





## Illegal Wildlife Trade (IWT) Challenge Fund Final Report

To be completed with reference to the "Project Reporting Information Note": (<a href="https://iwt.challengefund.org.uk/resources/information-notes/">https://iwt.challengefund.org.uk/resources/information-notes/</a>).

It is expected that this report will be a **maximum of 20 pages** in length, excluding annexes.

Submission Deadline: no later than 3 months after agreed project end date.

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IWT Challenge Fund Project Information

Project reference	IWT096
Project title	Case closed? Using historic cases to enable new financial investigations
Country(ies)	Uganda, Malawi, Zambia and Namibia
Lead Partner	Royal United Services Institute for Defence and Security Studies (RUSI)
Project Partner (s)	Wildlife Crime Prevention (WCP), Rooikat Trust, Environmental Investigation Agency (EIA), Royal Foundation's United for Wildlife (UfW) Financial and Transport Taskforces, WildAid, TRAFFIC, Refinitiv and Western Union
IWTCF grant value	£282,484
Start/end dates of project	Project Start date: 01/10/2021
Project Leader's name	Project End date: 31/12/2023
Project website/blog/social media	https://rusi.org/explore-our-research/projects/using-closed-illegal-wildlife-trade-cases-generate-new-financial-intelligence
Report author(s) and date	Annual Report 2

#### 1. Project summary



Wildlife crime is driven by greed as well as need, with much illegal wildlife trade (IWT) conducted for lucrative profits by transnational, organised offenders. Subsequently, there is global consensus around the need to 'follow the money' in IWT investigations. However, this is undermined by a lack of public sector capacity in financial-investigation as well as scant financial intelligence to support private sector actors in detecting suspicious activity.

In 2020, the Financial Action Task Force (FATF) – the global standard-setting body on money laundering and terrorist financing – published recommendations on measures to combat the risks of wildife-related illicit finance, including conducting parallel financial investigations of wildlife cases and prosecuting IWT offenders using anti-money laundering (AML) legislation. Yet, at the time of the FATF report, financial intelligence on IWT was not 'regularly or proactively collected, developed, and disseminated to initiate or support financial investigations into wildlife crimes'. 5

Building on RUSI's first Challenge Fund project *Follow the Money I* (IWT021) and *Follow the Money II* (IWT043) – conducted in Kenya, Tanzania, Uganda, Malawi, Mozambique and Zambia – this project seeks to address the low risk financial environment in East and Southern Africa that allows criminal actors to reap vast profits from IWT. This project (IWT096) enhances public sector capacity through multi-agency case review workshops aiming to increase the knowledge and skills required to increase the application of financial investigations and prosecutions using anti-money-laundering (AML) and financial crimes legislation in Uganda, Malawi, Namibia and Zambia. Through such case reviews, it also seeks to develop new sources of financial intelligence – wildlife crime typologies or risk indicators – which can be disseminated to the public and private sector to improve detection, monitoring and reporting of wildlife-related suspicious financial activity, including financial institutions who use such indicators to optimise their Suspicious Transaction Reporting (STR) systems. Longer term, by strengthening public sector investigation and prosecution, and private sector disruption of finacial crimes linked to IWT, the project aim to reduce IWT and thus alleviate poverty by protecting natural resources and ecosystem services upon which local communities and economies depend. Additionally, by promoting finanial investigation, IWT096 supports governments in the recovery of stolen assets, buttressing state revenues in the focal countries, three of which are classified as low-income under IWTCF guidance.<sup>6</sup>

The four project countries were selected based on their potential for globally relevant 'lessons learned' as well as explicit requests for further assistance, ensuring the programme is demand-driven. Assistance in each country departed from a different baseline: Malawi and Namibia, followed by Uganda, have the highest baseline capacity to conduct such investigations. The 2019 Malawi Mutual Evaluation Report (MER) prioritised wildlife crime among the predicate offences which generate the largest proceeds, commending the domestic cooperation being achieved through the Inter-Agency Committee on Combatting Wildlife Crime (IACCWC) and the Wildlife Crime Investigations Unit (WCIU), a joint initiative between the Department for National Parks and Wildlife (DNPW) and Malawi Police Service (MPS) with support from the Directorate of Public Prosecutions (DPP) and the Financial Intelligence Authority (FIA). During the course of the project, these foundational measures started to yield results, with landmark money laundering convictions of various members of the Lin-Zhang network achieved in 2023.8 In Namibia, the Financial Intelligence Centre (FIC) released a 2017 report on IWT and illicit finance, concluding 'almost all cases reviewed could not provide details on illicit financial flows such as methods and techniques used to fund poaching activities', thus enforcement was seen as disproportionately focussed on low-level poachers, and not targeting those who benefit from the crime. 9 In Uganda, authorities had included IWT as a threat in their 2017 National Risk Assessment (NRA) and established solid multi-agency architecture, in the form of a National anti-Wildlife Crime Coordination Task Force, yet criminal justice outcomes have been limited to date. 10 Zambia's baseline on IWT-related money flows was very limited at the project outset, despite the prevelance of high-level trafficking. Perhaps unsurprisingly, this jurisdiction has made the most significant progress during the course of this project. In all countries, the project sought to provide the necessary assistance to generate new financial intelligence, optimise financial investigations, and consolidate progress against IWT.

#### 2. Project Partnerships

Evidence for the narrative in this section is provided in Annex 5, 6

#### **Partnership Framework**

The project has enjoyed collaboration with a mix of sub-contractors, *pro bono* partners, local stakeholders, international civil society, private sector and technical experts. The input of individual partners has fluctuated in line with the activities and priorities, as outlined below, and all monitoring and evaluation (M&E), including report-writing, has been led by RUSI as the central coordinating project team.

The programme was designed with a local partnership framework in place across the focal countries, with the exception of Uganda where RUSI's own professional networks were considered robust enough to carry the logistical and coordination requirements of the project. Additionally, an early change request before project inception, due to escalating conflict in Cabo Delgado at that time, was approved and led to Namibia being selected as the fourth focal country in place of Mozambique, resulting in Rooikat Trust (RT) joining the project instead of WCS Mozambique (Annex 6). These local subcontracted partners thus included RT (Namibia), Lilongwe Wildlife Trust (LWT) (Malawi) and Wildlife Crime Prevention (WCP) (Zambia). Whilst RUSI had not partnered with RT before IWT096, RT plays a significant role in the Blue Rhino Task Force (BRTF), a joint initiative between the Namibian Police Force (NAMPOL) and the Ministry of Environment, Forestry and Tourism (MEFT), and underpins the Namibian authorities response to emerging IWT threats, including tackling the financial aspects of the crime, making them ideally suited for this project. All other local partners had worked with RUSI since the inception of IWT043, in 2018.

At an international/UK level, further NGO or private sector partners were identified at the outset of the project, with EIA providing inputs as subcontractors, and UfW, Western Union and Refinitiv committing services *pro bono*. Throughout the project's lifespan, tactical collaborations were further initiated on a *pro bono* basis, with WildAid and TRAFFIC also collaborating on select activities (Annex 6).

All local countries and local partners were selected based on requests for support in further financial investigation capacity building, most of which were established under IWT043 and demonstrated in letters of support provided at

submission (Annex 6). All partners were engaged in informal discussions on project design for IWT096, prior to bid submission, which were subsequently consolidated in formal negotiations and agreements during inception. Legal contracts, including codes of conduct, research ethics, data protection policies and statements of work, were thus agreed within six months of project inception (see Annex 5). RUSI then collaborated closely with the various partners to deliver all outputs, with involvement of local and global partners varying according to indidvidual strengths and priorities.

#### Formal and Informal Partner Participation and Roles

Activity-related evidence related to the below can be found in Section 3.1.

Under Output 1, RUSI, local partners and EIA all collaborated on the co-creation of case criteria (1.1), and the selection and shortlisting of 2 cases per country (1.2). WCP and RT were subsequently involved in gathering local case information and/or preparing briefing materials for the workshops in Zambia and Namibia (1.3 and 1.4). LWT, due to a paucity of suitable local cases in Malawi, chose to focus the case reviews on external case studies, which were created and prepared by EIA for the Lilongwe workshop. In Uganda, RUSI collaborated directly with the Financial Intelligence Authority (FIA) and Uganda Wildlife Authority (UWA) to determine case selection criteria and agree selection, supported by valuable inputs from individuals at both EIA and RUSI, with expertise on the inidvidual cases selected. Finally, WCP was responsible for the coordination of national agencies and activities in their support of the Inter-agency Framework on Asset Recovery's (IFAR) paper review, to which RUSI also provided technical facilitation and training inputs (1.5). The additional activity is a testament to the collaborative nature of the project and its commitment to continuous adaptation and live-learning.

Under Output 2, local partners in Zambia and Namibia played an integral role in the coordination and delivery of the case review workshops (2.1). For instance, WCP assisted in the identification and recruitment of appropriate workshop participants, from the relevant law enforcement and justice agencies involved in wildlife or wildlife-related financial crime investigation and prosecution, by coordinating invitations through their partner, DNPW. In Namibia, this activity was led by RUSI coordinating with the FIC and Rooikat as workshop co-hosts. Both WCP and RT were significant in identifying and securing relevant local private and public sector actors to offciate in the opening and closing ceremonies of the workshops. For example, in Namibia, the workshop was opened by Gerrit Eiman, Deputy Director of the FIC and Martha Imalwa, the Prosecutor General, and closed by Deputy Commissioner Barry de Klerk of NAMPOL, who leads operations for the BRTF. Additionally, WCP and RT supported (2.1) with the recruitment of expert speaker inputs and advice and administrative support on procurement of logistical arrangements. Speaker inputs at the workshops included presentations by Refinitiv and United for Wildlife (2.1). In Malawi, LWT provided logistical and strategic advice to RUSI on the delivery of the workshop (2.1)

In Uganda, RUSI led the design and coordination of the workshops directly with the local authorities, inviting the relevant agency participants, procuring the venue and arranging the schedule, and securing local speaker or officiant inputs from prominent public and private sector actors in the wildlife criminal justice and enforement chain (2.1). Across all countries, RUSI led the technical design and delivery of all four workshops, through its financial investigations trainer, Neil Bennett, and the wider project team. This was completed in close collaboration with EIA who contributed extensive planning inputs, various case review materials and training content, and provided an expert trainer to assist with the workshops in Uganda, Zambia and Malawi.

The workshops (2.1) also proved a major driver of informal collaboration and stakeholder engagement at the national level, with many 'mainstream' enforcement and financial intelligence agencies playing an elevated role as co-hosts, speakers or officiants, as well as providing trainees, demonstrating a growing engagement with the threat of wildlife crime, sometimes at the highest levels of leadership. In Namibia, seven different government institutions were represented including the Ministry of Environment Tourism and Forestry (METF), Office of the Prosecutor-General (OPG), the Financial Intelligence Centre (FIC), Office of the Judiciary, Namibian Police Force (NAMPOL), Namibia Revenue Agency (NNRA), and the Office of the President. Additionally, the private sector was represented among participants by the Banker's Association of Namibia. In Zambia, eight government agencies were represented, including DNPW, Zambia Revenue Authority, Zambia Police Service, the Anti-Money Laundering Investigation Unit (AMLIU) of the Drug Enforcement Commission (DEC), the Anti-Corruption Commission (ACC), the Financial Intelligence Centre (FIC) and National Prosecutions Authority (NPA). In Malawi, six agencies attended including the FIA, the Anti-Corruption Bureau (ACB), the Malawi Police Service (MPS) including the MPS Criminal Investigations Directorate and the MPS Central Intelligence Unit, the Directorate of Public Prosecutions (DPP), the Malawi DNPW Wildlife Crime Investigation Unit (WCIU), and the Malawi Revenue Authority (MRA). Additionally, guest speakers and dignitaries included the Director General of the FIA and the Director of Public Prosecutions. In Uganda, six different public authorities including the UWA, the FIA, the Criminal Investigations Directorate (CID) at Uganda Police Force (UPF), the Uganda Revenue Authority (URA), the Office of the Director of Public Prosecutions (ODPP), and the National Forestry Authority (NFA) were in attendance. Additionally, the workshop

was supported by guest speakers from the Asset Recovery, Plea Bargain and Wildlife and Environment teams at the ODPP, and the Chief Magistrate of the central wildlife court, the Deputy Director of Corporate and Legal Affairs, UWA, and the Executive Director of the FIA, lending high-level endorsement and institutional support to the activity.

Finally, the workshops (2.1) benefitted from significant private sector collaboration, in the form of formalised *probono* partnerships – such as Refinitiv and Western Union (WU), both of whom provided valuable training inputs – as well as informal involvement of local financial institutions, including Standard Chartered in Uganda and Zambia, NBS in Malawi, and the Bankers Association of Namibia/NEDBank in Namibia. In particular, the contributions from WU – whilst a formal partner at the project outset – surpassed expectation in programme design and value. Henri Schomper, Senior Manager of the WU Financial Intelligence Unit (FIU), attended each country workshop in person, for several days, delivering his own input on the work of the WU FIU and highlighting how they can support public sector agencies investigating wildlife-related illicit finance, as well as supporting the other two trainers in group work facilitation and handling questions. As outlined in Section 3 and demonstrated, his involvement led to a significant leap in cross-sector information sharing on wildlife-linked financial intelligence, thus feeding into MI 2.4.

In terms of supporting the emergence of *de facto* champions (2.3), WCP built substantial momentum and leveraged opportunities around the emergence of Margaret Kapambwe-Chitundu, Head of Asset Forfeiture for the National Prosecution Authority (NPA), e.g. the paper review under activity (1.5). They also provided RUSI with insights around the Zambian typology (2.4). RT, in Namibia, also enabled and facilitated the *de facto* champion, Hasan Sessay of the BRTF, in the adaptation and development of a locally-tailored 'Rapid Reference Guide' (RRG) (2.3). The RRG was outside the scope of this project, but reflects the momentum created by IWT096. RT also provided open source intelligence in support of the development of Namibian typologies (2.4). RUSI also engaged directly with Joan Katushabe, FIA, Her Worship (HW) Gladys Kamasanyu, and Douglas Kabagambe, URA, as multiple *de facto* champions in Uganda (2.3), involving them in future training and speaker opportunities both within and outside the scope of this project, and collaborating with Kabagambe to finalise the Ugandan typology (2.4). RUSI also engaged directly with the Malawian champion, John Minofu of the FIA, on the casino loans intelligence alert. RUSI also designed, delivered and analysed the pre- and post-workshop questionnaires (2.2), supported and facilitated the emergence of champions where possible (2.3), and developed and disseminated the red flag typologies in conjunction with UfW's intelligence capability and bulletin service, drawing upon EIA's Global Crime Tracker to do (2.4).

Most activities under Output 3 were predominantly executed by RUSI. However, collaboration was sought within the partnership network where relevant. WCP provided excellent inputs to the best practice report (3.1) around offender tiers, as well as providing valuable data on female offenders for the gender article, alongside LWT (3.4). Additionally, another *pro bono* input under Output 3, specifically under (3.4), comprised the provision by WildAid of pre-existing large-scale consumer survey gender-disaggregated datasets on attitudes to wildlife and wildlife crime, conducted as the base- and endline surveys for their wildlife crime social behavioural change campaigns in Uganda, but not yet undergone any gendered analysis. Preliminary gendered analysis was conducted but due to word length restrictions, the resultant article focused on evidence from the case files.

The level of partnership involvement increased again under Output 4, under the execution of the dissemination strategy (4.1). Whilst key roles envisaged in dissemination planning were not always taken up due to resource constraints and availability issues – for example key EIA and RT personnel were both unfortunately unavailable at the time of the virtual events – presenters at the virtual workshop (4.2) and public-private webinar (4.3) included representation from formal partners and the wider project ecosystem of national authority partners or beneficiaries, including RUSI, FIA Malawi, WCP, Western Union, NPA Zambia, UfW, and the Judiciary in Uganda. The events gave emerging project 'champions' – such as John Minofu of the FIA and Margaret Kapambwe-Chitundu of the NPA – a platform for sharing their expertise – as well allowing newer voices such as Suwilanji Namposya, a Legal Assistant at WCP, valuable exposure to presenting and training in a virtual environment. Contributions from experienced trainers and experts, from RUSI, Western Union, UfW and the Uganda Judiciary, complemented this line-up very well. Partners were primarily engaged in implementation of the above activities, but also involved in contributing M&E data and reports on key activities, to support the evaluation of progress against the project outcome and reporting.

#### Particular Achievements and Challenges

During the course of the project, all partners contributed valuable expertise and performed certain functions. However, notable achievements and successful outcomes, where partners went above and beyond the scope of work initially agreed and outcomes have led to new initiatives and further collaboration, include:

• The drive shown by WCP in capitalising on national momentum around financial intelligence, anti-corruption, and inter-agency collaboration on wildlife crime. This has led to significant impact on the ground – with Zambian authorities using financial investigation on live and closed wildlife cases for the first time (see Section 3.2) to new programmatic collaborations between RUSI and WCP – currently at bidding stage – where RUSI aims to provide financial investigation capacity building support to WCP's domestic and regional programmes on combating wildlife and timber trafficking flows.

- The new partnership with RT has been very successful, with RT showing great commitment to adopting best practice from IWT096 and earlier projects like IWT043, such as using wildlife case 'autopsies' as an investigation protocol at BRTF, integrating financial investigation and cross-sector information-sharing, and producing the RRG. RT's footprint and network in Angola may provide a future opportunity for partnership on further 'follow the money' capacity building, given evidence of Angola's challenges with tackling the illegal ivory and rhino trade, and the scale of cross-border illicit wildlife flows exiting Africa via Angola's ports.<sup>11</sup>
- The success of the WU FIU engagement in the training, resulted in significant public-private sector engagement on sharing financial intelligence and generating novel information for wildife investigators, supporting the mapping of wildlife networks and illicit financial flows by national authorities. RUSI and WU will work closely together on future activities of this nature, integrating WU FIU training inputs into their workshop design and best practice materials wherever possible. Indeed, this has already occurred under a GIZ-funded project, with Henri Schomper providing similar inputs in a multi-agency financial investigation workshop held in Nigeria in September 2023. Finding ways to facilitate regular engagement and follow-ups with local investigators is a key objective for future programmatic design, as Schomper observed that enquiries started to drop off six months after the workshops occurred, possibly due to the practise of rotating officers.
- Whilst the preliminary gendered analysis of the WildAid Ugandan datasets did not make the final edit in the
  gender article (3.4), the data sharing partnership brokered under this project has formed the genesis of
  future collaborations on improving evidence on gender and wildlife crime for the purposes of 'unlocking'
  demand reduction opportunities. This has led to a multi-country project proposal, supported by gender
  experts from University of Maryland, which is currently on a reserve list for IWTCF funding
  (IWTEVR10S2\1001).
- Support provided by UfW on the development and dissemination of the typologies and recruitment of participants and speakers for the virtual events led to significant results against indicators. RUSI and UfW have been long-term collaborators, ever since RUSI was contracted by the Royal Foundation to support the launch of the Financial Taskforce in 2018, 12 and this has continued under IWT096. UfW contributed to the costs of RUSI personnel attending their Southern Africa Chapter (SAC) event in March 2022 and March 2023. These events supported high-level engagement on the programmatic outputs and financial crime objectives of IWT096 with key stakeholders from the public/private sectors, and civil society, many of whom were subsequently invited to, and attended, the virtual events under Output 4. Additionally, the 2022 UfW SAC meeting was followed by a high level event where RUSI and UfW were able to engage on counter IWT strategy discussions for the region with the British High Commission (BHC) and other stakeholders in Kasane. In 2023, RUSI personnel also interacted with the South Africa Financial Intelligence Centre (FIC), regional representatives of USAID and the US Federal Bureau of Investigations, and key local public sector stakeholders from the Department of Forestry, Fisheries and the Environment (South Africa) and the Directorate of Priority Crimes (HAWKS; South Africa), as well as private sector attendees from ABSA, FNB/Firstrand, and WU. Finally, discussions were also had with Andrew Bastable, Defence Attache to the BHC in Zimbabwe and Defence Advisor to Botswana, Malawi and Zambia, and Zara Reid, the BHC's IWT, Climate Change and Biodiversity Coordinator in Southern Africa.
- The RUSI/UfW relationship continues outside of the scope of IWT096, where RUSI is currently supporting the stakeholder mapping and coordination and delivery of the upcoming UfW West African Chapter launch in July 2024. RUSI and UfW have also collaborated with TRAFFIC on an INL-funded intervention, advancing public private information sharing through cross-sector engagement in Beijing. Additionally, following her recent appointment to the role of Senior Associate Fellow at RUSI, <sup>13</sup> Xolisile Khanyile also the ex-director of the FIC in South Africa and South African Money Laundering Integrated Taskforce (SAMLIT), and newly appointed Chair of the UfW Financial Taskforce has confirmed her support for RUSI to engage with Southern African FIUs to conduct a range of activities, with the aim of advancing the understanding of the benefits of public-private partnerships (PPPs) and facilitating their effective implementation. Finally, through the respective RUSI and UfW partnerships with financial intelligence training provider Manchester CF, there are early conversations taking place on the coordination of expert updates of the FIU Connect training content on wildlife trafficking and environmental crime, tailoring coverage of typologies by region, and disseminating accredited content through national and regional training institutes and online knowledge platforms.
- The trip to the UfW SAC event also supported close engagement by RUSI with the US Fish and Wildlife Service (USFWS) Training and Development Unit at the International Law Enforcement Academy (ILEA) Botswana, where RUSI staff contributed to a joint training session on Anti-Money Laundering approaches to IWT, co-presenting alongside a Department of Justice Prosecutor to 34 trainees drawn from law enforcement agencies in Botswana, the Comoros, Eswatini, Madagascar, Tanzania, Thailand, South Africa and Vietnam. The trainees all received electronic copies of the RUSI best practice financial investigation rapid reference guides (RRGs) developed under IWT043.<sup>14</sup> In November 2023, RUSI also went on to share typologies developed under IWT096 with the USFWS ILEA Virtual Alumni group. It is hoped that, with the

necessary funding in place for both organisations, this collaboration can be expanded. Signs are promising: RUSI personnel have made further training presentations on financial investigation to USFWS's International Conservation Chief's Academy in March 2024.

In addition to stakeholder engagement at the above fora, RUSI staff were also invited by Defra in September 2022, to present to the first ever cross-Expert Groups event for the Biodiversity Challenge Funds at Worcester College, Oxford. Three project leaders, including RUSI, were invited to present on their experience on how best to capitalise on positive project outcomes, approach challenges and opportunities that arise during programme delivery, and share lessons learnt. RUSI project staff provided an overview of the programmatic arc of RUSI IWTCF activity (IWT021, IWT043 and IWT096) to demonstrate the scalability of evidence-based research and the impact of investing in novel approaches to targeting high-level offenders of IWT.



An unexpected aspect to project delivery was the extensive coordination required on deconflicting concurrent projects on financial investigation of IWT in Uganda from the Basel Institute on Governance (Basel) and the UNODC. From RUSI's early recommendations for this strategy to be adopted by wildlife investigators in 2015, 15 and the pioneering work conducted under IWT021, 16 financial investigation is now being mainstreamed in the wildife sector more broadly. Whilst RUSI welcomes other actors supporting this work, it necessitated extensive in-person and virtual coordination meetings with both parties to consult existing programme staff on their plans, aligning efforts for maximum synergy between activities, sharing learnings and risks to maximise impact of all efforts. Whilst challenging from a resource perspective, this has led to positive exchanges of knowledge, risk and optimised inputs to local communities across multiple programmes, creating donor efficiencies.

#### 3. Project Achievements

#### 3.1 Outputs

Output 1. IWT cases (at least n=2 per country, <7 years old) are selected using defined criteria co-created with partner NGOs and government agency partners and expert analysis conducted, in preparation for the 'train-the-trainer' workshops in Output 2

The use of closed case reviews in wildlife crime to generate new financial intelligence and improve investigation capacity is a novel approach, first pioneered by RUSI, in partnership with TRAFFIC and WWF in Laos PDR in 2019. Thus, at the time of programme inception, all focal countries for IWT096 were starting from a zero baseline in this regard, excepting Uganda which had benefitted from a UNODC workshop in May 2021 which had utilised a similar approach.

Output 1 has been achieved in line with the logframe timing, with positive results against all indicators and significant progress towards the Outcome. By June 2022, ahead of schedule, over-arching case selection criteria were co-created by RUSI and EIA, then locally tailored in collaboration with national NGO and government partners (Annex 8, Measurable Indicator [MI] 1.1, Means of Verification [MoV] 1.1). Local partners were then tasked with identifying and compiling a shortlist of cases (MI 1.2) using a case matrix – or record log – developed by RUSI. Case evaluation discussions were subsequently coordinated by RUSI, including any necessary deconfliction with concurrent interventions - such as Defra-funded work being conducted by the Basel Insitute on Governance (Basel) and Space for Giants (SfG) in Uganda – and any ongoing prosecutions, with 2 cases per country selected for review in the workshops (Annex 9, MI 1.2, MoV 1.2). In Malawi, challenges associated with the scant local cases available led to a decision to use external case studies instead of local cases. Financial and gender analysis was subsequently conducted under activity 1.3 (Annex 10, MI 1.3, MoV 1.3). This analysis was used as the basis for producing case briefing documents for the purposes of the respective training workshops (Annex 11, MI 1.4, MoV 1.4). The final activity under this Output was added in an approved Change Request, when the Case Review workshop in Zambia led to support for an inter-agency case review of mid-high level convicted wildlife offenders (MI 1.5). RUSI and WCP collaborated to support local agencies in Zambia in their review of a longlist of 100 closed cases from a financial perspective. From the longlist of 100 cases, WCP and DNPW collaborated to identify fourteen for financial review. These were then reviewed by the Interagency Coordination Framework for Asset Recovery (ICFAR) IWT Sub-Committee in July 2023, chaired by Margaret Kapambwe-Chitundu, Head of Asset

Forfeiture for the National Prosecution Authority (NPA). The review led to agreement to build financial intelligence profiles on 70 suspects (wildlife offenders and their wives/girlfriends), with inter-agency roles and responsibilities clearly identified and agencies tasked (Annex 12, MI 1.5, MoV 1.5). The AMLIU were assigned a central, coordinating role and intelligence-gathering is still in progress at the time of writing. WCP support regular ICFAR progress reviews, helping to overcome information sharing hurdles and monitor progress. Once the financial intelligence profiles are complete – beyond the scope of this project – leads will be identified and investigated by the relevant agencies, and NPA will review the case files to establish if there are grounds for further prosecution.

### Output 2: 'Train-the-trainer' workshops are delivered to selected officers from key government agencies in Malawi, Namibia, Uganda and Zambia.

Output 2 has been achieved, with most activities achieving extremely positive results against the various indicators. Firstly, by March 2023, the project successfully exceeded MI 2.1 by delivering 4 training days per country (n=16 total) to 90 relevant practitioners, 40% of whom were female. Eight of these training days and 34 practitioners (44% female) had been achieved as early as October 2022. Across the total 90 participants, 27 national agencies and enforcement actors from the focal countries were represented, equivalent to between 6-8 agencies per country. These results exceed MI 2.1 by 125% (participants trained), 60% (proportion of women trained), and 233% (agencies represented) (see Annex 13, MI 2.1, MoV 2.1 for evidence), MI 2.2 refers to the improvement in capacity following the workshop. Concerns over monitoring methodologies or target ambition were raised in A2R2, due to the broad variance shown by skill statement and country. The spectrum of results ranges from 37% to 63% uplift against skills statements in Malawi, 28% to 59% in Namibia, 44% to 67% in Uganda and 50% to 155% in Zambia (Annex 14, MI 2.2, MoV 2.2). As all workshops were completed by the time of submitting the report to which this feedback was responding, there was no possibility of changing data collection methods. However, further analysis calcualted the mean aggregate improvement of all skill statements, all countries, at 59%. Whilst the steep learning curve in Zambia has clearly offset more modest results elsewhere, and improvement against some statements was also more pronounced than others (see Section H in Annex 12 for a summary table by statement/country), this misses the target of 60% by a narrow margin. Furthermore, the variances by statement and country provided the technical lead with valuable insight into the tailoring of local training content (see Annual Report 2022/23, Qn.3).

Under MI 2.3, emerging concerns around duty of care towards individuals 'singled out' and the risk of corrupt actors sabotaging their careers or threatening personal safety – based on research conducted by RUSI in Uganda as part of another project – led to an approved change request, resulting in the natural evolution of de facto champions in each country, rather than their election or appointment by the project. A total of 8 de facto champions emerged from the cohort of participants and partners involved in the workshop activity under this Output, twice as many as originally envisaged, many of whom are emerging as 'best practice' advocates and trainers in their own countries and the wider region. In Malawi, Chikondi Lipato Sikwese and John Minofu of the FIA collaborated closely on the project, coordinating with the trainees, providing expert inputs to the virtual events (MI 4.2, MI 4.3) and 'red flag' typologies (MI 2.4). Minofu - outside the scope of this project - has gained great regional exposure through presenting training inputs on financial approaches to IWT at the International Law Enforcement Academy in Gaborone and the virtual alumni networks for the United States Fish and Wildlife International Law Enforcement Academy (ILEA) programme using the excellent Lin-Zhang investigation as a case study. In Namibia, Gerrit Eiman, Deputy Director of the FIC, and Charly Lyambo, Prosecutor at the Office of the Prosecutor General, became de facto local champions in terms of coordination and implementation, supported by their excellent co-workers. Hassan Sesay, a Rooikat embedded lawyer at the Blue Rhino Task Force, was also instrumental in driving the design of a locally-tailored financial investigation 'Rapid Reference Guide' (RRG) for the Namibian wildlife crime sector (see Annex 15, MI 2.3, MoV 2.3). Whilst this was a Rooikat-led initiative outside the scope of this project, it reflects Hassan's (and Rooikat's) commitment to building local capacity in financial investigation best practice in IWT, and the RRG was modelled on resources created by RUSI under IWT043 with editorial support from the RUSI team (Annex 15).

In Zambia, Margaret Kapambwe-Chitundu, Head of Asset Forfeiture for the National Prosecution Authority, became an exceptional advocate for championing project objectives, leading an inter-agency framework on further training and a multi-agency paper review of mid-high level wildlife cases for financial intelligence (MI 1.5) and contributing to the virtual events as a key speaker (MI 4.2, MI 4.3). In Uganda, there were multiple champions who supported the project, all drawn from the workshop participants. Firstly, Joan Katushabe, NWCCTF focal point for the FIA, guided coordination with trainees. Secondly, since the IWT096 workshop in March 2023, Douglas Kabagambe, Customs Officer for Uganda Revenue Authority, has delivered multiple training inputs on financial investigation of IWT for private and public sector audiences in Uganda, outside of the scope of this project, using a case review of the Vietnamese network. Additionally, he was instrumental in identifying and developing the novel financial intelligence on the chilli pepper concealment typology (MI 2.4) following the workshop exercise on the Onzima-Kulabale Case Review. Finally, a total of 6 participants from the Uganda workshop have been selected to become participants in a RUSI-led UWA financial investigation mentorship activity under the USAID/WCS Combating Wildlife Crime programme, which includes financial investigation on five dormant or closed wildlife cases, demonstrating both their ongoing personal ambition to strengthening their own capacity in financial approaches to tackling IWT, as well as UWA's commitments to mainstream both financial investigation capabilities and case review techniques within their team. See Annex 15 for evidence of correspondence and other examples.

In addition to examples of individual success by these 'champions' in peer-to-peer knowledge sharing and training activities, 100% of participants identified as 'trained trainers' (MI 2.3). This was evaluated qualitatively by asking trainees if they felt more confident in sharing their financial skills with their colleagues after the training. Responses were universally positive (see Section D, Annex 15, MI 2.3, MoV 2.3). This result was supported by quantitative analysis of other survey questions, which offered a chance to evaluate how much *more* confident trainees felt, against the baseline set in the pre-workshop questionnaire. Baseline confidence levels were lower in Uganda and Zambia (at an average of 2.88 and 2.83) and increased by 52% and 58% respectively. Where there was a higher confidence baseline, i.e., Namibia (3.0) or Malawi (3.27), the increase in levels was less marked, at 38% and 39% respectively (Section E, Annex 15). Analysis of the *number* of participants by different levels of confidence was also conducted both pre and post the training (see Section F, Annex 15). This demonstrated that the median level of confidence had moved from 'some' to 'a lot' (the highest category).

Under MI 2.4, four red flag intelligence alerts were due to be shared with a minimum of 40 private sector institutions by September 2023. Six intelligence alerts were created in total, based on novel financial or transport intelligence developed under IWT096, which had been identified by participants during workshop discussions under (2.1). These included 3 for Uganda and 1 each for the other focal countries. They comprised typologies and red flag indicators for (i) an alleged trafficker of live specimens (UG), (ii) rogue pastors using their religious status and operations to disguise illicit financial flows (NA), (iii) legal fees being paid via the proceeds of crime (ZA), (iv) the use of chill peppers to conceal pangolin shipments (UG), (v) the complex loan instruments used to launder money through casinos (MW), and (vi) illegal exotic pet trade with US/Uganda/Sudan transport links. These typologies were based on intelligence identified during the case reviews and workshop discussions, and developed through further research and analysis by the project team, drawing upon prior RUSI research, the EIA Global Crime Tracker, <sup>18</sup> the UfW intelligence function, and local media, and supported by follow up consultations with key participants (Annex 16, MI 2.4, MoV 2.4, and Annex 30 for the published typologies).

Due to their higher level of sensitivity, it was decided not to attribute alerts (i) and (vi) to the project, and these were disseminated discretely to a small number of trusted public and private sector partners of UfW. The other four alerts were clearly branded as products of IWT096, published on the UfW Alerts Library (open access), <sup>19</sup> and distributed via the monthly UfW intelligence bulletin (Annex 16). The bulletin's mailing list includes ~2,500 direct recipients, with a significant pass-on readership (~1,500), meaning four alerts were shared with ~4,000 inidviduals involved in counter-IWT/AML worldwide. Globally, direct recipients of the alerts represented 192 different public sector or enforcement agencies, 250 wildlife NGOs, and 609 private sector institutions (41% transport and 59% finance), <sup>20</sup> over 15x the target set in MI 2.4. The alerts were also shared directly with RUSI's own contacts in the regulated financial sector in each focal country (n=39) (Annex 16). Whilst MI 2.4 was far exceeded in terms of overall metrics, and alerts (i) and (vi) were completed in April and June 2023 respectively, the public alerts were only published in March 2024, due to unexpected delays caused by ensuring the originators of the intelligence were comfortable with publishing the intelligence.

Finally, whilst not specifically elucidated in the logframe, an additional further sharing of intelligence between public and private sector entities has occurred as a result of IWT096. Following presentations by Henri Schomper of WU FIU at each of the workshops (2.1), participants from each country became aware of the potential for using WU records to generate novel financial intelligence.

Output 3: Best-practice in using closed case reviews to create new financial intelligence and build capacity in the financial investigation of IWT is produced and published.

Output 3 has been achieved, with some MIs exceeded, albeit with delays compared to certain timings articulated in the logframe. A RUSI-published, peer-reviewed Whitehall Report, 'Using Closed Case Reviews in Financial Investigation of the Illegal Wildlife Trade', 21 was drafted, peer reviewed, proofed and produced by November 2023, documenting best practice in using the 'Closed Case Method' to generate novel financial intelligence and build capacity in using financial investigation in IWT (Appendix 18). This was a more comprehensive output than first envisaged, at 12,000 words long, and has achieved 1,545 page impressions by the time of writing - 67% from UK and EU IP-addresses and 33% from non-UK/non-EU domains – after its publication in mid-December 2023.<sup>22</sup> These results surpass the indicators defined in MI 3.1 by some measure (see Annex 17, MI 3.1, MoV 3.1 for evidence), though direct sharing of the report was completed in Q12024, in order to avoid getting 'lost' during the Christmas and New Year break. In addition to its organic readership online, and in conjunction with the sharing of a wider range of best practice materials under (3.2) - including speaker presentations from the events conducted under (4.2) and (4.3) - the Whitehall Report was shared directly with 346 relevant public sector and private sector practitioners, including 64% public sector and 17% each private sector and civil society, with over 30 individuals per focal country (up to 137 in the case of Uganda) receiving the best practice materials. Of the public sector agencies who received the Whitehall Report, a total of 29 were represented from the focal countries including six from Malawi (ACB, DNPW, DPP, FIA, MPS, MRA), seven each from Zambia (ACC, DNPW, DEC, FIC, NPA, ZP, ZRA) and Namibia (FIC, METF, NAMPOL, NNRA, Office of the President, OPG, and the Judiciary), and nine from Uganda (FIA, NEMA, NFA, ODPP, UPF, URA, UWA, CAA and the Judiciary). Furthermore, nine Nigerian agencies

and six South African agencies were also in receipt of materials. Receipt of the report was confirmed in over 20% of cases (n=71). See Appendix 19 for evidence (MI 3.1 and 3.2, MoV 3.1 and 3.2).

In terms of recognition of the best practice materials by national agencies, documented formal recognition from local authorities has been limited within the project lifecycle, therefore this indicator has constraints. Yet there is evidence of authorities and other actors adopting the best practice developed under IWT096 if actions, rather than words, are examined. Six agencies in Zambia have adopted the Closed Case Method under their inter-agency paper review (MI 1.5); the BRTF in Namibia (comprising two agencies) have incorporated the 'autopsy' approach to their RRG to financial investigation, and are also documented within the RRG as using cross-sector, cross-border information sharing in conjunction with the FIC and private sector partner WU to support financial intelligence development (three agencies total); in Uganda, UWA, in concert with FIA and other members of the NWCCTF (13 agencies total), are progressing case reviews on at least five investigations; and in Malawi, at least two authorities involved in the training (FIA, MPS WCIU) included officers working on the Lin-Zhang prosecution. Furthermore, champions Hasan Sessay, John Minofu, Margaret Chitundu, Douglas Kabagambe and HW Gladys Kamasanyu have used their profiles to advocate for financial investigation, prosecution and asset recovery in speaker opportunities and – in Kamasanyu's case – the national press. <sup>23</sup> The best practice report (MI 3.1) has also been enthusiastically embraced as training content by global wildlife enforcement experts and training practitioners. For instance, since the report's publication, the RUSI team has been asked to share its best practice recommendations in a webinar hosted by the "Follow the Money" Working Group (Countering Environmental Corruption Practitioners Forum, January 2024), an initiative hosted by WWF, Basel, TRAFFIC and Transparency International which has a membership of ~300. Additionally, RUSI has presented best practice materials at the World Wide Fund for Nature's (WWF's) financial investigation training workshop in Lao PDR in February 2024, and the USFWS International Conservation Chiefs Academy (ICCA) in March 2024. The typologies developed under IWT096 were additionally incorporated to an earlier training input, provided by RUSI to the USFWS ILEA Virtual Alumni best practice event in November 2023. These results suggests universal relevance, reinforced by the recent publication of a case review framework for wildlife crime by SAMLIT in South Africa which includes a similar financial analysis strategy for IWT.<sup>24</sup> Their report references the attendance of SAMLIT members at the IWT096 workshop events (MI 2.1),<sup>25</sup> reflecting how this project has contibuted to mainstreaming this approach. RUSI's dissemination of the IWT096 report also promoted the synergies between the two reports, via the presentation by UfW at the Public Private Webinar in December 2023, and introducing the SAMLIT IWT Committee to the Basel "Follow-the-Money" Working Group. In sum, IWT096 best practice methods are being mainstreamed by national agencies as well as civil society and public private sector partnerships. See Appendix 20 (MI 3.3, MoV 3.3).

The final indicator under Output 3, was achieved with the publication of a 1,100-word article on gender roles in wildlife crime on RUSI's Strategic Hub for Organised Crime (SHOC), 'Nature, Guns and Money' blog site (Annex 21, MI 3.4, MoV 3,4). Preparatory research included an extensive literature review, as well as related work on gender and IWT including analysis of attitudinal survey datasets from WildAid and a gender and envirionmental crime webinar hosted by RUSI in April 2023 (the latter outside the scope of this project). The final article was readied by July 2023, in line with the logframe, but was eventually published in September 2023 due to internal delays related to editorial and publications processes clashing with the holiday period. Further issues accessing historical page analytics, due to the migration of the SHOC site into rusi.org, mean that the exact number of page impressions for the article itself is unknown. What is known is that at least 437 people have read the article over the last six months, suggesting that the target of 1,000 was overly ambitious. However, the piece was well-received, with nearly 4,000 impressions on the Linked In promotional post and strong engagement by leading conservation and gender experts. A recent article by Nation Media in Kenya, suggesting a trend in arrests of female ivory traffickers, <sup>26</sup> further validates RUSI's findings in the article, prompting it to be shared again. See Annex 21.

Output 4: A half-day operational-level regional 'lessons learned' forum with public-sector participants is held to discuss the practical implications of the project's best practice, case studies and findings. As well as at a separate 2-hour public/private-sector webinar, attended by key institutions across finance and logistics sectors, alongside broader distribution activities guided by a high-impact public dissemination strategy coordinated across all project partners.

MI 4.1 was achieved, with a comprehensive dissemination plan developed to outline the strategy for distrubuting the findings of the project, via a number of platforms or vehicles including the Whitehall Report, the regional workshop and public-private webinar, as well as the intelligence alerts/typologies and gender article. This was cascaded into two event concept notes, and a brief to the RUSI communications team on the development of social media content and posts (see Annex 22, MI 4.1, MoV 4.1). The Whitehall Report was published on rusi.org. <sup>27</sup> An animated video was created to promote key findings of the report, and central posts/tweets (via RUSI, OCP and SHOC accounts on Linked In, Twitter and Facebook) created, amplified by retweets/shares from report authors and other members of the project team. The events were promoted via email invitations with event registration pages hosted on rusi.org. The webinar recording was hosted on YouTube, <sup>28</sup> and both this and the best practice report were linked to the rusi.org project page. <sup>29</sup>

Under MI 4.2, the virtual workshop was held in mid-December 2023, to align with the launch of the Whitehall Report (MI 3.1), representing a two week delay from the logframe timings. Other metrics were achieved, with 59 registered participants, with 27 attendees on the day, 19 of which represented the focal countries of the project (cf. 20 in MI 4.2). Other countries in attendance included Kenya, South Africa, and Nigeria, due to the invitation strategy outlined

below. Of the seven speakers, four (57%) originated from the focal countries (with a fifth – a RUSI project team member – from Kenya), and 57% were also female, well in excess of MI 4.2. See Annex 23 (MI 4.2, MoV 4.2) for further details. Whilst the proportion of female participants was not a metric for MI 4.2, the workshop attracted a split of 70% women and 30% men – a highly impressive result for the project's gender objectives (SIS B01).

A two-hour public private webinar (MI 4.3) was also held in mid-December, with 15 public sector and 23 private sector organisations in attendance, comprising 53 participants, 48% of which were female, well in excess of logframe targets. However, only 43.4% of participants came from the focal countries of Malawi, Namibia, Uganda and Zambia, compared to the 50% targeted in MI 4.3. This minor deficit reflects an unintended consequence of indicator methodology, as meeting a percentage indicator would have required event promotion to other countries which may benefit from the learnings to be articifically throttled. As it was, Nigeria had grown in importance as a transit country during the project lifespan, thus this was proactively targeted in the event invitations. Additionally, by promoting the event via the UfW regional East Africa and Southern Africa chapters, the major financial centres in Kenya, Nigeria and South Africa featured prominently. Positive responses from these areas, reflecting localised concerns over IWT or associated illicit finance, effectively reduced the relative proportion of respondents from focal countries but ensured greater impact of the project overall, in areas associated with wildlife-related illicit product or money flows. Indeed, when looking at the geographic range of participants more broadly, 64% came from East and Southern Africa jurisdictions and a further 12.5% from Nigeria. Thus, a total of 76.5% of attendees came from 'local' IWT source and transit jurisdictions in Africa, a significant result for events hosted by a UK-based organisation and indicative of local interest in this project. As an open access event, the webinar was recorded and is now hosted on the RUSI YouTube channel. Whilst very much a niche topic, the video has garnering an impressive 6,600 impressions and 209 additional views at the time of writing. See Annex 24 (MI 4.3, MoV 4.3).

Finally, under MI 4.4, voluntary exit polls were offered to 100% of attendees during the final minutes of each virtual event. Of the polls completed, 56% (n=14) claimed they were 'quite satisfied' and 44% claimed to be 'very satisfied' with the contents of the webinar. Qualitative feedback, where provided in the exit poll and direct communications, was also very positive. See Annex 25 (MI 4.4, MoV 4.4).

#### 3.2 Outcome

Outcome: Multi-agency case reviews and best-practice increase enforcement capacity, creating new financial intelligence and generating train-the-trainer financial-investigation skills, improving IWT investigation and prosecution in Malawi, Namibia, Uganda, and Zambia.

Key metrics suggest the collective results of the various outputs and activities will successfully combine to achieve the overall Outcome of IWT096. In all countries, multi-agency case reviews took place (MI 1.1, 1.2, 1.3, 1.5 and MI 2.1) and best practice materials were disseminated (MI 3.1, 3.2, 4.1, 4.2, 4.3), with capacity in financial investigation skills increasing (MI 2.2, 2.3, 4,4) as evidenced in Section 3.1. The prior section also outlines how IWT096 resulted in the development and dissemination of novel financial intelligence on illegal wildlife trade (MI 2.4) and increased trainee confidence in peer-to-peer knowledge sharing on financial investigation techniques (MI 2.3). The final measure of success at the outcome level is whether or not IWT investigation and prosecution has improved in the focal countries. This aspect of success is inherently difficult to 'measure' within the scope of this project, due to the lack of publicly-available data on charge sheets and case outcomes, the confidential nature of live cases, and the time taken to complete complex cases. This metric is also imperfect, as the number of IWT cases using financial investigation or prosecution may be influenced by corruption, flows displacement and other factors. Despite the intrinsic M&E challenges, there is evidently progress being made against the project Outcome.

Of all the countries, Malawi has demonstrated very public improvements in IWT investigation and prosecution during the lifespan of IWT096, with the successful conviction of several members of the Lin-Zhang network for money laundering and financial crime.<sup>30</sup> It is challenging to quantify exactly what role IWT096 played in this achievement, yet it is clear that the project outputs directly contributed to the capability of individual IWT096 trainees who were also officers on the Lin-Zhang case, at a key juncture in its prosecution (around six months prior to the money laundering convictions), as well as reinforcing over-arching commitments by the FIA and other agencies to prioritising wildlife crime as a money laundering threat. In Namibia, where rhino poaching has been undergoing a surge,<sup>31</sup> the project has galvanised key stakeholders into adopting financial investigation protocols for IWT cases and improving best practice (see Section 3.1).

More widely, national actors in Namibia are judged to have a robust understanding of the money laundering risks of wildlife crime, and the BRTF has proven a strong inter-agency mechanism for IWT investigation and prosecution, including of related financial crimes or the tracing of assets. <sup>32</sup> It has also demonstrated strong cross-sector, cross-border collaboration on transnational cases

However, many cases

the current timeframe. Recently, in response to their designation on the FATF 'grey list', Namibia has made high-level political commitments to improving the effectiveness of its AML regime against known risks,<sup>34</sup> thus RUSI anticipates more IWT cases to feature successful money laundering prosecution outcomes in the near term.

In Uganda, improvements in enforcement capacity and the development of novel intelligence, with 2 confidential alerts and 1 public-facing typology around the use of chilli peppers in concealing wildlife products, were outlined in Section 3.1 (MI 2.2, 2.3, 2.4).

Further examples of improvements in the use of financial intelligence are also visible in Uganda. The updated 2023 NRA on Money Laundering and Terrorism included extensive evaluation of wildlife crime risks, reporting and modalities, with 137 mentions of 'wildlife' compared to just 20 in the 2017 report, <sup>37</sup> reflecting its increased prioritisation at the national, strategic level. Accordingly, mainstream enforcement agencies are investing in developing IWT expertise, and UWA has committed to developing a discreet financial investigation function in-house. The Criminal Investigations Directorate in UPF, who normally lead any money laundering investigations, launched a dedicated wildlife crime desk in early 2023 and have seconded an officer to UWA for 2 years from ealy 2024. Under the WCS-led USAID/Uganda Combatting Wildlife Crime Activity (CWC), UWA have committed to developing the function of dedicated financial investigators within their enforcement team, who are currently receiving mentorship from RUSI as a sub-contractor to that project. Six of the 22 mentorship candidates are IWT096 'alumni' (Annex 15). The Closed Case Method and financial investigation is also starting to be seen in casework.

Under the same project, the Uganda

Bankers Association has also partnered with RUSI to deliver training to compliance officers at financial institutions, further empowering the role of the private sector for improved detection and investigation of wildife-linked illicit product and money flows. These activities form part of a continuum of interventions reflecting increased national commitment and capacity to use 'follow the money' approaches to IWT in Uganda.

Finally, Zambia has shown highly impressive progress against this Outcome, from a relatively low baseline. The momentum created by IWT096 sparked an inter-agency paper review of 100 historic wildlife cases, the intial phases of which were also supported by this project, which has resulted in 10 historic cases being selected for financial intelligence gathering and possible future prosecution (see Section 3.1).

Furthermore, the DEC AMLIU has approached WCP to request a dedicated training in financial investigation of IWT for their entry level officers, suggesting mainsteam AML actors are increasingly prioritising wildlife-related illicit financial flows.

More widely, the best practice developed under IWT096 is being amplified through global or regional training platforms and practitioner forums for knowledge-exchange, strengthening capacity in financial investigation and prosecution beyond the focal countries. This includes – as outlined in 3.1 – training inputs to ILEA, ICCA, Basel and WWF programmes in Africa and Asia. RUSI also continues to actively explore ways to improve and expand curricula on this topic.

#### 3.3 Monitoring of assumptions

All project assumptions were monitored continuously by the Project Lead and Project Manager, at the Outcome and Output levels. All assumptions remained true, or changed in a way which was favourable for the project, except for those detailed below, where either the assumption changed, the monitoring method changed, or an assumption was omitted at the project outset. The monitoring of assumptions – including where there is no change – is detailed in full, citing evidence, in a comprehensive table in Annex 27.

One assumption was missing at the outset, in that the description of stakeholders who remain willing to engage with project activities was expressly defined as 'government' partners. Government authority motivation did not change unfavourably, but this assumption failed to elucidate the risk that an NGO partner with influence over the project, might change their stance on participation, as was the case with LWT during Year 2 of the project (outlined in more detail in Section 2 and Annex 7). Thankfully, RUSI was able to leverage positive relations with the FIA in Malawi to deliver in-country and virtual activities under IWT096, to no detriment of the project achievements.

Additionally, the assumption under Output 3 that government partners remain willing to participate in production of best practice, peer review draft of best practice report and provide feedback partially changed, due to the stipulations of RUSI's stringent publishing process demanding independence in peer reviewers. This was not anticipated at the project design stage. After discussing the best practice report format with the RUSI Editorial and

Publications teams, the approach was altered slightly, with independent peer reviewers appointed (see Annex 17, MI 3.1) and government partners were involved in the development of best practice materials and the virtual events provided valuable fora for feedback and discussion (see Annexes 16, 23, 24, and 24).

Furthermore, the assumption related to Output 3.4, the publication and relevancy of the gender article, was subject to a change in monitoring methods. The article was published on the external SHOC site in September 2023, which was later migrated into the main rusi.org site. Page analytics for the period prior to its migration are no longer accessible to the project team, meaning the full readership figure is unknown. Alternative monitoring methods were used for relevancy and readership, including its position as 14<sup>th</sup> on Google search pages out of 3,810,000 results for keywords 'Gender' and 'Illegal Wildlife Trade', and the interest (nearly 4,000 impressions) shown in social media shares of the article from relevant audiences worldwide. See Annex 19, MI 3.4.

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

The agreed impact statement in our project logframe was 'A reduction in IWT and poverty alleviation in Malawi, Namibia, Uganda and Zambia through more effective public-sector investigation and prosecution, and private-sector disruption, of financial crimes linked to IWT.' This has remained unchanged, and the project has successfully contributed to this long-term goal, on several fronts.

Firstly, most historical enforcement interventions designed to combat illegal wildlife trade have focused on countering wildlife crime which takes place at the start of the illegal wildlife supply chain, i.e., poaching, and illegal harvesting of protected species. This has led to unintended downstream social harms, particularly for vulnerable groups and marginalised communities, as conservation has become heavily securitised at the park management level. <sup>39</sup> However, IWT involves a variety of offender types, including organised crime groups (OCGs), amongst other threat actors, who benefit from the vast illicit financial flows it generates. <sup>40</sup> Experts argue that higher-level traffickers motivated by greed are more blameworthy than low-level poachers and small-time traders motivated by need. <sup>41</sup> By focusing on strengthening the use of financial investigation and prosecution among public and private sector actors, IWT096 equips vulnerable jurisdictions with the tools to direct their focus against these higher-level offenders, causing maximum disruption to OCG supply chains and increasing the deterrent for their involvement in this particular type of illicit commodity, thus reducing wildlife crime. <sup>42</sup>

By reducing demand from OCGs for IWT products, this project also lowers the vulnerability of communities to committing wildlife or corruption offences. In turn, this prevents vulnerable groups, such as women and indigenous people involved in the legal and illegal harvesting of natural resources, from having physical confrontations with security actors who have – in specific cases and by no means universally – used physical and sexual abuse in their treatment of local communities, <sup>43</sup> as well as protecting the rural poor and their families from impoverishment through punitive, custodial justice outcomes. <sup>44</sup>

Through its contribution to IWT reduction, the project will also alleviate poverty by protecting the natural resources upon which local communities and economies depend in the longer term for ecosystem services and green economies. The destructive acts associated with IWT also cause habitat destruction, biodiversity loss and soil erosion, which are significant drivers of climate change. Therefore, the project will also contribute to the long-term mitigation of these significant, existential threats to humanity and the environment. Wildlife economies will also be protected for the benefit of community and government revenues. For instance, Uganda is heavily dependent on wildlife tourism, making conservation and IWT a strategic priority, as well as the expansion of revenues from legal wildlife economies which benefit local communities and the national economy.<sup>45</sup>

Additionally, financial investigation and prosecution includes the tracing, identification and recovery of stolen assets and proceeds of crime. Therefore, by strengthening IWT of as a strategy for prosecuting wildlife crime, IWT096 supports governments in the recovery of stolen assets and addresses corruption by state officials, buttressing and protecting revenues in the focal countries, three of which are classified as low-income under IWTCF guidance. Some estimates suggest developing countries lose between \$620-\$920 billion per annum to illicit financial flows linked to tax evasion, corruption and criminal activity. Whilst enumeration of illicit financial flows is inherently challenging, the recovery of such illicit assets can contribute significantly to government incomes, alleviating poverty in the longer term. Finally, the project has been successful in facilitating greater involvement of women in combatting IWT, helping to mainstream gender in the management of local resources and ensure women have a greater voice in decision-making in conservation. See Section 4.3 for more details.

#### 4. Contribution to IWT Challenge Fund Programme Objectives

#### 4.1 Thematic focus

The project works directly to strengthen law enforcement by increasing capacity to financially investigate and prosecute IWT. The project's theory of change posits that by contributing to improved law enforcement, legal frameworks will be effectively enforced, and deterrents created for wildlife offenders, especially those considered more culpable within the wider typological hierarchy. Evidence of this being achieved via the accumulation of

results from all activities and outputs, can be found in the details provided in Section 3 of this report, including the associated annexes, as well as Standard Indicators (SIs). For SIs please see Table 1, Annex 3.

#### 4.2 Impact on species in focus

At the time of application, the project identified multiple species which were expected to benefit from improved enforcement of IWT due to increased capacity in financial investigation and prosecution, in the countries in question, including African elephant (*Loxodonta Africana*), <sup>48</sup> black (*Diceros bicornis*) and white rhino (*Ceratotherium simum*), Temminck's pangolin (*Smutsia temminckii*) and white-bellied pangolin (*Phataginus tricuspis*), high-value flora such as rosewood species, Lion (*Panthera leo*), and various bushmeat species. Evidence provided under Section 3.2 of this report and SI B16 shows that 23 high-value IWT cases are benefiting from financial investigation, featuring elephant, rhino, pangolin, protected timber species, hippopotamus, African grey parrots, reptiles, and insects. However, it should be noted that prosecution data or court coverage does not always provide species specificity, meaning precision reporting on which sub-species is challenging.

The project has also benefitted other species not identified at its outset, as offending patterns are subject to rapid change, as seen with the sudden increase in trafficking of succulents.<sup>49</sup> Indeed, since the case review workshops, the Namibian FIC and the BRTF have successfully developed financial intelligence through cross-border, cross-sector collaboration, and used financial investigation to map succulent networks operating in Namibia (see Annex 26)

Thus, IWT096 has demonstrated how improving financial investigation and prosecution capacity has positively impacted on many of the species identified at the outset, but also has a wider impact on any species which becomes a focus for the illicit activities of OCGs. This demonstrates the sustainability of the achievements under IWT096, as the outcome drives a legacy which will be felt beyond initial target species. Additionally, it will be felt beyond domestic populations of species, due to the transit role played by the focal countries within global IWT supply chains where products can be sourced from outside their borders. Finally, as destructive acts associated with high value poaching and harvesting of protected flora and fauna carry additional impacts of habitat destruction or degradation, IWT096 has a broad impact on multiple species affected in this way.

#### 4.3 Project support to poverty reduction

As defined in previous reports, this project's impacts on poverty are indirect, but there is evidence that it will contribute to poverty alleviation in the long term. In line with academic research<sup>50</sup> and recommended practice under IWTCF funding,<sup>51</sup> this project has taken a multi-dimensional approach to poverty, moving beyond interpretations of poverty defined solely by material deprivation to contribute toward governance and gender equality objectives and through is achievements, indirectly reduce the causes of poverty in the longer term, including the lack of access to ecosystem services, food and water insecurity, climate change impacts, and the poor or under-funded provision of government services. In the project's lifespan it is not realistic nor possible to track such impacts *directly* due to the substantial timeframes involved in the translation of project activities into the achievement of higher-level impact for humanity and the environment. However, further information is provided below on the way the project supports poverty alleviation, and the indicators which do exist.

Impact on poverty has been achieved by serving a range of beneficiaries across several levels of society, including the 162 direct recipients of training (SI B01), wider communities in source and transit areas, and the general population. Firstly, the project has directly upskilled local enforcement, justice and private sector actors working in those locations (MI 2.1-2.3, MI 4.2-4.4), providing them with 8 best practice or knowledge products (MI 2.4, 3.1, 3.3 and SI B05). In total, 53 government departments or units (SI B24) have received 4.2 weeks of training (SI D06) which – amongst other skills – have enhanced awareness and understanding of biodiversity and associated poverty issues. Longer-term, the project will have an indirect but significant effect on community members living near national wildlife resources, especially those reliant upon wildlife-derived incomes, including nature-based tourism, through its contribution to reducing demand for IWT. Owing to the geo-location of wildlife in rural areas, these communities are highly vulnerable to environmental impacts, including the loss of biodiversity through IWT.

By targeting higher level wildlife criminals rather than pursuing poachers, this project has contributed to poverty alleviation by addressing the unequal economic incentives and vulnerabilities that underpin IWT. Whilst the academic evidence shows there is no common profile of the 'average poacher', <sup>52</sup> it is commonly agreed that many poachers involved in the actual poaching or harvesting are motivated by need not greed. <sup>53</sup> The arrest and imprisonment (or worse, death) of these offenders can plunge households and communities into escalating impoverishment, reinforcing social inequalities. <sup>54</sup> Critical criminological discourse has shown that imprisonment does little to deter recidivism among those in poverty. <sup>55</sup> Indeed, deprived of a breadwinner, other household members may be pushed into poaching who otherwise would not be. In the documented progress against the project Outcome (see Section 3.2), all countries are demonstrating improved enforcement of IWT using financial investigation and prosecution, including use of the case review methodology, therefore calibrating their enforcement focus against higher-level offenders, and mitigating such social and environmental harms. The theoretical framework for this programme, and practical best practice recommendations, were developed and published as 1 x peer-reviewed Whitehall Report (SI D12).

IWT096 will also have a macro-economic effect on poverty alleviation by contributing to sustainable conditions for wildlife tourism to grow, following the abatement of pandemic impacts. Pre-pandemic in Malawi, for example, direct and indirect nature-based tourism contributed up to 7.7% of GDP and is one of the principal foreign exchange earners for the country. 56 In a recent public lecture by Vera Kamtukule, the Malawian Minister for Tourism, international arrivals were forecasted to exceed 1.1m by 2025, surpassing the 978,000 received in 2019.<sup>57</sup> Whilst causality between wildlife enforcement and tourism growth is complex.<sup>58</sup> the inversion of this, that poor enforcement is a threat to tourism and associated, is commonly accepted throughout the region. Minister Kamtukule cited weak law enforcement as a historical driver of poor tourism growth.<sup>59</sup> Similarly, Uganda's 2023 NRA also observes links between unchecked IWT and impacts on tourism revenues.<sup>60</sup> Uganda has also increased annual arrivals between 56-59% per year since 2021 (though visitors are still circa 15% below pre-pandemic levels). 61 Zambia was on target to hit 1.5m visitors in 2023, 62 exceeding 2019 levels of 1,266,000, 63 and is aiming for 2m in 2024.64 By the end of 2023, Namibia was experiencing tourism occupancy levels of just 1.82% below prepandemic benchmarks, with 2024 figures set to surpass pre-Covid levels. 65 A failure to curb IWT in these countries would have severely compromised such growth trajectories in their respective tourism recovery plans. This project has supported these national priorities, noting that protection and growth of wildlife resources are a baseline condition for many goals articulated in national strategies that incorporate nature tourism as a major revenue stream.66

In line with the project's multidimensional approach to measuring poverty alleviation, citizens in and beyond the focal areas have and will continue to benefit from the project's contribution to reversing the hollowing out of the state by IWT-linked illicit financial flows and corruption. This occurs as these flows' negative impacts on governance, rule of law and public finances gradually decline and financial integrity increases. <sup>67</sup> This, in turn, will enhance state legitimacy and improve public services – to the benefit of all citizens, but particularly the most vulnerable. This project has also demonstrably increased structural agency as a measure of poverty alleviation by achieving an ambitious gender equality component to its activities (MI 1.3, MI 2.1, MI 3.4, MI 4.3). By equipping women to participate in decision-making in conservation, gender will be mainstreamed in the governance of natural resources, thereby reducing inequities and empowering females. In this respect the project was highly successful, training a near parity ratio of men to women across the whole set of capacity building and dissemination activities (SI B01).

Finally, Namibia is the only upper-middle income country of the focal jurisdictions. However, this classification is misleading, as much of the country's wealth is concentrated amongst a small sector of the population, the country also has the third-highest levels of income inequality globally, and poverty is still prevalent. <sup>68</sup> This project has therefore been able to advance enforcement best practice and contribute indirectly to poverty alleviation impacts in Namibia in the same ways as other focal countries, despite its official status as an upper-middle income country.

#### 4.4 Gender equality and social inclusion

In addition to the below, results against MI 2.1 showed 40% of the trainees in the case review workshops were women (60% more than originally targeted – see Annex 13). This is because of the relatively greater proportion of women representing justice actors, due to the multi-agency nature of the workshops (prosecutors are usually more gender diverse than their enforcement peers), as well as hopefully reflect an incremental uplift in females in intelligence and investigation roles. Additionally, 48% of attendees at the public-private webinar were female, well in excess of the MI 4.3 target of 35% (Annex 24) and a groundbreaking 70% of attendees at the virtual regional workshop were women, meaning overall, the project trainees comprised 162 people, including 85 men and 77 women – a near parity outcome (see SIS B01).

Please quantify the proportion of women on the Project Board <sup>69</sup>	The Project Board Comprises 2 women and 1 man (67%): Tom Keatinge (Lead Applicant), Cathy Haenlein (Project Lead), Anne-Marie Weeden (Project Manager and IWT Expert) <sup>70</sup>
Please quantify the proportion of project partners that are led by women, or which have a senior leadership team consisting of at least 50% women. <sup>71</sup>	Four of the project's seven partners, (57%) are led by women <i>or</i> have a senior leadership team consisting of at least 50% women: Wildlife Crime Prevention, 72 EIA, 73 United for Wildlife (The Royal Foundation), 74 and TRAFFIC. 75 Three (43%) do not meet this criteria: Western Union, 76 Refinitiv (now LSEG) 77 and Lilongwe Wildlife Trust. 78

#### 5. Monitoring and evaluation

Underlined by adaptive management principles, the project team requested several changes to the project and its logframe, to guarantee impact and maximise efficiencies and opportunities. These are summarised in full in the table in Annex 26. Major changes included: the change of focus country from Mozambique to Namibia due to the deterioration of the security situation in Cabo Delgado between the project design and the funding decision and the increased opportunities and suitable partners in Namibia; the exit of LWT from the project in April 2023 due to changing risk landscape; and the request for a three-month No Cost Extension to defer the project end date from September to December 2023, due to two key members of the project team having unavoidable personal commitments in the period June-August 2023. These were all communicated to NIRAS and approved. More minor

changes were also requested during the project timeline, including the communication of personnel and signatory changes, minor adjustments to timelines on the logframe, and small adjustments to budgets to facilitate novel, added value activities which capitalised on *ad hoc* opportunities and momentum to promote over-arching project objectives. For example, RUSI was approved to move 'Other costs' to 'Travel and Subsistence' in Year 1 of the project to support Alex Reid in attending the UfW SAC meeting and BHC/UfW regional IWT meeting in March 2022. Additionally, it was agreed that RUSI could move £3,500 from 'Other costs' in Year 2 to 'Staff Costs' in the same fiscal year, to facilitate the paper review by Zambia (MI 1.5). Non-fiscal changes to activities included the *pro bono* contribution from TRAFFIC of providing Ben Brock as a trainer for the Namibian workshop (MI 2.1) and the switch from 1 day to a half-day for the virtual regional workshop, to accommodate time differences.

The M&E system adopted by the project, rooted in the guidelines provided by Defra, <sup>79</sup> was successful. Constant engagement with partners, and continuous review of the project's logframe enabled the project team to identify and act on novel opportunities, and quickly move to mitigate risks and take advantage of opportunities, as evidenced by the changes above. These have a tangible impact on overall project Outcome success, as can be seen with the reallocation of funds for the Zambian activity (1.5) and the over-arching achievements of this jurisdiction in integrating the use of financial intelligence into historic case reviews and live investigations. This demonstrates the value of a nimble M&E framework and simplified Change Request procedure. However, the introduction of the Standard Indicators (SIs)<sup>80</sup> midway through the project timeline – whilst valuable for measuring impact at an aggregate level – created an additional reporting burden at the project level, as the team had to gather data and report on metrics for both the project's unique MIs as well as the new SIs.

The project underwent several internal evaluations as part of RUSI's internal protocols. RUSI projects must undergo an internal risk assessment prior to the commencement of activities, and specific activities may be assessed for risk periodically throughout the project (e.g., see Annex 6). Finally, all RUSI publications undergo rigorous ethics, editorial and peer review processes, to ensure research methods to ensure published material aligns with research activities, and that research ethics have been correctly adhered to. This control mechanism ensures the project's final outputs meet RUSI's research quality standards, protecting and maintaining the broader IWT Challenge Fund's reputation.

#### 6. Actions taken in response to Annual Report reviews

Reviews have asked RUSI to clarify the mechanisms that the project is using to manage and coordinate partnerships and activities among partners and provide supporting documents. Engagement for each partnership is managed bilaterally, between focal staff on the RUSI and partner teams. Communication is conducted through email correspondence and virtual meetings, but in-country workshops have also provided valuable opportunities for face-to-face interactions. Local partners are encouraged to guide and steer local outputs as much as they are comfortable doing so, with RUSI coordinating and supporting the over-arching project trajectory. Supporting documents which demonstrate the management of local project partners are included throughout the annexes supporting various MIs, particularly under Outputs 1, 2 and 4 which saw greater partner engagement. Finally, a specific framework which has facilitated significant partnership engagement on this project is the UfW Financial and Transport Taskforces. Outlined in Section 2, the Taskforces and their regional chapters allows RUSI to engage with a variety of public and private sector actors who are committed to countering IWT and is the perfect channel for disseminating new financial intelligence on trafficking modalities (MI 2.4) or promoting virtual events (MI 4.2, 4.3). Longer term the most recent review (A2R2) suggested RUSI explore further private sector partnerships based on the success of the WU collaboration. Whilst no response was required, RUSI is pleased to report that Manchester CF has asked RUSI to collaborate on the updating, regional tailoring, and dissemination of their wildlife trafficking curricula for FIUs and financial institutions in the private sector. A2R2 also highlighted the need to outline mitigation measures for monitoring MI 2.2, which can be found under Section 3.1 of this report. Finally, referencing A1R1, A2R2 requested more information on how the project is implementing foreseen sustainability strategies and deconflicting with Basel, SfG, and other financial intelligence projects. This was handled in a series of informal and formal coordination meetings. RUSI met with UNODC twice, SfG twice, and Basel multiple times in monthly coordination meetings (sometimes with SfG in attendance also) during the key period of in-country implementation. This has assisted with information sharing on cases considered for selection, as well as provision of training inputs into the Basel 'Follow the Money' working group, the latter part of a wider strategy of sustainability with RUSI advocating and promoting the Closed Case Method in various fora. Other sustainability strategies include integrating this approach to other RUSI illicit finance interventions to scale this model thematically (e.g., timber trafficking, illegal fishing) or geographically (e.g., Laos, West Africa, Latin America); provision of mentorship programmes to key jurisdictions such as ongoing work in Uganda under the WCS-led CWC programme; strengthening the partnership with WCP in Zambia to leverage momentum and provide support where they need it to facilitate local advancement of financial investigation; fundraising to develop accredited, locally-tailored curricula for financial investigation and prosecution of IWT with Manchester CF and other partners such as UfW, and the advancement of public-private information sharing across Southern Africa, spearheaded by RUSI Senior Associate Fellow, Xolisile Khanvile.

#### 7. Lessons learnt

Drawing on the project's M&E strategy (Section 5) and building on the main risks mitigated during implementation (Section 8) the project team has extracted four major lessons which inform recommendations for future programming:

- 1. The value of baseline political economy analysis (PEA) during project implementation, it became apparent that political economy analysis of focal country wildlife crime sectors and particular cases was vital to mitigate risk and ensure project delivery. As reported on in Section 9 of ARY1, patterns emerged in case selection: closed cases were not always as closed as they appeared; and cold cases were usually cold for a reason. Furthermore, unforeseen risks emerged around LWT, linked to corrupt actors in government authorities, leading to the NGO's eventual exit from the project (see Section 2 and 8). On other IWT projects, RUSI has started to incorporate a PEA as standard practice, to help identify the power structures, vulnerabilities and corruption risks in a particular sector or area. This subsequently informs and optimises delivery of activities and helps to minimise delays or dangers due to risk. By conducting research for a PEA in Uganda under a parallel programme, RUSI identified the safeguarding risk on MI 2.3, leading to the change request to 'drop' the explicit election of champions and simply empower the emergence of *de facto* champions instead. This learning could be applied at a broader DEFRA programming level, with a PEA conducted in a particular jurisdiction potentially supporting multiple IWTCF projects and providing economies of scale.
- 2. The importance of high-level national buy-in the project's success was predicated on high-level and senior stakeholder buy-in within each focal country. Buy-in from high-level officials ensures the correct and able personnel are included in each national workshop and held accountable for disseminating their learnings amongst their peers. For example, in Namibia, the presence of the Prosecutor-General lent credibility to the workshop and emphasised the priority the country is placing on the process of financially investigating wildlife crimes. In Zambia, buy-in from the National Prosecutions Authority (NPA) catalysed the additional Interagency paper review. In Malawi, having the Director General of the FIA cemented the importance of wildlife crime within the national AML agenda. In Uganda, the Director of the FIA closed the workshop, personally handing over certificates to proud trainees. Against the wider backdrop of high corruption levels in many source and transit countries, it is critical that future projects identify their key national stakeholders at the onset of each project to help guarantee the likelihood of success.
- 3. The need for greater coordination among implementing NGOs and donors on financial investigation curricula and activities during implementation, the project team learned of numerous similar initiatives that were being implemented throughout the region, reflecting a positive trend for mainstreaming financial investigation in IWT. While the case review method at the core of this project meant its novelty and value endured, the delivery of financial investigative capacity building to wildlife law enforcement agencies would benefit from greater coordination and less siloed working. Efforts should be made to support projects and programmes that work to harmonise, standardise and institutionalise financial investigative capacity building to cross-sector stakeholders in the region, reflected in emerging donor priorities.<sup>81</sup>.Workshop participants in IWT096 activities highlighted the challenges with the fragmentation of effort:
  - a. Inconsistencies in the agencies trained: justice actors and the private sector are often omitted leading to weak links in the criminal justice or enforcement chain.
  - b. Duplication/confliction of training content: officers may receive training from numerous different entities. It is critical that as RUSI did under IWT096 every effort is made to establish the baseline of an intervention's beneficiaries, and understand the content of previous training, thus shaping curricula to avoid duplication and enhance complementarity.
  - c. An absence of certified, accredited curricula: participants in all focal countries lamented the absence of officially accredited courses available through national and regional institutions.
  - d. A lack of standard operating protocols for financial investigation: in many countries, financial investigation of wildlife crime still falls 'between the stools' of different agencies or justice pathways, creating confusion.
  - e. Resource prioritisation: Stakeholder engagement must take place to ensure agencies are prioritising budgets and personnel to become financial investigators, to capitalise on the training given.
  - f. Continuity can be compromised by development funding cycles: Projects of 12 to 24 months can mean a loss of momentum or lack of coordination between implementing organisations or grant cycles.
- 4. **Underexploited opportunities for promotion of project findings –** the project team feels the current and past IWT Challenge Fund projects led by RUSI have underemphasised the importance of disseminating project learnings. During national workshops, RUSI was informed that the rapid reference guides it produced for three of the four focal countries under IWT043 did not have as much impact as they could have done, due to the low number of physical copies that were printed and disseminated to law enforcement actors. Similarly, RUSI feels there is merit in taking the learnings from the present project and disseminating them in more creative ways: 'moving typologies' using ScrollyTelling software, 82 transnational dialogue forums; donor-specific engagement; multimedia and others.

Less significant and more specifically, but nonetheless valuable lessons include:

- Project assumptions should apply to all partners with influence on the project outcome, not just one sector (see analysis of LWT exit under Section 3.3 of this report)
- Indicator design for dissemination of best practice should consider potential constraints should illicit product or money flows suffer displacement during the lifespan of programme design, fundraising and implementation. Whilst all focal countries were still displaying evidence of significant IWT activity throughout the project, the largest transcontinental flows had shifted to exiting Africa from Nigeria. Whilst efforts to target Nigerian stakeholders to participate in the dissemination activities were fruitful (see Section 3.1), their addition led to a reduced percentage of core focal country attendance (MI 2.3). Project indicator design therefore should, whilst adhering to SMART principles, carefully consider the repercussions of choosing a percentage metric over an actual threshold.

#### 8. Risk Management

The project encountered three unforeseen risks during the reporting year which were captured in formal change requests.

- 1. As communicated in RUSI's June 2023 change request, it became apparent that the success of the project's final year was heavily reliant on two key members of RUSI staff, Mark Williams and Anne-Marie Weeden, who were suffering an unforeseen clash of personal priorities (a baby and a dissertation, respectively) necessitating simultaneous leave around this time. This led to a change request for a three-month no-cost extension. The requirement for a concurrent absence of two key members of staff for an extended period was unfortunate and is unlikely to reoccur in the future.
- 2. The same change request also detailed a risk associated with MI 2.3, which originally required the formal election of 'champions' within each focal country. Based on findings from primary research being conducted by a team member on another project in one of the focal countries, and informed by conversations with local practitioners, the project team concluded there were personal and professional risks to 'honest brokers' labelled this way, due to the risk of corrupt actors, creating a duty of care concern for RUSI. The change request proposed RUSI support the emergence of *de facto* champions, mitigating this risk.
- 3. RUSI's December 2023 change request identified the risk that the project's engagement events specifically the online public sector-facing workshop would struggle to reach its desired audience. This risk was driven by challenges in securing attendance from public sector officials for a full-day online conference across timezones with up to three hours variance (exacerbated by the workshops falling during Daylight Savings Time, due to the no-cost extension). To mitigate this issue, RUSI proposed reframing the format of the workshop from a full-day to a half-day, to accommodate time differences and local stakeholder availability.

#### 9. Sustainability and legacy

The project's theory of change was designed to ensure sustainable, long-term contributions beyond the lifecycle of the project. Outputs 1 and 2 were designed to combine to drive greater capacity for financial investigation and prosecution of IWT in the focal countries, as well as novel financial intelligence on wildlife crime, and these ambitions were achieved. Outputs 3 and 4 built on the earlier activities, developing best practice guidance and 'red flag' typologies, to enhance and amplify capacity both among and beyond the original workshop participants. In Zambia, the addition of the paper review (MI 1.5) demonstrated locally led momentum around the 'best practice' at the heart of IWT096, scaling up the case methodology and delivering impact beyond the scope of the project timeline. Except for two of the intelligence alerts (MI 2.4) and the virtual regional workshop (MI 4.2), both of which had a limited distribution due to the sensitivity of intelligence, all outputs and assets of the project are open-access and will be housed on the rusi.org website for at least ten years.

In all countries, the project has driven demonstrable progress against the project Outcome, with tangible indicators of a move towards adopting financial investigation of high-value IWT activities as a standard protocol at a policy level, as well as its use in active investigations of closed and live cases. Furthermore, the best practice guidance (MI 3.1) and financial intelligence (MI 2.4) products are being advanced nationally and regionally by project champions and civil society actors and training institutions, and information between the public and private sectors is improving, supporting the financial investigation of wildlife crime (MI 2.4). Whilst designed to be closely integrated with other aspects of the project, these are the individual project achievements which are most likely to endure in the short-medium term. Section 4.2 has demonstrated how the long-term impacts of these achievements will positively benefit target species in the focal countries, and beyond their borders, as well as additional species for which illicit demand may increase over time. Section 3.4 and 4.3 show how the project contributes to poverty alleviation using a multi-dimensional approach, improving governance and gender agency in the protection of natural resources, as well as providing the enabling environment for tourism growth and recovery of associated revenues in the long-term. Additionally, these sections outlined the social and environmental value of promoting tools and skills which focus enforcement actions against high-level wildlife crime offenders and corrupt enablers, reducing the punitively damaging focus on subsistence actors and thus avoiding further impoverishment and recidivism. This last aspect came into sharper focus during the project's lifecycle, due to the expanding knowledge base in the wider discourse.83

Finally, the project has no physical resources to dispose of and all project team members continue to work on expanding the understanding of wildlife crime, and improving the societal response, from their respective positions and organisations.

#### 10. IWT Challenge Fund Identity

The project has made numerous efforts to publicise the IWT Challenge Fund throughout its lifecycle. In line with evolving branding guidelines, the project has utilised both the UKAID logo as well as the more recently issued UK International Development (UK Dev) logo to brand all external project documentation, with communication with the FCDO External Affairs team to ensure compliance when iconography was updated. Logo-branded materials include project flyers, workshop invitations and materials (MI 2,1), the project's Whitehall Report (MI 3.1), and PowerPoint presentations utilised during the final dissemination activities (MI 4.2, 4.3 etc.). The project has also specifically cited the IWT Challenge Fund as the project's funder during all verbal and written communications with external parties. RUSI has also identified opportunities to promote the project and the UK Dev logo at relevant external events. These include presentations to the USFWS ICCA programme, the Basel-hosted Follow-the-Money Working Group and WWF's Lao PDR workshop (Annex 18). Additionally, the UK Government's contribution to the project's work has been formally recognised on the project webpage, 84 at the start and end of each in-country workshop, within the narrative of the project's best practice report (Annexes 16), and at the start and end of the virtual workshops (Annex 22) and during dissemination of best practice materials (Annex 18). In line with the branding guidelines, the Fund was presented as a distinct project under the overarching umbrella of UK International Development. In all four of the project's target countries – Malawi, Namibia, Uganda and Zambia – host agencies and organisations are aware of the IWT Challenge Fund. Global and local partners have all worked on or were aware of IWT Challenge Fund interventions (some had worked on IWT043 with RUSI). The Fund is generally well-known amongst civil society and national counter-wildlife-crime stakeholders in Sub-Saharan Africa, owing to previous funding cycles and the proportion of delivery within that region. Finally, RUSI has promoted IWT096 social content on dedicated corporate channels on X/Twitter (136,800 followers), LinkedIn (39,000 followers) and YouTube (18,400 followers). At a group level, RUSI's Organised Crime and Policing (OCP) research group, under which this project sits, has also cascaded project content on its own accounts on X/Twitter (1,903 followers) and LinkedIn (788 followers), providing an overall potential audience for project-related posts of nearly 200,000 high quality followers spanning security, enforcement, defence, academia, research and policy. RUSI referenced the IWT Challenge Fund in its promotional Twitter thread85 following the publication of the Whitehall Report and parallel Linked in post. 86 The authors of the project's Whitehall Report amplified these posts via their personal accounts on X/Twitter and LinkedIn, as well as promoting other project outputs, which garnered at least another 7,000 further impressions.

#### 11. Safeguarding

Has your Safeguarding Policy been updated in the past 12 months?	
Have any concerns been investigated in the past 12 months	
Yes All RUSI projects are administered by the Lead, to whom project teams are required queries and issues including: witnessed o abuse or harassment (SEAH); allegations RUSI connected to the project. If the repo Safeguarding lead will report it to	I to immediately refer specific r suspected sexual exploitation, of SEAH from anyone outside of
Yes Details can be provided on request	
Past: 66% Planned: 34%	
	Yes All RUSI projects are administered by the Lead, to whom project teams are required queries and issues including: witnessed o abuse or harassment (SEAH); allegations RUSI connected to the project. If the repo Safeguarding lead will report it to Yes Details can be provided on request  Past: 66%

Has there been any lessons learnt or challenges on Safeguarding in the past 12 months? Please ensure no sensitive data is included within responses.

**No relevant incidents on the project.** A safeguarding *risk* was identified around the formal election of 'champions' for reasons outlined in Section 3.1 of this report.

#### 12. Finance and administration

#### 12.1 Project expenditure

Final numbers to be confirmed following the procurement of the project's final audit and confirmation of foreign banking charges.

Project spend (indicative) since last Annual Report	2022/23 Grant (£)	2022/23 Total actual IWTCF Costs (£)	Variance %	Comments (please explain significant variances)
Staff costs (see below)				
Consultancy costs				
Overhead Costs				
Travel and subsistence				
Operating Costs				
Capital items (see below)				
Others (see below)				
TOTAL	46,600	46,072		

Staff employed	Cost
(Name and position)	(£)
Tom Keatinge, IWT and Illicit Finance Expert (Lead Applicant)	
Cathy Haenlein, Project Leader and IWT Expert	
Anne-Marie Weeden, Project Manager and IWT Expert	
Mark Williams, Research Analyst and IWT Expert	
TOTAL	22,953.63

Capital items – description	Capital items – cost (£)
N/A	0
TOTAL	0

Other items – description	Other items – cost (£)
Banking Charges for Payments to Africa	
Research Outputs	
TOTAL	5,200

#### 12.2 Additional funds or in-kind contributions secured

Source of funding for project lifetime	Total (£)
<b>Western Union</b> , planned in-kind staff time contribution to support in-country workshop delivery, with additional time for follow-up and virtual events; cost of	
flights and airport transfers for in-country workshops	
<b>Refinitiv</b> , planned in-kind staff time contribution to support project workshop content and delivery (reduced from £16,000 estimate)	
United for Wildlife, planned in-kind staff time contribution of £5,000 to support	
in-country workshops, additional in-kind staff time contribution to support editing of typologies, invitations and presentations at virtual events	
TRAFFIC, additional in-kind staff time contribution to support the delivery of the	
Namibia workshop	
WildAid, additional in-kind staff time to support to development of gender	
analysis output	
TOTAL	£45,400

Source of funding for additional work after project lifetime	Total (£)
N/A	N/A
TOTAL	0

#### 12.3 Value for Money

The project promised excellent value for money (VfM) through the extent of its direct and indirect beneficiaries; ability to achieve its ambitious outcome; contribution to SDGs 1, 2, 8, 10, 13, 15 and 16; high-quality activities; staff experience and expertise; and contribution to long-term impact relative to cost inputs. The project has delivered against this promise, surpassing many of the metrics identified as proof of success. Ninety participants from 27 agencies participated in the case review workshops. Six novel typologies were created, strengthening financial intelligence for IWT. Overall, the project's written outputs also reached more readers than originally predicted: readership for the best practice report attained 1,545; the 'red flag' typologies reached >4,000 cross-sector counter-IWT practitioners; and the gender article was read by at least >437 and generated nearly 4,000 impressions in one social media post. Wider distribution of best practice was further achieved via the dissemination strategy, with 80 attendees at the virtual events and 346 cross-sector counter-IWT practitioners in receipt of materials. Women were well-represented throughout, with 40% of case review workshop attendees and up to 48% of virtual event attendees identifying as female, a two-thirds female project board and 57% of partners led by women or with at least 50% women in their senior leadership. The breadth and depth of the project reach thus represents excellent value for money and has contributed significantly towards a successful outcome.

Furthermore, the project delivered multiple additional outputs, either within the scope of IWT096 – through reallocation of funds to opportunities that capitalised on the Zambian and UfW SAC opportunities – or through added-value from partners – such as the creation of the RRG on financial investigation for IWT in Namibia. These drive further VfM by extending the project's impact beyond the scope of the initial grant and logframe.

VfM is further evidenced by the expected and additional matched funding received. The project received planned co-financing contributions from Refinitiv, United for Wildlife and Western Union, as well as further *pro bono* inputs during its lifespan from United for Wildlife, Western Union, TRAFFIC, and WildAid. In total, matched funding contributed 16% of the total budget and represented significant in-kind staff time from high-level experts who would not otherwise focus on these activities. RUSI themselves has further taken on all possible opportunities, *pro bono*, to engage with external partners and entities to promote the project's work and findings. This includes, among others, presentations to the USFWS ILEA and ICCA programmes, the Basel Follow-the-Money Working Group and WWF's Lao PDR workshop. Finally, procurement of project travel requirements was conducted with VfM in mind. A minimum of three quotations were sourced for all workshop venues and in-country accommodation, and with one exception (where the project team sought local guidance on the feasibility of workshop transport) the cheapest quote was selected. This ensured the project was able to adhere to its original budget and vest as much money as possible in local partners and expert time on the project.

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

I agree for the Biodiversity Challenge Funds Secretariat to publish the content of this section.

Wildlife crime is conducted by a wide range of different criminal actors, across the illicit supply chains, from subsistence and opportunistic poachers to organised crime groups, with links to other types of serious crime. One of the challenges facing governments in key source and transit countries is how to successfully target organised crime actors. 'Following the money' intrinsically focuses enforcement efforts at higher-level offenders, avoiding causing unintended social harms through punitive treatment of marginalised communities. The Royal United Services Institute (RUSI) led the project, 'Case closed? Using historic cases to enable new financial investigations', funded by the UK government through the Illegal Wildlife Trade Challenge Fund, to test a new method for building capacity in financial investigation and prosecution based on conducting multi-agency case reviews of closed wildlife cases.

First pioneered by RUSI in Lao PDR in partnership with TRAFFIC and WWF, this project was delivered with the help of the Environmental Investigation Agency, United for Wildlife, Western Union, Rooikat Trust, Wildlife Crime Prevention and other partners, targeting four focal countries – Malawi, Namibia, Uganda and Zambia. The 'Case Closed' project included delivery of capacity-building workshops for public sector agencies – where 40% of participants were women – and development of novel financial typologies and gendered case analysis. Findings and best practice materials were then created and disseminated to a wider audience of public and private sector actors across Africa and worldwide. The 'Closed Case Method' has proven to be a successful strategy for building capacity, generating momentum around financial investigation and prosecution of wildlife crime. Wider engagement activities, and the enabling of local champions – such as Margaret Chitundu from Zambia's National Prosecution Authority – have resulted in locally led initiatives where national authorities have adopted the approach to scale up integration of financial investigation to casework on both closed and live wildlife cases. Each of the focal countries is now actively using financial investigation and prosecution in their handling of illegal wildlife trade cases. Though its practical approach, the project has helped drive financial investigation out of the classroom and into the courtroom.

Information on the images and graphics provided under this question can be found in Annex 29, and all openaccess publications are listed in Table 2, Annex 3.

# 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	
Impact: A reduction in IWT and poverty alleviation in Malawi, Namibia, Uganda and Zambia through more effective public-sector investigation and prosecution, and private-sector disruption, of financial crimes linked to IWT.				
Outcome:				
Multi-agency case reviews and best- practice increase enforcement capacity, creating new financial intelligence and generating train-the-trainer financial- investigation skills, improving IWT	0.1 By March 2023, all participants in closed case reviews in Malawi, Namibia, Uganda, and Zambia (at least 10 per country, n=40 total) have improved understanding of the	0.1 Results of pre- and post-workshop evaluation surveys completed by participants; usage records of systems put in place during workshops; project notes and M&E record of	The security situation – including the impact of Covid-19 – will allow project activities to take place in-country as planned.	
investigation and prosecution in Malawi, Namibia, Uganda, and Zambia.	dynamics of wildlife-linked illicit financial flows and enhanced capacity to effectively investigate and prosecute IWT from a financial perspective, as judged by pre- and post-workshop	implementation; participant contributions and feedback; internal law enforcement agency records; courtroom monitoring records.	If any adjustments to project activities are required in light of the evolution of the coronavirus pandemic, the options to use technology and the involvement of established in-country partners will	
	evaluation surveys. Fifty per cent of this indicator (i.e., a minimum of 20 participants across two focal countries)	0.2 Correspondence with relevant government agencies; record of transferral of best practice to relevant	allow capacity-building activities to proceed.	
	to be attained by October 2022.	agencies, regional and international stakeholders; records of agencies	The Malawian, Namibian, Ugandan, and Zambian governments remain	
	<b>0.2</b> By December 2023, at least 12 (3 per country, n=12 total) government agencies in Malawi, Namibia, Uganda, and Zambia, and partners across the regional and international community,	engaged in workshops; external surveys, analyses and needs assessments; usage records of best- practice systems put in place; social media; citations in relevant local,	committed to improving their anti-money laundering/anti-financial crime regimes to meet international standards and to counter IWT.	
	have access to dedicated best practice in conducting closed IWT case reviews to generate actionable new financial intelligence and increase capacity to	regional and national documents and policies; reference in media and academic studies.	Government partners remain willing to provide accurate case records under agreed data-sharing parameters.	
	use financial investigation tools to disrupt mid- and high-level IWT actors.	0.3 Records and reports of law- enforcement agencies; project records; partner records; documented	Government partners remain willing to engage in multi-agency case reviews and act upon new intelligence	
	New financial intelligence created and enhanced financial-investigation capacity results in agreement from lead	exchanges between project team and lead investigating agencies; records of use of intelligence-sharing pathways;	generated to reopen cases for further investigation.	
	law enforcement agencies in each country that criteria for acting on new	record of engagement with private sector institutions; newspaper articles;	Private sector institutions see the value in engaging on financial intelligence	

	intelligence have been met, allowing the initiation of operational progress on 4 cases reviewed. Supporting this, at least 4 (1 per country) financial intelligence reports on red flags for how traffickers operate in Malawi, Namibia, Uganda, and Zambia are transferred to the private sector, marking a significant shift from the current baseline of highly limited intelligence sharing by September 2023.	prosecution rates; court records; courtroom monitoring reports; assessments by external research institutes and NGOs; journal articles in law and environmentally focused journals.	reports on high-level traffickers operating in the focus countries, as shared through established intelligence-sharing pathways.
Outputs:  1. IWT cases (at least n=2 per country, <7 years old) are selected using defined criteria co-created with partner NGOs and government agency partners and expert analysis conducted, in preparation for the 'train-the-trainer' workshops in Output 2	<ul> <li>1.1 Tailored, formally defined case selection criteria are co-created with government and NGO partners in each country according to local priorities by September 2022 (n= 4 criteria sets, 1 per country).</li> <li>1.2 Four internal record logs of all midand-high level IWT cases suitable for review (1 per country) are created (based on defined criteria in MI 1.1) and 8 cases (2 per country) selected for financial analysis by March 2023. Fifty per cent of these (l.e., two logs for two countries) to be completed by October 2022.</li> <li>1.3 All 8 cases are analysed from a financial perspective, identifying missed sources of financial intelligence and avenues for further investigation by September 2023. A gendered perspective is used in the analysis in all 8 case to generate new intelligence about gender roles and offender profiles, as well as gendered impacts by September 2023.</li> <li>1.4 On the basis of this analysis, workshop case briefings (n= 2 per country, 8 total) are produced and disseminated to partner agencies (minimum 12 agencies) for discussion</li> </ul>	<ul> <li>1.1 Correspondence with relevant law enforcement agencies and NGO partners; project notes and records; M&amp;E records; internal reports of the relevant agencies; records of circulation of case selection criteria.</li> <li>1.2 Project notes and records; internal record logs; internal reports of the relevant agencies; internal databases; correspondence with relevant law enforcement agencies and NGO partners; evidence of circulation of record logs.</li> <li>1.3 Written internal analysis of financial and gendered dynamics; project notes and records; M&amp;E records.</li> <li>1.4 Written case briefings; correspondence with relevant agencies and NGO partners; project notes and records; M&amp;E records; reports of the relevant agencies; record of questions agreed and documented on each case.</li> <li>1.5 Written communication between the relevant agencies, emails and correspondence from local partner NGOs and consultants suppporting the process; records of meetings held between agencies; case lists identifying cases for evaluation; report from local</li> </ul>	The Covid-19 pandemic will have limited impact on this Output, given the presence and involvement of established in-country partners and the predominantly internet-based nature of the relevant activities.  At least two mid/high-level cases in Malawi, Namibia, Uganda, and Zambia are suitable for multi-agency review.  Government partners in each country can mutually agree suitable criteria for case selection.  Partner agencies remain willing and able to share historic case files and candidly discuss the details of mid/high-level cases.

	and use within workshop training scenarios. Fifty per cent of these to be disseminated by October 2022, and the remaining fifty per cent by March 2023.	partners as to the outcome of the paper review.	
	<b>1.5</b> A further multi-agency paper case review is conducted in Zambia by public sector agencies by August 2023, evaluating twenty (n=20) cases suitable for financial review, from a long list of c.100 mid-high level wildlife cases.		
2. 'Train-the-trainer' workshops are delivered to selected officers from key government agencies in Malawi, Namibia, Uganda and Zambia.	2.1 Number of days of multi-agency 'train-the-trainer' closed case reviews (4 days per country, n=16 total) which provide at least 40 relevant actors (10 per country, n=40 total, 25% women) from at least 3 government agencies in Malawi, Namibia, Uganda, and Zambia (n=12 agencies total) with new skills and expertise by March 2023. Participants will be demonstrably better able to effectively collect and share on financial intelligence, initiate financial investigations, and facilitate future case reviews. Fifty per cent of the workshops to be completed by October 2022, and the remaining indicators to be achieved by March 2023.  2.2 A 60% increase is evident in preand-post workshop capacity in terms of the skills required to effectively investigate illicit financial flows linked to IWT and prosecute on this basis, as measured by pre- and post-workshop evaluation surveys by March 2023.	<ul> <li>2.1 Number of days of multi-agency historic case review training provided in Malawi, Namibia, Uganda, and Zambia (baseline = IWT021/IWT043, 7 days per country) to at least 40 individuals from at least 3 public-sector agencies; project notes and M&amp;E record of workshops; participant feedback; internal agency reports; results of preand post-workshop evaluation surveys; procurement records; receipts; certificates of completion.</li> <li>2.2 Project notes and M&amp;E record of implementation of workshops; participant feedback; internal agency reports; results of pre- and post-workshop evaluation surveys.</li> <li>2.3 Project notes and M&amp;E record of implementation and results of training showing correspondence with champions; internal agency records; email correspondence with appointed champions.</li> </ul>	The security situation – including the impact of Covid-19 – allows the workshops to take place in-country as planned. Options for virtual components can be agreed with partners as required, and workshops can proceed on this basis if required, in light of involvement of established in-country partners and ability to use secure technology to deliver key content.  Direct beneficiaries will have sufficient capacity to absorb and implement new approaches and will remain open to inter-agency co-operation.  Relevant public-sector agencies see the value of participation in the project and remain prepared to engage.  Relevant private-sector institutions see the value of participation in the project and remain prepared to engage on intelligence shared via established intelligence-sharing pathways.
	2.3 Four (n=4) <i>de facto</i> country "champions" will emerge throughout project implementation to guide ongoing collaboration and coordination between trainees in relation to the training delivered by March 2023, with 100% of	2.4 Internal private-sector records; internal records of use of intelligence-sharing pathways; documentation of briefings for sharing; internal private-sector distribution and membership lists; project records; M&E record of implementation; email correspondence.	Capacity-building efforts will be sufficiently dynamic to respond to any legislative and regulatory changes at the national and regional levels.  In-depth knowledge and institutional familiarity on the part of in-country

	all participants identifying as 'trained trainers'.  2.4 By September 2023, new financial intelligence generated during case reviews and workshops is shared with the private sector using established, secure, dedicated intelligence-sharing pathways, in the form of 4 red flag intelligence briefings (1 per country) reaching a minimum of 40 private-sector institutions.		partners allows selection of suitable participants in multi-agency workshops.
3. Best-practice in using closed case reviews to create new financial intelligence and build capacity in the financial investigation of IWT is produced and published.	3.1 By November 2023, one universal, globally relevant 7,000-word RUSI report is collaboratively produced on best practice in conducting historic case reviews, with example case studies, which reaches at least 500 readers (25% from non-EU IP addresses) and is transferred directly to at least three local government agencies per country (12 total).  3.2 By November 2023, all workshop participants and 'champions' (n=10 individuals per country) are directly provided with documented best-practice and acknowledge receipt of the resources.  3.3 The best practice report is formally recognised by national agencies by December 2023 (n=8 total), where there had previously been little in the way of recognised evidence or recommendations to feed into priority setting and policy making for financial analysis strategies against IWT (baseline = RUSI previous research, ESAAMLG, APG and FATF June 2020 report.)  3.4 By July 2023, 1 open-access analysis of gender roles, offender	<ul> <li>3.1 Publication record; rusi.org website pages; internal editorial records and version histories; project documentation; citations in newspaper articles, journal articles and social media.</li> <li>3.2 Project notes; Malawian, Namibian, Ugandan, and Zambian lawenforcement and policy documents; documented email exchanges with the relevant national agencies; CITES NIAP reports; M&amp;E records.</li> <li>3.3 Project notes; Malawian, Namibian, Ugandan, and Zambian lawenforcement and policy documents; documented email exchanges with the relevant national agencies; CITES NIAP reports; M&amp;E records.</li> <li>3.4 Publication record; rusi.org website pages; internal editorial records and version histories; website report accessed rates and analytics; project documentation; citations in newspaper articles, journal articles and social media; media reporting; private-sector reporting.</li> </ul>	The Covid-19 pandemic will have limited impact on this Output, given the presence and involvement of established in-country partners and the predominantly internet-based nature of the relevant activities.  All relevant authorities remain happy to continue to extend permission to use sanitised and anonymised case material in public best practice findings.  Government partners remain willing to participate in production of best practice, peer review draft of best practice report and provide feedback.  A gendered analysis of the selected cases produces valid, reliable and significant findings of relevance and use to a regional and global audience.

4. A half-day operational-level regional 'lessons learned' forum with public-sector participants is held to discuss the practical implications of the project's best practice, case studies and findings. As well as at a separate 2-hour public/private-sector webinar, attended by key institutions across finance and logistics sectors, alongside broader distribution activities guided by a high-impact public dissemination strategy coordinated across all project partners.	profiles, and gendered IWT impacts (based on findings from the gendered case review under Output 1) is published on rusi.org and viewed by an audience of at least 1,000 readers by September 2023.  4.1 By July 2023, one high-impact public dissemination strategy is drafted and approved, with roles assigned to all project partners, incorporating social media, regional 'lessons learned' forum hosting and public/private-sector webinar components.  4.2 By November 2023, at least 20 selected participants across the focus countries attend regional 'lessons learned' forum (n=20 total), with at least	<ul> <li>4.1 Drafts of dissemination strategy; documented final dissemination strategy; internal records of RUSI Communications Department; social-media campaign planning records; email exchanges between partners with regard to dissemination strategy; project records; M&amp;E records.</li> <li>4.2 'Lessons learned' forum agendas; correspondence with participants and speakers; project M&amp;E records;</li> </ul>	The security situation – including the impact of Covid-19 – allows the regional forum to take place as planned. Options for virtual components can be agreed with partners as required, and the forum can proceed on this basis if required, in light of involvement of established incountry partners and ability to use secure technology to deliver key content.  Key public-sector agencies continue to
	audience of at least 1,000 readers by September 2023.		
'lessons learned' forum with public- sector participants is held to discuss the practical implications of the project's best practice, case studies and findings. As well as at a separate 2-hour public/private-sector webinar, attended by key institutions across finance and logistics sectors, alongside broader distribution activities guided by a high- impact public dissemination strategy	<ul> <li>4.1 By July 2023, one high-impact public dissemination strategy is drafted and approved, with roles assigned to all project partners, incorporating social media, regional 'lessons learned' forum hosting and public/private-sector webinar components.</li> <li>4.2 By November 2023, at least 20 selected participants across the focus countries attend regional 'lessons</li> </ul>	documented final dissemination strategy; internal records of RUSI Communications Department; social-media campaign planning records; email exchanges between partners with regard to dissemination strategy; project records; M&E records.  4.2 'Lessons learned' forum agendas; correspondence with participants and	impact of Covid-19 – allows the regional forum to take place as planned. Options for virtual components can be agreed with partners as required, and the forum can proceed on this basis if required, in light of involvement of established incountry partners and ability to use secure technology to deliver key content.

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

- **1.1** Co-creation, tailoring and definition of case selection criteria in collaboration with partner NGOs and government partners to identify mid-and-high level IWT cases suitable for financial analysis.
- **1.2** Selection of 2 cases per country in line with criteria defined in Activity 1.1, creation of record logs (1 per country) of all mid-and-high level IWT cases selected, and facilitation of secure transfer of cases for expert analysis.
- **1.3** Analysis of cases from a financial perspective, identifying missed sources of financial intelligence and avenues for further investigation with a gendered perspective used to consider cases from the point of view of gender roles and offender profiles, as well as gendered impacts.
- **1.4** Production of 2x pre-workshop case briefings per countryand dissemination of briefings to government partners.
- 1.5 Coordination of a multi-agency paper financial intelligence review of n=20 cases from longlist of c.100 mid-high level wildlife cases in Zambia.
- **2.1** Collaborative design and elaboration of agenda and capacity-building content for 'train-the-trainer' workshops to be delivered in each country, and sharing of final agendas with all project partners and relevant agencies.
- **2.2** Selection and invitation of financial, field, and other officers from law-enforcement agencies in each country for 'train-the-trainer' workshops, confirming exact participants, venues, and all other logistics.
- 2.3 Delivery of 'train-the-trainer' workshops in each country, and identification of one dedicated "champion" per agency to guide ongoing collaboration and coordination.
- **2.4** Sharing of financial intelligence resulting from workshops with the private sector, as agreed with participating agencies during workshops, using dedicated, secure intelligence-sharing pathways.
- **3.1** Analysis of lessons learned and identification of best practice in using closed case reviews as a capacity-building and financial-intelligence generating exercise, on the basis of project reporting, M&E during previous activities, in collaboration with partner organisations and participants.
- **3.2** Drafting of one 7,000-word open-access report, laying out lessons learned and best practice in conducting historic case reviews as a capacity-building and financial-intelligence generating exercise with practice case studies.
- **3.3** Drafting of 1 open-access 1,000 word analysis of gender roles, offender profiles and gendered IWT impacts, based on findings emerging during the gendered case review under Output 1.
- **3.4** Formal professional editing, production, and publication of 7,000-word best-practice report as a RUSI Occasional Paper, and of 1,000-word report on gender and IWT as a shorter rusi.org output.
- **4.1** Drafting and production of a high-impact, multi-dimensional inter-regional dissemination strategy for the project's results, including strategy for disseminating the 7,000-word best-practice report and 1,000-word report on gender and IWT.
- **4.2** In line with the dissemination strategy produced under Activity 4.1, planning and convening of a 1-day operational-level regional 'lessons learned' forum with public-sector participants from Malawi, Namibia, Uganda, and Zambia.
- **4.3** In line with the dissemination strategy produced under Activity 4.1, planning and convening of a 2-hour public/private-sector webinar for key public and private (finance and logistics sector) actors, as well as national, regional, and international stakeholders and donors.
- **4.4** In line with the dissemination strategy produced under Activity 4.1, design and deployment of a tailored social-media campaign coordinated across all project partners.

Annex 2 Report of progress and achievements against final project logframe for the life of the project

Project summary	Measurable Indicators	Progress and Achievements
Impact		
A reduction in IWT and poverty alleviat Zambia through more effective public-s private-sector disruption, of financial cr	sector investigation and prosecution, and	Equipping key source and transit jurisdictions with skills to direct enforcement effort against higher-level offenders, increasing the deterrent for organised crime (OC) actors involved in IWT
		Reducing harm to vulnerable groups from lowering risks of abusive enforcement practice or punitive justice, by reducing OC demand for the harvesting of wildlife.
		Protecting natural resources and biodiversity, safeguarding ecosystem services and green economies, and mitigating climate change impacts, thereby alleviating poverty
		Promoting asset recovery techniques, thereby increasing revenues in low income countries or countries with a prevalence of poverty / income inequality
Outcome Multi-agency case reviews and best-practice increase enforcement capacity, creating new financial intelligence and generate train-the-trainer financial-investigation skills, improving IWT investigation and prosecution in Malawi, Namibia, Uganda, and Zambia.	0.1 By March 2023, all participants in closed case reviews in Malawi, Namibia, Uganda, and Zambia (at least 10 per country, n=40 total) have improved understanding of the dynamics of wildlife-linked illicit financial flows and enhanced capacity to effectively investigate and prosecute IWT from a financial perspective, as judged by pre- and post-workshop evaluation surveys. Fifty per cent of this indicator (i.e., a minimum of 20 participants across two focal countries) to be attained by October 2022.  0.2 By December 2023, at least 12 (3 per country, n=12 total) government agencies in Malawi, Namibia, Uganda, and Zambia, and partners across the regional and international community, have access to dedicated best practice in conducting closed IWT case reviews to generate actionable new financial intelligence and increase capacity to use financial investigation tools to disrupt mid- and high-level IWT actors.	<ul> <li>0.1 By March 2023, 90 participants across Malawi, Namibia, Uganda and Zambia (&gt;15 per country) have achieved a mean improvement across all skill statements of 59%. Half of the countries (a total of 34 participants) had completed their training by October 2022.</li> <li>0.2 By December 2023, 18 government agencies in Malawi (5), Namibia (5), Uganda (4) and Zambia (4) had access to best practice materials, through the dissemination of the report and other learnings at the virtual events. Additionally, 12 other agencies had access, representing national authorities from Kenya, Nigeria, South Africa and the United Kingdom.</li> <li>0.3. The project knows at least 23 cases in which financial intelligence is being acted upon, including 5 in Uganda (2 dormant, 2 closed and 1 live), 16 in Zambia (14 closed and 2 live), 1 in Namibia (live) and 1 in Malawi (now resulted in successful conviction). Further, 6 intelligence alerts (3 for Uganda and 1 each for the remaining focal countries) were transferred to the private sector. 33% of these were transferred by September 2023; the rest were only available for release in March 2023.</li> <li>See section 3.1 for evidence and support on the above.</li> </ul>
	New financial intelligence created and enhanced financial-investigation	

Output 1. IWT cases (at least n=2 per	capacity results in agreement from lead law enforcement agencies in each country that criteria for acting on new intelligence have been met, allowing the initiation of operational progress on 4 cases reviewed. Supporting this, at least 4 (1 per country) financial intelligence reports on red flags for how traffickers operate in Malawi, Namibia, Uganda, and Zambia are transferred to the private sector, marking a significant shift from the current baseline of highly limited intelligence sharing by September 2023.  1.1 Tailored, formally defined case	1.1 Four sets of locally tailored case criteria were created (1 per country) in
country, <7 years old) are selected using defined criteria co-created with partner NGOs and government agency partners and expert analysis conducted, in preparation for the 'train-the-trainer' workshops in Output 2.	selection criteria are co-created with government and NGO partners in each country according to local priorities by September 2022 (n= 4 criteria sets, 1 per country).  1.2 Four internal record logs of all midand-high level IWT cases suitable for review (1 per country) are created (based on defined criteria in MI 1.1) and 8 cases (2 per country) selected for financial analysis by March 2023. Fifty per cent of these (I.e., two logs for two countries) to be completed by October 2022.  1.3 All 8 cases are analysed from a financial perspective, identifying missed sources of financial intelligence and avenues for further investigation by September 2023. A gendered perspective is used in the analysis in all 8 case to generate new intelligence about gender roles and offender profiles, as well as gendered impacts by September 2023.  1.4 On the basis of this analysis, workshop case briefings (n= 2 per country, 8 total) are produced and disseminated to partner agencies	coordination with local government and NGO partners by June 2022, ahead of target.  1.2 For case selection matrixes were created (1 per country) and two cases were selected for each country by March 2023 (50% of these were complete by October 2022, to meet the timeline of the earlier workshops).  1.3 All 8 cases were analysed from a financial and gendered perspective by March 2023, ahead of schedule.  1.4 Eight sets of workshop materials were produced (case summaries and/or presentations on case studies), 2 per country, and are disseminated to 28 agencies participating in the workshops in October 2022 (4 case briefings, 14 agencies) and March 2023 (4 case briefings, 14 agencies) respectively.  1.5 Zambia conducted a paper case review, based on a long list of 100 cases, identifying 14 suitable for financial review, by July 2023. Less cases were selected based on their suitability for pursuing financial intelligence. However, those 14 cases comprise 70 suspects who are undergoing ongoing financial investigation.  See Section 3.1 for more evidence and details on the above.

	(minimum 12 agencies) for discussion and use within workshop training scenarios. Fifty per cent of these to be disseminated by October 2022, and the remaining fifty per cent by March 2023.  1.5 A further multi-agency paper case review is conducted in Zambia by public sector agencies by August 2023, evaluating twenty (n=20) cases suitable for financial review, from a long list of c.100 mid-high level wildlife cases.	
Activity 1.1 Co-creation, tailoring and de collaboration with partner NGOs and gov high level IWT cases suitable for financia	ernment partners to identify mid-and- Il analysis.	Completed
<b>Activity 1.2</b> Selection of 2 cases per country 1.1, creation of record logs (1 per country selected, and facilitation of secure transfer		Completed
Activity 1.3 Analysis of cases from a final sources of financial intelligence and aver gendered perspective used to consider croles and offender profiles, as well as get	nues for further investigation – with a asses from the point of view of gender ndered impacts.	Completed
Activity 1.4 Production of 2x pre-worksh dissemination of briefings to government		Completed
Activity 1.5 Coordination of a multi-agen n=20 cases from longlist of c.100 mid-hig		Completed (n=14 cases)
Output 2. 'Train-the-trainer' workshops are delivered to selected officers from key government agencies in Malawi, Namibia, Uganda and Zambia.	2.1 Number of days of multi-agency 'train-the-trainer' closed case reviews (4 days per country, n=16 total) which provide at least 40 relevant actors (10 per country, n=40 total, 25% women) from at least 3 government agencies in Malawi, Namibia, Uganda, and Zambia	<ul> <li>2.1 The project delivered 4 training days per country (n=16 total) to 90 relevant practitioners, 40% of whom were female, by March 2023. Eight of these training days were completed by October 2022. A total of 28 national agencies and enforcement actors from the focal countries were represented (a minimum of six agencies per country).</li> <li>2.2 Mean aggregated improvement across all 'skill statements' in all countries</li> </ul>
	(n=12 agencies total) with new skills and expertise by March 2023. Participants will be demonstrably better able to effectively collect and share on financial intelligence, initiate financial investigations, and facilitate future case reviews. Fifty per cent of the workshops to be completed by October 2022, and	was 59%.  2.3 A total of 9 champions emerged during project implementation, guiding communications with the local cohorts, promoting best practice nationally and regionally, providing training inputs to their peers, supporting the development of financial typologies, and spearheading financial investigation casework and capacity development. 100% of all particiants identified as 'trained trainers' in workshop evaluation.
	the remaining indicators to be achieved by March 2023.	<b>2.4</b> Six (n=6) novel intelligence alerts were created, with 2 alerts (both Uganda) disseminated on a limited distribution by June 2023 and 4 alerts (1 per country)

	<ul> <li>2.2 A 60% increase is evident in preand-post workshop capacity in terms of the skills required to effectively investigate illicit financial flows linked to IWT and prosecute on this basis, as measured by pre- and post-workshop evaluation surveys by March 2023.</li> <li>2.3 Four (n=4) de facto country "champions" will emerge throughout project implementation to guide ongoing collaboration and coordination between trainees in relation to the training delivered by March 2023, with 100% of all participants identifying as 'trained trainers'.</li> <li>2.4 By September 2023, new financial intelligence generated during case reviews and workshops is shared with the private sector using established, secure, dedicated intelligence-sharing pathways, in the form of 4 red flag intelligence briefings (1 per country) reaching a minimum of 40 private-sector institutions.</li> </ul>	disseminated by March 2023. The March 2023 alerts are available in an open-access online library, and were disseminated to over 4,000 counter-IWT actors, including representatives of >609 private sector institutions.  See Section 3.1 for more information and evidence on the above.
content for 'train-the-trainer' workshops t sharing of final agendas with all project p	partners and relevant agencies.	Completed
enforcement agencies in each country for exact participants, venues, and all other		Completed
<b>Activity 2.3</b> Delivery of 'train-the-trainer' identification of one dedicated "champior collaboration and coordination.	n" per agency to guide ongoing	Completed
Activity 2.4 Sharing of financial intelliger private sector, as agreed with participatir dedicated, secure intelligence-sharing participations.	ng agencies during workshops, using	Completed (partially delayed)
Output 3. Best-practice in using closed case reviews to create new financial intelligence and build capacity in the financial investigation of IWT is produced and published.	3.1 By November 2023, one universal, globally relevant 7,000-word RUSI report is collaboratively produced on best practice in conducting historic case reviews, with example case studies, which reaches at least 500	<b>3.1</b> By November 2023, one universal, globally relevant 12,000 word RUSI 'best practice' report is completed, and subsequently reaches 1,545 readers (37% outside the EU/UK) and is transferred directly to at least six agencies per focal country (29 agencies total).

readers (25% from non-EU I addresses) and is transferre at least three local governme agencies per country (12 tot 3.2 By November 2023, all v participants and 'champions individuals per country) are oprovided with documented by practice and acknowledge rether resources.  3.3 The best practice report recognised by national agen December 2023 (n=8 total), there had previously been lit way of recognised evidence recommendations to feed in setting and policy making for analysis strategies against I' (baseline = RUSI previous re ESAAMLG, APG and FATF report.)  3.4 By July 2023, 1 open-act analysis of gender roles, offer profiles, and gendered IWT (based on findings from the case review under Output 1) published on rusi.org and vie audience of at least 1,000 re September 2023.	per focal country) are provided with documented best practice, with 20% of these confirmed as received. This was delayed and was achieved by February and March 2024.  3.3 Formal recognition was not feasible within the timeframe of this project. However, there is evidence of between 12-21 national agencies utilising the best practice recommendations, with case reviews or financial investigations/prosecutions well underway by December 2023. Best practice recommendations have also been reflected in 5 champions exchanging knowledge with their peers, and materials have been integrated as evidence in 4 external training platforms and 1 report.  3.4 One open-access 1,100 word article sharing findings of analysis on gender and IWT is published on RUSI's website in September 2023. Monitoring of page analytics met with technical difficulty, so it is only known that the article was read by >437 people but social media shares of the link garnered nearly 4,000 impressions.  See Section 3.1 for more information and evidence on the above.
<b>Activity 3.1</b> Analysis of lessons learned and identification of best practusing closed case reviews as a capacity-building and financial-intellige generating exercise, on the basis of project reporting, M&E during prevactivities, in collaboration with partner organisations and participants.	ious
<b>Activity 3.2</b> Drafting of one 7,000-word open-access report, laying out learned and best practice in conducting historic case reviews as a capabuilding and financial-intelligence generating exercise with practice case	acity-
Activity 3.3 Drafting of 1 open-access 1,000 word analysis of gender r offender profiles and gendered IWT impacts, based on findings emerging the gendered case review under Output 1.	oles, Completed
Activity 3.4 Formal professional editing, production, and publication of word best-practice report as a RUSI Occasional Paper, and of 1,000-w on gender and IWT as a shorter rusi.org output.	

Putput 4. A half-day operational-level regional 'lessons learned' forum with public-sector participants is held to discuss the practical implications of the project's best practice, case studies and findings. As well as at a separate 2-hour public/private-sector webinar, attended by key institutions across finance and logistics sectors, alongside broader distribution activities guided by a high-impact public dissemination strategy coordinated across all project partners  4.1 Drafting and production of a high-imp dissemination strategy for the project's redisseminating the 7,000-word best-practice and IMT.	esults, including strategy for	4.1 One public dissemination strategy is drafted and approved by September 2023, including roles assigned to partners, social media briefs, and annexes for regional virtual workshop and public-private webinar concept notes.  4.2 In December 2023, 29 participants attend the virtual regional workshop, at least 19 of whom represent the focal countries. Of 7 speakers, 57% represent the focal countries, and 57% are women.  4.3 In December 2023, 23 private sector and 15 public sector organisations, 53 individuals in total (43.4% from focal countries but 76.5% from key source and transit jurisdictions in East, Southern or West Africa) attend the two hour public-private webinar, of which 48% are female.  4.4 In December 2023, 100% of participants of the virtual events are offered the chance to complete an anonymous survey for feedback, and of those who did, 56% claimed they were 'quite satisfied' and 44% claimed to be 'very satisfied' with the contents of the webinar.  See Section 3.1 for more information and evidence on the above.
gender and IWT. <b>4.2</b> In line with the dissemination strategy	v produced under Activity 4.1 planning	Completed
and convening of a half-day operational-l with public-sector participants from Malay	evel regional 'lessons learned' forum wi, Namibia, Uganda, and Zambia.	·
<b>4.3</b> In line with the dissemination strategy and convening of a 2-hour public/private-(finance and logistics sector) actors, as winternational stakeholders and donors.	sector webinar for key public and private	Completed

<b>4.4</b> In line with the dissemination strategy produced under Activity 4.1, design and deployment of a tailored social-media campaign coordinated across all project partners.	Completed
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Table 1 Project Standard Indicators

IWTCF Indicator number	Name of indicator using original wording	Name of Indicator after adjusting wording to align with IWTCF Standard Indicators	Units	Disaggre gation	Y1 total	Y2 total	Y3 total	Total to Date	Total planned during the project
IWTCF- B01	Number of people trained in law	Number of people trained in law enforcement skills	People	Men	0	54	31	85	32
D01	enforcement skills	emorcement skiiis		Women	0	36	41	77	18
IWTCF- B05	Number of best practice guides and knowledge products published and endorsed	Number of best practice guides and knowledge products published and endorsed	Number	Language (English)	0	2	6	8	6
IWTCF- B16	Proportion of cases handed to/received from another agency that have been followed up with action	Number of cases reviewed by multiple agencies which have been followed up with actions	Number	Cases	0	1	22	23	4
IWTCF- B24	Number of government institutions/departments with enhanced awareness and understanding of biodiversity and associated poverty issues	Number of government institutions/departments with enhanced awareness and understanding of biodiversity and associated poverty issues	Number	Governm ent institution s	0	27	26	53	39
IWTCF- D06	Number of training weeks provided to relevant stakeholders	Number of training weeks provided to relevant stakeholders	Number	Stakehold er group (governm ent agencies and private sector financial institution s)	0	4	0.2	4.2	4.2

IWTCF-	Number of papers	Number of papers published in	Number	RUSI	0	0	1	0	1
D12	published in peer	peer reviewed journals		Journal					
	reviewed journals								

In addition to reporting any information on publications under relevant standard indicators, in Table 2, provide full details of all publications and material produced over the last year that can be publicly accessed, e.g. title, name of publisher, contact details, cost. Mark with an asterisk (\*) all publications and other material that you have included with this report.

Table 2 Publications

Title	Туре	Detail	Gende	Nationalit	Publisher	Available from
	(e.g. journals, manual, CDs)	(authors, year)	r of Lead Author	y of Lead Author	s (name, city)	(e.g. weblink or publisher if not available online)
Using Closed Case Reviews in Financial Investigation of the Illegal Wildlife Trade*	RUSI Whitehall Report	Anne- Marie Weeden, Mark Williams, Cathy Haenlein and Elijah Glantz, 2023	Femal e	GB/NL	RUSI, London	https://www.rusi.org/explore-our-research/publications/whitehall-reports/using-closed-case-reviews-financial-investigation-illegal-wildlife-trade
Understandin g the Female Wildlife Offender: Lessons from the Case Files	Blog article	Anne- Marie Weeden, 2023	Femal e	GB/NL	RUSI, London	https://www.rusi.org/networks/shoc/nature-guns-money/understanding-female-wildlife-offender-lessons-case-files
Case Reviews to Enhance Cross-Sector Response to	Webinar	RUSI, 2023	N/A	N/A	RUSI via Youtube	https://www.youtube.com/watch?v=Hx3ZVxYJQvA

Title	Type (e.g. journals, manual, CDs)	Detail (authors, year)	Gende r of Lead Author	Nationalit y of Lead Author	Publisher s (name, city)	Available from  (e.g. weblink or publisher if not available online)
IWT-related Money Laundering						
Typology: Use of chili peppers to obfuscate wildlife consignment*	United for Wildlife Taskforc e Alert	Anne- Marie Weeden, RUSI, 2023 (publishe d 2024)	Femal e	GB/NL	United for Wildlife, London	https://mcusercontent.com/c9276ae78732e6b7f7bb610ad/files/c46bc221-1885-29e6-f394-98cb5cba94eb/00172 Typology Chili peppers concealment.01.pdf
Typology: Syndicate Uses Casino Loans to Launder Proceeds of Ivory Trafficking in Malawi*	United for Wildlife Taskforc e Alert	Anne- Marie Weeden, RUSI, 2023 (publishe d 2024)	Femal e	GB/NL	United for Wildlife, London	https://mcusercontent.com/c9276ae78732e6b7f7bb610ad/files/cf33b87e-20d9-7913-bd88-f14a796d1c8f/00170 Typology Casinos Malawi IWT.pdf
Typology: Shadow Actors Funding Legal Fees in Zambia*	United for Wildlife Taskforc e Alert	Mark Williams, RUSI, 2023 (publishe d 2024)	Male	KE/GB	United for Wildlife, London	https://mcusercontent.com/c9276ae78732e6b7f7bb610ad/files/857100f8-dd2b-5852-9720-fe2d42b4bcc4/00171 Typology SHADOW ACTORS FUNDING LEGAL FEES IN ZAM BIA.pdf
Typology: Use of Religious Positions*	United for Wildlife Taskforc e Alert	Mark Williams, RUSI, 2023 (publishe d 2024)	Male	KE/GB	United for Wildlife, London	https://mcusercontent.com/c9276ae78732e6b7f7bb610ad/files/583e2dbd-7540-801b-c30b-48e043254239/00169 Typology Pastors and IWT.pdf

#### **Checklist for submission**

	Check
<b>Is the report less than 10MB?</b> If so, please email to <a href="mailto:BCF-Reports@niras.com">BCF-Reports@niras.com</a> putting the project number in the Subject line.	Y
<b>Is your report more than 10MB?</b> If so, please discuss with <a href="mailto:BCF-Reports@niras.com">BCF-Reports@niras.com</a> about the best way to deliver the report, putting the project number in the Subject line.	Y – annexes and video/images only
If you are submitting photos for publicity purposes, do these meet the outlined requirements (see section 10)?	Y
<b>Have you included means of verification?</b> You should not submit every project document, but the main outputs and a selection of the others would strengthen the report.	Y
Do you have hard copies of material you need to submit with the report? If so, please make this clear in the covering email and ensure all material is marked with the project number. However, we would expect that most material will now be electronic.	N
If you are submitting photos for publicity purposes, do these meet the outlined requirements (see section 13)?	Y
Have you involved your partners in preparation of the report and named the main contributors	Υ
Have you completed the Project Expenditure table fully?	Υ
Do not include claim forms or other communications with this report.	