



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	IWT059
Project title	Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade
Country(ies)	China, Singapore, Vietnam, Lao PDR, Malawi, Malaysia, Kenya, Tanzania, Mozambique, Zambia
Lead organisation	Environmental Investigation Agency (EIA)
Partner institution(s)	<ul style="list-style-type: none"> • Liberty Shared (formerly Liberty Asia) • Royal United Services Institute (RUSI)
IWT grant value	£332,234
Start/end dates of project	1 st July 2018 to 31 st March 2021 [Note; Original end date of 30 th June 2020 extended by 9 months through an approved change request]
Project Leader’s name	Julian Newman
Project website/blog/social media	N/A
Report author(s) and date	Julian Newman, 14 th July 2021

1. Project summary

The main problem this project sought to address is the absence of effective financial investigations to disrupt the activities of organised crime syndicates involved in the illegal wildlife trade. In 2016, INTERPOL estimated that IWT generates between \$7 billion and \$23 billion in profits for criminals, yet there is scant evidence of law enforcement agencies using financial investigation techniques to trace the proceeds of these crimes and bring anti-money laundering charges against senior syndicate members. For example in 2016 the United Nations Office on Drugs and Crime surveyed 45 jurisdictions and found that while 86 per cent reported being affected by wildlife crime, only 26 per cent of countries surveyed had conducted financial investigations into wildlife crimes, and in only one per cent of cases were AML laws use.

In addition, private sector financial institutions lack sufficient knowledge to gauge their potential exposure to clients (both individuals and companies) potentially involved in IWT due to a lack of detailed information on how money associated with IWT moves and insufficient red flags to highlight suspicious transactions. The project seeks to reduce these information gaps through the provision of detailed typologies (transaction mapping) based on actual IWT cases.

More effective use of financial investigations and increased involvement of banks in tracking IWT-linked financial flows will make it harder for criminal syndicates implicated in IWT to operate and create a deterrent effect if governments start prosecuting suspects using anti-money laundering laws and confiscating their assets. Such measures will reduce the incentive for criminals involved in the poaching and trafficking of endangered species, especially elephants, rhinos, tiger and pangolins, where the involvement of organised crime has been well documented. Overall more effective use of financial investigations by the project countries will curb illicit flows and contribute to poverty alleviation through increased seizure of assets from wildlife criminals.

2. Project Partnerships

In this project the UK-based Environmental Investigation Agency (EIA) was the Lead Organisation with support from two partners to implement project activities. The main partner was Liberty Shared (formerly Liberty Asia), which is based in Hong Kong with project staff also based in the United States. The second partner was the London-based Royal United Services Institute (RUSI).

EIA had pre-existing relationships with both partners prior to the project commencing. In terms of Liberty Shared, an NGO working to curb human trafficking, both groups saw the potential to apply its methodology of engaging the finance sector through typologies to the problem of illegal wildlife trade. EIA began contributing open source articles to Liberty Shared's media monitoring programme and commenced work on its first typology, after receiving training from Liberty Shared, prior to the project commencing.

Collaboration with RUSI began through a previous Illegal Wildlife Trade Challenge Fund project entitled Following the Money: Disrupting Wildlife-Linked Illicit Financial Flows in Kenya/Tanzania/Uganda (IWT021) which commenced in 2016 and involved providing training workshops on financial aspects of IWT to government agencies and bank. RUSI led the project and EIA was involved in delivering some of the training modules

EIA's role in the project was to oversee project management and planning. In terms of activities EIA was responsible for conducting research and investigations into specific IWT flows spanning Africa and Asia, and for developing channels to communicate the typologies to relevant government Financial Intelligence Units (FIUs) and other government enforcement agencies. EIA also presented the final typologies to banks and contributed information to Liberty Shared's Media Monitoring programme.

Liberty Shared's role was to assist in turning the findings from EIA's research and investigations into typologies and to arrange presentations of the findings to banks as well as distributing the typologies via a secure server. Liberty Shared also oversaw a Media Monitoring programme for the first two years of the project, which EIA took over the responsibility for in October 2020.

RUSI's role was smaller and more specific and involved leading on engagement with the Financial Action Task Force and related regional bodies, and analysis of National Risk Assessment's produced by project countries. Cooperation between EIA and RUSI on a different IWT Challenge Fund project led by

the latter group also benefited this project, with training workshops in Malawi, Mozambique and Zambia helping form contacts with Financial Intelligence Units and other agencies in the countries.

During the project EIA to oversee implementation, of activities, setting quarterly targets and prioritisation of activities. The Project Leader held calls at least once a month with Liberty Shared's Head of Actionable Research and worked closely with their Typologies Manager in creating narrative reports and graphics subsequently disseminated to banks. Quarterly meetings were with RUSI's Director to discuss the project. A planned meeting of all project staff from the three organisations scheduled for late March had to be postponed due to COVID-19 travel restrictions.

Post-project EIA has continued to collaborate with RUSI, including providing input for a RUSI report entitled "Illegal Wildlife Trade and Financial Investigations in West Africa", while RUSI's decision to scale back its Actionable Research Programme to focus on other methods of curbing human trafficking means that future collaboration on IWT will be limited.

In terms of engagement with relevant organisations which are not project partners the Project Leader met with staff from the British Embassy in Laos, the British High Commission in Malawi and the British High Commission during project-related trip to explain the project and share information. Also in September 2019 EIA formally joined the United for Wildlife Financial Taskforce, established in 2018 to support the role of banks in curbing IWT, and which currently has 44 member banks. This provided additional channels to provide information developed through the project to the financial sector.

3. Project Achievements

Note: text in red brackets [] is confidential and not for publication

3.1 Outputs

Output 1: Greater awareness of illicit financial flows linked to illegal wildlife trade cases through the provision of detailed typologies to national FIUs and other relevant government enforcement agencies in project countries

By the end of the project Output 1 had been partially achieved, based on assessment of the 3 Output indicators, 1 of which was fully achieved and 2 partially achieved (see below for details of the assessment).

At the heart of this project was the provision of detailed typologies (or case studies) on wildlife crime syndicates to public sector agencies and private sector financial institutions to fill major information gaps hampering the effective use of anti-money laundering procedures and laws against wildlife criminals. The term "typology" refers to various techniques used to launder money from criminal activities and identifies the main actors and facilitators along the supply chain, and associated money flows.

These typologies were derived from detailed intelligence analysis and field investigations carried out by EIA and augmented by open source information such as press articles and court records. This information would then be converted into a typology format designed by Liberty Asia.

During the project EIA's intelligence analysts produced a wide range of information products which fed into the typologies and assisted in planning of investigations. Some of the outputs, such as confidential profiles of individuals involved in the illegal wildlife trade were also disseminated to relevant law enforcement agencies in project countries, such as China Customs Anti-Smuggling Bureau.

The products included a comprehensive database of seizures for the four focus species of the project (elephants, tigers, pangolins and rhinos (the data can be viewed on EIA's website at <https://eia-international.org/global-environmental-crime-tracker/>), which allowed analysis of changing trends in terms of wildlife trafficking routes. Other outputs included situational analysis of IWT in specific countries, Persons of Interest profiles and network charts mapping wildlife crime syndicates. In addition the intelligence team compiled open source media reports on IWT cases, which were provided to financial institutions via Liberty Shared's Media Monitoring programme (see Output 2 for more details of the programme).

Five field investigations were completed, producing information which assisted in producing the typologies. EIA's investigations methodology involves initial analysis to select locations and targets, including social media research, initial remote engagement followed by meetings in country between EIA

undercover investigators and target suspected of being involved in IWT, with the meetings being covertly recorded to provide evidence.

[REDACTED]

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During year 3 no field investigations were possible COVID-19 international travel restrictions. Yet EIA's investigators quickly adapted and were able to gather useful intelligence through social media research and remote engagement with illegal wildlife traders.

By the end of the project the target of producing 6 typologies had been met. The typologies were derived from open source research such as court records, and new and historical information from EIA's field investigations and intelligence analysis. The methodology used involved EIA staff producing a first draft using a template developed by Liberty Shared. The template is based on mapping out the supply chain for the contraband wildlife from source, through transit and into destination countries. Different actors are then identified at the different stages, such as Poacher, Coordinator, Shipper, Leader, and Consumers. The typology then describes how money is moved at various stages of the supply chain and the values involved and identifies the individuals and companies involved.

The draft narrative document would then be sent to Liberty Shared's Manager of Actionable Research Programme for checking and elaboration where necessary. Two version of the narrative would be produced; a full version including names of individuals and companies, and an anonymised version with the names removed. Banks interested in receiving a typology would be sent the anonymised version first, and then would have to request the full version. This system was devised by Liberty Shared based on legal advice to avoid potential defamation action and maintain commercial confidentiality. Liberty Shared staff would produce an accompanying network diagram, again in both full and anonymised versions, illustrating the supply chain and the different individuals and companies at various stages. One typology was produced in year 1, 3 in project year 2, and 2 in project year 3. Collectively the 6 typologies covered all 4 focus species for the project, and 7 of the project countries (China, Malaysia, Laos, Vietnam, Malawi, Mozambique and Tanzania).

The first typology involved ivory trafficking from Tanzania to the Far East and was centred around two linked seizures of ivory tusks in Dar es Salaam and Zanzibar. Research by EIA revealed that the syndicate involved was headed by two Chinese nationals and used a web of front companies to move money between Tanzania, Hong Kong and mainland China.

The second typology was focused on a shipment of 2.3 tonnes of ivory from Pemba, in northern Mozambique, to the town of Shuidong in southern China. Investigations by EIA coupled with information from Chinese records showed how the IWT syndicate involved had used underground money changers to move funds to Mozambique to pay for the ivory tusks but had then used the formal banking system to share the profits.

The third typology illustrated the smuggling of pangolin scales from Nigeria to southern China and was based largely on analysis of Chinese records. Again underground money changers were used, and the formal banking system in China.

The fourth typology was based on a major ivory seizure in Malawi, where the 2 suspects had fled after being sentenced to 7 years in jail for wildlife trafficking and money laundering. Research by EIA identified companies and individuals linked to suspects and the use of international money transfer services

The fifth typology focused on Vietnamese ivory trafficking groups active in Malaysia, and illustrated several methods to move money, including use of the formal banking system, temporary accounts in China, and gold shops.

The sixth and final typology was based on EIA's investigations into tiger trafficking in the Mekong region, with a focus on companies involved in tiger farming as a front for illegal trade

The typologies were shared with 7 FIUs in project countries (China, Malaysia, Laos, Vietnam, Malawi, Mozambique and Tanzania) as well as South Africa, a non-project country which expressed interest in receiving the Vietnam typology

[REDACTED] FIUs were opaque and not used to engaging with NGOs. This made building relations challenging with requests for meetings often not answered. In the end face-to-face meetings were only possible with FIUs in Malawi, Vietnam and Laos.

Achievements against Indicators:

1.1: By mid-2020 at least 6 typologies on IWT cases have been produced, derived from a target of 6 field investigations completed, that yield financial intelligence of use to FIUs and other government agencies

Fully achieved, with 6 typologies produced. Evidence provided in Annex 1 in the form of copies of the typologies.

1.2: By mid-2020 at least one typology provided to 10 FIUs (1 per country) and 20 other relevant government enforcement agencies (2 per country) in project countries.

Mostly achieved, with 7 out of 10 FIUs receiving typologies.

1.3 Effective relationships established with 10 FIUs by end of 2019

Partially achieved, only 4 effective relationships developed. Evidence provided in the form of back to office reports of meetings with FIUs

Output 2: Regular information provision to private sector financial institutions enhances understanding of risks associated with illegal wildlife trade and embedded in customer due diligence systems

The indicators for Output 2, which focused on provision of information on IWT to the financial sector had been exceeded by the end of the project. See below for details of the assessment.

A range of channels were developed to provide IWT typologies and other pertinent information to a total of 28 banks. These included distribution via Liberty Shared's secure server and followed by webinars for interested banks and bilateral relationships with the compliance departments of major international banks. In addition in September 2019 EIA was invited to join the United for Wildlife Financial Taskforce, giving access to the 44 member banks.

A total of 20 banks downloaded the anonymized versions of typologies from Liberty Shared's secure server, including Barclays and ABSA in Africa and Standard Chartered and Westpac in Asia. Subsequently all of the banks requested the full version of the typologies, indicating a strong interest in the subject matter.

During years 2 and 3 of the project EIA and Liberty Shared organised a total of 11 webinars to explain the typologies in more detail to interested banks. The format involved using the diagram of the typology to explain the financial flows at different stages of the supply chain and what red flags to look for, such as smuggling routes, commodities used to conceal illegal wildlife products,

The typology on ivory trafficking from Mozambique to China was presented on five occasions, including a joint presentation with US NGO CINTOC, which had developed its own typology on ivory trafficking from Kenya with Liberty Shared, which had a clear link to the IWT syndicate portrayed in EIA's Mozambique case. The typology on pangolin trafficking from Nigeria to China was presented on two

occasions, as was the typology on Vietnamese IWT syndicates. In addition two webinars were held in year 3 summarising the main findings from the typologies, one of which was tailored to banks in East Asia.

The development of bilateral relationships with major international banks during the project, [REDACTED] also allowed the typologies to be provided directly. In addition EIA's membership of the United for Wildlife Financial Taskforce provided an additional channel for dissemination. The typology on Vietnam was converted into an alert and sent around the 44 member banks for the taskforce. In addition the typologies on ivory trafficking from Tanzania to China and Mozambique to China were translated into Chinese (both anonymized and full versions) were provided to 6 Chinese banks which are members of the taskforce.

The project also generated a series of Red Flags, used by banks to identify potential suspicious transactions. In total 40 specific red flags were featured in the 6 typologies, spanning payment methods, key locations and smuggling routes, and types of front companies used to conceal financial flows linked to IWT.

In addition to providing red flags as part of the typology dissemination process, EIA also conveyed the findings through meetings and presentations. In September 2019, the Project Leader participated in a day-long workshop on IWT red flags for United for Wildlife Financial Taskforce members. In addition EIA gave presentations via to compliance staff from two major international banks; [REDACTED] attended by 400 staff. It was challenging to gauge the extent to which the red flags were routinely used by the banks, as feedback was limited due to commercial confidentiality requirements. However the fact that all of the banks which downloaded the anonymized versions of the typologies subsequently requested the full versions of typologies indicates that as a minimum the banks checked their client portfolios for the names of individuals and companies contained in the typologies.

In addition to disseminating typologies to banks adverse media reports on IWT cases were also provided to financial due diligence companies which create list-based compliance checks and Know Your Customer databases used by banks to check their client portfolio. This involved EIA staff compiling media reports on IWT cases in a range of languages (including Chinese and Vietnamese) and sending the information on a monthly basis to Liberty Shared for use in its Media Monitoring programme. The information was then shared with a range of financial compliance companies including Refinitiv's World-Check database, Lexis Nexis, Moody's and Dow Jones. In September 2020 EIA took over responsibility for the Media Monitoring programme from Liberty Shared after learning it might be discontinued. In total submissions made by the partners during the project to due diligence database resulted in the creation of 1,383 new and updated profiles.

Achievements against Indicators

2.1: By mid-2020 at least 6 typologies on IWT cases have been produced based on a target of 6 field investigations completed that yield financial intelligence of use to banks, with an interim target of at least 3 typologies on IWT cases based on 3 field investigations completed produced by mid-2019 (from a baseline of 0).

See 1.1 above

2.2: Number of banks receiving typologies on IWT cases reaches at least 18 banks by mid-2020 from a baseline of 4 banks receiving typologies from project partners prior to the project commencing

Indicator exceeded, with typologies provided to 28 banks. Evidence provided through the typologies in Annex 1, data from Liberty Shared's secure server, and emails sent to banks.

2.3: Effective communication channels established with 18 international and regional banks by mid-2020 from a baseline of 12 prior to project commencing.

Indicator exceeded with channels created with 20 banks. Evidence provided in the form of presentations given to banks (Annex 2), webinar participant lists, emails.

2.4: Common "red flags" used to identify financial flows and entities connected to IWT are derived from typologies provided and used routinely by at least 12 banks by mid-2020, with an interim target of 6 banks using "red flags" by September 2019 (from a baseline of 0).

Indicator achieved, with 40 red flags provided to 28 banks. Evidence provided through the typologies in annex A

2.5: Number of wildlife traffickers and associated companies uploaded into customer due diligence databases (such as World-Check) used by banks based on submission by project partners increases to at least 250 a year by mid-2020 (from a baseline of 100 in 2017).

Fully achieved with 333 profiles created or updated in year 1, 561 in year 2, and 489 in year 3. Evidence provided feedback from recipients.

Output 3: Engagement with international and regional anti-money laundering bodies, including dissemination of reports and briefings, elevates the profile of IWT and ensures it is embedded in National Risk Assessments conducted during the project in relevant countries

Based on the indicators Output 3, which focused on elevating awareness of money laundering aspects of IWT amongst international bodies and regulators was largely achieved by the end of the project.

The target of producing two public reports on money laundering linked IWT was achieved. Initially a report had been planned in year 1 of the project to coincide with the London Conference on illegal Wildlife Trade which was held in October 2018, but the late start to the project meant there was insufficient time. Instead 2 reports were published in the final year of the project, by which time sufficient information had been generated to provide a good overview of the situation regarding the use of anti-money laundering measures to curb IWT, with compelling case studies based on the typologies developed under the project.

In July 2020 EIA released the first report, entitled “Money Trails – Identifying Financial Flows Linked to Wildlife Trafficking”. The report assessed the barriers and opportunities to deploying anti-money laundering measures against wildlife criminals and summarised the main findings from the typologies produced under the project at that time. A short film, podcast and press release were produced to support the launch of the report, with the materials uploaded to EIA’s website.

In March 2021 EIA and Liberty Shared collaborated on the production of a second report entitled “Tackling Financial Flows from Illegal Wildlife Trade in East Asia”. The report highlighted the role played by major consuming markets in East Asia in driving the illegal wildlife trade and called on banks in the region to take greater efforts to detect financial transactions linked to IWT and to increase the number of suspicious transaction reports sent to Financial Intelligence Units in the region. The report was uploaded to EIA’s website and a webinar held by EIA and Liberty Shared to explain the findings to banks which attended.

In addition EIA contributed a case study derived from the Tanzania ivory trafficking typology to a major digest of cases involving financial flows linked to IWT produced by the NGO TRAFFIC in conjunction with the United Nations Office on Drugs and Crime.

In terms of engagement with international anti-money laundering bodies the project partners were well placed to utilize the opportunity provided when in June 2019 the incoming Chinese presidency of the Financial Action Task Force announced its intention to make the illegal wildlife trade a priority during its one year tenure.

Project partner RUSI with its in-depth knowledge of FATF processes convened a meeting of NGOs, including EIA, to discuss specific actions which should be undertaken during the Chinese presidency to elevate action by financial regulators against IWT. A list of 7 recommendations was produced, including the need to conduct parallel financial investigations into IWT cases and for assessors to ensure that the risk of IWT is properly reflected in National Risk Assessments. The recommendations were sent to the FATF Secretariat and published as a comment piece on RUSI’s website.

RUSI subsequently attended an initial meeting on FATF’s potential role in curbing IWT held in London in September. The meeting was attended by the FATF Executive Secretary, and representatives from China, UK and Botswana (with the latter two countries working to support the Chinese presidency on IWT).

In November 2019 both EIA and Liberty Shared were selected by FATF as two of the five NGOs invited to submit experiences and recommendations on illicit financial flows connected to IWT in the form of a questionnaire. EIA’s response drew heavily on information generated during the project and following

submission the FATF secretariat requested copies of the Tanzania and Shuidong ivory trafficking typologies

Consequently, EIA was one of only two NGOs invited to present at a side-event on IWT held in Paris during the FATF plenary in February 2020. EIA spoke about the project's work in raising awareness of IWT amongst the financial sector and used an ivory trafficking case study to highlight some of the main types of financial flows.

The engagement with FATF culminated in the release FATF's first major report on the subject, entitled "Money Laundering and the Illegal Wildlife Trade". The report analysed a range of cases, including one submitted by EIA and made a series of recommendations on matters such as the use of financial investigations to identify wider wildlife crime networks and international cooperation channels. The landmark report greatly elevated the issue of IWT amongst national financial regulators. In June 2020, the incoming German Presidency announced it would review progress on recommendations included in the IWT report by the 2021.

Engagement with regional AML bodies, specifically the East and Southern Africa Anti-Money Laundering Group (ESAAMLG) and the Asia Pacific Group on Money Laundering (APG) was partly successful. The Project Leader met with the organisation's Senior Legal Expert and Law Enforcement Expert at ESAAMLG's office in Dar es Salaam, Tanzania. And discussed a range of issues including challenges in conducting financial investigations, especially in terms of international cooperation, and regional trends in IWT. Following the meeting EIA provided four project typologies to ESAAMLG.

EIA and RUSI were able to use information generated during the project to provide briefing documents on IWT trends in three project countries, to coincide with field visits by assessors as part of the FATF mutual evaluation process. Reports on Laos and Vietnam were sent to assessors from APG and an analysis of IWT in Mozambique was sent to assessors from ESAAMLG. The goal of getting IWT included on the agenda of typology meetings held by the regional bodies was not achieved.

As part of the FATF mutual evaluation process countries must produce a National Risk Assessment, the main money laundering risks in the country. These NRAs provide a useful opportunity to properly examine the money laundering risk of IWT and to step measures to mitigate the risk. At the outset of the project it was anticipated that 5 project countries would complete their NRAs during the project, based on the FATF evaluation process calendar. In fact only 3 occurred for which EIA was able to obtain copies of the report. The NRAs of Vietnam and Malawi considered IWT a medium to high risk, but disappointingly Laos, which is a hub for IWT, regarded the risk as low due to a lack of court cases on wildlife crime. It is hope that EIA's report on Laos sent to the assessors will help correct oversight. In additions although Mozambique did not produce an NRA its Mutual Evaluation Report identified IWT as a money laundering threat

Achievements against Indicators

3.1: At least one report per year (one by mid-2019 and one by mid-2020) summarising financial flows linked to IWT cases provided to regional AML bodies (APG and ESAAMLG) and FATF (from a baseline of 0 reports produced in the past).

This indicator was fully met, with 2 reports produced during the project. Evidence is provided in the form of copies of the 2 reports in Annex 3.

3.2: Sessions on IWT typologies included as a matter of routine in annual meetings of APG and ESAAMLG.

This specific indicator was not met, but positive engagement with international AML bodies helped raise the profile of IWT amongst financial regulators. Evidence provided in Annex 3 the form of EIA and Liberty Shared's submission to FATF, briefings on wildlife crime sent to regional bodies, commentaries by RUSI, and reports of meetings.

3.3: IWT identified as a significant money laundering risk in 3 out of 5 project countries scheduled to undertake National Risk Assessments by mid-2020 (from a baseline of 0).

This indicator was met in terms of the percentage of project countries recognising IWT as a risk, with 3 out of 4 (75 per cent) rather than the goal of 3 out of 5 (60 per cent).

3.2 Outcome

Project Outcome: “Enhanced capabilities and commitment of the public and private sectors to deploy anti-money laundering measures against wildlife trafficking syndicates, effectively curtailing their activities.”

Assessment of the relevant indicators show that the project Outcome was achieved, with the agreed extension to the project providing valuable additional time to complete important project activities.

The six detailed typologies produced under the project helped fill information gaps and raise the awareness of financial flows linked to IWT amongst target audiences in the public and private sectors. These real world case studies highlighted a range of methods used by IWT syndicates to move money around, including use of front companies and networks of informal money changers. During the project, a range of channels were developed to disseminate the typologies to banks and government agencies,

A major highlight was the successful engagement by the project partners with the Financial Action Task Force, the global standard setter on anti-money laundering processes. The major report by FATF on IWT, which the partners contributed to, elevated the profile of IWT amongst national Financial Intelligence Units and other enforcement agencies. Media monitoring and communication with FIUs in project countries show that in the last year of the project 5 of the target countries (China, Kenya, Malawi, Malaysia and Tanzania) had charged wildlife criminals with money laundering offences.

The typologies were communicated to banks through webinars, bilateral relationships developed during the project and EIA’s membership of the Untied for Wildlife Financial Taskforce. The high percentage of banks requesting full versions of the typologies indicate follow-up actions by the recipient banks, such as checking the names of individuals and companies in their internal compliance systems. Discussions with companies which provide due diligence and “know your customer” services to banks, and which received the monthly adverse media reports on IWT provided under the project, revealed increasing demand amongst client banks for content, due to a perceived increase in attention to IWT by banking regulators.

An assessment of achievement against the Outcome indicators is provided below:

0.1: By December 2019, a target of 5 FIUs in project countries that have received typologies have conducted follow-up analysis into the individuals and entities identified and disseminated findings to law enforcement agencies, rising to a target of 8 FIUs in total conducting financial analysis and dissemination by mid-2020 (from a baseline of 0).

This indicator was not fully realised, with 6 FIUs carrying out analysis based on the typologies, rather than the target of 8. One reason was the difficulty in building relationships with FIUs in some of the project countries due to planned face-to-face meetings in the final year of the project not being possible due to COVID-19 related travel restrictions. Highlights include the formation of a multi-agency team in Malawi to pursue a major ivory trafficker as a direct result of a typology produced under the project and the provision of information on Chinese nationals engaged in IWT in Malawi, Vietnam and Nigeria.

The main Means of Verification were internal plans, and a log of engagements were adequate. Evidence is provided in Annex 1 and consists of copies of the typologies, meeting reports, a sample intelligence briefing sent to a Chinese enforcement agency [REDACTED] and a sample quarterly project plan.

0.2: By December 2019 at least 6 international banks (based on a minimum of 12 engaged in the project) that have received typologies have followed up with remedial actions against the individuals and entities identified, rising to a target of at least 9 banks pursuing remedial actions by mid-2020 (from a baseline of 0).

This indicator was exceeded with at least 206 banks requesting full versions of the typologies in order to run the names of individuals and companies included in the typologies through their internal compliance systems. Due to commercial confidentiality issues the banks involved were not able to provide further details of any specific actions

The Means of Verification were project plans and correspondence and meetings with banks and remain Valid. Evidence of engagement with banks is provided in Annex 2 in the form of presentations given to banks via joint webinars with Liberty Shared and a presentation given to staff from a major international bank. A further source is data from Liberty Shared showing how many banks requested full versions of the typologies after downloading anonymised versions from their secure server.

0.3: By mid-2020 enforcement agencies in at least 5 project countries have demonstrably used financial investigations in IWT cases (from a baseline of 1).

This indicator was attained with financial investigations undertaken in 6 project countries; China, Laos, Kenya, Tanzania, Malawi and Malaysia.

The Means of Verification were records of meetings with government agencies, media monitoring and court records and proved adequate. Evidence is provided in Annex 1 in the form of meeting reports and a compilation of relevant press stories and a blog by EIA about a case in China.

0.4: By mid-2020 a target of at least 9 international banks (based on a minimum of 12 banks engaged in project) receiving typologies from project partners have used the information to refine due diligence and develop red flags for IWT-linked financial flows (from a baseline of 0)

This indicator was exceeded with the 40 specific red flags contained in the 6 typologies disseminated to 28 banks. The Means of Verification were correspondence with banks and a log of media stories submitted to due diligence services used by banks and were appropriate. An additional source of verification was Liberty Shared's record of typology downloads. Evidence is provided through copies of typologies in Annex 1 which include red flags developed during the project.

0.5: By mid-2020 5 project countries formally recognise wildlife trafficking as an important AML risk and take measures to mitigate it (from a baseline of 0)

This indicator was mostly achieved with 3 out of 4 project countries producing a National Risk Assessment or undergoing a mutual evaluation review during the project recognising IWT as a money laundering risk. One reason for the failure to meet the goal of 5 was delays to the FATF evaluation process due to COVID-19.

Means of Verification were public statements and monitoring of the FATF National Risk Assessment process which allowed progress against the indicator to be measured. Evidence is provided in Annex through a trip report of meetings with FIU's in Vietnam and Laos, Malawi and Mozambique's Mutual Evaluation Reports

3.3 Monitoring of assumptions

The main assumptions were reviewed by the Project Leader on an annual basis, as well as regular exchange of information with colleagues in EIA on the situation in specific countries. The only major change to the assumptions relates to Output 1, Assumption 1 which predicted that security and safety in project countries would be sufficient to allow project activities to take place. The impact of the COVID-19 pandemic negated this assumption. However the impact on the project was confined to preventing planned meetings with FIUs in three of the project countries, as EIA and project partners adjusted by conducting remote investigations through online platforms and social media. EIA's investigators were able to exploit the fact that IWT traders, especially those in West Africa, were more willing to engage remotely and provide evidence of their stockpiles of illegal wildlife products, and details of shipments as their usual Asian buyer were unable to travel. In addition the project adjusted by increasing the number of webinars held by banks, and through online meeting platforms were able to presentations on IWT trends and red flags to hundreds of compliance staff from two major international banks.

An assessment of the validity of the assumptions during the project is provided below

Outcome Assumptions:

Assumption 1: FIUs in target countries have the remit and resources to analyse IWT cases and channels to communicate and cooperate with government law enforcement agencies to ensure cases are followed up

Overall FIU's in project countries have a clear mandate to investigate IWT cases, and in some countries, it has been strengthened during the project, such as Malawi where the FIU now has investigative powers. However, IWT is still not recognised as a priority in all project countries such as Laos

Assumption 2: Financial investigations lead to legal actions sufficient to hinder the activities of wildlife crime syndicates

By the end of the project legal actions based on anti-money laundering regulations had occurred in 5 project countries. A good example comes from Malawi where wildlife trafficking and money laundering laws were used to dismantle a major IWT syndicate, with the head of the group facing prison after recently being found guilty. In China financial investigations led to the successful prosecution of members of a major ivory smuggling syndicate.

Assumption 3: Banks regard potential exposure to money laundering linked to wildlife crime as an issue of concern

This assumption held true, as shown by the growth in membership of the United for Wildlife Taskforce to 44 banks, the growth in the number of banks receiving typologies under the project, and increased demand for IWT-related content from due diligence service providers.

Assumption 4: Disruption of IWT syndicates will alleviate poaching pressure on target species in source countries

The assumption remained valid, as exemplified by evidence from Tanzania where effective enforcement action against ivory trafficking syndicates has led to a decline in elephant poaching.

Output Assumptions:

- Output 1:

Assumption 1: Safety and security situation in project countries sufficient to allow planned activities to take place

This assumption remained correct until January 2020 when the COVID-19 virus began spreading in project countries. This meant no further travel was possible under the project from April 2020.

Assumption 2: Research and investigations yield sufficient relevant information for typologies to be produced

This assumption was, as evidenced by the target of 6 typologies being produced during the project being attained

Assumption 3: - FIUs and other agencies willing to accept information from project partners

This assumption largely held true, yet 1 FIU did not respond to an email containing a typology.

- Output 2:

Assumption 1: Safety and security situation in project countries sufficient to allow planned activities to take place

See comments under Output 1, Assumption 1 above.

Assumption 2: Research and investigations yield sufficient relevant information for typologies to be produced

See comments under Output 1, Assumption 2 above.

Assumption 3: Financial institutions are sufficiently concerned by potential exposure to IWT and reputational risk to act on typologies provided by project partners

See comments under Outcome Assumption 3 above.

Assumption 4: Project partners are able to expand their network of contacts with banks beyond Asia, especially in Africa

The assumption remained true, with the project developing good working relations with international banks having a substantial footprint in Africa.

Assumption 5: Banks' customer due diligence procedures are sufficiently robust to avoid offering services to individuals and companies implicated in IWT cases included in databases

This assumption was valid based on Liberty Shared's considerable knowledge of how banks conduct due diligence on customers.

- Output 3:

Assumption 1: FATF and regional AML bodies willing to engage with project partners

Successful engagement with FATF on IWT and provision of information to regional bodies demonstrates the validity of this assumption.

Assumption 2: National Risk Assessments result in an accurate analysis of threats posed by IWT

This assumption did not hold true during one project country failing to accurately assess IWT threats. However, the subsequent Mutual Evaluation Report procedure is likely to prompt corrective actions. With hindsight it would have been better to state “National Risk Assessment and mutual evaluations...” in this assumption.

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

The agreed impact for the project is as follows: “Systematic deployment of anti-money laundering measures in illegal wildlife trade cases erodes the capabilities of trafficking networks leading to a reduction in poaching and enhanced livelihood opportunities in source countries.”

The overall impact of the project envisaged disruption to the operations of IWT syndicates leading to reduced poaching and enhanced livelihood opportunities in source countries. Due to its focus on a specific aspect of the enforcement response to IWT, namely increased use of anti-money laundering laws and procedures by the private and public sector, the project impacts on biodiversity and poverty alleviation were mainly indirect.

In terms of impacts on the illegal wildlife trade EIA’s experience demonstrates that effective enforcement action, ranging from seizures to prosecutions can severely disrupt the operational capabilities of syndicates. For example, information provided by EIA to Chinese authorities in 2018 led to a series of arrests of members of a wildlife trafficking network based in southern China active in Tanzania and Mozambique. Since the dismantling of the network elephant poaching in both southern Tanzania and northern Mozambique has fallen. In addition during the project authorities in Malawi arrested and prosecuted members of a major wildlife crime syndicate trafficking ivory, rhino horns and pangolins, with the ringleader found guilty of trafficking and money laundering offences.

During the project, a wide range of information and intelligence, including financial details, was provided to FIUs and enforcement agencies in project countries, which could prompt further enforcement action against IWT syndicates and so alleviate poaching pressure on the target species. The release of a major report on IWT by the Financial Action Force in 2020, which the project partners contributed to, significantly raised the profile of wildlife amongst government financial regulators, and EIA’s media monitoring programme showed an increase in the number of cases where money laundering laws were used to prosecute wildlife criminals.

In terms of poverty alleviation reduced poaching rates have the potential to enhance human development in rural areas by protecting wildlife tourism income in range states included in the project. Increased use of laws to seize assets from wildlife criminals, as is happening in Tanzania and Malawi, can contribute to state funds.

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

The project supported two of the four themes; strengthening law enforcement and ensuring effective legal frameworks.

In terms of strengthening law enforcement the project links to London Conference Declaration commitments XV (providing necessary conditions for the use of the full range of investigative techniques and tools) and XVI (strengthen cross-border cooperation). It also linked to commitments 10, 11 and 12 contained in the declaration which emerged from the second London Conference of the Illegal Wildlife Trade, held in October 2018. These commitments concerned increased use of anti-money laundering measure to tackle IWT-linked illicit financial flows. In particular the project through the provision of typologies helped share experiences and best practice with government agencies. Throughout the project a wide array of information was shared with government agencies, increasing knowledge of the

activities of IWT syndicates, methods used and trends. A highlight was the creation of a multi-agency taskforce in Malawi to pursue a notorious ivory trafficker who had absconded following the provision of a typology by EIA. Evidence is provided in Annex 1 in the form of typologies, a sample intelligence briefing and trip reports.

In terms of ensuring effective legal frameworks the project links to London Conference Declaration commitments IX (address the problem of corruption and money laundering facilitating wildlife trafficking) and X (support full range of existing legislation and law enforcement) and Kasane Statement commitments 4 (review and amend national legislation as necessary and appropriate so that offences connected to the illegal wildlife trade are treated as "predicate offences") and (ensure that relevant prosecutors, judges, Financial Intelligence Units, and authorities engaged in law enforcement, have the resources, knowledge and capacity effectively to investigate and prosecute financial crimes associated with wildlife crime)

The project supported these commitments by increasing knowledge of wildlife crime amongst FIUs and other government agencies in the project countries. In addition the provision of detailed briefings on IWT in three countries to FATF assessors conducting site visits as part of the mutual evaluation process assisted with ensuring that the risk of money laundering linked to IWT is properly reflected and mitigation measures, such as strengthening relevant laws, put in place. Evidence is provided in Annex 1 in form of reports of meetings with FIUs, and in Annex 3 where briefings on IWT sent to assessors can be found.

5. Impact on species in focus

Research by EIA shows that improved enforcement against wildlife trafficking syndicates can lead to reduced poaching rates in range states. For example in Tanzania, one of the project countries, sustained poaching caused the country's elephant population to plunge by 60 per cent between 2009 and 2014, with 10, 000 elephants killed a year. Yet with much approved enforcement leading to the arrest of over 2,000 poachers and traffickers led to the elephant population stabilizing and then growing from 43,000 in 2014 to 60,000 in 2019 according to government figures.

The project has an indirect impact on elephants, tigers, pangolins and rhinos through the provision of intelligence, including financial information, to enforcement agencies to assist in disrupting networks engaged in trafficking these species. In addition, the project has also raised awareness of IWT amongst banks through the provision of three typologies during year two, contributing to an increase capability to detect suspicious transactions linked to IWT.

6. Project support to poverty alleviation

As the project's main beneficiaries are government agencies and private sector banks impacts on poverty were indirect. Such benefits include increased capabilities of government agencies, especially FIUs, to trace illicit financial flows which exacerbate poverty in source countries and potentially lead to asset recovery with funds going into government budgets. For example, during the project the verdict in a major ivory trafficking case included seizure of connected assets, while in Malawi the FIU began the process of seizing a farm where illegal trade in pangolins occurred. Effective action against IWT syndicates also promotes rule of law and reduces the corruption which is key enabler in IWT cases.

In the long-term effective enforcement against criminals engaged in IWT will lead to reductions in poaching and protect rural livelihoods dependent on wildlife tourism.

7. Consideration of gender equality issues

In line with the International Development (Gender Equality) Act of 2014 the project partners were committed to ensuring gender equality and equity were promoted throughout the project where possible. However, 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. In terms of project staff six were male and six were female, representing a fair gender balance

8. Sustainability and legacy

As the project's main aim was to help fill information gaps on financial flows linked to EIA by providing typologies to government agencies and private sector banks attaining a higher profile in the project countries was not a major aim. Yet during the project awareness of the outputs has increased among the target audience of banks and government agencies as the volume of information produced has risen. This is demonstrated by the number of banks and agencies receiving typologies growing throughout the project and surpassing the indicators set out in the project logframe.

An important project achievement was the 3 partners contribution to work conducted by the Financial Action Taskforce which culminated in the release of a landmark report on money laundering and IWT in June 2020. This will undoubtedly raise the profile of the issue amongst financial regulators. Also the provision of detailed briefings to FATF assessors evaluating anti-laundering systems in 3 of the project countries will help ensure that the money laundering risk posed by IWT is properly reflected and steps taken to mitigate it, including potential policy changes to comply with the FATF standards.

In addition EIA has built effective information provision channels with a range of banks and has continued to develop these since the project ended. At the start of the project the partners had only developed one draft typology, and by the end it had produced the target number of 6. With expertise developed during the project EIA will continue to develop new typologies derived from detailed research and field investigations, as is currently working on a new one focused on trafficking of ivory and pangolin scales from Nigeria.

Also in October 2020 EIA assumed management of the IWT Media Monitoring programme established by Liberty Shared and is working to increase the number of recipient banks and due diligence database providers and NGO contributing content on IWT to the system.

Overall the project's exit strategy remains valid. The case studies developed have raised awareness of financial crimes linked to IWT and methods used, thereby increasing the capabilities of government agencies to conduct financial investigations into IWT and of private sector banks to detect suspicious transactions carried out by wildlife criminals. In addition EIA is now recognised as a credible and useful source of information on IWT-related financial flows, with one example being the invitation extended to the Project Leader to speak at major conference for banks and regulators in Latin America taking place in September 2021

9. Lessons learnt

The production of typologies under the project went well with EIA and Liberty Shared working well together to convert substantial amounts of intelligence gathered through field investigations and research into format suitable for banks and government regulators. In addition communicating the findings to interested banks proceeded well, with different channels developed including via webinars, presentations to compliance staff from specific banks, and through EIA's membership of the United for Wildlife Financial Taskforce.

Conversely effective engagement with all FIUs in project countries remained an elusive target. It proved challenging to secure meetings with some of the target FIUs, and well-placed intermediaries assisted in securing meetings with the Lao PDR and Vietnam FIUs. This appears to be a problem not unique to this project, with even government officials and donors reporting similar barriers in some countries. This could be partly due to the sensitive nature of work conducted by FIUs and an unfamiliarity in dealing with NGO.

It also proved difficult to penetrate the FATF National Risk Assessment and Mutual Evaluation processes, with access to reports not always possible and a lengthy multi-year schedule of country evaluations which meant that only few of the project country's NRAs fell within the two-year project period.

It also proved difficult to penetrate the FATF National Risk Assessment and Mutual Evaluation processes, with access to reports not always possible and a lengthy multi-year schedule of country evaluations which meant that only few of the project country's NRAs fell within the project period.

The major lesson learned would be to focus on fewer project countries, ideally six, to allow stronger relations to be built with key stakeholders such as FIUs. Other recommendations include use of intermediaries to initiate contact with FIUs and building relations with assessors from regional FATF-style

bodies engaged in the mutual evaluation process to feed information on IWT into National Risk Assessments.

9.1 Monitoring and evaluation

Overall the monitoring and evaluation plan as set out in the original project plan functioned satisfactorily during the project. One unavoidable change involved a planned meeting of partners in April 2020 to review progress had to be cancelled due to COVID-19 travel restrictions.

Responsibility for M & E work was shared by EIA and Liberty Shared. EIA uses software packages such as i2 (commonly used by law enforcement agencies) to capture and display intelligence from investigations and research. It also operates a dissemination tracker recording information subsequently shared with law enforcement agencies. A Back to Office Report system is used to record details of all meetings relevant to the project. Liberty Shared operates a monthly monitoring system to record details of all names provided to Know Your Customer databases under the project, and how many resulted in new or updated profiles. The organisation also uses analytics to record participation rates in webinars.

The main weakness identified in the M & E framework in terms of linking Outputs to the Outcome relates to indicators based on follow-up actions by government agencies and banks (Outcome indicators 0.1, 0.2, 0.3). This is mainly due to difficulties in obtaining feedback from recipients on the use made of the information provided, either due to operational procedures or commercial confidentiality. Instead the project only has incomplete qualitative feedback from some of the recipients on the usefulness of the information provided. A proxy indicator was used in this report for the indicator 0.2, with the number of banks requesting full versions of the typologies after receiving the anonymised versions (100 per cent) a good indicator that the information was of substantial interest.

9.2 Actions taken in response to annual report reviews

In response to issues raised in the Annual Report Review for Year 1 the project partners included more information on relationships with government agencies in subsequent reports and also improved reporting against logframe indicators in the Annual Report for Year 2 and the Final Report. A proxy indicator was also developed to measure the usefulness of information provided to banks, based on the percentage of banks requesting full versions of the typologies after receiving the anonymized versions.

In response to the main comment in the Annual Report Review for Year 2 the project partners have provided more comprehensive evidence for results reported in this final report.

Both of the annual report reviews were discussed with project partners.

10. IWT Challenge Fund Identity

Both of the publications produced under the project contained the statement “Funded by the UK Government through the Illegal Wildlife Trade Challenge Fund”, with the UK Aid logo prominently displayed. In addition mention was made that the project was funded by the IWT Challenge Fund at the beginning of webinars held for banks.

11. Impact of COVID-19 on project delivery

The main impact of COVID-19 was the barriers to international travel which prevented planned meetings with FIUs in 3 of the project countries taking place. An extension to the project of nine months was requested and approved in June, in the hope that international travel would resume before then, which proved not to be the case.

In response some of the travel funds were reallocated to consultancies, such as translation fees for producing some of the typologies in Chinese, to ensure outputs were met. In addition the project partners arranged additional webinars, such as one targeted at banks in east Asia held at the end of March.

On a positive note the rapid adoption of remote engagement via online meeting platforms allowed presentations on IWT to be delivered to hundreds of compliance staff from major international banks. EIA expects to continue using virtual meetings to continue engagement with banks, as this has proved very effective and reduces the needs for travel and hence reduced emissions from flying.

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)				
Audit costs				
TOTAL				

Staff employed (Name and position)	Cost (£)
G FATONA, PROJECT FINANCE OFFICER	
M AERNE, INTELLIGENCE OFFICER	
J BROOME, SNR INTELLIGENCE OFFICER	
J NEWMAN, CAMPAIGNS DIRECTOR	
M THORNTON, SNR INTELLIGENCE OFFICER	
INVESTIGATOR (not named for security reasons)	
D DIMITROVA, INTELLIGENCE OFFICER	
INVESTIGATOR 2 (not named for security reasons)	
C MILNES, VISUAL COMMS OFFICER	
P WOOLWICH, HEAD OF COMMS	
D JEPSON, Head of Actionable Research	
V FARABEE, Typologies Manager	
K SPEER, Analyst	
TOTAL	

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

Other items – description	Other items – cost (£)
Bank charges	
Laptop license renewal	
Monitoring and evaluation	
TOTAL	

12.2 Additional funds or in-kind contributions secured

Source of funding for project lifetime	Total (£)
TOTAL	

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

12.3 Value for Money

Overall the project provided good value for money. For example, the project was able to utilize a wide array of information produced by EIA’s investigative and intelligence staff beyond the time allocated in the project budget. In addition the media monitoring activity involved input from EIA staff with specific language skills not included in the project budget.

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)

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: Systematic deployment of AML measures in illegal wildlife trade cases erodes the capabilities of trafficking networks leading to a reduction in poaching and enhanced livelihood opportunities in source countries.</p>			
<p>Outcome: Enhanced capabilities and commitment of the public and private sectors to deploy anti-money laundering measures against wildlife trafficking syndicates, effectively curtailing their activities.</p>	<p>0.1: By December 2019, a target of 5 FIUs in project countries that have received typologies have conducted follow-up analysis into the individuals and entities identified and disseminated findings to law enforcement agencies, rising to a target of 8 FIUs in total conducting financial analysis and dissemination by mid-2020 (from a baseline of 0).</p> <p>0.2 By December 2019 at least 6 international banks (based on a minimum of 12 engaged in the project) that have received typologies have followed up with remedial actions against the individuals and entities identified, rising to a target of at least 9 banks pursuing remedial actions by mid-2020 (from a baseline of 0).</p> <p>0.3: By mid-2020 enforcement agencies in at least 5 project countries have demonstrably used financial investigations in IWT cases (from a baseline of 1).</p>	<p>0.1: Quarterly project action plans, records of engagement and correspondence with FIUs and law enforcement agencies</p> <p>0.2: Quarterly project action plans, records of engagement and correspondence with banks</p> <p>0.3: Records of engagement and correspondence with FIUs and other government agencies, media monitoring, court records</p>	<ul style="list-style-type: none"> - FIUs in target countries have the remit and resources to analyse IWT cases and channels to communicate and cooperate with government law enforcement agencies to ensure cases are followed up - Financial investigations lead to legal actions sufficient to hinder the activities of wildlife crime syndicates - Banks regard potential exposure to money laundering linked to wildlife crime as an issue of concern -Disruption of IWT syndicates will alleviate poaching pressure on target species in source countries

	<p>0.4: By mid-2020 a target of at least 9 international banks (based on a minimum of 12 banks engaged in project) receiving typologies from project partners have used the information to refine due diligence and develop red flags for IWT-linked financial flows (from a baseline of 0)</p> <p>0.5 By mid-2020 5 project countries formally recognise wildlife trafficking as an important AML risk and take measures to mitigate it (from a baseline of 0)</p>	<p>0.4: Records of engagement and correspondence with banks, log of submissions to World-Check, survey of banks in project year 2</p> <p>0.5: Public statements of officials in project countries, monitoring of National Risk Assessment process, reports from meetings of regional AML bodies</p>	
<p>Outputs:</p> <p>1. Greater awareness of illicit financial flows linked to illegal wildlife trade cases through the provision of detailed typologies to national FIUs and other relevant government enforcement agencies in project countries.</p>	<p>1.1: By mid-2020 at least 6 typologies on IWT cases have been produced, derived from a target of 6 field investigations completed, that yield financial intelligence of use to FIUs and other government agencies, with an interim target of at least 3 typologies on IWT cases produced based on 3 field investigations completed by mid-2019 (from a baseline of zero)</p> <p>1.2: By mid-2020 at least one typology provided to 10 FIUs (1 per country) and 20 other relevant government enforcement agencies (2 per country) in project countries, with an interim target of at least one typology provided to 5 FIUs and 10 other government agencies by mid-2019.</p>	<p>1.1: Quarterly project activity plans, EIA project tracker system, EIA's case inventory database, video and still photographs and reports from field research.</p> <p>1.2: Quarterly project activity plans, EIA project tracker system, internal record of engagement with FIUs and enforcement agencies</p> <p>1.3: Email or other correspondence between EIA and FIUs, internal reports of meetings</p>	<ul style="list-style-type: none"> - Safety and security situation in project countries sufficient to allow planned activities to take place - Research and investigations yield sufficient relevant information for typologies to be produced - FIUs and other agencies willing to accept information from project partners

	<p>1.3 Effective relationships established with 10 FIUs by end of 2019, with an interim target of 5 by end of 2018 developed through joint provision of financial intelligence training workshops with RUSI in 2017 and 2018 (from a baseline of 2).</p>		
<p>2. Regular information provision to private sector financial institutions enhances understanding of risks associated with illegal wildlife trade and embedded in customer due diligence systems</p>	<p>2.1: By mid-2020 at least 6 typologies on IWT cases have been produced based on a target of 6 field investigations completed that yield financial intelligence of use to banks, with an interim target of at least 3 typologies on IWT cases based on 3 field investigations completed produced by mid-2019 (from a baseline of 0).</p> <p>2.2: Number of banks receiving typologies on IWT cases reaches at least 18 banks by mid-2020 from a baseline of 4 banks receiving typologies from project partners prior to the project commencing.</p> <p>2.3: Effective communication channels established with 18 international and regional banks by mid-2020 from a baseline of 12 prior to project commencing.</p> <p>2.4: Common “red flags” used to identify financial flows and entities connected to IWT are derived from typologies provided and used routinely by at least 12 banks by mid-2020, with an interim</p>	<p>2.1: Quarterly project activity plans, EIA project tracker system, EIA’s case inventory database, Video and still photographs and notes from field research.</p> <p>2.2: Record of dissemination via secure server, internal log of interactions with banks, feedback from survey of banks in project year 2</p> <p>2.3: Record of correspondence and meetings with banks, reports from RUSI-led training courses for private sector in 5 of the project countries</p> <p>2.4: Internal log of interactions with banks, feedback from survey of banks in project year 2, meetings with banks</p> <p>2.5: EIA’s spreadsheets of monthly submissions, LA’s records of submissions to databases, monthly feedback from database operators</p>	<ul style="list-style-type: none"> - Safety and security situation in project countries sufficient to allow planned activities to take place - Research and investigations yield sufficient relevant information for typologies to be produced - Financial institutions are sufficiently concerned by potential exposure to IWT and reputational risk to act on typologies provided by project partners - Project partners are able to expand their network of contacts with banks beyond Asia, especially in Africa - Banks’ customer due diligence procedures are sufficiently robust to avoid offering services to individuals and companies implicated in IWT cases included in databases

	<p>target of 6 banks using “red flags” by September 2019 (from a baseline of 0).</p> <p>2.5: Number of wildlife traffickers and associated companies uploaded into customer due diligence databases (such as World-Check) used by banks based on submission by project partners increases to at least 250 a year by mid-2020 (from a baseline of 100 in 2017).</p>		
<p>3. Engagement with international and regional anti-money laundering bodies, including dissemination of reports and briefings, elevates the profile of IWT and ensures it is embedded in National Risk Assessments conducted during the project in relevant countries.</p>	<p>3.1: At least one report per year (one by mid-2019 and one by mid-2020) summarising financial flows linked to IWT cases provided to regional AML bodies (APG and ESAAMLG) and FATF (from a baseline of 0 reports produced in the past).</p> <p>3.2: Sessions on IWT typologies included as a matter of routine in annual meetings of APG and ESAAMLG.</p> <p>3.3: IWT identified as a significant money laundering risk in 3 out of 5 project countries scheduled to undertake National Risk Assessments by mid-2020 (from a baseline of 0).</p>	<p>3.1: Quarterly project activity plans, EIA’s internal project tracker, report production schedules, feedback from regional and international AML bodies</p> <p>3.2: Invitations to project partners to attend relevant meeting, internal back to office reports, official meeting reports</p> <p>3.3: Records of interactions with FIUs, public statements by FATF and regional AML bodies, analysis of initial risk assessments</p>	<p>- FATF and regional AML bodies willing to engage with project partners</p> <p>- National Risk Assessments result in an accurate analysis of threats posed by IWT</p>
<p>Activities (each activity is numbered according to the output that it will contribute towards, for example 1.1, 1.2 and 1.3 are contributing to Output 1)</p> <p>1.1 – Desk research into IWT cases including news reports, seizure data, and social media monitoring</p> <p>1.2 – Targeted field investigations into IWT cases, based on research outputs</p> <p>1.3 – Production of typologies (narrative and visual) derived from investigation findings</p> <p>1.4 – Dissemination of typologies to relevant FIUs and other government agencies</p> <p>1.5 – Follow-up meetings with FIUs to discuss typologies</p> <p>2.1 - Desk research into IWT cases including news reports, seizure data, and social media monitoring</p>			

- 2.2 - Targeted field investigations into IWT cases, based on research outputs
- 2.3 - Production of typologies (narrative and visual) derived from investigation findings
- 2.4 – Communication of typologies to interested banks via LA’s secure platform
- 2.5 – Follow-up briefings to interested banks through conference call platforms
- 2.6 – Media monitoring of IWT cases, including Chinese language reports
- 2.7 – Monthly submission of information derived from media monitoring to customer due diligence databases

- 3.1 – Published report on opportunities to use AML measures against IWT released to coincide with the London Conference on IWT in October 2018
- 3.2 – Published report in late 2019 summarising typologies produced under the project
- 3.3 – Attendance at annual meetings of regional AML bodies in Asia and Africa
- 3.4 – Meetings and engagement with FATF
- 3.5 – Analysis of initial National Risk Assessment findings

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>Systematic deployment of AML measures in illegal wildlife trade cases erodes the capabilities of trafficking networks leading to a reduction in poaching and enhanced livelihood opportunities in source countries.</p>		<p>As the project's main beneficiaries have been government agencies and private sector banks impacts on poverty and livelihoods are indirect. These include increased capabilities of government agencies, especially FIUs, to trace illicit financial flows which exacerbate poverty and to seize assets derived from IWT.</p> <p>In terms of impacts on IWT, by providing detailed information on linked financial flows and specifics on individuals and companies involved to a range of enforcement agencies the project assists in the disruption of trafficking syndicates which can reduce poaching pressure. Such intelligence-led enforcement has been shown to be effective in Tanzania and Mozambique, both project countries, where elephant poaching has greatly reduced due to actions against trafficking syndicates. Similarly, in China, another project country, robust action prompted by intelligence has led to a host of IWT-linked seizures and information sharing with transit countries in the region.</p>
<p>Outcome</p> <p>Enhanced capabilities and commitment of the public and private sectors to deploy anti-money laundering measures against wildlife trafficking syndicates, effectively curtailing their activities.</p>	<p>0.1: By December 2019, a target of 5 FIUs in project countries that have received typologies have conducted follow-up analysis into the individuals and entities identified and disseminated findings to law enforcement agencies, rising to a target of 8 FIUs in total conducting financial analysis and dissemination by mid-2020 (from a baseline of 0).</p> <p>0.2 By December 2019 at least 6 international banks (based on a minimum of 12 engaged in the project) that have received typologies have followed up with remedial actions against the individuals and entities identified, rising to a target of at least 9 banks pursuing remedial actions by mid-2020 (from a baseline of 0).</p> <p>0.3: By mid-2020 enforcement agencies in at least 5 project countries have demonstrably used financial investigations in IWT cases (from a baseline of 1).</p>	<p>0.1 During the project typologies were provided to FIUs in 7 project countries and one non-project country (South Africa, due to the typology on Vietnam containing information on rhino horn smuggling from the country). Follow-up engagement indicates analysis of the intelligence provided by 5 countries.</p> <p>0.2 During the project 16 banks receiving typologies conducted follow-up research, usually checking client portfolios. The high percentage of banks of banks requesting full versions of the typologies after receiving the anonymised versions (100%) indicates follow-up actions</p> <p>0.3 By the end of the project enforcement agencies in 6 project countries had conducted financial investigations into IWT cases, as demonstrated through engagement with the agencies and media monitoring of court cases.</p>

	<p>0.4: By mid-2020 a target of at least 9 international banks (based on a minimum of 12 banks engaged in project) receiving typologies from project partners have used the information to refine due diligence and develop red flags for IWT-linked financial flows (from a baseline of 0)</p> <p>0.5 By mid-2020 5 project countries formally recognise wildlife trafficking as an important AML risk and take measures to mitigate it (from a baseline of 0)</p>	<p>0.4 Typologies produced by the project partners contained a total of 40 specific red flags which were communicated to 31 banks. In addition red flags contained in the Vietnam typology were distributed to the 44 banks in the United for Wildlife Financial Taskforce.</p> <p>0.5 The goal was partly attained; with 3 out of 4 target countries (Malawi, Mozambique and Vietnam which completed a National Risk Assessment or Mutual Evaluation during the project classifying IWT as a money laundering risk.</p>
<p>Output 1. Greater awareness of illicit financial flows linked to illegal wildlife trade cases through the provision of detailed typologies to national FIUs and other relevant government enforcement agencies in project countries.</p>	<p>1.1: By mid-2020 at least 6 typologies on IWT cases have been produced, derived from a target of 6 field investigations completed, that yield financial intelligence of use to FIUs and other government agencies, with an interim target of at least 3 typologies on IWT cases produced based on 3 field investigations completed by mid-2019 (from a baseline of zero)</p> <p>1.2: By mid-2020 at least one typology provided to 10 FIUs (1 per country) and 20 other relevant government enforcement agencies (2 per country) in project countries, with an interim target of at least one typology provided to 5 FIUs and 10 other government agencies by mid-2019.</p> <p>1.3 Effective relationships established with 10 FIUs by end of 2019, with an</p>	<p>1.1 The target was fully achieved with 6 typologies produced during the project (1 in year 1, 3 in year 2 and 2 in year 3). Collectively the typologies covered all 4 of the target species and 7 of the project countries. Evidence is provided in the form of the anonymised typologies in Annex 1.</p> <p>1.2 The target was not fully achieved, with typologies provided to FIUs in 7 project countries (and 1 non-project country), and 15 enforcement agencies. Evidence is provided in trip reports contained in Annex 1</p>

	interim target of 5 by end of 2018 developed through joint provision of financial intelligence training workshops with RUSI in 2017 and 2018 (from a baseline of 2).	1.3 This target was not fully achieved, with communication taking place with 7 FIUs rather than the projected 10. Evidence is provided in trip reports contained in Annex 1.
Activity 1.1 – Desk research into IWT cases including news reports, seizure data, and social media monitoring		This continuous activity yielded a wide range of intelligence products used during the project, including a database of major seizures, network charts of IWT syndicates, profiles of Persons of Interest and country assessments. While this information is confidential an examples is contained in Annex 1.
Activity 1.2 – Targeted field investigations into IWT cases, based on research outputs		During the project 5 detailed field investigations took place covering Vietnam, Thailand, Laos, Uganda, Angola and Nigeria. Evidence in provided in Annex 1 in the form of EIA reports based on field investigation findings. During year 3 field investigations did not take place due to the pandemic, but remote engagement by EIA investigators with illegal wildlife traders yielded useful information.
Activity 1.3 - Production of typologies (narrative and visual) derived from investigation findings		Activity completed with the production of 6 typologies (both anonymised and full versions) by the end of the project. 2 of the typologies were translated into Chinese.
Activity 1.4 – Dissemination of typologies to relevant FIUs and other government agencies		Typologies were provided to FIUs in 7 out of the 10 project countries, and
Activity 1.5 – Follow-up meetings with FIUs to discuss typologies		Meetings were held with FIUs in 3 countries to discuss specific typologies. The number would have been higher if not for international travel not being possible during year 3.
Output 2 Regular information provision to private sector financial institutions enhances understanding of risks associated with illegal wildlife trade and embedded in customer due diligence systems	<p>2.1: By mid-2020 at least 6 typologies on IWT cases have been produced based on a target of 6 field investigations completed that yield financial intelligence of use to banks, with an interim target of at least 3 typologies on IWT cases based on 3 field investigations completed produced by mid-2019 (from a baseline of 0).</p> <p>2.2: Number of banks receiving typologies on IWT cases reaches at least 18 banks by mid-2020 from a baseline of 4 banks receiving</p>	<p>2.1 See comments under Indicator 1.1 above.</p> <p>2.2 During the project typologies were shared with a total of 28 banks (surpassing the target of 18 banks) via Liberty Shared’s secure platform and</p>

	<p>typologies from project partners prior to the project commencing.</p> <p>2.3: Effective communication channels established with 18 international and regional banks by mid-2020 from a baseline of 12 prior to project commencing.</p> <p>2.4: Common “red flags” used to identify financial flows and entities connected to IWT are derived from typologies provided and used routinely by at least 12 banks by mid-2020, with an interim target of 6 banks using “red flags” by September 2019 (from a baseline of 0).</p> <p>2.5: Number of wildlife traffickers and associated companies uploaded into customer due diligence databases (such as World-Check) used by banks based on submission by project partners increases to at least 250 a year by mid-2020 (from a baseline of 100 in 2017).</p>	<p>through direct engagement with banks. Chinese versions of 2 typologies were shared with 6 Chinese banks.</p> <p>2.3 Direct communication channels established with 20 banks during the project, including presentations on typologies to compliance officers from 2 major international banks and meetings with 5 major financial due diligence service providers.</p> <p>2.4 Total of 40 specific red flags contained in the project’s typologies shared with 29 banks, as well as 44 banks which are members of the United for Wildlife Financial Taskforce.</p> <p>2.5 In total 1383 new profiles were created or updated based on information provided by project partners during the project. The annual target of 250 was exceeded in all 3 project years.</p>
<p>Activity 2.1. Desk research into IWT cases including news reports, seizure data, and social media monitoring</p>		<p>See comments under Activity 1.1 above.</p>
<p>Activity 2.2. Targeted field investigations into IWT cases, based on research outputs</p>		<p>See comments under Activity 1.2 above</p>
<p>Activity 2.3. Production of typologies (narrative and visual) derived from investigation findings</p>		<p>See comments under Activity 1.3 above</p>
<p>Activity 2.4. Communication of typologies to interested banks via LA’s secure platform</p>		<p>In addition to using the platform established by Liberty Shared typologies were also shared directly with banks based on relationships developed during the project.</p>

Activity 2.5. Follow-up briefings to interested banks through conference call platforms	During the project 11 webinars were arranged to present typologies to interested banks.
Activity 2.6. Media monitoring of IWT cases, including Chinese language reports	This activity occurred continuously during the project, with monitoring taking place of news sources in English, Chinese and Vietnamese.
Activity 2.7. Monthly submission of information derived from media monitoring to customer due diligence databases	This activity occurred continuously during the project, with EIA assuming management of the submission system from Liberty Shared in October 2020.
<p>Output 3. Engagement with international and regional anti-money laundering bodies, including dissemination of reports and briefings, elevates the profile of IWT and ensures it is embedded in National Risk Assessments conducted during the project in relevant countries.</p>	<p>3.1: At least one report per year (one by mid-2019 and one by mid-2020) summarising financial flows linked to IWT cases provided to regional AML bodies (APG and ESAAMLG) and FATF (from a baseline of 0 reports produced in the past).</p> <p>3.2: Sessions on IWT typologies included as a matter of routine in annual meetings of APG and ESAAMLG.</p> <p>3.3: IWT identified as a significant money laundering risk in 3 out of 5 project countries scheduled to undertake National Risk Assessments by mid-2020 (from a baseline of 0).</p>
Activity 3.1. Published report on opportunities to use AML measures against IWT released to coincide with the London Conference on IWT in October 2018	The report was delayed until year 3 to allow time for the project to develop more case studies.
Activity 3.2. Published report in late 2019 summarising typologies produced under the project	This activity was delayed, instead one report was produced in 2020 and one in 2021. In addition a short film on IWT financial flows was also produced.
Activity 3.3. Attendance at annual meetings of regional AML bodies in Asia and Africa	This activity did not occur, partly due to the pandemic and initial difficulties in engaging with the regional bodies. A meeting with senior ESAAMLG staff took place in year 2.
Activity 3.4. Meetings and engagement with FATF	Excellent progress on this activity occurred in years 2 and 3 with project partners involved in consultations with FATF secretariat and providing input into a major FATF report on money laundering and IWT launched in June 2020

Activity 3.5. Analysis of initial National Risk Assessment findings

Analysis shows that shows that 3 out of 4 project countries producing NRAs or completing Mutual Evaluation during the project considered IWT a money laundering risk.

Annex 3 Standard Measures

Table 1: Project reporting against IWT Challenge Fund Standard Measures

Project Ref and Title: IWT059 - Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade							
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						

Project Ref and Title: IWT059 - Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade

Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
3B	Number of loans provided to micro, small and medium 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

Project Ref and Title: IWT059 - Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade

Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
8	Number of illegal wildlife trade management plans, action plans, or strategies produced for use by Governments, public authorities, or other implementing agencies in the host country						
9	Number of field guides/manuals produced to assist work related to IWT product identification, classification and recording						
10A	Number of customs officials trained						
10B	Number of prosecutors/judges trained						
10C	Number of police officers trained						
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).						
11A	Number of criminal networks/trade routes mapped/identified	6					Each typology produced under the project contained information on IWT

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Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
							syndicates and smuggling routes
11B	Number of illegal wildlife shipments detected						
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						
13B	Value of illegal wildlife products seized through law enforcement action facilitated by the project						
13C	Number of wildlife crime cases submitted for prosecution	1					
13D	Number of individuals charged for wildlife crime	2					
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						

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Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
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						
15B	Number of intelligence or information reports exchanged with INTERPOL or the World Customs Organization						
15C	Number of amendments to national laws and regulations in project countries						
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)	Approx. 600					Compliance staff from banks received briefings and presentations on IWT

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Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
17B	Number of training weeks provided						
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 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)						

Project Ref and Title: IWT059 - Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade

Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
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							
21A	Number of papers published in peer reviewed journals						
21B	Number of papers submitted to peer reviewed journals						
21C	Number of other publications produced	2					
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>)	0					

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Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
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 master's qualifications (MSc/MPhil etc) obtained						
24C	Number of other qualifications obtained						
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 proved provided						

Project Ref and Title: IWT059 - Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade							
Code	Description	Total	Nationality (if relevant)	Gender (if relevant)	Title or Focus (if relevant)	Language (if relevant)	Comments
26A	Number of conferences/seminars/workshops organised to present/disseminate findings	11					
26B	Number of conferences/seminars/workshops attended at which findings from IWT project work will be presented/ disseminated	7					
26C	Number of individual media articles featuring the project	5					

Publications

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)
Report *	EIA, Money Trails, 2020	UK	UK	Male	EIA, London	https://eia-international.org/report/money-trails-identifying-financial-flows-linked-to-wildlife-trafficking/
Report *	EIA / Liberty Shared, Tackling Financial Flows from Illegal Wildlife	UK	UK	Male	EIA, London	https://eia-international.org/report/tackling-financial-flows-from-illegal-wildlife-trade-in-east-asia/

	Trade in East Asia, 2021					

Annex 4 IWT Contacts

Ref No	IWT059
Project Title	Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade
Project Leader Details	
Name	Julian Newman
Role within IWT Project	Project Leader
Address	[REDACTED]
Phone	
Fax/Skype	
Email	
Partner 1	
Name	Duncan Jepson
Organisation	Liberty Shared
Role within IWT Project	Lead for Liberty Shared on the project. Coordinated production of typologies, participated in webinars and financial sector engagement, and undertook project planning and financial reporting for project reports.
Address	[REDACTED]
Fax/Skype	
Email	
Partner 2	
Name	Tom Keatinge
Organisation	Royal United Services Institute (RUSI)

Role within IWT Project	Lead on engagement with the Financial Action Task Force, published commentaries on IWT and money laundering.
Address	[REDACTED]
Fax/Skype	
Email	

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.	YES
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.	NO
If you are submitting photos for publicity purposes, do these meet the outlined requirements (see section 13)?	NO
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.	YES
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.	NO
Have you involved your partners in preparation of the report and named the main contributors	YES
Have you completed the Project Expenditure table fully?	YES
Do not include claim forms or other communications with this report.	