 163 cases in 2019. This was compounded by the closure of the special wildlife court between March and July, which led to a backlog in court cases building up and a number of cases not being heard in court.

To respond to COVID-19 impacts on wildlife trafficking in Uganda, EIA was awarded a IWT Challenge Fund Covid Rapid Response grant (CV19RR06) titled 'Responding to COVID-19 impacts on wildlife trafficking in Uganda/DRC'. This grant fit into the IWT056 project and was implemented between January and March 2021. It involved NRCN and Conserv Congo (in DRC) as implementing partners. Specifically, the project involved activities to clear the court case back-log, strengthen DRC-Uganda cross-border intelligence-led investigations, and forge a partnership between NRCN and Conserv Congo. Research/intelligence assessments of COVID-19 impacts on wildlife trafficking, the zoonotic disease risks associated with wildlife trafficking and the characteristics of wildlife trafficking between DRC and Uganda were also initiated. This research will feed into the development of future initiatives aimed at preventing the spillover of zoonotic diseases from animals to humans.

15. Safeguarding

Please tick this box if any safeguarding or human rights violations have occurred during this financial year.

If you have answered yes, please ensure these are reported to ODA.safeguarding@defra.gov.uk as indicated in the T&Cs.

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.

Under a separate project focused on West and Central Africa, EIA has developed a social safeguards risk management plan. Measures identified in this plan are also being implemented through this IWT056 project, including those relating to investigations, information management, advocating for criminal justice responses, and capacity building (a copy of this plan is provided in the project M&E safeguarding folder).

In 2020, EIA setup up an internal Equality, Diversity and Inclusion (EDI) committee that is currently developing recommendations for the Senior Management Team on options to further strengthen implementation of EDI practices within the organisation.

16. Project expenditure

Please expand and complete Table 1. If all receipts have not yet been received, please provide indicative figures and clearly mark them as Draft. The Actual claim form will be taken as the final accounting for funds.

Table 1: Project expenditure during the reporting period (April 2020-March 2021)

Project spend (indicative) since last annual report	2020/21 Grant (£)	2020/21 Total actual IWT Costs (£)	Variance %	Comments (please explain significant variances)
Staff costs (see below)				
Consultancy costs				
Overhead Costs				
Travel and subsistence				
Operating Costs				
Capital items (see below)				
Others (see below)				
Audit costs				
TOTAL				

17. 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)

To engage in international advocacy efforts to address the role of consumer demand in driving the trafficking of pangolins from countries such as Uganda, EIA completed extensive open-source research into China's legal pangolin scale medicine market. This included the collection and analysis of information on laws, online advertisement of patented medicines containing pangolin scales by pharmaceutical companies, and the regulated transfers of pangolin scales by entities in China. EIA findings were published in October 2020 in a report titled 'Smoke and Mirrors: China's complicity in the global illegal pangolin trade'. The report revealed the extent to which the Chinese Government is supporting the continued use of pangolins, the world's most trafficked mammal. In June 2020, Chinese State media reported that pangolin scales had been removed from traditional medicines – but the Smoke and Mirrors report showed that pangolin scale medicine is still legal and pharmaceutical companies continue to be licenced to produce it driving the illicit sourcing of pangolin scales from across Asia and Africa. The report identified 221 Chinese companies licenced to sell pangolin scale products; 56 of these companies actively advertising medicinal products claiming to contain pangolin online; and a total of 64 products listing pangolin as an ingredient advertised on manufacturer websites. Some of the products were found on e-commerce sites, including eBay and Taobao, with international shipping to the US, UK and other countries. One of the companies identified is China's largest traditional Chinese medicine (TCM) pharmaceutical company, China Beijing Tong Ren Tang Group Co Ltd, which has subsidiaries across the world and whose shareholders include major European and US investment funds. The report made recommendations emphasising the importance of the Chinese government living up to its international biodiversity conservation commitments by eliminating demand for pangolin products and closing its legal markets for globally threatened wildlife. The report received wide media attention and resulted in articles in online editions of The Guardian, The Independent, The Telegraph, National Geographic and Mongabay.

Annex 1: Report of progress and achievements against Logical Framework for Financial Year 2020-2021

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	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 3, project implementation was constrained by the impacts of the COVID-19 crisis. This limited EIA and NRCN engagement with key stakeholders and led to the delay in delivery of certain activities. Nonetheless, efforts were made to adapt to the new context, which has ensured activity delivery. Intelligence generated by EIA and NRCN in year 2 of the project was compiled into a financial typology and two pangolin/wildlife trafficking red-flag documents. These were shared with the Ugandan FIA. The FIA signed up to the UfW Financial Taskforce. Several intelligence products on criminal networks and their methods of operation were shared with international agencies, including USFWS, Interpol, UNODC and US State Department. These disseminations have informed ongoing criminal investigations into pangolin trafficking networks. NRCN has continued to successfully investigate and prosecute pangolin traffickers. This has included the ongoing investigation of 4 high-level traffickers. NRCN have engaged with the Uganda transport sector through a roundtable event to build government and private sector support for action to end the use of transport services for pangolin trafficking. 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. A substantive public-facing report on the role of China's medicine market in the global pangolin trade was published to build international support for eliminating demand for pangolin scales.</p>	

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	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</p>	<p><i>Note, means of verification are available in the zip folder 'IWT056_m&e_files_year3' shared with this report.</i></p> <p>0.1 Baseline = 1, current status = 3</p> <p>Information on pangolin trafficking networks operating in Uganda was generated from digital, remote and field investigations. This resulted in the production of 43 intelligence reports (project total: 213). EIA has maintained remote engagement with one person of interest based in Uganda. EIA and NRCN have engaged USFWS on one trafficking network by sharing intelligence to inform an ongoing criminal investigation.</p> <p>0.3 Baseline = 0, current status = 2</p> <p>A 6-page Uganda transport sector red-flag document was shared with the UfW Transport Taskforce Intelligence Unit and can be used by transport sector companies to assess wildlife trafficking risks associated with Uganda. The document contains information on routes used to transport illegal wildlife products, methods of transport (road, air, maritime), role of transport companies, and transport specific red-flags. A briefing document titled 'Information Briefing for Uganda Transport Sector on Illegal Wildlife Trade Risks' was shared with participants of the March 2021 roundtable event to build awareness of transport sector wildlife trafficking risks.</p> <p>0.4 Baseline = 28, current status = 150</p>	<p>0.1 This outcome has been achieved; however</p> <p>0.3 NRCN will be sharing a summary report of the March 2021 transport sector roundtable event and follow up on actions agreed.</p> <p>0.4 No year 4 budget for this so no further activity planned</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 4.</p> <p>0.6 EIA and NRCN obtained funding from DSWF to bring JFIT members together on an active case. Due to COVID-19 impacts this activity was postponed and will be implemented in year 4, quarter 1. It will be facilitated by an international financial investigation expert from the UK with the goal of launching a new financial investigation.</p>

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
	<p>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 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>UWA and UPF made 60 arrests for pangolin trafficking over the reporting period (project total: 132). A total of 25 suspects were successfully convicted (project total: 65) and 7 were acquitted (project total: 16). Of the 25 convictions, 18 received custodial sentences, and a total of 268 months of custodial sentences issued, with a mean sentence of 12.18 months.</p> <p>0.5 Baseline = 21, current status = 113</p> <p>Outcome delivered in year 2. In year 3, NRCN initiated distribution of the poster produced in year 2 to raise awareness of pangolin trafficking, pangolin products and concealment methods amongst Ugandan law enforcement stakeholders. A total of 2000 copies of the poster were printed, and it has been distributed to UWA stations, police stations/posts, and court premises across Uganda.</p> <p>0.6 Baseline = 0, current status = 0</p> <p>In year 2, to overcome challenges associated with the need for multi-agency financial investigations and corruption, EIA and NRCN facilitated the establishment of the Joint Financial Investigation Team (JFIT). The mandate of the JFIT was to cooperate on financial investigations on cases of serious wildlife/pangolin trafficking. In year 3, while high-level committed to wildlife financial investigations the JFIT has not launched a specific investigation due to the impacts of COVID-19.</p>	
<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</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</p>	<p>1.1 Baseline = 1, current status = 3. Building on progress delivered in year 2, remote contact was maintained with two persons of interest, and one intelligence assessment updated (see sections 3.1, 3.2, folder 'output_1.1_1.2_intelligence_outputs').</p> <p>1.2 Baseline = 1, current status = 3. NRCN prosecutors monitored the UWA/URA prosecution of four Vietnamese nationals (Nguyen Son Dong, Pham Van Chieu, Phung Thi Lien and Dinh Van Chung) for the possession of prohibited wildlife goods (424kg pangolin scales and 3,299kg elephant ivory) (see sections 3.1, 3.2, folder 'output_1.1_1.2_intelligence_outputs').</p>	

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
<p>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>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 with other stakeholders by December 2019</p>	<p>1.3 Output target delivered in years 1 and 2. NRCN have supported UWA and the DPP to undertake prosecutions based on the Uganda Wildlife Act 2019. (see folder 'output_1.3_new_laws').</p> <p>1.4 Annual target = >70%, year 3 status = 72%. NRCN supported UWA and UPF to undertake 60 arrests of traffickers involved in the sourcing of pangolin scales in and around Uganda. A total of 25 pangolin traffickers were convicted and 23 received custodial sentences (with 18 of these receiving a fine), an additional 2 were given cautions. On cases that NRCN prosecuted or supported there was a 72% conviction rate. See Excel doc 'pangolin_m&e_datashets' sheet 'OUTPUT_1.4_CONVICT_RATE'</p> <p>1.5. Target = 10 staff, year 2 status = 12 government staff. Output target delivered in years 1 and 2. Continued coordination and mentoring support for multi-agency financial investigations was scheduled to take place in year 3 but due to COVID-19 these were postponed to year 4, quarter 1.</p> <p>See folder 'activity_1.10_financial_investigations' for documents relating to the workshop including ToR, schedule, consultant report, and photographs.</p>	
<p>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</p>		<p>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. In year 3, the Senior/Principal</p>	<p>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</p>

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
		<p>Campaigner and EIA Intelligence Team exchanged information with the NRCN investigations and database team to inform analyses. See MoU in folder 'pangolin_m&e_files - external\NRCN_processes'</p>	<p>enforcement. Resources permitting, EIA will also provide ad-hoc technical support to NRCN on the development of intelligence information systems.</p>
<p>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.</p>		<p>Desk-based processing and analysis of intelligence from digital and field investigations was completed. This included the production of 43 intelligence reports and update of one intelligence assessment produced in year 2. 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'.</p> <p>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.</p>	<p>In year 4, no further digital, remote or field investigations are planned. Information on one pangolin trafficking network that links to China will be published in a public -facing report in year 4, quarter 2.</p>
<p>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</p>		<p>In year 3, communications with NRCN over activity implementation, budget management and M&E data submission continued. Communications took place over online using email, Zoom and WhatsApp. Ad-hoc meetings between NRCN and relevant government stakeholders on pangolin investigations, wildlife valuation guidelines, and transport sector involvement were held. See folder 'activity_1.3_EIA_M&E_visits' for information from years 1 and 2</p>	<p>Due to COVID-19 travel restrictions communication between EIA and NRCN will be maintained remotely, and a final EIA M&E visit conducted in year 4 quarter 2.</p>
<p>Activity 1.4 Field work to ground-truth desk-based research, gather information on trade incidents, download & transcribe findings</p>		<p>For year 2, see Excel doc 'UGA_field_operation_jun19_progress_report_log' in folder 'output_1.1_1.2_intelligence_outputs'</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>		<p>NRCN have conducted confidential meetings with the UWA intelligence unit, Focused Conservation Solutions 'Special Wildlife Crime Unit', police and prosecutors over pangolin investigations.</p>	<p>Drawing on information collected through the project complemented with information obtained from key-informant interviews, a non-confidential situational assessment of national and transnational pangolin trafficking in</p>

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
		See Excel doc 'pangolin_m&e_datasheets' sheets 'OUTPUT_1.1_1.2_INTEL_DISSEMIN' and 'OUTPUT_1.1_1.2_INTEL_REPORTS'	Uganda will be published publicly in year 4, quarter 2.
Activity 1.6 Liaise with the UWA and other enforcement agencies to monitor law enforcement response and provide additional information generated by further desk and field research		Pangolin/wildlife trafficking cases handled only by UWA have been monitored by NRCN so that prosecution support can be provided if required. For pangolin/wildlife trafficking offenders given custodial sentences (from NRCN and UWA prosecutions), NRCN has conducted prison visits to ensure they complete these. See Excel doc 'pangolin_m&e_datasheets' sheet 'OUTPUT_1.4_NRCN_LE'	NRCN will continue to independently prosecute pangolin trafficking cases, and monitor cases handled by UWA to ensure high standards of transparency.
Activity 1.7 Prepare amendments to national regulations to integrate provisions for CITES Appendix I listing and disseminate to law-makers		As reported in the year 2 annual report, 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').	Activity now completed; however, as highlighted in section 9 of the year 2 report 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.
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		NRCN held meetings with the UWA led 'wildlife valuation working group' to develop a draft Terms of Reference (ToR) for a consultant to produce the wildlife valuation guidelines. This ToR was developed with inputs from relevant stakeholders through a meeting held in September 2020. Due to COVID-19 related delays, an extension was granted by DEFRA for this activity to be completed between April and September 2021. See documents in folder 'activity_1.8_valuation_guidelines'	In year 4, NRCN will support the UWA wildlife valuation working group by recruiting a consultant with expertise in wildlife valuation/sentencing to produce a final draft of the wildlife valuation document.
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)		NRCN conducted five regional 1-day workshops in year 2. In year 3, NRCN produced distributed 2000 posters to raise awareness of pangolins and their products amongst UWA, UPF and URA enforcement officers across the country.	No further activity

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
		See folder 'activity_1.9_LE_awareness' for UPF workshop report and awareness posters + distribution list.	
Activity 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		NRCN and EIA held a 4-day wildlife trafficking financial investigations workshop in year 2. The workshop was delivered by two expert international consultants (Neil Bennett and David Artingstall). See folder 'activity_1.10_financial_investigations' for documents relating to the workshop including ToR, schedule, consultant report, and photographs.	Training workshop complete, next phase of financial investigations capacity building in Uganda covered under output 2.
Output 2. The financial sector (including public and private sector institutions) has 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 = 2. The EIA Intelligence Team has produced two outputs under this output: 1. a financial typology on a Vietnamese network involved in the export of elephant ivory and pangolin scales from Uganda in 2019. This sanitised 10-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; and 2. a financial red-flag document detailing information on wildlife trafficking patterns, indicators and recommendations. See folder 'output_2_financial_sector\output_2.1_typologies'</p> <p>2.2 Baseline = 57, current status = 395 (baseline + yr 1: 92, yr 2: 89, yr 3: 157). Over the reporting period, EIA submitted 250 names for pangolin trafficking, 157 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 'EIA KYC submissions - April 2020 - March 31 2021' (Password: 'MMWildlife')</p> <p>2.3 Baseline = 0, current status = 2. Two pangolin/wildlife trafficking red-flag documents were shared with the FIA in addition to the financial typology produced under output 2.1.</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.		The EIA Intelligence Team and NRCN finalised a financial typology on Vietnamese network involved in the export of elephant ivory and pangolin scales from Uganda in 2019. This has been shared with the Uganda FIA. The typology will assist recipients'	In year 4, EIA will engage with the FIA to obtain feedback on the typology and understand Uganda's wildlife related financial intelligence priorities. We will also seek to gain information on

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
		<p>understanding of client and transactional risk exposure from such activities. A financial red-flag document was also shared with the FIA and UfW detailing notable characteristics and patterns associated with pangolin and ivory trafficking in Uganda.</p> <p>See folder 'output_2_financial_sector\output_2.1_typologies'</p>	<p>progress relating to the development of red-flags for Uganda's banking sector to submit suspicious transaction reports relating to wildlife trafficking.</p>
<p>Activity 2.2 Regular submission of details of known pangolin traders to Thomson Reuters World-Check</p>		<p>The EIA Intelligence Team 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 'EIA KYC submissions - April 2020 - March 31 2021' (password: 'MMWildlife')</p>	<p>EIA has taken over responsibility of the wildlife trafficking component of the media monitoring database from Liberty Shared and will continue to submit names to KYC databases.</p>
<p>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.</p>		<p>To date briefings on pangolin trade have not been prepared for the ESAAMLG. Sydney Asubo (Uganda FIA Director) is the currently the Chair of ESAAMLG and this represents an opportunity to engage the region on pangolin trafficking issues.</p>	<p>The situational assessment on pangolin trafficking in Uganda (activity 1.5) will be shared with the ESAAMLG in year 4.</p>
<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</p>	<p>3.1 Baseline = 0, current status = 10. EIA engaged with major transport companies such as Maersk, Pacific International Lines and Ethiopian Airways to push for better screening and black-listing procedures. NRCN worked with UWA to engage 7 Uganda government agencies and associations in a roundtable meeting held in March 2021. See folder 'output_3_transport_sector' 'year_3'.</p> <p>3.2 Baseline = 0, current status = 1. Participants of the March 2021 roundtable demonstrated an interest in sign-up to UfW but are yet to do so. In March 2021, the FIA signed up to the UfW Financial Taskforce Mansion House Declaration as a result of facilitation provided by EIA. See folder 'output_3_transport_sector' 'year_3'</p> <p>3.3 In year 3, no information has been obtained on URA use and deployment of the scanners, it is understood that COVID-19 impacted border inspections between March and June 2020. As reported in section 10: The mobile scanners are under management by URA, which is responsible for their deployment and use. NRCN and EIA have not been able to confirm use at border points first-hand. We do know that URA used a container scanner during the January 2019 seizure of pangolin scales and ivory in Kampala (in the vicinity of Mandela National Stadium), and this was an intelligence-based seizure.</p>	

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
	<p>(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>Activity 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>EIA engaged with major transport companies such as Maersk, Pacific International Lines and Ethiopian Airways to push for better screening and black-listing procedures. In March 2021, NRCN worked with UWA to engage 7 Uganda government agencies and associations in a roundtable meeting held at the Protea Hotel in Kampala to sensitise them on the threats to pangolins and involvement of criminal networks.</p>	<p>No further activity planned in year 4.</p>
<p>Activity 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>During the transport sector roundtable held in March 2021, UfW Transport Taskforce Manager Ian Cruickshank presented information on how participants can sign up to the UfW taskforces. Many participants demonstrated an interest in sign-up. In March 2021, the FIA signed up to the UfW Financial Taskforce Mansion House Declaration as a result of facilitation provided by EIA.</p> <p>See folder 'output_3_transport_sector' including document 'March 2021 UGA transport roundtable summary report'</p>	<p>NRCN plans to follow up with the participants of the March 2021 meeting plus other stakeholders to facilitate sign-up in year 4, quarter 1.</p>
<p>Activity 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>In year 2, URA informed EIA/NRCN that scanners were in use at the Uganda-Kenya border at Busia (to Kisumu, Kenya) and Malaba (to Eldoret, Kenya). In year 3, no information has been obtained on URA use and deployment of the scanners, it is understood that COVID-19 impacted border inspections between March and July 2020.</p>	
<p>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</p>		<p>Activity pending completion of Activity 2.3</p>	<p>Once the Uganda national/transnational pangolin trafficking situational assessment is prepared in year 4 quarter 2, it will be shared with EIA</p>

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
			contacts in the UNODC Wildlife and Forest Crime programme.
<p>Output 4. Public-facing materials to raise awareness of criminality and corruption associated with the global pangolin trade.</p>	<p>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>	<p>Baseline 0, current status = 63 (yr 1 = 6 + yr 2 = 27 + yr3 = 30). EIA has published 27 pangolin-related public-facing outputs on its website focusing news articles, blogs and reports. These have covered law enforcement accountability, pangolin medicine production in China, the overlap between wildlife and forest-crime, and the use of intelligence-led techniques. In Uganda, as a result of NRCN engagement with media organisations, 3 news stories have been published on pangolin trafficking See pdfs in folder 'output_4_public_media\year_3'</p>	
<p>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</p>		<p>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 Chimp Reports). EIA has published 22 pangolin-related news articles and blogs on its website.</p> <p>See pdfs in folders 'output_4_public_media\year_3\EIA_news' and 'output_4_public_media\year_3\NRCN_Uganda_news'</p> <p>In August 2020, EIA joined the Center for Biological Diversity and International Environmental Law Project, both based in the US, in filing a Pelly petition calling on the US Government to formally sanction China for illegally trading in critically endangered pangolins.</p> <p>See pdfs in folder 'output_4_public_media\year_3\EIA_Pelly_petition'</p> <p>A public-facing report on the role of China's legal pangolin scale medicine market in driving transnational trafficking (including from Uganda) was published by EIA. The report titled "Smoke and Mirrors: China's complicity on the global illegal pangolin trade" was published on 13 October 2020 in English and Mandarin Chinese. EIA also published three additional reports relating to</p>	

Project summary	Measurable Indicators	Progress and Achievements April 2020 - March 2021	Actions required/planned for next period
		<p>pangolin trafficking: 'Out of Africa: How West and Central Africa have become the epicentre of ivory and pangolin scale trafficking to Asia', 'Double Impact: The nexus where wildlife and forest crime overlap'; and 'Off the Hook: The need for transparency and accountability in tackling wildlife crime'.</p> <p>See pdfs in folder 'output_4_public_media\year_3\EIA_public_facing_reports'</p>	
<p>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</p>		<p>The EIA Intelligence Team developed and introduced a new Microsoft PowerBI database to enter, manage and analyse pangolin, ivory, Asian big cat, and other species seizure data. This new database has standardised the seizure data fields across species and allows for the data to be visualised in an online dashboard. The dataset now includes 1,798 pangolin incident records globally for the period 2000 to 2021.</p>	<p>EIA is currently planning to launch the revamped version of the online seizure maps in year 4, quarter 1</p>
<p>Activity 4.3 Make non-sensitive datasets available to journalists and academic researchers to support other studies and reports on the global pangolin trade</p>		<p>Information from the pangolin global seizure dataset was shared with 10 separate journalists, NGOs, researchers and government agencies. Recipients included TRAFFIC, Monitor Conservation Research Society, UNODC, CITES Secretariat, InfoNile, The Independent, Wall Street Journal and CitiBank.</p>	<p>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.</p>

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@itsi.co.uk if you have any questions regarding this.

Project summary	Measurable Indicators	Means of verification	Important Assumptions
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<p>Impact: (Max 30 words) rural local communities</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</p>		
<p>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.</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</p>	<p>0.1 Intelligence summary reports and assessments 0.1. photographs, films, and notes from research</p> <p>0.2 financial typologies; feedback from banks/banking sector</p> <p>0.3 meeting minutes with transport sector representatives 0.3 annual report of transportation taskforce 0.3 enforcement alerts 0.3 policy announcements 0.3 EIA intelligence disseminations</p>	<p>Governments in the region remain committed to ending the illegal pangolin trade</p> <p>National FIUs have the mandate and capacity to include pangolin/wildlife crime in their work</p> <p>Law enforcement agencies respond positively to independent findings.</p> <p>Transport companies that are engaged with initiatives such as the Transportation Taskforce have commercial operations in Uganda or will do so in the future.</p> <p>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>

	<p>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>0.4 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 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</p>	<p>1.1 Intelligence assessments (that include criminal network association charts)</p> <p>1.2 NRCN investigation/court case records</p> <p>1.2 Seizure records and follow-up actions taken</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>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>1.3 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>2.3 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 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>2.3 Internal record of engagement with FIA</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>

<p>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 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>	<p>Sufficient resources for mobile scanners to be used for pangolin detection</p>
<p>4. Public-facing materials to raise awareness of criminality and corruption associated with the global pangolin trade.</p>	<p>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>	<p>4.1 Media articles 4.2 NGO reports/publications, social media communications 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> <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</p> <p>1.4 Field work to ground-truth desk-based research, gather information on trade incidents, download & transcribe findings</p> <p>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> <p>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>1.7 Prepare amendments to national regulations to integrate provisions for CITES Appendix I listing and disseminate to law-makers</p>			

- 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.
-
- 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

Table 1 Project Standard Output Measures

Code No.	Description	Gender of people (if relevant)	Nationality of people (if relevant)	Year 1 Total	Year 2 Total	Year 3 Total	Total to date	Total planned during the project
Established codes								
9	Pangolin law and trafficking awareness posters (x2) distributed to police, wildlife, and customs authorities across Uganda			1	1		2	2
10C	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		Uganda		92		100	72
10F	Between 14 and 18 April 2019, 20 individuals from UWA, NRCN, UPF, DPP and FIA participated in a 4-day financial intelligence workshop		Uganda		20		20	10
11A	Trafficking networks investigated by EIA in depth includes one that links to China, one involving an East African national linked to a wider trafficking network in Uganda, and one Vietnamese syndicate.		Uganda, Vietnam, China		3		3	3
11B	Illicit pangolin products such as scale, skins, and live animals have been seized by NRCN, UWA and UPF through law			33	40	60	133	

	enforcement operations							
13A	Arrests of individuals found in possession of pangolins and their derivatives or involved in their trafficking		Uganda, DRC, South Sudan, Vietnam	33	40	60	133	
13C	Individuals submitted for prosecution at the Standards, Utilities and Wildlife Court (at Buganda Road Court, Kampala)		Uganda, DRC, South Sudan,	17	30	34	81	
13E	Intelligence reports on pangolin trafficking in Uganda used for investigations planning and the preparation of analytical outputs			0	170	43	213	
15A								
15B	Intelligence assessment on a transnational pangolin trafficking shared with Interpol			0	0	1	1	
15C	Uganda Wildlife Act 2019 (including protections for pangolins) enacted in 2019			0	1	0	1	1
17B	Financial investigations training (1-week), UPF wildlife law awareness training (1-week), JFIT roundtable and NRCN financial investigations case review/intelligence training (1-week)			0	3	0	3	2

Table 2 Publications

Title	Type (e.g. journal)	Detail (authors, year)	Gender of Lead	Nationality of Lead Author	Publishers (name, city)	Available from (e.g. weblink or publisher if not available online)
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	s, manual , CDs)		Author			
Smoke and Mirrors: China's complicity in the global illegal pangolin trade*	Public-facing report	EIA, October 2020	Male	UK	Environmental Investigation Agency, London, UK	https://eia-international.org/report/china-as-complicity-in-the-global-illegal-pangolin-trade-smoke-and-mirrors/
Out of Africa: How West and Central Africa have become the epicentre of ivory and pangolin scale trafficking to Asia*	Public-facing report	EIA, December 2020	Female	India/UK	Environmental Investigation Agency, London, UK	https://eia-international.org/wp-content/uploads/Out-of-Africa-SINGLE-PAGES.pdf
Double Impact: The Nexus where wildlife and forest crime overlap*	Public-facing report	EIA, January 2021	Male	UK	Environmental Investigation Agency, London, UK	https://eia-international.org/report/double-impact-the-nexus-where-wildlife-and-forest-crime-overlap/
Off the Hook: The need for transparency and accountability in tackling wildlife crime*	Public-facing report	EIA, March 2021	Female	India/UK	Environmental Investigation Agency, London, UK	https://eia-international.org/report/off-the-hook-the-need-for-transparency-and-accountability-in-tackling-wildlife-crime/

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

Checklist for submission

	Check
Is the report less than 10MB? If so, please email to IWT-Fund@itsi.co.uk putting the project number in the subject line.	
Is your report more than 10MB? If so, please discuss with IWT-Fund@itsi.co.uk about the best way to deliver the report, putting the project number in the subject line.	x
Have you included means of verification? You should not submit every project document, but the main outputs and a selection of the others would strengthen the report.	x
Do you have hard copies of material you need 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	x
Have you completed the Project Expenditure table fully?	x
Do not include claim forms or other communications with this report.	