



Illegal Wildlife Trade (IWT) Challenge Fund Final 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-terms-and-conditions/>). It is expected that this report will be a **maximum** of 20 pages in length, excluding annexes.*

IWT Challenge Fund Project Information

Project reference	IWT056
Project title	Strengthening Enforcement against the Illegal Pangolin Trade in Uganda
Country(ies)	Uganda
Lead organisation	Environmental Investigation Agency (UK)
Partner institution(s)	Natural Resource Conservation Network (NRCN)
IWT grant value	£399,203
Start/end dates of project	1 July 2018 to 31 March 2021 (extended to 30 September 2021)
Project Leader’s 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. 15/12/21

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 was 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 transnational 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.

Between years 1 and 2, EIA developed and maintained working relationships with project partners in Uganda through quarterly in-country visits. Country visits provided vital opportunities for in-person discussions over strategy development, work planning, activity implementation, problem solving and M&E. Following the onset of the COVID-19 pandemic, the M&E plan was adapted so that engagements between EIA and NRCN were carried out virtually. 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. During visits to Uganda, the Senior Pangolin/Principal Campaigner met government officials in the UWA, UPF, Uganda Revenue Authority and Financial Intelligence Authority (FIA). Due to COVID-19, since March 2020, EIA has been unable to undertake any in-person engagements with Ugandan government officials. However, there have been email exchanges with UWA and the FIA).

NRCN has coordinated with other stakeholders in Uganda through the National Wildlife Crime Coordination Task Force (NWCCTF). This includes WCS and the USAID Combating Wildlife Trafficking in Uganda project. NRCN has also conducted and coordinated law enforcement investigations into pangolin traffickers in cooperation with Focused Conservation. 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. Other NGOs engaged at an early stage of the project included: WildAid, Uganda Conservation Foundation and Tikki Hywood Foundation (Zimbabwe).

Through our investigations in Uganda, EIA identified DRC as a priority pangolin scale source country. Working in partnership with Conserv Congo through a project (CV19RR06) in late early 2021 Conserv Congo conducted field investigations into the sourcing and export of pangolin scales and elephant ivory from DRC. This project also facilitated a new collaboration between NRCN and Conserv Congo on cross-border investigations for which a Memorandum of Understanding was signed in February 2021.

Throughout the project, EIA and NRCN have undertaken some engagements with the UK High Commission in Kampala. This included a meeting at the High Commission on 4 February 2020 with Nicholas Rae (Second Political Secretary). An additional virtual call on 3 March 2021 was held with Simon Tucker (First Political Secretary) and Simon Harris (Second Political Secretary). Topics of conversation covered financial investigations, wildlife trafficking issues, public communications, and government engagement strategies.

Wildlife trafficking issues in Uganda have received considerable interest over recent years and the country has a busy wildlife conservation donor/NGO landscape. There is a need for enhanced coordination between donors, NGOs and UN agencies to ensure efficiencies in strategic approaches and programme implementation. EIA and NRCN seek to continue their partnership beyond this project and are currently discussing a renewed MoU and future strategic directions/project concepts.

3. Project Achievements

3.1 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

Throughout the course of the project, EIA has investigated 10 persons of interest for transnational pangolin trafficking in Uganda¹. Information was collected using undercover investigations (in-person and virtual), open-source research and anonymous sources.

Four separate criminal networks were investigated in-depth, this included the following cases: one involving the abuse of Uganda's wildlife use rights system by a Chinese national linked to TCM interests and their associates (Lead 1), one involving an East African national involved in sourcing pangolin scales from Central/East Africa for export to Asia (Lead 2), one involving illicit wildlife product suppliers of a significant transnational Vietnamese syndicate (Lead 3), and one involving several wildlife traffickers of West African origin (Lead 4). Intelligence was also generated on individuals and entities involved in pangolin trafficking outside of these networks. It is also important to note that wildlife trafficking networks are horizontal in nature and dynamic, meaning that the role of individual traffickers is often fluid, and they can shift between different networks or work with more than one network depending on their motivations, specialism, or seniority.

Three intelligence assessments were generated each of which included network charts of pangolin trafficking networks². Confidential information on intervention points/intelligence recommendations relating to all three networks was shared by EIA to NRCN and selected international law enforcement/government agencies to inform law enforcement investigations³.

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

NRCN investigates and prosecutes cases under their MoU with UWA, and cooperates closely with the UPF and DPP. Between 2019 and 2021, 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 and has not led to a positive prosecutorial outcome. To review the challenges faced by this investigation and prosecution, EIA commissioned a case review (see Output 2.1). Over the course of the project, NRCN has supported UWA to conduct investigations into a total of 13 mid- to high- level persons of interest for pangolin and other wildlife trafficking, the individuals represent at least 8 separate wildlife trafficking networks (three of the individuals investigated by NRCN

¹ See doc 'POI_list' in 'output_1.1_1.2_intelligence_outputs'

² See docs in 'output_1.1_1.2_intelligence_outputs/reports_network_chart_maps'

³ See doc 'pangolin_m&e_datasheets-updated' sheet 'OUTPUT_1.1_1.2_INTEL_DISSEMIN'

were also investigated by EIA)⁴. The names of these individuals are confidential due to the sensitivity of the investigations. However, NRCN played a pivotal role in the investigation into Moazu Kromah (a Liberian national resident in Uganda) who was arrested by UWA and deported to the USA for prosecution in 2019. Although the US indictment for Kromah listed ivory and rhino horn trafficking crimes, he was also known to be involved in pangolin scale trafficking.

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

In July 2019, the Uganda Wildlife Act was assented by the President of Uganda and this entered force in September 2019⁵. The new act lists all four African pangolin species as protected species in its third schedule and all species listed in any international convention (such as CITES) are treated as protected species. Under the law, pangolin trafficking offences are therefore "liable to a fine not exceeding ten thousand currency points or to life imprisonment or both". To support engagement efforts to ensure the Bill was assented, NRCN engaged and cooperated with UWA, the Ministry of Tourism, Wildlife and Antiquities and WCS.

To build awareness of the Uganda Wildlife Act, NRCN conducted five regional 1-day workshops in September 2019 with the UPF on illegal pangolin trade and the laws relevant to wildlife trafficking in Uganda (including the Uganda Wildlife Act)⁶. The workshops were co-financed by USFWS and The Wildcat Foundation and took place in the Central, Western, Northern, West Nile and Eastern regions. Awareness was also built on the roles and responsibilities of UPF and NRCN in detecting, investigating and prosecuting wildlife crimes. In addition to this, NRCN/EIA produced two posters to raise awareness of pangolins and their products amongst UWA, UPF and URA enforcement officers.

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

NRCN have conducted 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 supported UWA and UPF to undertake operations that led to the arrest of 132 traffickers involved in the sourcing of pangolins and their products in and around Uganda⁷. Of the 132 traffickers arrested, 61 traffickers were convicted, with 4 receiving a caution, 18 receiving a custodial sentence with a fine, and 5 receiving only a custodial sentence.

On cases that NRCN prosecuted or supported there was a 79% conviction rate (61 convicted / (convicted + closed = 77) *100)⁸. 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 have worked with UWA to conduct an assessment of how a wildlife valuation guideline can be produced in Uganda.

Activities under this objective were enhanced through the award of 'CV19RR06 - Responding to COVID-19 impacts on wildlife trafficking in Uganda/DRC'. With this co-financing NRCN initiated cross-border wildlife trafficking investigation collaboration activities with Conserv Congo in DRC.

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

⁴ See doc 'POI_list' in 'output_1.1_1.2_intelligence_outputs'

⁵ See doc 'Uganda-Wildlife-Act-2019' in 'output_1.3_new_laws'

⁶ See doc 'Police training workshop report1' in 'activity_1.9_LE_awareness\year_2'

⁷ See doc 'pangolin_m&e_datasheets-updated' sheet 'OUTPUT_1.4_NRCN_LE'

⁸ See doc 'pangolin_m&e_datasheets-updated' sheet 'OUTPUT_1.4_CONVICT_RATE'

With co-financing from David Shepherd Wildlife Foundation (DSWF), NRCN and EIA held a 4-day wildlife trafficking financial investigations workshop in April 2019 in Kampala, Uganda⁹. The workshop was delivered by two expert international consultants (Neil Bennett and David Artingstall) and involved 20 individuals from UWA, NRCN, UPF, DPP and FIA. Participants had a variety of roles within their own organisations, including investigators, analysts, and prosecutors, 12 of these were from government agencies. The training programme filled an identified capacity gap that investigators and prosecutors of wildlife crimes in Uganda did not have the skills and experience necessary to build cases for associated financial crimes, or to use financial intelligence techniques to assist in their wildlife cases. It consisted of a mix of theory teaching, an emphasis on practical exercises and local expert input from public and private sectors. Special speakers were drawn from Western Union, Standard Chartered Bank, Airtel Money, URA, Ministry of Justice (Chief Magistrate) and FIA.

Output 2

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 and NRCN finalised a financial typology on the Vietnamese network involved in the export of elephant ivory and pangolin scales from Uganda in 2019¹⁰. The typology will assist recipients' understanding of client and transactional risk exposure from pangolin trafficking. While EIA's and NRCN's investigations into pangolin traffickers have generated significant intelligence on methods of operation, trafficking routes, individuals involved and corruption, detailed financial intelligence has not been sufficient to produce a second typology. This is because much of this intelligence is held by government agencies and often only comes to light through court proceedings/judgements for mid- to high-level traffickers.

To ensure delivery of this output, EIA produced two additional documents. One of these was a financial red-flag document detailing notable characteristics and patterns associated with pangolin and ivory trafficking in Uganda. Another output was a technical review of the Vietnamese case assessed in the financial typology by a wildlife crime consultant (WildCrime)¹¹. The goal of this was to review the challenges faced with this case and identify lessons learned and recommendations (see Section 9 for more information).

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

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.

During the project (years 1 to 3), 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)¹².

In January 2021, EIA took over management of the wildlife crime reporting aspect of the KYC Media Monitoring system from Liberty Shared. 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.

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)

⁹ See docs in 'activity_1.10_financial_investigations\year_2\NRCN_finance_intel_training_report-apr19'

¹⁰ See docs in 'output_2_financial_sector\output_2.1_typologies'

¹¹ See doc 'VN_case_review_summary-CONFIDENTIAL' in 'output_2_financial_sector\output_2.1_typologies' (note this is a shortened summary of the actual document since it contains confidential information)

¹² See doc 'EIA KYC submissions - April 2020 - March 31 2021' (Password: 'MMWildlife') in 'output_2.2_LS_submissions'

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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) in April 2021. 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.

In September 2021, EIA publishing a briefing document titled "The role of transnational criminal networks and China's legal pangolin scale medicine market in driving the global illegal pangolin trade"¹³. This document outlined key information on key elements of how the global pangolin trade is being conducted and included a section on law enforcement issues relating to pangolin trafficking, including the need for financial investigations. To build awareness of these issues amongst regional AML stakeholders in East Africa, in September 2021, EIA shared this document with Joseph Jagada, Principal Expert at the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) Secretariat.

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.

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 RUSI¹⁴ ¹⁵. 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.

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 investigations¹⁶. 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 assessment¹⁷. 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.

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

¹³ See doc '2021-Pangolin-CITES-Briefing-SPREADS' in 'EIA_public_facing_reports'

¹⁴ See docs in 'output_3_transport_sector/year_3'

¹⁵ See doc 'Round table meeting report – NRCN' in 'output_3_transport_sector/year_3'

¹⁶ See doc 'EIA_IS_0330_Transport Red Flags' in 'output_3_transport_sector/year_3'

¹⁷ See doc 'Double-Impact-2020-SPREADS' in 'output_4_public_media/year_3\EIA_public_facing_reports'

guidelines for the International Maritime Organisation, in collaboration with other stakeholders, for tackling wildlife trafficking.

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 in September 2021, EIA and NRCN facilitated the introduction of Sewante Muhammad at Uganda's Ministry of Works and Transport to Ian Cruickshank at the United for Wildlife Transport Taskforce. Unfortunately, to date, the Ministry has not signed the declaration. It is also known that the Transport Taskforce sought to encourage Uganda Airlines to sign-up to the taskforce but again this has to date not been successful.

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

UNODC Container Control Programme point of contact David Dongo told EIA/NRCN in October 2019 that the URA scanners were deployed at the Uganda-Kenya border at Busia (to Kisumu, Kenya) and Malaba (to Eldoret, Kenya) and at these locations the scanners check 100% of containers. NRCN have observed a URA scanner in operation at the Mutukula border in mid-2021. We also 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. It is understood that COVID-19 impacted border inspections between March and July 2020. In year 3, NRCN disseminated a pangolin identification poster (see output 2) with law enforcement officers (including URA) at priority wildlife trafficking hubs across Uganda.

Output 4

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

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 countries¹⁸.

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). A total of 15 media reports on pangolin trafficking were published by the Ugandan media (4 in year 1, 8 in year 2, and 3 in year 3), EIA published 69 pangolin-related news articles and blogs on its website (8 in year 1, 23 in year 2, 22 in year 3, and 6 in year 4) focusing on a range of topics including China's domestic wildlife market and Wildlife Protection Law, transnational pangolin trafficking, and a lack of action by governments to address pangolin trafficking and corruption.

To present findings from our investigations into transnational pangolin trafficking and draw attention to policy, governance, legal and law enforcement issues EIA published a total of 13 public-facing reports (2 in year 1, 1 in year 2, 4 in year 3 and 6 in year 4). The target audiences of the reports included: CITES Management Authorities, pangolin source, transit and consumer country governments, regional governments, international organisations (CITES Secretariat, UN, UNODC, etc), law enforcement, NGOs, journalists, and researchers. Many of these reports included information gathered through EIA investigations conducted in Uganda, but also information from open-source research and EIA investigations in other countries of concern for pangolin trafficking (e.g. Nigeria, Vietnam, and China).

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

¹⁸ See docs in 'output_4_public_media'
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was accompanied with a press release and received significant media attention. In mid-2021, VICE News released a short documentary on the global illegal pangolin trade featuring an interview with the Principal Campaigner, Chris Hamley¹⁹. The video has now had over 1.6 million views on YouTube.

To build awareness of key pangolin trafficking issues amongst CITES Parties and encourage action, policy advocacy has been undertaken in association with various CITES meetings, including CoP-18 in Geneva, Switzerland in August 2019, and the 31st meeting of Animals Committee in June 2021. In association with these meetings, EIA has shared briefing documents with CITES stakeholders highlighting recommendations to enhance action on transnational pangolin trafficking. This included the September 2021 briefing “CITES Briefing Document: The role of transnational criminal networks and China’s legal pangolin scale medicine market in driving the global illegal pangolin trade”.

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

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 pangolins²⁰. 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.

EIA has collated information from publicly available and confidential sources (English, French, Vietnamese and Chinese language media articles, and partner reports) on pangolin seizure incidents (including scales and whole live/dead animals) that took place globally during the reporting period. The EIA Intelligence Team developed and introduced a new Microsoft PowerBI database (‘Global Environmental Crime Tracker’²¹) 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 2,063 pangolin incident records globally for the period 2000 to 2021 and from 01/07/2018 to 30/09/2021 there are 928 datapoints. The updated dataset is accessible to the public through EIA’s website. Across all years of the project, information from the pangolin global seizure dataset was shared with journalists, NGOs, researchers, and government agencies. Recipients included Interpol, TRAFFIC, UNODC, CITES Secretariat, and various media outlets including the BBC and The Independent²².

3.2 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.

Information on pangolin trafficking networks operating in Uganda was generated from open-source research, field investigations, anonymous sources, and closed-sources. This resulted in the production of 337 intelligence reports (year 1: 1, year 2: 170, year 3: 42, and year 4: 124) and three intelligence

¹⁹ VICE News. 2021. ‘Inside the Global Underground Wildlife Trafficking Market’

<https://www.youtube.com/watch?v=f0fUIWJ8VsE&t=6s>

²⁰ See doc ‘EIA US Pangolin Pelly China Petition - 8.6.2020’ in ‘output_4_public_media\year_3\EIA_Pelly_petition’

²¹ <https://eia-international.org/global-environmental-crime-tracker/>

²² See doc ‘pangolin_m&e_datashets-updated’ sheet ‘OUTPUT_1.1_1.2_INTEL_DISSEMIN’

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assessments (including three network charts - Output 1.1)^{23 24}. Information was generated on the identities of traffickers, associates, stockpiles, methods of operation (incl. trafficking routes, concealment, corruption, communication methods, species convergence), cover companies, and financial activities of individuals involved in the sourcing and export of pangolin scales from Uganda and other African countries to Asia.

Through the investigations in Uganda, EIA documented how West and East African (incl. Guineans, Nigerians, Liberians), and Asian (incl. Chinese, Vietnamese) nationals exploit Uganda's under-resourced law enforcement sector and corruption prevalence to consolidate and export pangolin scales. We identified that pangolin scales are often sourced or stored in countries such as South Sudan, DRC, Central African Republic, Burundi and then consolidated for onward shipment to Asia from Uganda.

To advocate for international and national law enforcement agencies to effectively investigate serious pangolin traffickers, EIA has strategically disseminated intelligence with trusted partners. Intelligence dissemination has involved a combination of providing in-person or virtual briefings, or sharing confidential documents. The main formats for dissemination have included intelligence reports, summaries and red-flags, and assessments. During the project EIA disseminated 86 intelligence documents (10 intelligence reports, 30 intelligence summary, 13 intelligence assessments, 16 seizure dataset, and 17 other) to law enforcement, NGO partners, the media and academia²⁵. Recipients have included USFWS Office of Law Enforcement, US Homeland Security Investigations, US State Department, China Customs Authority Anti-Smuggling Bureau, United for Wildlife, Uganda Financial Intelligence Agency, NRCN, Conserv Congo, RUSI, CITES Secretariat, and the UNODC.

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.

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) in April 2021. 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 in March 2021.

EIA/NRCN met with the Uganda FIA represented by Sydney Asubo and Wesonga Benjamin in January 2020. At this meeting, discussions focused on the sharing of information between NRCN/EIA and the FIA to support financial investigations into wildlife/pangolin traffickers. This has led to the integration of financial intelligence into NRCN's pangolin trafficking investigations. 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 Financial Taskforce.

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 investigations²⁶. 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 in April 2021. 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. Information shared

²³ See doc 'pangolin_m&e_datasheets-updated' sheet 'OUTPUT_1.1_1.2_INTEL_REPORTS'

²⁴ See docs in 'output_1.1_1.2_intelligence_outputs\reports_network_chart_maps'

²⁵ See doc 'pangolin_m&e_datasheets-updated' sheet 'OUTPUT_1.1_1.2_INTEL_DISSEMIN'

²⁶ See doc 'EIA_IS_0330_Transport Red Flags' in 'output_3_transport_sector/year_3'

with UfW was included in their monthly intelligence bulletin. A red-flag briefing document titled ‘Information Briefing for Uganda Transport Sector on Illegal Wildlife Trade Risks’ was prepared²⁷. 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. During the roundtable event, the NRCN data analyst gave a presentation on the transportation methods used by pangolin trafficking networks in Uganda.

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

Across years 1 to 3, based on NRCN investigations, UWA and UPF have made 132 arrests for pangolin trafficking during the project (note, the year 4 no-cost extension did not include budget for investigations in year 4)²⁸. A total of 61 pangolin traffickers were successfully convicted (in addition to 4 who received cautions) and 16 were acquitted due to insufficient evidence/poor investigation. Of the 61 convictions, 60 received custodial sentences, and a total of 866 months of custodial sentences issued, with a mean sentence of 14 months. A total of UGX (GBP) of revenue was generated for the Ugandan government from fines and the mean fine was UGX (GBP). Four government officials were arrested for pangolin trafficking, including one individual each from Uganda’s Internal Security Organization (ISO), 3rd Div Headquarters of UPDF, and Military Police, as well as an officer from the South Sudan Police Service. Two of these individuals were convicted.

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

To build awareness of the Uganda Wildlife Act, NRCN conducted five regional 1-day workshops in September 2019 with the UPF on illegal pangolin/wildlife trade and the laws relevant to wildlife trafficking in Uganda (including the Uganda Wildlife Act)²⁹. A total of 92 UPF officers participated in the awareness workshops (14 - West Nile, 16 – North, 21 – Eastern, 18 – Central, 23 – Western). Content of the workshops included: wildlife conservation, laws governing wildlife in Uganda, offences under the wildlife act, CITES, role of UPF in wildlife conservation, mandate of UPF in combating wildlife crime, investigation procedures and methods of concealment.

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

In Uganda there has never been any successful prosecutions of wildlife traffickers for offences under the Anti-money Laundering Act (2013). NRCN have also proactively incorporated financial investigation techniques into their investigations of pangolin traffickers, including the use of financial profiles. 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), members of this include UWA, FIA, URA, DPP, UPF and NRCN³⁰. The mandate of the JFIT is to cooperate on financial investigations on cases of serious pangolin/wildlife trafficking. The goal of this activity was to generate the institutional support and structures for effective investigations that lead to prosecutions for money laundering offences associated with pangolin/wildlife trafficking. The focus on engagements with the JFIT members has been to assess challenges and identify future opportunities to ensure that parallel financial investigations are conducted on wildlife crime cases. This has involved reviewing historical cases, such as that of Moazu Kromah and the Vietnamese syndicate involved in the trafficking of pangolin scales and ivory seized in January 2019.

²⁷ See doc ‘Uganda transport sector briefing document – 2020’ in ‘output_3_transport_sector\year_3’

²⁸ See doc ‘pangolin_m&e_datasheets-updated’ sheet ‘OUTPUT_1.4_NRCN_LE’

²⁹ See docs in ‘activity_1.9_LE_awareness\year_2’

³⁰ See docs in ‘activity_1.10_financial_investigations\year_2\lessons_learned_exercise-jan20’

To support ongoing efforts to draw lessons learned from wildlife crime related financial investigations work in Uganda, in mid-2021, EIA provided information and peer-review support for a report produced by RUSI, NRCN and WCS³¹. The NRCN Executive Director, Vincent Opyene, was a co-author of this report.

3.3 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 a high-level Malian pangolin trafficker.

During the project, 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

Under Uganda's national money laundering and terrorist financing national risk assessment report (2017), wildlife crime was assessed to cost Uganda USD 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 opposition³².

Law enforcement agencies respond positively to independent findings

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. As members of the taskforce, these companies would have received UFW intelligence bulletins containing EIA intelligence. 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.

³¹ RUSI. 2021. Occasional Paper Illegal Wildlife Trade in Uganda Tracking Progress on 'Following the Money'. Available online: <https://static.rusi.org/295-OP-IWT-Uganda.pdf>

³² <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/>

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 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

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

Output assumptions

Output 1

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

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 utilized its membership of the UfW Financial Taskforce to disseminate four typologies to some of the 45 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 2020, 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 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 3.1 (output 3.3), URA informed EIA/NRCN that the URA scanners were deployed at the Uganda-Kenya border at Busia (to Kisumu, Kenya) and Malaba (to Eldoret, Kenya). NRCN have observed a URA scanner in operation at the Mutukula border in mid-2021, no additional 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.

3.4 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 against Transnational Organised Crime 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 transnational 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.

From March 2020, EIA/NRCN 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 has provided law enforcement agencies both in Uganda and internationally with information on the modus operandi, logistics, structures, offender characteristics and interrelations on pangolin trafficking networks. This has been used to inform investigations that strategically disrupt these networks through arrests and prosecutions, and in turn creating a situation in which wildlife traffickers face greater risks of arrest and prosecution. The project has worked to deliver this impact by 1) generating intelligence on individuals and networks involved in trafficking pangolin in Uganda (337 new intelligence reports, two intelligence red-flag documents targeting the transport and finance sectors, and three intelligence assessments) and the dissemination of this to relevant investigation agencies, and 2) through the arrest of 132 offenders for pangolin trafficking, 61 suspects were successfully convicted (including 2 government security sector staff).

Kasane statement:

The Republic of Uganda is a signatory of both the Kasane statement and the London Declaration on the Illegal Wildlife Trade, and this project has supported the implementation of several objectives from both. These include those on investigating and prosecuting financial crimes (Kasane – actions B4 and B5, London paragraphs 10, 11 and 12) and building support from the transport sector on pangolin trafficking (Kasane – action C8). 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 and providing capacity building support to Uganda government stakeholders and NRCN to conduct parallel financial investigations; 2) Uganda's public transport sector stakeholders have been 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 an enhanced understanding of the national and transnational pangolin trafficking situation (outputs 1.1 and 1.2), involvement of organised crime groups in pangolin trafficking, and built capacity to utilise intelligence-led techniques and financial investigations (output 2.1, and outcomes 0.1, 0.2 and 0.6). By linking information on pangolin trafficking networks with criminal investigations conducted by NRCN and UWA, as well as international law enforcement agencies, 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 (output 1.4, and outcome 0.1). This disruption has broken the supply chains established by such criminal networks 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 has not had any direct poverty alleviation impacts conceived in its design. As highlighted in section 3.4, the project has however had 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 has supported 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. In Uganda, NRCN acts as one of the most effective civil society 'watchdogs' on the activities of the government to combat wildlife trafficking, but also on the illegal activities of government officials in the sourcing and export of illegal wildlife products (specific cases are confidential and cannot be reported here). 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) conducted 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 completed a technical assessment that provided 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 132 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 3.1 output 1.5, the financial investigations workshop completed in April 2019 had 20 participants, of these 5 were women. Participants were largely selected by the leadership of the government agency with which they work based on the applicability of their role to the training. However, some key and inspiring women performed influential roles during the training, this included Chief Magistrate HW Patricia Amoko who delivered a special presentation on challenges relating to the prosecution of financial criminal offences.

As reported under section 3.1 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.

In year 1, NRCN had a total of 34 staff of which 12 were women, in year 2 it had 33 staff of which 14 were women, and in year 3 it had 29 staff of which 11 were women. Women performed roles such as 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. As highlighted below in section 9, NRCN worked with WildAid in year 2 (not funded under this project) to communicate publicly the achievements of Winnie Namayenje (NRCN/DPP Prosecutor) as a role model for wildlife conservation and criminal justice.

8. 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, 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 (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 collaborates 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. Financial investigations capacity building achievements as well as lessons learned delivered through the project will feed into the recently approved projects "IWT088 - Holding Uganda-based transnational wildlife criminals accountable by empowering financial investigations" and "IWT096 - Case closed? Using historic cases to enable new financial investigations". NRCN is a partner on IWT088 and EIA is a partner on IWT096. We plan to use the case review built through this IWT056 project on the Vietnamese network (section 3.1, output 2.1) as the basis for further participatory engagement with Uganda government agencies to draw lessons learned through IWT096. EIA also seeks to generate additional funds to support the implementation of projects that channel intelligence and investigations management support to NRCN, generate further research outputs on Uganda pangolin and elephant ivory trafficking, and the implementation of law enforcement investigations into DRC to Uganda wildlife trafficking.

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. Through this project, EIA has worked with its partners to produce a series of public-facing outputs, such as detailed research and investigations reports on transnational pangolin trafficking. All of these are publicly available on the EIA website and will remain so, these documents have provided a basis for policy advocacy engagements with a range of stakeholders to encourage larger-scale international action on pangolin trafficking. This will continue to have an impact beyond the timeframe of the project.

9. Lessons learnt

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

From March 2020, due to the COVID-19 pandemic, engagement and collaboration with partners shifted to virtual meetings. 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 when communicating online since third-party entities can potentially monitor or intercept conversations. 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.

NRCN investigations and prosecutions have resulted in a high conviction success rate for pangolin trafficking. This reflects the value of intelligence-led approach adopted, strong understanding of evidence requirements for wildlife prosecutions, and the existence of a special wildlife court (with judges sensitised to the provisions of the Uganda Wildlife Act). Essential to this work has been the development and maintenance of good relations between NRCN and UWA, UPF, and DPP both at the institutional level and with key individuals. NRCN draws on well-established relationships with individuals with a commitment to accountability, transparency and wildlife conservation in these three government agencies.

Throughout the project there has been a growing government and public understanding of the seriousness of wildlife crime, which contributes to building buy-in for action on trafficking cases. From year 2, this was especially the case in relation to government awareness on the vital role of financial investigations and AML prosecutions to combat serious wildlife trafficking. This has resulted in growing support for improved capacity and resources for financial investigations from key agencies. The financial investigations exercise conducted in January 2020 (see section 3.2, outcome 0.6) was specifically designed to function to build a better understanding of lessons learned, highlight successes and overcome barriers to effective implementation of Uganda's AML Act for wildlife trafficking cases. Bringing the relevant agencies together to discuss issues in the form of a roundtable event proved highly effective in building consensus and support for a solution (joint financial investigation team) that has considerable potential to provide the basis for successful investigations. EIA/NRCN lessons learned from financial investigations capacity building support work implemented in this project were reflected in the RUSI report covered in outcome 0.6.

At the request of NRCN, in April 2019 EIA assessed NRCN's internal intelligence processes. This assessment concluded that there was potential for additional training in three core areas: source record management, structured analytical techniques and case management and tasking. To resolve these gaps an EIA Intelligence Officer completed five days of intelligence training for two NRCN Database Managers and additional relevant investigations and prosecutions staff in October 2019. In February 2020, based on recommendations from the financial investigations lessons learned exercise, a second phase of intelligence training was completed. This focused on the development of investigation target subject profiles and the integration of these into NRCN's existing electronic case management system. The updated subject profiles include data entry fields that cover key aspects of a target's identity and associated details. It includes a checklist of open and closed sources that NRCN investigators can draw on as they implement their investigation strategies. Outputs from this work were also shared with RUSI for inclusion in their latest handbook on financial investigations (DEFRA IWT CF funded and produced in cooperation with EIA).

The passing and assent of the new Uganda Wildlife Act (2019) has been successful in including all four African pangolin species. However, during its development, NRCN raised concerns with UWA over the lack of a minimum penalty in section 71 (1) of the Act. This leaves discretion for penalties with the judiciary on a case-by-case basis. Despite NRCN engagement on the issue, no changes were made by the Ministry of Tourism, Wildlife and Antiquities. NRCN engagement with UWA on legal process/sentencing issues has focused on the development of the wildlife valuation guidelines, the Commissioner of Wildlife has explained that regulations to ensure minimum penalties to support the Act will be developed as and when the resources are available. To address issues over corruption in the judiciary, NRCN is implemented anti-corruption sensitisation training with DPP judicial officers (funded by a different donor). This sensitisation highlighted the negative impacts of wildlife crime corruption on Uganda's judicial system.

Furthermore, despite improvements in the previous version of the Wildlife Act, a Statutory Instrument required to outline which protected species are 'fully' or 'partially' protected is yet to be produced. This means that it is possible for globally threatened or CITES Appendix I listed to species to be legally exploited in Uganda. EIA has also identified significant issues relating to the abuse of the Wildlife Act's 'Wildlife Use Rights' system by wildlife traffickers and the lack of Non-Detriment Findings studies on CITES Appendix II listed species. To draw attention to this, a public-facing report on a case study relating to 'Lead 1' (output 1.1) is currently under production and due to be published by EIA in 2022.

Regarding the Vietnamese network presented in the typology produced under output 2, to evaluate the challenges that have led to poor performance on this case, EIA and NRCN recruited a consultancy (WildCrime) to conduct a comprehensive review of the case. This covered the investigation, international cooperation, links between the suspects and wider criminal networks, the use of financial investigation techniques, and the prosecution/court hearings. Drawing primarily on existing information such as case papers and intelligence reports, and some interviews, the case review established the following:

- A limited evidential investigation was conducted into the defendants, their associates, financial background and movements
- Many of the entities in the case, including companies and individuals, were not investigated
- An effective financial investigation did not take place on those charged, not charged but involved, or the companies linked to the suspects
- The services of Interpol were not utilised
- Challenges with inter-agency cooperation hindered the investigation
- COVID-19 related court closures in Kampala led to delays in the prosecution

The case review included a series of recommendations, amongst which were the following:

- The case was seen as worthy of prosecution and every effort should be made to see it through to a conclusion. Those defendants named on the indictment should be arrested and face trial.
- INTERPOL may be able to assist with liaison between Uganda, Vietnam and other countries to trace the defendants
- A continued investigation could, even without prosecutions, cause significant disruption to the network and frustrate their activities.
- Intelligence relating to this case should be carefully evaluated (graded), focusing on the most reliable elements. Information of unknown or dubious origin or quality should be treated accordingly.
- This case may still provide opportunities to develop soft capacity building, foster inter-agency cooperation, international cooperation, and counter-corruption etc.
- A critical debrief should be held focusing on the intelligence issues, addressing questions related to quality, assessments of quality, organisations involved in dissemination (including NGOs), reliance on the intelligence for issuing wanted notices, actioning arrests and charging individuals. The lessons learned could be developed into a useful guidance document.

The intention is for this case review to be continued with a visit by to Uganda to interview individuals knowledgeable about the case and gather more information to assess its challenges. It will also feed into planned work with RUSI under IWT096. Since the syndicate leaders associated with this case have not been investigated, a more in-depth review of the intelligence associated with the case is also planned to inform future investigations activity. It is highly likely these individuals continue to engage in transnational wildlife trafficking in Africa or Asia.

9.1 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 to year 4. 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 listed 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 or 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 were reflected in an updated M&E framework/collection plan.

In years 3 and 4, 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 twice annually across all years of the project). 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.

9.2 Actions taken in response to annual report reviews

Questions raised in previous annual reviews have been addressed in years 2 and 3 annual reports.

Points to note from previous annual review questions:

- Year 1: Changes to project log-frame. EIA submitted a log-frame change request to DEFRA in February 2020 that was approved in March 2020. This updated log-frame responded to comments regarding overlap between outcome and output indicators to the best extent possible without changing or expanding the project.
- Year 2. 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. As reported in section 3.1 output 3.3, NRCN have recently observed a scanner in use at the Mutukula border crossing. Effort has also been made to disseminate materials with UWA, UPF and URA to aid in the identification of pangolin parts. However, such identification using a scanner requires different and more technical expertise. Given that there was only one seizure of wildlife (that of ivory and pangolin scales in January 2019) linked to the use of the scanner, we have low confidence that it is being strategically used in an intelligence-led capacity to detect illicit wildlife.

Year 3

- Please provide references to the evidence documents in the running narrative text (ideally through hyperlinks)
Footnotes with references to evidence documents applied throughout this document.
- Is it possible to spell out the implications of the issues mentioned relating to the financial typology discussed under output indicators 2.1 and 2.3?
Addressed in full under section 9 on lessons learned.
- It would be interesting to learn more of the work of the wider pangolin programme mentioned at Section 13 of AR3 – and of how the efforts of this IWTCF project are integrated and coordinated with it

This IWTCF project contributed to the delivery of the pangolin programme strategic areas, which include: Outcome 1 - Demand for pangolin parts and derivatives in major consumer countries such as China and those in West, Central and East Africa is significantly reduced or eliminated; Outcome 2 - Ability of transnational pangolin trafficking networks to operate with impunity in West, Central and East Africa, as well as South East and East Asia is significantly curtailed; Outcome 3 - Pangolin 'captive-breeding' is not pursued as a viable option to supply pangolin parts and derivatives in China or transit/source countries (in Africa and South East Asia); and, Outcome 4 - National level wildlife activist and conservation civil-society organisations in Africa and Asia effectively campaign for pangolin/wildlife protection and government accountability on wildlife crime (cross-cutting outcome).

This project was implemented with co-financing provided from Friedman French Foundation, National Geographic Society, and the David Shepherd Wildlife Foundation. Based on lessons learned from this project and strategic priorities, in October 2020, the pangolin programme initiated cross-campaign activities with EIA's elephant programme in West and Central Africa. This includes activities in Nigeria, Cameroon and Gabon funded by INL and IWT101 to address that region's significant role in transnational pangolin/ivory trafficking. We are also implementing activities to encourage action by government, particularly in China, to eliminate demand for pangolin scales, including drawing attention to the role of the legal market for pangolin medicine.

- Reporting of expenditure against budget could be clearer (See comments at Section 14 below)

Year 3 financial report edited and sent to LTS/DEFRA following annual report review in June 2021.

10. 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 included 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.

11. Impact of COVID-19 on project delivery

Year 3 of the project was 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.

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 increased the costs associated with transport and demanded more resources to gather intelligence and transfer suspects. Furthermore, from March 2020 to project end, EIA staff were 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 from March 2020 and the Senior Management Team met regularly to review the COVID-19 situation. The EIA office in London reopened from mid-2021 for a minimum number of staff according to social distancing procedures. The use of virtual meetings has

enhanced team collaboration and coordination, and when combined with regular in-person team interactions through hybrid working it has proven to be an effective and more productive model of working. EIA is likely to continue with this approach. However, the lack of travel for partner engagements, policy meetings/conferences, networking events and other stakeholder related engagements has affected our ability to develop new relationships and influence directly.

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 9).

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.

12. Finance and administration

12.1 Project expenditure

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)				
TOTAL				

Staff employed (Name and position)	Cost (£)
FATONA - MANAGEMENT ACCOUNTANT	
HAMLEY - SENIOR PANGOLIN CAMPAIGNER	
MALLU - PROJECT FINANCE MANAGER	
MILNES - VISUAL COMMS EDITOR	
NEWMAN - CAMPAIGNS DIRECTOR	
THORNTON - SENIOR INTELLIGENCE OFFICER	

VILA-RAGUZ - PROJECT FINANCE MANAGER	
POOPALARAJAH - PROJECT FINANCE MANAGER	
LEE - PANGOLIN INVESTIGATOR 1	
BROOME - SNR INTELLIGENCE OFFICER	
MICALLEF - RESEARCHER	
TOTAL	

Capital items – description	Capital items – cost (£)
TOTAL	

Other items – description	Other items – cost (£)
TOTAL	

12.2 Additional funds or in-kind contributions secured

Please confirm the additional funds raised for this project. This will include funds indicated at application stage as confirmed or unconfirmed, as well as additional funds raised during the project lifetime. Please include all funds relevant to running the project as well as levered funds for additional work after the project ends.

Were any additional in-kind contributions secured during the project?

Source of funding for project lifetime	Total (£)
TOTAL	

Source of funding for additional work after project lifetime	Total (£)

TOTAL	
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12.3 Value for Money

The project delivered good value for money through various means. For instance, for EIA travel arrangements to Uganda, permitted costs of flights and hotels were set within reasonable limits to ensure that the work was delivered to high standards. International travel has only been undertaken when necessary. Travel related budget changes due to COVID-19 have supported additional staff time as well as consultancies that have enhanced project management, intelligence analysis and lessons learned. Within Uganda, NRCN has a robust financial management system that ensures that investigations and project costs are reasonable in relation to the kind of activity implemented.

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

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

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

Note: Insert your full logframe. If your logframe was changed since your application and was approved by a Change Request the newest approved version should be inserted here, otherwise insert application logframe.

Project summary	Measurable Indicators	Means of verification	Important Assumptions
<p>Impact: (Max 30 words) The illegal wildlife trade is no longer the primary threat to pangolins; intelligence-led enforcement reduces the impacts of the illegal trade on rural local communities</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</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</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>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>0.3 annual report of transportation taskforce</p> <p>0.3 enforcement alerts</p> <p>0.3 policy announcements</p> <p>0.3 EIA intelligence disseminations</p> <p>0.4 Uganda Wildlife Authority / NRCN pangolin arrest and prosecution outcome database</p> <p>0.5 NRCN report on workshop implementation (with results from questionnaires) conducted under their UWA MoU</p> <p>0.5 Participant lists from NRCN workshops</p> <p>0.5 Law enforcement awareness posters</p> <p>0.6 Uganda Wildlife Authority / NRCN pangolin arrest and prosecution outcome database</p> <p>0.6 NRCN/ investigation/court case records</p>	
<p>Outputs:</p> <p>1. Law enforcement agencies, specialist investigation units (including FIUs) and prosecutors in Uganda, are provided with the information they need to conduct intelligence-led enforcement and financial investigations, and the</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>1.1 Intelligence assessments (that include criminal network association charts)</p>	<p>As implementation rests with government agencies, assumes that governments are genuinely committed to ending illegal wildlife trade and will respond appropriately to the independent research findings from the project.</p>

<p>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>1.2 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>1.2 NRCN investigation/court case records 1.2 Seizure records and follow-up actions taken</p> <p>1.3 Media articles 1.3 Government reports to CITES (particularly those submitted to support resolution Conf. 17.10 Conservation of and trade in pangolins)</p> <p>1.4 NRCN investigation/court case records 1.4 Uganda Wildlife Authority / NRCN pangolin arrest and prosecution outcome database</p> <p>1.5 and 1.6 Minute meetings with UWA; UWA reports and policy documents</p> <p>1.6 NRCN training workshop report including pre and post training questionnaires for participants</p>	
<p>2. The financial sector (including public and private sector institutions) have the information they need to produce policies and other actions that combat the link between illicit financial flows and pangolin crime/trafficking.</p>	<p>2.1 Number of financial typologies relating to pangolin trafficking networks produced and shared with banking institutes (baseline of zero in 2017 to target of one by December 2019 and two by December 2020)</p> <p>2.2 Number of accepted submissions to Thomson Reuters World-Check increases from a baseline of 57</p>	<p>2.1 Anonymised financial typology documents 2.1 Direct feedback from banking sector</p> <p>2.2 Thomson Reuters World-Check feedback via Liberty Shared</p>	<p>Financial institutions are sufficiently concerned about IWT to accept and act on typologies provided</p> <p>Banks avoid offering services to individuals and companies entered into "know your customer" databases</p>

	<p>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>2.3 Internal record of engagement with FIA</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>	

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

- 1.1 Establishment of agreed systems and processes for collecting, managing and sharing information between EIA and NRCN followed by collation of information on pangolin trade
 - 1.2 Analysis and mapping of criminal networks, points of intervention identified, new desk-based and field research tasks determined including desk-based research and correspondence relating to networks in demand countries in Asia.
 - 1.3 Scoping trip to liaise with NRCN, national law enforcement agencies and brief them following initial analyses. Conduct a review of M&E processes
 - 1.4 Field work to ground-truth desk-based research, gather information on trade incidents, download & transcribe findings
 - 1.5 Prepare and disseminate confidential dossiers for Ugandan law enforcement agencies and prosecutors (incl. NRCN) through face-to-face briefings, and to other relevant countries, including transit and destination countries, and intergovernmental bodies electronically
 - 1.6 Liaise with the UWA and other enforcement agencies to monitor law enforcement response and provide additional information generated by further desk and field research
 - 1.7 Prepare amendments to national regulations to integrate provisions for CITES Appendix I listing and disseminate to law-makers
 - 1.8 Commission a wildlife valuation expert to prepare judicial guidelines, and disseminate guidelines electronically and physically to prosecutors and judiciary through face-to-face briefings as part of a briefing on the role of serious organised crime in pangolin trade
 - 1.9 Prepare multi-lingual awareness materials and conduct five regional 1-day workshops for Ugandan enforcement authorities regarding pangolin trade and Uganda Wildlife Act (2019)
 - 1.10 Prepare and deliver a training workshop for Ugandan government agencies involved in investigating and prosecuting wildlife crime on how to conduct financial investigations, and facilitate the development of a multi-agency team for joint financial investigations on wildlife trafficking cases
-
- 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
-
- 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 2 Report of progress and achievements against final project logframe for the life of the project

Project summary	Measurable Indicators	Progress and Achievements
<p>Impact</p> <p>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>The delivery of this project has contributed to the strengthening of criminal justice responses in Uganda to disrupt the organised crime groups involved in the sourcing, consolidation and export of pangolins. This has been achieved through a multi-pronged approach that has involved support and collaboration with an effective wildlife crime investigation and prosecution civil-society organisation (NRCN), documenting and assessing the criminal networks involved in transnational pangolin trafficking, sharing intelligence with partners, building government capacity to conduct parallel financial investigations, sensitisation of the transport sector, and production of public-facing outputs as a tool for policy advocacy targeting the governments of pangolin source, transit and destination countries. The project has led to: the training of 123 government and CSO staff who have benefited from enhanced knowledge of intelligence and investigation techniques; identification and assessment of four pangolin trafficking networks; 86 intelligence disseminations to partners to inform law enforcement action; as well as intelligence-led enforcement action that has led to the conviction of 61 low- to mid- level pangolin traffickers. These achievements have increased the risk of apprehension and prosecution for pangolin-related trafficking offences in Uganda. This has contributed to the conservation of wild pangolin populations by deterring organised crime groups from sourcing pangolins in Uganda and adjacent countries. The project has served to promote 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. 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 action from China to eliminate demand for pangolin scales.</p>
<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</p>	<p>Note, means of verification are available in the zip folder shared with this report.</p> <p>0.1 Baseline = 1, current status = 4</p> <p>Information on pangolin trafficking networks operating in Uganda, Asia and other African countries was generated from open-source research, partners, anonymous sources, and remote and field investigations. This resulted in the production of 337 intelligence reports (year 1: 1, year 2: 170, year 3: 42, and year 4: 125). Four separate criminal networks were investigated in-depth, this included the following cases: one involving the abuse of Uganda's wildlife use rights system by a Chinese national linked to TCM interests and their associates</p>

	<p>stronger integration of wildlife/pangolin crime into financial investigations and financial sector regulatory mechanisms. From a baseline of zero official wildlife-related typologies produced on pangolin trafficking networks in Uganda, to one by March 2021.</p> <p>0.3 Increased understanding of transport methods used by pangolin trafficking networks in and around Uganda; engagement with transport sector leads to better integration of pangolin trafficking methods into risk analysis systems and associated policies; number of red-flag alerts relating to pangolin trafficking in Uganda disseminated to law enforcement agencies or UFW Transport Taskforce increases from a baseline of zero in 2017 to two in March 2021.</p> <p>0.4 Increased number of arrests of individuals implicated in the illegal pangolin trade in Uganda from 28 in 2017 to 40 by March 2021</p> <p>0.5 Increased awareness among Ugandan enforcement, judiciary and wildlife confiscation authorities of the updated protected species status of 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>(Lead 1), one involving an East African national involved in sourcing pangolin scales from Central/East Africa for export to Asia (Lead 2), one involving illicit wildlife product suppliers of a significant transnational Vietnamese syndicate (Lead 3), and one involving several wildlife traffickers of West African origin (Lead 4). To advocate for international and national law enforcement agencies to effectively investigate serious pangolin traffickers, EIA has strategically disseminated intelligence with trusted partners.</p> <p>0.2 Baseline = 0, current status = 1</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 in April 2021. 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 = 132</p> <p>Across years 1 to 3, based on NRCN investigations, UWA and UPF have made 132 arrests for pangolin trafficking during the project (note, the year 4 no-cost extension did not include budget for investigations in year 4). A total of 61 pangolin traffickers were successfully convicted (in addition to 4 who received cautions) and 16 were acquitted due to insufficient evidence/poor investigation. Of the 61 convictions, 60 received custodial sentences, and a total of 866 months of custodial sentences issued, with a mean sentence of 14 months.</p> <p>0.5 Baseline = 21, current status = 113</p> <p>With co-financing from USFWS and Wildcat Foundation, NRCN conducted five regional 1-day workshops in September 2019 with the UPF on illegal pangolin/wildlife trade and the laws relevant to wildlife trafficking in Uganda (including the Uganda Wildlife Act). A total of 92 UPF officers participated in the awareness workshops (14 - West Nile, 16 – North, 21 – Eastern, 18 – Central, 23 – Western). In year 3, NRCN initiated distributed posters 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>0.5 Baseline = 0, current status = 0</p>
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<p>Output 1. Law enforcement agencies, specialist investigation units (including FIUs) and prosecutors in Uganda, are provided with the information they need to conduct intelligence-led enforcement and financial investigations, and the UWA Intelligence Unit is provided with the skills required to conduct financial investigations, so that collectively they can detect and disrupt the pangolin trafficking networks that operate in the country. Intelligence-led enforcement is focused on the criminal networks and not low-level local poachers, reducing potential negative impacts of enforcement action on marginalised rural communities.</p>	<p>1.1 An increase in the number of pangolin trafficking networks that are mapped out using network analysis software (baseline of one in 2017 to at least two by October 2019 and three in total by October 2020); intervention points identified</p> <p>1.2 Number of pangolin trafficking networks that are investigated by Uganda Wildlife Authority/NRCN, increases from one in 2017 to at least two by October 2019 and three by October 2020</p> <p>1.3 Transfer of all pangolins to CITES Appendix I is included within Uganda's recent orders and regulations enabling CITES provisions to be incorporated into domestic legislation by January 2019</p> <p>1.4 Uganda Wildlife Authority / NRCN conviction rate for pangolin trafficking offences remains above 2017 baseline of 70% up to March 2021</p> <p>1.5 Minimum of 10 staff from government agencies involved in investigating and prosecuting wildlife crime receive one training session on required intelligence gathering to pursue financial investigation in</p>	<p>1.1 Baseline = 1, current status = 3. Three intelligence assessments were generated each of which included network charts of pangolin trafficking networks. Confidential information on intervention points/intelligence recommendations relating to all three networks was shared by EIA to NRCN and selected international law enforcement/government agencies to inform law enforcement investigations. (see sections 3.1, 3.2,).</p> <p>1.2 Baseline = 1, current status = 8. Over the course of the project, NRCN has supported UWA to conduct investigations into a total of 13 mid- to high- level persons of interest for pangolin and other wildlife trafficking, the individuals represent at least 8 separate wildlife trafficking networks (of these, three networks were also investigated by EIA – so 3 of the 4 leads) (see sections 3.1, 3.2).</p> <p>1.3 As a result of engagement by NRCN and other organisations with the Ministry of Tourism, Wildlife and Antiquities, in July 2019, the Uganda Wildlife Act was assented by the President of Uganda and this entered force in September 2019 (see section 3.2 and).</p> <p>1.4 Annual target = >70%, project annual average = 79%. On UWA/UPF cases that NRCN prosecuted or supported there was a 79% conviction rate (61 convicted / (convicted + closed = 77) *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.</p> <p>1.5. Target = 10 staff, project total = 12 government staff. NRCN and EIA held a 4-day wildlife trafficking financial investigations workshop in April 2019 in Kampala, Uganda. Participants included 20 individuals from UWA, NRCN, UPF, DPP and FIA, 12 of the 20 participants were drawn from government agencies.</p>

	cooperation with other stakeholders by December 2019	
Activity 1.1 Establishment of agreed systems and processes for collecting, managing and sharing information between EIA and NRCN followed by collation of information on pangolin trade		At the start of the project, arrangements for regular and confidential sharing of information between NRCN and EIA relating to pangolin trafficking were agreed. The basis for information sharing between the two organisations is a Memorandum of Understanding. Throughout the project the Senior/Principal Campaigner and EIA Intelligence Team exchanged information with the NRCN investigations and database team to inform analyses and investigations activity. With funding through CV19RR06 NRCN established an MoU for cross-border investigations with Conserv Congo based in DRC.
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.		The EIA Intelligence Team supported the design and implementation of investigations into pangolin trafficking networks. Information generated from investigations was processed and analysed using EIA's information management practices, which were significantly enhanced through the lifetime of the project. Outputs included intelligence reports, summaries, assessments, and network charts. The Intelligence Team also provided capacity building support to NRCN in intelligence management techniques and maintaining information sharing relationships with partners.
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		Following an initial scoping trip to Kampala in Jan/Feb 2019 involving the Project Leader and Principal Campaigner, an additional four trips were taken by EIA to meet with NRCN. The purpose of the trips was to build relationships, meet relevant government agencies (UWA, UPF, DPP, URA and FIA), coordinate capacity building workshops, implementation research and investigations activity, develop workplans, solve problems and conduct M&E. From the onset of COVID-19 engagements were held virtually, and communications with NRCN over activity implementation, budget management and M&E data submission continued. Communications took place over online using email, Zoom and WhatsApp. NRCN continued to work with and engage government stakeholders closely during the COVID-19 period.
Activity 1.4 Field work to ground-truth desk-based research, gather information on trade incidents, download & transcribe findings		EIA investigators conducted a total of 36 covert meetings with 24 target subjects. This resulted in over 70 hours of video and audio recordings. During the field operation briefing and debriefing meetings were held to log information and plan investigation tactics.
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		NRCN have conducted confidential meetings with the UWA intelligence unit, Focused Conservation Solutions 'Special Wildlife Crime Unit', police and prosecutors over pangolin investigations.

		During the project EIA made 86 intelligence document disseminations (10 intelligence reports, 30 intelligence summary, 13 intelligence assessments, 16 seizure dataset, and 17 other) to law enforcement, NGO partners, the media and academia. <i>Note: these are the number of disseminations, and the same document is often shared with more than one recipient.</i>
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.
Activity 1.7 Prepare amendments to national regulations to integrate provisions for CITES Appendix I listing and disseminate to law-makers		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).
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		In August/September 2021, NRCN recruited a national consultant named Dr Emmanuel Kasimbazi (a law Professor at the University of Makerere) to produce a situational assessment for the development of a wildlife valuation guideline regulation by UWA. The situational assessment reviewed different approaches to wildlife valuation in countries such as India, Hong Kong, China, Vietnam, and South Africa and provided recommendations.
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.
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).
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</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.</p> <p>2.2 Baseline = 57, current status = 395 (baseline + yr 1: 92, yr 2: 89, yr 3: 157).</p>

	<p>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>During the project (years 1 to 3), 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).</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>
<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.</p>		<p>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' 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>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. In 2021, EIA took over the management of the media monitoring program from Liberty Shared, and is now responsible to submission of names for Know Your Customer checks.</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>In September 2021, EIA publishing a briefing document titled "The role of transnational criminal networks and China's legal pangolin scale medicine market in driving the global illegal pangolin trade". To build awareness of key issues amongst regional AML stakeholders in East Africa, in September 2021, EIA shared this document with Joseph Jagada, Principal Expert at the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) Secretariat.</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>3.1 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.</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,</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>the FIA signed up to the UfW Financial Taskforce Mansion House Declaration as a result of facilitation provided by EIA.</p> <p>3.3 The mobile scanners are under management by URA, which is responsible for their deployment and use. UNODC Container Control Programme point of contact David Dongo told EIA/NRCN in October 2019 that the URA scanners were deployed at the Uganda-Kenya border at Busia (to Kisumu, Kenya) and Malaba (to Eldoret, Kenya) and at these locations the scanners check 100% of containers.</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>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>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 1, 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. 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 was 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 4, NRCN have observed a URA scanner in operation at the Mutukula border in mid-2021. No additional information has been obtained on URA use and deployment of the scanners.</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>Briefing document titled "The role of transnational criminal networks and China's legal pangolin scale medicine market in driving the global illegal pangolin trade" was shared with Javier Montano Duran (UNODC Regional Coordinator Container Control Programme (CCP) Eastern Africa) and Jorge Rios (Chief of the UNODC Wildlife/ Forest Crime Programme) in September 2021.</p>

<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 = 69 (yr 1 = 6 + yr 2 = 27 + yr3 = 30, + yr 4 = 6). EIA has published 69 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, 15 news stories have been published on pangolin trafficking.</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 present findings from our investigations into transnational pangolin trafficking and draw attention to policy, governance, legal and law enforcement issues EIA published a total of 13 public-facing reports (yr 1 = 2, yr 2 = 1, yr 3 = 4 and yr 4 = 6). Highlighted include:</p> <ul style="list-style-type: none"> - A public-facing report on the role of criminal networks operating in southeast Asia in pangolin and ivory trafficking was produced titled 'Exposing the Hydra: The growing role of Vietnamese syndicates in ivory trafficking' documented the findings of a two-year investigation (implemented prior to this IWT056 project). The report exposed the activities of a major transportation specialist based in Malaysia who was responsible for the trafficking of significant volumes of Asian pangolins between the 1990s and 2000s. - 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 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>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>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 (https://eia-international.org/global-environmental-crime-tracker/). Data in the Global Environmental Tracker is generated through open-source research conducted by wildlife researchers/campaigners and from partners (such</p>

	<p>as NRCN, Conserv Congo and TRAFFIC). The dataset now includes 2,063 pangolin data points for all years (21/03/2000 - 30/11/2021) and from 01/07/2018 to 30/09/2021, there are 928 datapoints.</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>Between years 1 and 3, information from the pangolin global seizure dataset was shared with 30 separate journalists, NGOs, researchers or law enforcement agencies. Recipients included the following:</p> <ul style="list-style-type: none"> - International organisations: UNODC, UNDP, Interpol, CITES Secretariat - Law enforcement: US Fish and Wildlife Service, Nigeria customs - Media: National Geographic Magazine, The Pangolin Reports, BBC, InfoNile, The Independent, Wall Street Journal - NGO: Global Initiative Against Transnational Organized Crime, ADM Capital Foundation, WWF Hong Kong, PanNature – Vietnam, TRAFFIC, Monitor Conservation Research Society, South Asian pangolin project - Academic: University of Oxford, Duke University, Junita College - Private sector: CitiBank

Annex 3 Standard Measures

If your project is finished, please complete the table below. We use these figures as part of our evaluation of the wider impact of the Illegal Wildlife Trade Challenge Fund programme. Projects are not evaluated according to quantity. That is – projects that report few standard measures are not seen as being of poorer quality than those projects which can report against multiple standard measures.

Please quantify and briefly describe all project standard measures using the coding and format of the Illegal Wildlife Trade Challenge Fund Standard Measures in Table 1 found on the IWT website [here](#). If any sections are not relevant for your project (or for a specific measure), please leave blank.

Table 1: Project reporting against IWT Challenge Fund Standard Measures

Project Ref and Title:							
Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
Sustainable livelihoods and economic development measures							
1A	Number of individuals who received training in sustainable livelihood skills						
1B	Number of households who received training in sustainable livelihood skills						
1C	Number of individuals benefitting from training (i.e. broader HH of individual directly trained)						
1D	Number of training weeks provided						
2A	Number of cooperatives established						
2B	% cooperatives established that are functioning at project end (at least a year after establishment)						
3A	Number of credit and savings groups established						
3B	Number of loans provided to micro, small and medium						

Project Ref and Title:							
Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
	enterprises (MSMEs)						
3C	Total value (£) of loans provided						
4A	Number of sustainable livelihoods enterprises established						
4B	Number of existing enterprises receiving capacity building support						
5A	Number of households that have experienced an increase in household income as a result of involvement						
5B	Average percentage increase per household against baseline						
6A	Number of people to receive other forms of education/training						
6B	Number of training weeks provided						
7	Number of (i.e., different types - not volume - of material produced) training materials to be produced for use by host country						
Law enforcement and legal framework measures							
8	Number of illegal wildlife trade management plans, action plans, or strategies produced for use by Governments, public authorities, or other implementing						

Project Ref and Title:							
Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
	agencies in the host country						
9	Number of field guides/manuals produced to assist work related to IWT product identification, classification and recording	2			Pangolin law and trafficking awareness posters (x2) distributed to police, wildlife, and customs authorities across Uganda		
10A	Number of customs officials trained						
10B	Number of prosecutors/judges trained						
10C	Number of police officers trained	92	Uganda		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		
10D	Number of trainers trained						
10E	Number of individuals who attended refresher training						
10F	Number of other specialist services trained (e.g. dog units, rangers, forensic services).	20	Uganda		Between 14 and 18 April 2019, 20 individuals from UWA, NRCN, UPF, DPP and FIA participated in a 4-day financial intelligence workshop		
11A	Number of criminal networks/trade routes mapped/identified	3	Uganda, Vietnam, China		Trafficking networks investigated by EIA in depth includes one that links to		

Project Ref and Title:							
Cod e	Description	Tota l	Nationalit y (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comment s
					China, one involving an East African national linked to a wider trafficking network in Uganda, and one Vietnamese syndicate.		
11B	Number of illegal wildlife shipments detected	133			Illicit pangolin products such as scale, skins, and live animals have been seized by NRCN, UWA and UPF through law enforcement operations		
12	Duration or frequency of patrols by law enforcement rangers supported through the project						
13A	Number of arrests (linked to wildlife crime) facilitated by the project	133	Uganda, DRC, South Sudan		Arrests of individuals found in possession of pangolins and their derivatives or involved in their trafficking		
13B	Value of illegal wildlife products seized through law enforcement action facilitated by the project						
13C	Number of wildlife crime cases submitted for prosecution	81	Uganda, DRC, South Sudan		Individuals submitted for prosecution at the Standards, Utilities and Wildlife Court (at Buganda Road Court, Kampala)		
13D	Number of individuals charged for wildlife crime	133	Uganda, DRC, South Sudan		Arrests of individuals found in possession of		

Project Ref and Title:							
Cod e	Description	Tota l	Nationalit y (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comment s
					pangolins and their derivatives or involved in their trafficking		
13E	Number of individuals successfully prosecuted for wildlife crime cases, charges brought for wildlife crime offences using non-wildlife crime specific legislation – e.g. money laundering						
13F	Number of actioned cases handed to/received from another agency						
14	Value of assets seized through money laundering or proceeds of crime legislation						
15A	Number of intelligence reports fed into management decisions on species protection	337				Intelligence reports on pangolin trafficking in Uganda used for investigations planning and the preparation of analytical outputs	
15B	Number of intelligence or information reports exchanged with INTERPOL or the World Customs Organization	1				Intelligence assessment on a transnational pangolin trafficking shared with Interpol	
15C	Number of amendments to national laws and regulations in project countries	1				Uganda Wildlife Act 2019 (including protections for	

Project Ref and Title:							
Cod e	Description	Tota l	Nationalit y (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comment s
						pangolins) enacted in 2019	
16A	Number of databases established in project countries						
16B	Number of databases established that are operational in project countries						
16C	Number of databases established that are used for law enforcement						
17A	Number of people who received other forms of education/training (which does not fall into the above category)						
17B	Number of training weeks provided	3			Financial investigations training (1-week), UPF wildlife law awareness training (1-week), JFIT roundtable and NRCN financial investigations case review/intelligence training (1-week)		
Behaviour change for demand reduction measures							
18A	Number of individuals surveyed on relevant IWT behaviour pre-intervention (baseline)						
18B	Number of individuals surveyed on relevant IWT						

Project Ref and Title:							
Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
	behaviour post-intervention						
18C	Number and type of IWT behaviour change materials produced / Number and type of IWT behaviour change materials distributed						
18D	Number of communication channels carrying campaign message						
18E	Number of champions/key influencers speaking on behalf of the demand reduction campaign						
18F	Number of appropriate partners with direct influence on target audience that have distributed campaign message(s)						
18G	Number of people reached with behaviour change messaging (i.e. audience)						
19	Number of individuals that have had their relevant IWT behaviour changed						
20	Number of stakeholders/key influencers that have actively discouraged the purchase/use of IWT products e.g. pledges signed						
Cross cutting measures							

Project Ref and Title:							
Cod e	Description	Tota l	Nationalit y (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comment s
21A	Number of papers published in peer reviewed journals						
21B	Number of papers submitted to peer reviewed journals						
21C	Number of other publications produced	13					
22A	Amount of match funding secured (£) for delivery of project during the period of the IWT Challenge Fund grant (<i>please note that the figure provided here should align with financial information provided in section 12.2</i>)						
22B	Funding leveraged (£) for work after the IWT Challenge Fund grant ends (<i>please note that the figure provided here should align with financial information provided in section 11.2</i>)						
23	Estimated value (£) of physical assets to be handed over to host country(ies)						
24A	Number of Bachelor qualifications (BSc) obtained						
24B	Number of Masters qualifications (MSc/MPhil etc) obtained						
24C	Number of other qualifications obtained						

Project Ref and Title:							
Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
25A	Number of undergraduate students who received training						
25B	Number of training weeks provided						
25C	Number of postgraduate students who received training						
25D	Number of training weeks provided						
26A	Number of conferences/seminars/ workshops organised to present/disseminate findings						
26B	Number of conferences/seminars/ workshops attended at which findings from IWT project work will be presented/disseminated						
26C	Number of individual media articles featuring the project						

Publications

Provide full details of all publications and material that can be publicly accessed, e.g. title, name of publisher, contact details. Mark (*) all publications and other material that you have included with this report

Table 2: Details of project publications

Type * (e.g. journals, manual, CDs)	Detail (title, author, year)	Nationality of lead author	Nationality of institution of lead author	Gender of lead author	Publishers (name, city)	Available from (e.g. web link, contact address etc)
The role of transnational criminal networks and China's legal	Public-facing report	EIA, September 2021	UK	Male	Environmental Investigation Agency, London, UK	https://eia-international.org/wp-content/uploads/2021-Pangolin-CITES-Briefing-SPREADS.pdf

pangolin scale medicine market in driving the global illegal pangolin trade – CITES Briefing Document						
Smoke and Mirrors: China's complicity in the global illegal pangolin trade*	Public-facing report	EIA, October 2020	UK	Male	Environmental Investigation Agency, London, UK	https://eia-international.org/report/china-s-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	India/UK	Female	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	UK	Male	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	India/UK	Female	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 IWT Contacts

To assist us with future evaluation work and feedback on your report, please provide details for the main project contacts below. If you are providing personal details on behalf of someone else, please ensure that they have agreed to sharing their information with us.

Please add new sections to the table if you are able to provide contact information for more people than there are sections below.

Please see our Privacy Notice on how contact details will be used and stored:

<https://www.gov.uk/government/publications/illegal-wildlife-trade-challenge-fund-application-round>

Ref No	IWT056
Project Title	Strengthening Enforcement against the Illegal Pangolin Trade in Uganda
Project Leader Details	
Name	Julian Newman
Role within IWT Project	Project Leader
Address	
Phone	
Fax/Skype	
Email	
Partner 1	
Name	Vincent Opyene
Organisation	Natural Resource Conservation Network
Role within IWT Project	CEO/Founder of NRCN
Address	
Fax/Skype	
Email	
Partner 2 etc.	
Name	
Organisation	
Role within IWT Project	
Address	
Fax/Skype	
Email	

Annex 5 Onwards – supplementary material (optional but encouraged as evidence of project achievement)

Checklist for submission

	Check
Is the report less than 10MB? If so, please email to IWT-Fund@ltsi.co.uk putting the project number in the subject line.	
Is your report more than 10MB? If so, please discuss with IWT-Fund@ltsi.co.uk about the best way to deliver the report, putting the project number in the subject line.	
If you are submitting photos for publicity purposes, do these meet the outlined requirements (see section 13)?	
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.	
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.	
Have you involved your partners in preparation of the report and named the main contributors	
Have you completed the Project Expenditure table fully?	
Do not include claim forms or other communications with this report.	