

Applicant: **McCarthy, John**
Organisation: **Environmental Investigation Agency (EIA)**
Funding Sought: **£560,000.00**

IWTR7S2\1006

Disrupting international wildlife trafficking networks in West and Central Africa

This project will reduce the international trafficking of elephant ivory and pangolins in West/Central Africa. It will do this by building more effective criminal justice responses to organised wildlife trafficking in Nigeria by working with government and civil-society organisations. The project will generate information to inform intelligence-led law enforcement investigations into trafficking and corruption, build capacity for wildlife crime financial investigations, and enhance regional cooperation, including with Gabon and Cameroon.

Section 1 - Contact Details

PRIMARY APPLICANT DETAILS

Name John
Surname McCarthy
Organisation Environmental Investigation Agency (EIA)
Tel (Work) [REDACTED]
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CONTACT DETAILS

Name Mary
Surname Rice
Organisation Environmental Investigation Agency (EIA)
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[REDACTED]
[REDACTED]

GMS ORGANISATION

Type	Organisation
Name	Environmental Investigation Agency (EIA)
Phone	[REDACTED]
Email	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]

Section 2 - Title, Dates & Budget Summary

Q3. Project title:

Disrupting international wildlife trafficking networks in West and Central Africa

What was your Stage 1 reference number? e.g. IWTR7S1\100123

Q4. Country(ies)

Which eligible country(ies) will your project be working in? Where there are more than 4 countries that your project will be working in, please add more boxes using the selection option below.

Country 1	Nigeria	Country 2	Cameroon
Country 3	Gabon	Country 4	No Response

Do you require more fields?

No

Q5. Project dates

Start date:

01 April 2021

End date:

31 March 2024

Duration (e.g. 2 years, 3 months):

3 years

Q6. Budget summary

Year:	2021/22	2022/23	2023/24	Total request
Amount:	£147,757.00	£229,968.00	£182,275.00	£ 560,000.00

Q6a. Do you have proposed matched funding arrangements?

Yes

What matched funding arrangements are proposed?

EIA is expecting to secure approximately £ [REDACTED] from new and existing long-term donors which will contribute to the total costs of this project over three years, with an increased likelihood of new donations expected as a result of securing funds from the IWT Challenge Fund Round 7.

Q6b. Proposed (confirmed and unconfirmed) matched funding as % of total Project cost (total cost is the IWT Challenge Fund request plus other funding required to run the project). [REDACTED]

Section 3 - Project Summary & Objectives

Q7. Summary of project

Please provide a brief summary of your project, its aims, and the key activities you plan on undertaking. Please note that if you are successful, this wording may be used by Defra in communications e.g. as a short description of the project on [GOV.UK](https://www.gov.uk).

Please write this summary for a non-technical audience.

This project will reduce the international trafficking of elephant ivory and pangolins in West/Central Africa. It will do this by building more effective criminal justice responses to organised wildlife trafficking in Nigeria by working with government and civil-society organisations. The project will generate information to inform intelligence-led law enforcement investigations into trafficking and corruption, build capacity for wildlife crime financial investigations, and enhance regional cooperation, including with Gabon and Cameroon.

Q8. What will be the Outcome of the project?

This should be an action orientated statement e.g. training provided to the judiciary results in increased successful prosecutions of poaching.

This should be the same as the Outcome statement in the logframe uploaded at Question 34.

Intelligence-led law enforcement, including use of financial investigations and regional cooperation, disrupts ivory and pangolin trafficking networks and associated corruption West/Central Africa through increased risks for wildlife criminals.

Q9. Which of the four key IWT Challenge Fund objectives will your project address?

Please tick all that apply.

- Strengthening law enforcement
- Ensuring effective legal frameworks

Q10. Which of the commitments made in the London Conference Declarations, the Kasane Statement and/or the Hanoi Conference does this project support?

Please provide the number(s) of the relevant commitments and some brief information on how your project will contribute to them. There is no need to include the text from the relevant commitment.

Strengthening Law Enforcement (XIII- XVI, 2014 London Conference Declaration; C, Hanoi Statement; 16 and 18, 9- 12, 2018 London Conference Declaration)

The project will address corruption and illicit financial flows from ivory and pangolin trafficking in Nigeria and increase awareness among relevant criminal justice system professionals in relation to these issues. The project will increase the use of financial investigation techniques and public-private collaboration to identify criminals and their networks. The project will also strengthen regional law enforcement co-operation between Nigeria, which is the largest export hub for ivory and pangolin scales in Africa, and

Cameroon, Gabon and other relevant source and transit countries.

Ensuring Effective Legal Frameworks and Deterrents (IX-XII, 2014 London Conference Declaration; 4-5 Kasane Statement; B, Hanoi Statement; 9, 2018 London Conference Declaration)

The project will promote effective practices aimed at the prevention of corruption and detection of money-laundering associated with wildlife trafficking, which will assist prosecution and the imposition of penalties that are an effective deterrent. The project will support the use of the full range of applicable laws relevant for tackling serious organised crimes including money laundering and anti-corruption legislation.

It should be noted that Nigeria is a signatory to the 2018 London Declaration, which particularly focuses on tackling corruption and money laundering (calling for “action to tackle the illicit financial flows associated with wildlife trafficking and related corruption, including the increase of use of financial investigation techniques and public/private collaboration to identify criminals and their networks”).

Q11. Global Goals for Sustainable Development (SDGs)

Please detail how your project will contribute to the Global Goals for Sustainable Development (SDGs).

The project will contribute towards SDGs 15, 16 and 17.

The project will promote the achievement of targets 15.5 and 15.7 related to halting biodiversity loss by reducing elephant and pangolin poaching. It will also tackle one of the drivers of the spread of zoonotic diseases such as COVID-19 since human exposure to animals at various stages of the illegal wildlife trade chain presents opportunities for the spread of such diseases.

The project will significantly boost SDG 16 by tackling security and organised crime issues in Nigeria which have been identified as having the highest criminal market score for fauna crime in the entire continent (ENACT, 2019). In particular, the project will seek to achieve target 16.3 and 16.6 by promoting the rule of law and greater government accountability. The project will directly contribute towards targets 16.4 by seeking to prevent illicit financial flows associated with organised wildlife crime. By increasing awareness of the role of corrupt state actors in enabling wildlife trafficking and by working with relevant anti-corruption authorities, the project will reduce corruption associated with wildlife crime.

The project will promote target 17.9 by implementing capacity building at the national level which will in turn support Nigeria’s efforts to achieve the SDGs mentioned above. The project will also contribute towards targets 17.16 and 17.17 by facilitating multi-stakeholder collaboration and partnerships amongst relevant Nigerian government agencies, between the public-private sector within the finance and banking community and by engaging civil society groups.

Section 4 - Lead Organisation Summary

Q12. Lead organisation summary

Has your organisation been awarded an IWT Challenge Fund or Darwin Initiative award before (for the purposes of this question, being a partner does not count)?

Yes

If yes, please provide details of the most recent awards (up to 6 examples).

Reference No	Project Leader	Title
IWT059	Julian Newman	Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade
IWT056	Julian Newman	Strengthening enforcement against the illegal pangolin trade in Uganda
IWT046	Debbie Banks	Enhancing Enforcement to End Tiger Trade in South East Asia
IWT030	Mary Rice	Combatting illegal ivory trade: training film to aid enforcement officers
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>


Have you provided the requested signed audited/independently examined accounts? If you select "yes" you will be able to upload these. Note that this is not required from Government Agencies.


Yes

Please attach the requested signed audited/independently examined accounts.


 [EIA UK Annual Report & Accounts 2019](#)


 10/11/2020


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 pdf 3.12 MB

 [EIA UK Annual Report & Accounts 2018](#)

 10/11/2020

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Section 5 - Project Partners

Q13. Project partners

Please list all the partners involved (including the lead organisation) and explain their roles and responsibilities in the project. Describe the extent of their involvement at all stages, including project development.

This section should illustrate the capacity of partners to be involved in the project, and how local institutions, local communities, and technical specialists are involved as appropriate. Please provide Letters of Support for the lead organisation and each partner or explain why this has not been included.

N.B: There is a file upload button at the bottom of this page for the upload of a cover letter (if applicable) and all letters of support.

Lead Organisation name: Environmental Investigation Agency UK (EIA)

Website address: www.eia-international.org

Details (including roles and responsibilities and capacity to engage with the project):

EIA has long-standing experience and a successful track record in conducting undercover investigations into transnational wildlife trafficking networks in Africa, including Nigeria, Uganda, Mozambique, Tanzania, Malawi, Zambia and Angola. Since 2000, EIA has advocated for intelligence-led solutions to wildlife crime, producing analytical and campaign outputs tailored to law enforcement, policy, media and public audiences. EIA's approach involves collaborating with government, civil-society organisations and the private sector to strengthen criminal justice system responses to wildlife crime relevant to specific African contexts. EIA was responsible for developing this project proposal in cooperation with ANI. Through the project we will coordinate closely with ANI staff based in Lagos/Abuja to ensure strong strategic oversight, management, implementation and evaluation of this project. EIA will work closely with ANI to engage government, civil-society and private sector stakeholders and build support for action on wildlife trafficking. EIA will be responsible for co-organising workshops and other engagement events with ANI, and will complete desk-based research, field investigations and intelligence management relating to wildlife trafficking. EIA will also be responsible for generating various public-facing communications outputs.

Have you included a Letter of Support from this organisation? (Note: this can be uploaded at the bottom of the page) Yes

Have you provided a cover letter to address your Stage 1 feedback? (Note: this can be uploaded at the bottom of the page) Yes

Do you have partners involved in the Project?

Yes

1. Partner Name: Africa Nature Investors (ANI)

Website address: www.africanatureinvestors.org

Details (including roles and responsibilities and capacity to engage with the project):

ANI's goal is to bring best practice eco-tourism and nature conservation to West Africa. They aim to demonstrate that conservation can be a catalyst for investment and development, benefitting local communities and other stakeholders.

In November 2017, they signed a 30-year Partnership Agreement with the Nigerian government granting ANI the mandate to work on all aspects of the management and development of Gashaka-Gumti National Park (GGNP). The agreement established a management board for the park. The agreement also established the Gashaka Management Team that manages the park on a day to day basis working closely with the Nigerian Government Conservator of Parks.


ANI will collaborate with EIA on strategic planning as well as implementation of activities on law enforcement capacity building; involvement of civil-society and the media; information dissemination; and engagement with the banking sector in Nigeria. ANI will lead on securing institutional support for the project, including the development of relationships with government officials and private sector leaders, and logistics arrangements for meetings and capacity building events. ANI will coordinate activities with its existing IWT084 project. ANI will also draw on its established network of contacts in the Nigerian government, private sector and NGO community.


Have you included a Letter of Support from this organisation? Yes


Do you have more than one partner involved in the Project?

No


Please provide a cover letter responding to feedback received at Stage 1 if applicable and a combined PDF of all letters of support.

 [IWTR7S11246 Cover Letter](#)


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 [IWTR7S11246 LoS COMBINED](#)

 10/11/2020

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Section 6 - Project Staff

Q14. Project staff

Please identify the core staff on this project, their role and what % of their time they will be working on the project. Further information on who should be classified as core staff can be found in the guidance.

Please provide 1 page CVs for these staff or a 1 page job description or Terms of Reference for roles yet to be filled. These should match the names and roles in the budget spreadsheet. If your team is larger than 12 people please review if they are core staff, or whether you can merge roles (e.g. 'admin and finance support') below, but provide a full table based on this template in the PDF of CVs you provide.

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Mary Rice	Project Leader	5	Checked
Julian Newman	EIA Campaigns Director	10	Checked
Chris Hamley	EIA Senior Campaigner (Pangolins)	35	Checked
Shruti Suresh	EIA Senior Campaigner (Elephants)	20	Checked


Do you require more fields?


Yes


Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Cheryl Lo	EIA Wildlife Crime Researcher	60	Checked
Haran Poopalarajah	EIA Projects Finance Manager	20	Checked
Melanie Butler	EIA Senior Intelligence Officer	10	Checked
Denitsa Dimitrova	EIA Intelligence Officer/Analyst	40	Checked
[name withheld for security reasons]	EIA Senior Field Operative	25	Checked
[name withheld for security reasons]	EIA Field Operative	25	Checked
Tunde Morakinyo	ANI Executive Director	10	Checked
To be recruited	ANI Wildlife Project Coordinator	100	Checked

Please provide 1 page CVs (or job description if yet to be recruited) for the project staff listed above as a combined PDF.

Ensure the file is named clearly, consistent with the named individual and role above.

 IWTR7S11246 Combined CVs

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Have you attached all project staff CVs?

Yes

Section 7 - Species & Project Statement

Q15. Species project is focusing on

Where there are more than 4 species that will benefit from the project's work, please add more fields using the selection option below.

African elephant (*Loxodonta africana*)

White-bellied pangolin (*Manis tricuspis*)

Black-bellied pangolin (*Manis tetradactyla*)

Giant pangolin (*Manis gigantea*)

Do you require more fields?

Yes

5. Temminck's pangolin (*Smutsia temminckii*)

No Response

No Response

No Response

No Response

No Response

No Response

No Response

Q16. Problem the project is trying to address

What specific aspect(s) of the illegal trade in wildlife will your project address? Please describe the level of threat to the species concerned.

Please also explain which communities are affected by this issue, and how this aspect of the illegal trade in wildlife relates to poverty or efforts of people and/or states to alleviate poverty. Please cite the evidence you are using to support your assessment of the problem (references can be listed in your additional attached PDF document which can be uploaded at the bottom of the next page).

The West/Central Africa region is a major hub for the trafficking of high-value illicit wildlife between Africa and South East and East Asia. EIA investigations into wildlife trafficking networks operating in Nigeria conducted between 2019 and 2020 have demonstrated that the country plays a major role as a source and transit hub in the international trafficking of ivory and pangolin scales (EIA 2020). This includes ivory and

pangolin products sourced from Cameroon, Gabon, Central African Republic, Republic of Congo, Democratic Republic of Congo and Liberia.

The wildlife sourcing footprint of criminal networks operating in Nigeria extends across the region's globally important tropical forests and savannas. This is presenting severe threats to populations of the region's last strongholds of elephants and pangolins.

African elephants are classified as Vulnerable on the IUCN Red List. African savanna elephants declined by 30% between 2007 and 2014 and African forest elephants declined by 65% between 2002 and 2013, primarily due to poaching (Maisels, et al. 2013). Poaching levels remain high across West/Central Africa (Schlossberg, et al. 2020) with some elephant populations in this region being particularly vulnerable to local extinction (IUCN 2016).

African pangolins are experiencing catastrophic levels of overexploitation and a rapidly escalating risk of extinction. Between 2016 and 2019, the equivalent of 585,000 African pangolins were seized from illegal trade (Challender, et al. 2020). While pangolin population estimates are unavailable, all four African pangolin species are classified as either Endangered or Vulnerable on the IUCN Red List, primarily due to poaching and trafficking.

Ivory and pangolin scale trafficking in West/Central Africa undermine the livelihoods and health of rural communities located in and around the areas where poaching takes place. It does this by fuelling overexploitation and depletion of wildlife resources that communities rely on for their livelihoods. West/Central Africa is an emerging zoonotic diseases hotspot (Allen, et al. 2017) and rural communities engaged in the exploitation of wildlife such as pangolins brings them into contact with animals of disease risk.

Wildlife trafficking networks operating in Nigeria are involved in serious crimes such as money laundering, corruption and fraud (EIA, 2020). Such crimes divert resources away from government activities critical for poverty eradication, which undermines their ability to meet their development objectives and human rights obligations (Bohoslavsky, 2016). Corruption associated with wildlife trafficking undermines rule of law and human security, and the credibility of governments across the region.

While there have been arrests of intermediate- to high- level wildlife traffickers in Nigeria, few cases have resulted in prosecutions. Corruption combined with a severe lack of intelligence-led investigations, use of financial investigations and regional cooperation is limiting the country's ability to curtail the activities of wildlife trafficking networks (USAID 2019). With a primary focus on Nigeria, and secondary focus on Cameroon and Gabon, this project aims to disrupt the regional trafficking of pangolin scales and elephant ivory through enhanced capacity for financial investigations, more effective government-led law enforcement and improved accountability.

Section 8 - Method, Beneficiaries & Exit Strategy

Q17. Methodology

Describe the methods and approach you will use to achieve your intended Outcome and Impact. Provide information on:

- How you have analysed historical and existing initiatives and are building on or taking work already done into account in project design (either by your organisation or others). Please cite evidence where appropriate.
- The rationale for carrying out this work and a justification of your proposed methodology.

- How you will undertake the work (materials and methods).
- How you will manage the work (roles and responsibilities, project management tools etc.).

Please make sure you read the [Guidance Notes](#), particularly Section 3, before answering this question.

The project will build on, and draw lessons learned from, EIA's ongoing programme addressing the transnational trafficking of elephants, pangolins and Asian big cats. This has included five DEFRA IWT Challenge Fund grants: IWT030, IWT043, IWT046, IWT056 and IWT059. Through both IWT043 (with Royal United Services Institute - RUSI) and IWT056, EIA has built government capacity in Africa to conduct financial investigations into wildlife trafficking. The project will integrate recommendations from RUSI's (2020) ongoing capacity assessment on West/Central Africa illicit financial flows and wildlife trafficking. It will also coordinate with WCS/ANI's IWT084, which is generating wildlife trafficking intelligence in the Nigeria-Cameroon Green Corridor.

Lessons learnt from IWT043/IWT056/IWT059 and the OECD (2018) and FATF (2020) show that financial investigations can dramatically strengthen wildlife trafficking law enforcement outcomes. Financial investigations are also an underutilised tool in addressing corruption in wildlife crime (Reid et al. 2020), including in West/Central Africa (ECOWAS 2018).

This project will leverage a grant recently awarded to EIA/ANI from the U.S. Bureau of International Narcotics and Law Enforcement Affairs (INL). The INL project (2020 -2022) focuses on strengthening Nigeria's criminal justice response to disrupting wildlife trafficking networks and does not include capacity building for financial investigations in Nigeria or the West/Central Africa region, so this project will resolve this gap.

EIA and ANI have developed relationships with key stakeholders in Nigeria including the Nigeria Customs Service, the Economic and Financial Crimes Commission (EFCC), Nigerian FIU, and the Federal Ministry of Environment. EIA regularly shares intelligence with the US Fish and Wildlife Service – Office of Law Enforcement (USFWS). EIA has also established relationships with UK National Crime Agency and UK Border Force in Nigeria. EIA is a member of the United for Wildlife Taskforces and will build on these to enhance private sector involvement.

The Nigerian FIU has recently established a Natural Environment and Wildlife Trade Crimes Analysis Unit which demonstrates the institutional commitment of the Nigerian government to prioritise financial intelligence gathering relating to wildlife trafficking. Further, the EFCC is the lead agency with a mandate for preventing, investigating and prosecuting corruption and other financial crimes in Nigeria. Formal support from both the Nigerian FIU and the EFCC for this project represents an opportunity through which the lack of multi-agency financial investigations for wildlife trafficking in Nigeria can be addressed.

The project will focus on reducing the trafficking of elephant ivory and pangolin scales using strengthened capacity for financial investigations into wildlife trafficking and enhanced accountability. Nigeria will be the focus country for capacity building, accountability, financial sector, and intelligence sharing activities. To facilitate regional law enforcement cooperation on investigations into criminal networks operating across borders, the project will involve Cameroon and Gabon. Other West/Central Africa priority countries for regional engagement will be identified based on investigations. The project's outputs and activities include:

1. Nigerian and international law enforcement have the information required to conduct investigations targeting wildlife trafficking networks and associated corrupt actors, and civil-society hold key stakeholders accountable
 - EIA investigations into wildlife trafficking networks operating in Nigeria and other West/Central African countries

- Production/dissemination of intelligence documents on wildlife trafficking in Nigeria and the region to law enforcement
- Engagement with Nigerian civil society and media through an event on wildlife trafficking issues
- EIA public facing communication outputs on wildlife trafficking in Nigeria and other West/Central African countries

2. Enhance government capacity and public-private sector collaboration in Nigeria to conduct financial investigations into wildlife trafficking

- Workshops/roundtables to build capacity for financial investigations on wildlife cases
- Dissemination of EIA intelligence to Nigerian FIU and banking sector
- Sensitisation of Nigerian banking sector on identifying and assessing exposure to wildlife trafficking related money laundering risks
- Facilitation of outreach between Nigerian FIU and financial sector to encourage intelligence sharing relating to wildlife trafficking

3. Enhance West/Central Africa regional law enforcement cooperation and sharing of intelligence on wildlife trafficking and associated financial crime

- Regional engagement with FIUs/relevant FATF-style regional bodies to develop awareness on wildlife trafficking related financial crime, and regional cooperation
- Inter-agency joint action planning with representatives of West/Central Africa law enforcement agencies on cooperation and information exchange
- Regular dissemination of intelligence and financial typologies to West/Central Africa FIUs, FATF-style regional bodies and banking sector

EIA Strategic Lead and ANI Director will be responsible for overseeing the project, with day-to-day delivery managed by the EIA Senior Campaigners and ANI Project Coordinator (Nigeria-based). EIA will draw on WildTeam's Project Management for Wildlife Conservation (PMWC) approach to ensure high standards of project management.

Q18. Beneficiaries

- Who will benefit from the work outlined above, and in what ways?
- How will this contribute to sustainable development for the reduction of poverty?
- How many people are likely to benefit from this intervention e.g. number of households?
- How do you intend to monitor the benefits they accrue?

If your project is working in an Upper Middle Income Country, please explain how benefits will be delivered to people living in poverty in Low and/or Low Middle Income countries.

Include, where possible, information on whether and how there are ways to support the most vulnerable communities, including women.

Demand reduction projects should clearly demonstrate their indirect links to poverty reduction, for example, by identifying impacts in the source countries for the products concerned.

The project will have various positive macro-level impacts relating to enhanced capacity, governance, socio-economic development and human health that will address poverty in Nigeria and the wider West/Central Africa region in the long-term.

EIA/ANI will prioritise building in-country government and civil-society capacity in Nigeria through

workshops and other engagement activities that build awareness, develop institutional support for action on wildlife crime, and resolve capacity gaps identified through needs assessments. We will adopt a multi-agency approach in this work to ensure a breadth of relevant Nigerian government agencies are engaged and cooperate to successfully disrupt wildlife trafficking.

Nigeria is ranked 146 out of 180 countries on Transparency International's Corruption Perception Index (2019) and other West/Central African countries such as Cameroon perform poorly on corruption. Corruption in the Nigerian police, customs, judiciary and other government departments is a major barrier to effective law enforcement against wildlife trafficking networks. Corruption undermines government accountability and leads to the misappropriation of resources that could be used to further human development. It also enables the trafficking of humans and illicit products such as drugs, illegal timber, minerals and firearms. Organised crime and corruption in Nigeria and the West/Central Africa region contributes to weak governance that marginalises rural communities, which in turn exacerbates poverty and drives conflict.

By involving anti-corruption agencies, such as the EFCC, and promoting the publicisation of wildlife crime related corruption, the activities implemented through this project will explicitly contribute to efforts that strengthen governance in Nigeria. We will assess and monitor the activities of the Nigerian government to combat wildlife trafficking and document any illegal activities of government officials in the sourcing and export of illicit wildlife products. We will also identify entry-points for anti-corruption investigations, including ensuring anti-money laundering approaches are used and document the role of corruption in preventing financial investigations into wildlife traffickers or government officials.

Communities affected by pangolin scale and elephant ivory trafficking include those living in and around wildlife source areas across West/Central Africa. Activities implemented will build disincentives that discourage criminal networks from sourcing wildlife from marginalised and underdeveloped rural areas, which will have a twofold outcome for poverty reduction.

Firstly, it will reduce overexploitation of wildlife and prevent the depletion of resources that communities would have traditionally used for subsistence needs and provide a basis for wildlife-related development opportunities (e.g. ecotourism and protected area employment opportunities).

Secondly, it will reduce the likelihood that rural communities in source areas engage in wildlife exploitation that brings them into contact with animals of disease risk. Ivory and pangolin scale supply chains also include other species affected by illegal trade that are of significant disease risk such as bats, monkeys and apes. By preventing wildlife trafficking and diminishing the benefits of poaching, this project will protect the health of people in West/Central Africa that come in to contact with wildlife from diseases such as Ebola, monkeypox and anthrax (Walsh and Haseeb. 2015, Durski, et al 2018, Carlson, et al. 2019).

Q19. Gender Equality

All applicants must consider whether and how their project will contribute to reducing inequality between persons of different gender. Explain how your project will collect sex disaggregated data and what impact your project will have in promoting gender equality.

EIA and ANI have internal equality of opportunity procedures that ensure gender balance amongst teams at all levels in each organisation. Activities completed will be designed and implemented to empower women and avoid negative impacts on them. Nigerian government agencies have a high proportion of men in decision-making positions. This situation is rooted in broader issues that prevent women's empowerment in the country including those relating to education, economic opportunities, governance and health. It has been suggested that greater participation of women in senior government positions is associated with lower rates of corruption (Jha and Sarangi, 2018).

This project will have limited influence over the Nigerian government to strengthen its gender equality policies in agencies relevant to wildlife criminal justice. However, there will be opportunities through

capacity building, civil-society engagement and public communications activities through which to promote women's empowerment.

Participants of capacity building activities in Nigeria are usually allocated by relevant government officers and this at times can be a barrier to ensuring participation of women. To overcome this, EIA and ANI will work with relevant government agencies to set a minimum threshold of 30% women to participate in financial investigations training workshops and roundtable events. We will also ensure the event engaging civil-society on wildlife trafficking issues will have the same threshold for women's participation. To ensuring monitoring and evaluation of this target, gender disaggregated data will be collected on event participation. During events, trainers will be tasked with actively promoting the need for gender equality in strengthening criminal justice responses to wildlife crime.

Efforts will be made to identify Nigerian women who have made notable strides in delivering successes in wildlife criminal justice work in Nigeria. In consultation with them, we will seek to highlight their work publicly to build awareness of and celebrate their achievements.

Q20. Impact on species in focus

How will the species named in Question 15 benefit from the work outlined above? What do you expect the long-term impact on the species concerned to be?

The large-scale trafficking of ivory and pangolin scales to Asian markets is a major threat to the survival of African elephants and all four African pangolin species. Between 2000 and 2019, a minimum of 46 tonnes of ivory and 144 tonnes of pangolin scales have been seized from shipments exported from Nigeria, and only 3 tonnes of ivory and 23 tonnes of pangolin scales were seized within its borders (EIA, 2020). Transnational wildlife traffickers exploit Nigeria's weak governance and ineffective law enforcement. The continued high-volume exploitation of African elephants and pangolins by traffickers makes it very likely that they will be pushed into higher categories of extinction risk over the coming decade.

Intelligence-led investigations, successful prosecutions and proportionate penalties can effectively demobilise and deter wildlife trafficking networks. The project will build accountability and ensure financial investigations and anti-corruption approaches are integrated into wildlife crime law enforcement. This will make Nigeria and West/Central Africa a more high-risk operating environment for wildlife traffickers. This will lead to a reduction in the quantities of ivory and pangolin scales trafficked through Nigeria and will alleviate pressure on wildlife populations in the long-term, particularly in West and Central Africa.

Q21. Pathway to change

Please outline your project's expected pathway to change. This should be an overview of the overall project logic and outline how you expect your Outputs to contribute towards your overall Outcome and, longer term, your expected Impact.

This project will disrupt the trans-national trafficking of pangolin scales and elephant ivory from Nigeria and other West/Central African countries through more effective law enforcement. It will do this by ensuring that relevant government agencies in Nigeria adopt intelligence-led approaches and financial investigation practices that are effective and involve cooperation with the finance sector as well as law enforcement agencies in the West/Central Africa region. The project has three outputs:

1. Nigerian and international law enforcement agencies have the information required to conduct operations targeting criminal networks and the corrupt actors facilitating transnational wildlife trafficking, and civil society hold key stakeholders accountable

2. Enhanced government capacity and public-private sector collaboration to conduct financial investigations for serious and organised wildlife trafficking
3. Enhanced West/Central Africa regional law enforcement cooperation and sharing of intelligence on wildlife trafficking and associated financial crime

These outputs will increase the risks associated with pangolin scale and elephant ivory trafficking in Nigeria and other West/Central Africa source countries by disrupting criminal networks involved through targeted law enforcement action. This in turn will contribute to addressing the role of Nigeria as a major source, transit and crime hub for the large-scale trafficking of wildlife between Africa and Asia.

Q22. Exit Strategy


State how the project will reach a stable and sustainable end point, and explain how the outcomes will be sustained, either through a continuation of activities, funding and support from other sources or because the activities will be mainstreamed in to "business as usual". Where individuals receive advanced training, for example, what will happen should that individual leave?


The project will have a lasting impact by improving the understanding of wildlife trafficking in Nigeria, equipping law enforcement with skills for conducting financial investigations and encouraging co-operation amongst government agencies at national and regional levels. Intelligence generated through the project will provide a basis upon which governments and NGOs can strategically plan advocacy, law enforcement and demand elimination interventions to combat wildlife trafficking across West/Central Africa.


This project will be one of the first in Nigeria to build sustained momentum towards the use of financial investigation techniques for wildlife trafficking cases. The project will boost the functioning of the newly established wildlife crime unit in the FIU and support UNODC implementation of the ICCWC Wildlife and Forest Crime Analytic Toolkit in Nigeria. The project will also support US Government efforts to establish a vetted wildlife crime unit in Nigeria. This will enhance institutional structures through which wildlife trafficking can be investigated beyond the lifetime of the project.

The project will support CITES implementation, including CITES National Ivory Action Plans for Nigeria, Cameroon and Gabon. It will also complement long-term UK and US Government initiatives to provide law enforcement support to Nigeria to tackle organised crime, money laundering and corruption.

If necessary, please provide supporting documentation e.g. maps, diagrams, references etc., as a single PDF using the file upload below:

 [IWTR7S11246 References](#)

 10/11/2020

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Section 9 - Funding and Budget

Q23. Budget

Please complete the appropriate Excel spreadsheet, which provides the Budget for this application. Some of the questions earlier and below refer to the information in this spreadsheet.


Note that there are different budget templates for grant requests under £100,000 and over £100,000.

- [Budget form for projects under £100,000](#)
- [Budget form for projects over £100,000](#)


Please refer to the [Finance for Darwin/IWT Guidance](#) for more information.

N.B: Please state all costs by financial year (1 April to 31 March) and in GBP. The IWT Challenge Fund cannot agree any increase in grants once awarded.

Please upload your completed IWT Budget Form Excel spreadsheet using the field below.

 [IWTR7S11246 Budget FINAL](#)

 10/11/2020

 17:25:02

 xlsx 68.77 KB

Q24. Funding

Q24a. Is this a new initiative or a development of existing work (funded through any source)?

Development of existing work

Please provide details:

This project builds on EIA-UK DEFRA IWT Challenge Fund grants IWT046, IWT056 and IWT059. These projects successfully delivered activities to combat the trafficking of elephant ivory, pangolin scales and Asian big cats in key source and transit countries.

Over the past 2 years, EIA-UK has initiated field investigations work in Nigeria that has informed the development of this proposal through a project titled "Disrupting criminal networks trafficking pangolin scales and ivory between West/Central Africa and Asia through intelligence-led investigations". This has been funded by Elephant Crisis Fund, Band Foundation, Oak Foundation, Rufford Foundation, Friedman French Foundation and Pangolin Crisis Fund. This work has also been funded by a National Geographic Society project titled "Improving the Future for Pangolins – Exposing and Reducing the Transnational Illegal Trade in Pangolin Meat and Scales".

A new grant to EIA/ANI from the US Bureau of International Narcotics and Law Enforcement Affairs (INL) (2020-2022) focuses on strengthening legal frameworks, building investigations/prosecutorial capacity, and enhancing regional cooperation in Nigeria. The activities outlined in this proposal will resolve gaps in the INL project on financial investigations capacity, engaging with civil-society, financial sector involvement, and regional financial intelligence sharing.

Q24b. Are you aware of any other individuals/organisations/projects carrying out or applying for funding for similar work?

Yes

If yes, please give details explaining similarities and differences, and explaining how your work will be additional to this work and what attempts have been/will be made to co-operate with and learn lessons from such work for mutual benefits:

WCS/ANI is implementing an IWT Challenge Fund project (IWT084) focused on intelligence gathering in the Nigeria-Cameroon Green Corridor. The project will coordinate with this project on strategy, resource sharing and government engagement.

US Government INL is supporting Focused Conservation Solutions (FCS) to establish a vetted wildlife crime unit in Nigeria. EIA will coordinate closely with FCS to share intelligence on wildlife trafficking networks.

RUSI are implementing a GIZ project to produce a regional knowledge/capacity assessment on illicit financial flows and wildlife trafficking in Togo, Nigeria and Cameroon. EIA will integrate lessons learned from RUSI's work into this project.

UNODC are implementing a project to strengthen Nigeria's response wildlife trafficking. EIA is engaging with UNODC on the ICCWC process, development of the national strategy to combat wildlife crime, and co-ordination on planned capacity building activities.

USAID have implemented the West Africa Biodiversity and Climate Change (WABICC) programme with Tetra Tech (2015-2020), expected to be renewed in 2021. EIA/ANI are communicating with Tetra Tech to build on wildlife trafficking related achievements and integrate lessons learned.

Eagle Network conduct work to disrupt wildlife trafficking in eight West/Central African countries. EIA is coordinating with Eagle Network on information sharing, regional cooperation and government engagement.

Q25. Co-financing

Are you proposing co-financing?

Yes

Q25a. Secured

Provide details of all funding successfully levered (and identified in the Budget) towards the costs of the project, including any income from other public bodies, private sponsorship, donations, trusts, fees or trading activity, as well as any your own organisation(s) will be committing.

Donor Organisation	Amount	Currency code	Comments
Bureau of International Narcotics and Law Enforcement Affairs (INL)	██████	GBP	No Response
Elephant Crisis Fund	██████	GBP	No Response
Oak Foundation	██████	GBP	No Response
No Response	0	No Response	No Response

Do you require more fields?

No

Q25b. Unsecured

Provide details of any co-financing where an application has been submitted, or that you intend applying for during the course of the project. This could include co-financing from the private sector, charitable organisations or other public sector schemes. This should also include any additional funds required where a donor has not yet been identified.

Date applied for	Donor Organisation	Amount	Currency code	Comments
<i>No Response</i>	Band Foundation	██████	GBP	<i>No Response</i>
<i>No Response</i>	Elephant Crisis Fund	██████	GBP	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	0	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	0	<i>No Response</i>	<i>No Response</i>

Do you require more fields?

No

Section 10 - Capital Costs, Value for Money & Ethics

Q26. Outputs of the project and Open Access

Please describe the project's open access plan and detail any specific costs you are seeking from the IWT Challenge Fund to fund this.

EIA is committed to open access to data and transparency. EIA has a comprehensive seizure database, which at the time of writing consists of 3,198 illegal ivory trade records dating back to 1998 and 1,600 illegal pangolin trade records from 2000. Seizure information and other relevant intelligence collected during the project will be used to update the database. Excluding any confidential data, our entire database is available for public use and we routinely share our data with other organisations such as Liberty Shared, C4ADS and TRAFFIC, as well as academics, journalists and students. In order to enhance public access to our seizure data, EIA has published and disseminated visually attractive interactive wildlife crime maps which are accessible on our website.

EIA is currently transitioning our data into another platform using Microsoft Office PowerBI which will help us produce dashboards in the form of visualisations and interactive maps. Once completed, this will enhance public access to our database because the dashboards will be freely accessible on our website. This new platform will make the data more user-friendly and visually compelling.

Excluding any information which may be sensitive for law enforcement purposes, major project outputs will be made publicly available on our website and social media platforms including online communications products such as press releases, news stories and public-facing reports. The project will seek to engage the public and increase awareness by producing compelling videos and interactive multi-media pages on wildlife trafficking, money laundering and corruption in Nigeria and other West/Central countries.

Q27. Financial Risk Management

This question considers the financial risks to the project. Explain how you have considered the risks and threats that may be relevant to the successful financial delivery of this project. This includes risks such as fraud or bribery, but may also include the risk of fluctuating foreign exchange and internal financial processes such as storage of financial data.

EIA has a qualified London-based finance team, which oversees the implementation of financial management processes within the organisation and with project partners in developing countries. The organisation also has an Anti-Bribery and Corruption Policy in line with UK government law. Sub-grants to project partners carry risks around a lack of transparency on grant financial management accounting. To eliminate these risks EIA includes specific clauses in our sub-grant agreements to ensure that partners implement robust systems for documenting project expenditure and produce accurate and fully accounted financial reports. These agreements also include clauses on adherence to the UK Bribery Act. Processes established by EIA with partners to mitigate financial risks include regular financial reports, tracking of expenditure, spot checks of transactions and supporting documents, and direct communication between the EIA finance team and project partner finance teams. ANI has a finance manager based in Nigeria who is responsible for implementing donor financial compliance. Through this project the EIA finance team will provide ad-hoc support to ANI to ensure full compliance with DEFRA terms and conditions. Monthly Monitoring and Evaluation meetings between partners will be used to track project implementation.

Q28. Capital items

If you plan to purchase capital items with IWT funding, please indicate what you anticipate will happen to the items following project end. If you are requesting more than 10% capital costs, please provide your justification here.

N/A

Q29. Value for money

Please describe why you consider your application to be good value for money including justification of why the measures you will adopt will secure value for money.

EIA has a decades-long record for intelligence-gathering, collaboration with law enforcement and advocacy that makes us one of the most effective campaigning organisations tackling environmental challenges. Our Wildlife Programme's strategic approach is to generate information from investigations to inform advocacy that leads to significant and sustained disruptions to transnational wildlife trafficking. This project will provide value for money through:

- EIA's capable and highly experienced team of wildlife campaigners, intelligence officers, investigators, communications specialists and financial managers.
- EIA's proven track record in advocating for the use of wildlife crime financial investigations will be further buttressed through our partnership with ANI, the Nigerian FIU and EFCC
- EIA's unique position as the only NGO which has gathered significant intelligence on major persons of interest in transnational wildlife trafficking networks in Nigeria
- Leveraging resources from EIA/ANI's INL grant, which will enable us to expand activities and build government institutional support
- Supporting in-country capacity and building government ownership and civil-society voices that will generate wildlife criminal justice outcomes beyond the project lifetime.

Through monitoring and evaluation, learning and strategic planning we will adapt to changing conditions

and integrate lessons learned from this project and those from other organisations. The project will serve as a model and case study on how financial investigations can be integrated into efforts to combat wildlife trafficking in West/Central Africa. Strengthening wildlife crime investigations in the region will not only benefit elephants and pangolins but also benefit other flora and fauna which are trafficked through Nigeria.

Q30. Ethics and human rights

Outline your approach to meeting the IWT's key principles for ethics as outlined in the Guidance Notes.

Additionally, are there any human rights and/or international humanitarian law risks in relation to your project? If there are, have you carried out an assessment of the impact of those risks, and of measures that may be taken in order to mitigate them?

This project will ensure strong leadership and participation from Nigerian and other West/Central African government and civil-society stakeholders. EIA's partnership with ANI, one of Nigeria's most innovative national conservation organisations, will channel support for an organisation working to promote the involvement of African nationals in conservation.

EIA has over two decades of experience in conducting field investigations including in Nigeria as well as standard operating procedures for the conduct of undercover fieldwork. Our Campaigns Director and Senior Investigator have a combined experience of 42 years overseeing or conducting undercover investigations. EIA's in-house knowledge and procedures will ensure that risks are assessed and mitigated to ensure the safety of undercover investigators. Undercover methods will be used where justified in the public interest and as a means of upholding the credibility of our findings.

EIA will safeguard the rights, privacy and safety of people detailed in confidential briefings and publications. EIA will share confidential sensitive information related to criminal activity with relevant governmental agencies to aid law enforcement, except in cases where suspects could be liable to the death penalty or other risks. Information in reports for public release will be limited to that which is necessary, fair and proportionate to the public interest in raising awareness about wildlife trafficking and will be reviewed by libel lawyers where necessary.

EIA partner organisations are contractually obliged to adhere to international human rights laws and required by EIA to implement measures ensuring their activities do not support government actions that violate human rights.

Q31. Corruption

This question specifically considers corruption. Explain how you have considered any risk of corruption that may affect the success of this project, and how you plan to manage this. This may include financial corruption, but may also deal with gifts or inducements, or other types of dishonesty or deceit.

Nigeria and other West/Africa countries have high rates of corruption. While the project is specifically dedicated to tackling corruption in wildlife crime, we recognise that corruption is a risk to the project's outcomes. For example, this could include barriers associated with the government choosing not to investigate wildlife traffickers, or potential interference in judicial proceedings. To mitigate this, EIA/ANI will complete due diligence to identify trusted government champions to work with and support project implementation. This will include liaising with the UK and US embassies and trusted NGO contacts in

Nigeria such as WCS-Nigeria. Engagement with Ministers and other high-level government stakeholders as well as with the media will help secure political willingness and public awareness of corruption in wildlife crime. We will also monitor wildlife trafficking law enforcement investigations and prosecutions to detect corruption and respond appropriately.

EIA/ANI will encourage relevant international organisations to voice public concerns over the role of corruption in Nigeria. For example, Nigeria is currently being closely monitored for non-compliance under the international CITES framework. EIA will ensure that CITES Parties have relevant information to inform their decision-making on this issue and to encourage Nigeria to take urgent action.

Q32. Use of data

If your project involves data collection and/or analysis which identifies individuals (e.g. biometric data, intelligence data), please explain the measures which are in place and/or will be taken to ensure the proper control and use of the data. Please explain the experience of the organisations involved in managing this information in your project.

If any aspect of your project relates to informant network data please also explain what measures are in place to ensure it is properly controlled.

Information generated will be managed according to EIA's internal protocols ensuring safe storage, robust analysis and compliance with data protection rules. EIA is registered with the UK's Information Commissioner's Office to hold data, is compliant with the EU General Data Protection Regulation, and adheres to UK Data Protection Act regulations.

Confidential briefings, containing nominal criminal information, will be provided directly to law enforcement agencies, specialised anti-money laundering and anti-corruption units, INTERPOL, WCO, UNODC, the CITES Secretariat, relevant UK and US government officials using encryption when appropriate.

Information from desk-based and field research will be securely held in EIA's database, which also has analytical tools, including a network mapping function. EIA's Intelligence Team has procedures in place to protect the details of any person providing us with confidential information; source details are not stored in intelligence reports but are kept in Provenance files which are stored securely and have restricted access.

Q33. Safeguarding

Projects funded through the IWT Challenge Fund must fully protect vulnerable people all of the time, wherever they work. In order to provide assurance of this, projects are required to have appropriate safeguarding policies in place. Please confirm the lead organisation has the following policies and processes in place and that these can be available on request:

We have a safeguarding policy, which includes a statement of our commitment to safeguarding and a zero tolerance statement on bullying, harassment and sexual exploitation and abuse	Checked
---	---------

We have attached a copy of our safeguarding policy to this application (file upload below)	Checked
---	---------





We keep a detailed register of safeguarding issues raised and how they were dealt with	Checked
We have clear investigation and disciplinary procedures to use when allegations and complaints are made, and have clear processes in place for when a disclosure is made	Checked
We share our safeguarding policy with downstream partners	Checked
We have a whistle-blowing policy which protects whistle blowers from reprisals and includes clear processes for dealing with concerns raised	Checked
We have a Code of Conduct for staff and volunteers that sets out clear expectations of behaviours - inside and outside the work place - and make clear what will happen in the event of non-compliance or breach of these standards	Checked

Please outline how you will implement your policies in practice and ensure that downstream partners apply the same standards as the lead organisation.

EIA implements its policies by ensuring that they are an essential part of the induction process for all new staff and volunteers. Staff and volunteers are reminded of safeguarding policies and the code of conduct at regular 1-2-1 meetings and at all staff meetings. EIA encourages staff to make it known if they have been subjected to any form of abuse or discrimination and reassures them that these matters will be dealt with quickly and confidentially. If any incidents occur a detailed record is kept.

With downstream partners we check, as part of the due diligence process, that they have policies which are consistent with EIA's and expect them to adopt copies of EIA's policies if they do not. As part of the reporting process with partners we expect them to state if there have been any safeguarding issues or other forms of discrimination that have taken place during the reporting period and to explain what measures have been undertaken to deal with the problems and over what time period it was, or was expected to be, resolved. EIA also offers HR help and advice to partners. Safeguarding is always on the agenda of any meetings arranged with partners.

Please upload the lead organisation's Safeguarding Policy as a PDF

-  [EIA UK Safeguarding Policies](#)
-  10/11/2020
-  17:34:57
-  pdf 369.42 KB

Section 11 - Logical Framework





Q34. Logical Framework

IWT Challenge Fund projects will be required to monitor (and report against) their progress towards their expected Outputs and Outcome. This section sets out the expected Outputs and Outcome of your project, how you expect to measure progress against these and how we can verify this.

- [Stage 2 Logframe Template](#)

Please complete your full logframe in the separate Word template and upload as a pdf using the file upload below. Copy your Impact and Output statements and your activities below - these should be the same as in your uploaded logframe.

Please upload your logframe as a PDF document.

 [IWTR7S11246 Logical Framework FINAL](#)
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 pdf 160.54 KB

Impact:

Effective and accountable law enforcement in Nigeria and the West/Central African region leads to a significant reduction in transnational pangolin and ivory trafficking, and contributes to poverty alleviation

Outcome:

Please ensure that your Outcome statement has been copied from your logframe into Q8.

Project Outputs

Output 1:

Nigerian and international law enforcement agencies have the information required to conduct operations targeting criminal networks and the corrupt actors facilitating transnational wildlife trafficking, and civil society hold key stakeholders accountable

Output 2:

Enhanced government capacity and public-private sector collaboration in Nigeria to conduct financial investigations for serious and organised wildlife trafficking

Output 3:

Enhanced West/Central Africa regional law enforcement cooperation and sharing of intelligence on wildlife trafficking and associated financial crime

Output 4:

No Response

Output 5:

No Response

Do you require more Output fields?

It is advised to have less than 6 Outputs since this level of detail can be provided at the Activity level.

No

Activities

Each activity is numbered according to the Output that it will contribute towards, for example, 1.1, 1.2, 1.3 are contributing to Output 1.

Each activity should start on a new line and be no more than approximately 25 words.

1. Nigerian and international law enforcement agencies have the information required to conduct operations targeting criminal networks and the corrupt actors facilitating transnational wildlife trafficking, and civil society hold key stakeholders accountable
 - 1.1 EIA multi-language research into corruption and money laundering associated with wildlife trafficking networks operating in Nigeria and other West/Central African countries
 - 1.2 EIA field investigation into corruption and money laundering associated with wildlife trafficking networks operating in Nigeria and other West/Central African countries
 - 1.3 Preparation of intelligence outputs on wildlife trafficking in Nigeria and the region, including associated corruption, money laundering and convergence between wildlife and forest crime, and dissemination of these to law enforcement agencies
 - 1.4 Engagement with Nigerian civil society/media through a one day workshop on monitoring and reporting of wildlife trafficking issues, corruption, money-laundering and law enforcement activity
 - 1.5 EIA public facing communications outputs on pangolin scale and elephant ivory trafficking in Nigeria and West/Central Africa, including the role of money-laundering and corruption

2. Enhanced government capacity and public-private sector collaboration in Nigeria to conduct financial investigations for serious and organised wildlife trafficking
 - 2.1 Engagement with key Nigerian government agencies to build awareness and generate high-level buy-in for multi-agency measures to conduct financial investigations to address serious and organised wildlife trafficking
 - 2.2 Multi-day capacity building workshop on conducting financial investigations for wildlife cases for investigators, analysts and prosecutors
 - 2.3 Regular dissemination of EIA intelligence (briefings, intel reports/summaries, assessments/typologies) to Nigeria Financial Intelligence Unit (FIU) and Nigerian banking sector (direct and through United for Wildlife Financial Taskforce)
 - 2.4 Engagement with Nigerian public and private banking sector to sensitise them on identifying and assessing exposure to money laundering risks relating to wildlife trafficking and adoption of mitigation measures
 - 2.5 Facilitation of outreach between Nigerian FIU and financial/banking sector to encourage suspicious activity reporting and intelligence sharing relating to wildlife trafficking

3. Enhanced West/Central Africa regional law enforcement cooperation and sharing of intelligence on wildlife trafficking and associated financial crime
 - 3.1 Regional engagement with FIUs and relevant FATF-style regional bodies (i.e. Inter-Governmental Action Group against Money Laundering in West Africa - GIABA and the Task Force on Money Laundering in Central Africa - GABAC) to develop awareness on wildlife trafficking related financial crime, and regional LE cooperation
 - 3.2 Inter-agency international joint action planning with representatives of West/Central Africa law enforcement agencies on cooperation and information exchange in the region (depending on investigation findings potential countries incl. Nigeria, Cameroon, Gabon)
 - 3.3 Regular dissemination of intelligence and financial typologies (incl. red-flags) to West/Central Africa regional FIUs (e.g. Cameroon, Gabon), relevant FATF-style regional bodies, global banking sector (direct and including via UfW taskforce), and names of traffickers for inclusion in Know Your Customer databases


Section 12 - Implementation Timetable


Q35. Provide a project implementation timetable that shows the key milestones in project activities


Provide a project implementation timetable that shows the key milestones in project activities. Complete the Excel spreadsheet template as appropriate to describe the intended workplan for your project.

- [Implementation Timetable Template](#)

Please add/remove columns to reflect the length of your project. For each activity (add/remove rows as appropriate) indicate the number of months it will last, and fill/shade only the quarters in which an activity will be carried out. The workplan can span multiple pages if necessary.

 [IWTR7S11246 Implementation Timetable FINAL](#)

 10/11/2020

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Section 13 - M&E and FCDO notification

Q36. Monitoring and evaluation (M&E) plan

Describe, referring to the indicators in your logframe, how the progress of the project will be monitored and evaluated, making reference to who is responsible for the project's M&E.

IWT Challenge Fund projects will need to be adaptive and you should detail how the monitoring and evaluation will feed into the delivery of the project including its management. M&E is expected to be built into the project and not an 'add' on. It is as important to measure for negative impacts as it is for positive impact. Additionally, please indicate an approximate budget and level of effort (person days) to be spent on M&E (see [Finance for Darwin/IWT](#)).

Project progress will be measured using the outcome and output indicators outlined in the project logical framework table. These indicators will be integrated into EIA's existing West/Central Africa M&E framework developed using the Project Management for Wildlife Conservation (PMWC) approach developed by WildTeam. WildTeam is currently providing support to EIA campaigns for the establishment and implementation of systems to effectively track activity delivery and achievements across a number of donor funded projects. The M&E framework will be based on the elephant/pangolin campaign's West/Central Africa situational model and results chains, and clearly link the project's activities, outputs, outcomes and overall impact goals.

The project leader will have overall responsibility for project M&E and will coordinate with team members in ANI (Executive Director, Wildlife Project Coordinator) and EIA (Wildlife Project Officer, Senior Wildlife Campaigners). A series of either remote and in-person project kick-off meetings with both EIA and ANI staff members will be held to establish integrated M&E processes, communication schedules and information management systems.

The month-to-month implementation of the project M&E framework will be coordinated by the EIA Wildlife Project Officer and ANI Wildlife Project Coordinator. The framework will specify EIA and ANI staff members responsible for obtaining and reporting data and information on each indicator. All M&E data and supporting information will be stored in the WildTeam tracker and a corresponding EIA M&E database.

To plan and adapt activities, discuss project progress, resolve challenges and identify lessons learnt, EIA will hold regular remote or in-country meetings with ANI. There is sufficient funding in EIA's international travel budget line to ensure key project personnel meet in-person at least twice a year.

The EIA Wildlife Project Officer will prepare monthly M&E reports that will provide a summary of project delivery against the indicators outlined in the M&E framework. These will be reviewed at monthly meetings, where workplans will be agreed, project implementation challenges resolved, and lessons learned integrated. M&E analytical outputs will inform EIA wildlife program biannual strategic planning sessions.

For indicators relating to investigations and intelligence (0.1 to 0.3 and 1.1 to 1.3), EIA will draw quantitative summary information from our internal intelligence management systems that include intelligence report and disseminations tracker databases. We will also provide highly sanitised and redacted samples of intelligence outputs such as strategic assessments and network charts. For indicators relating to workshops and roundtables (1.4, 2.1 to 2.3, 3.1 and 3.2), pre- and post- questionnaire evaluations will be used to evaluate effectiveness, and consultant trainers/facilitators will produce event summary workshop reports. Gender disaggregated participant lists will be gathered at all events held. Meeting minutes will be recorded for all engagements with government and in-person/remote intelligence briefings with law enforcement agencies (sanitised where necessary).

Project achievements will be communicated through EIA's website and seasonal 'Investigator' magazine that is sent to our supporters. We will also share experiences with in-country conservation partners such as WCS, as well as other EIA civil-society partners such as NRCN and Conserv Congo.

Total project budget for M&E in GBP (this may include Staff, Travel and Subsistence costs) £ [REDACTED]

Number of days planned for M&E 17

Percentage of total project budget set aside for M&E (%) [REDACTED]

Q37. FCDO Notifications

Please state whether there are sensitivities that the Foreign Commonwealth and Development Office will need to be aware of should they want to publicise the project's success in the IWT Challenge Fund competition in the host country.

Yes

Please outline and provide reasoning for any sensitivities that the Foreign and Commonwealth Office need to be aware of.

No Response

Please indicate whether you have contacted your Foreign Ministry or the local embassy or High Commission (or equivalent) directly to discuss security issues (see [Guidance Notes](#)) and attach details of any advice you have received from them.

Yes (no written advice)

Section 14 - Certification

Q38. Certification

On behalf of the

trustees

of

Environmental Investigation Agency UK (EIA)

I apply for a grant of





£560,000.00

I certify that, to the best of our knowledge and belief, the statements made by us in this application are true and the information provided is correct. I am aware that this application form will form the basis of the project schedule should this application be successful.

(This form should be signed by an individual authorised by the applicant institution to submit applications and sign contracts on their behalf.)

- I have enclosed CVs for key project personnel, letters of support, budget and project implementation timetable (uploaded at appropriate points in application).
- Our last two sets of signed audited/independently verified accounts and annual report are also enclosed.

Checked

Name	JOHN MCCARTHY
Position in the organisation	Trust and Statutory Funding Manager
Signature (please upload e-signature)	 JM signature  10/11/2020  17:48:38  jpg 15.01 KB
Date	10 November 2020

Section 15 - Submission Checklist

Checklist for submission

	Check
I have read the Guidance, including Guidance Notes for Applicants and Finance for Darwin/IWT	Checked

I have read, and can meet, the current Terms and Conditions for this fund.	Checked
I have provided actual start and end dates for my project.	Checked
I have provided my budget based on UK government financial years i.e. 1 April – 31 March and in GBP.	Checked
I have checked that the budget is complete, correctly adds up and I have included the correct final total at the start page of the application.	Checked
The application has been signed by a suitably authorised individual (clear electronic or scanned signatures are acceptable).	Checked
I have attached my completed logframe as a PDF using the template provided.	Checked
(If copying and pasting into Flexi-Grant) I have checked that all my responses have been successfully copied into the online application form.	Checked
I have included a 1 page CV or job description for all key project personnel identified at Question 14, including the Project Leader, or provided an explanation of why not.	Checked
I have included a letter of support from the Lead Organisation and main partner organisation(s) identified at Question 13, or an explanation as to why not.	Checked
I have included a cover letter from the Lead Organisation, outlining how any feedback received at Stage 1 has been addressed where relevant.	Checked
I have included a copy of the lead organisation’s safeguarding policy, which covers the criteria listed in Question 33.	Checked
I have been in contact with the FCDO in the project country/ies and have included any evidence of this. If not, I have provided an explanation of why not.	Checked
I have included a signed copy of the last 2 annual report and accounts for the Lead Organisation.	Checked
I have checked the IWT website on GOV.UK immediately prior to submission to ensure there are no late updates.	Checked
I have read and understood the Privacy Notice on GOV.UK	Checked

We would like to keep in touch!

Please check this box if you would be happy for the lead applicant and project leader (if different) to be added to our mailing list. Through our mailing list we share updates on upcoming and current application rounds under the IWT Challenge Fund and our sister grant scheme, the Darwin Initiative. We also provide occasional updates on other UK Government activities related to the illegal wildlife trade and share our quarterly project newsletter. You are free to unsubscribe at any time.

Checked

Data protection and use of personal data

Information supplied in this application form, including personal data, will be used by Defra as set out in the latest copy of the Privacy Notice for Darwin, Darwin Plus and the Illegal Wildlife Trade Challenge Fund available [here](#). This Privacy Notice must be provided to all individuals

whose personal data is supplied in the application form. Some information, but not personal data, may be used when publicising the Darwin Initiative including project details (usually title, lead organisation, location, and total grant value) on the GOV.UK and other websites.

Information relating to the project or its results may also be released on request, including under the 2004 Environmental Information Regulations and the Freedom of Information Act 2000. However, Defra will not permit any unwarranted breach of confidentiality nor will we act in contravention of our obligations under the General Data Protection Regulation (Regulation (EU) 2016/679).

Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

Project Summary	Measurable Indicators	Means of Verification	Important Assumptions
Impact: Effective and accountable law enforcement in Nigeria and the West/Central African region leads to a significant reduction in transnational pangolin and ivory trafficking, and contributes to poverty alleviation			
<p>Outcome: Intelligence-led law enforcement, implementation of financial investigations and regional cooperation disrupts ivory and pangolin trafficking networks and associated corruption in Nigeria, and West/Central Africa through increased risks for wildlife criminals</p>	<p>0.1 Number of intermediate to high level target persons of interest for pangolin scale and elephant ivory trafficking active in Nigeria, and identified by EIA, investigated by law enforcement agencies increases from 0 investigated in 2020 to a minimum of 3 investigated by March 2024</p> <p>0.2 Increase in government recognition of the need to combat serious and organised wildlife crime, including ivory and pangolin scale trafficking, as a priority for Nigerian law enforcement agencies by March 2024</p> <p>0.3 Nigerian enforcement agencies have conducted financial investigations on a minimum of 3 wildlife</p>	<p>0.1 Meeting minutes from engagement with Nigerian law enforcement representatives; feedback from other law enforcement partners such as USFWS; indictment/charge documents; seizure records, law enforcement action logs</p> <p>0.2 Public statements by heads of agencies / key representatives of relevant agencies; strategy documents, minutes from meetings / engagement</p> <p>0.3 Meeting minutes from engagement with Nigerian law enforcement representatives including FIU;</p>	<p>Travel and work restrictions associated with efforts to control transmission of COVID-19 do not affect project kick-off and initial activity implementation by project and government staff</p> <p>Nigerian and other West/Central African governments remain committed to disrupting serious and organised wildlife trafficking</p> <p>Corruption and government bureaucracy do not affect efforts to arrest and prosecute individuals implicated in wildlife trafficking</p> <p>Limited government resourcing does not impede law enforcement investigations and prosecutions</p> <p>Disruption of wildlife trafficking networks will alleviate poaching</p>

Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

	<p>trafficking cases by March 2024 (baseline to be determined in year 1)</p> <p>0.4 Number of intelligence disseminations to and between law enforcement agencies in Nigeria and other West/Central African countries increases from a baseline of 0 in 2020 to 5 by March 2024</p>	<p>feedback from UfW Financial Taskforce</p> <p>0.4 Feedback from national wildlife trafficking law enforcement focal points and international law enforcement partners</p>	<p>pressure on pangolins and elephants in source countries</p> <p>Safety and security situation in project countries sufficient to allow planned activities to take place</p>
<p>Outputs:</p> <p>1. Nigerian and international law enforcement agencies have the information required to conduct operations targeting criminal networks and the corrupt actors facilitating transnational wildlife trafficking, and civil society hold key stakeholders accountable</p>	<p>1.1 Number of intermediate to high level target persons of interest for pangolin scale or elephant ivory trafficking engaged through EIA field investigations in Nigeria and other West/Central African countries (e.g. Cameroon) increases from a baseline of 9 to a total of 13 by September 2022, and 15 by March 2023</p> <p>1.2 Strategic intelligence assessment report (with network charts) on Nigeria-based West/Central Africa wildlife trafficking</p>	<p>1.1 EIA field investigation daily progress report log</p> <p>1.2 EIA intelligence report register database; sanitised/redacted sample of strategic assessment</p> <p>1.3 EIA internal intelligence disseminations tracker; sanitised/redacted samples of intelligence documents</p> <p>1.4 Roundtable summary report, training materials, participant</p>	<p>Government agencies continue to cooperate with national and international conservation NGOs</p> <p>Vetted wildlife law enforcement units in Nigeria exist to handle confidential and sensitive intelligence</p> <p>Vetted units in Nigerian and international law enforcement agencies respond positively to intelligence shared with them and remain willing to cooperate at the international level</p>

Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

	<p>networks (incl. money laundering, corruption and recommendations) produced based on intelligence collected through field investigations by March 2023</p> <p>1.3 Number of EIA intelligence documents (reports, summaries, and assessments/financial typologies) on wildlife traffickers operating in Nigeria and other West/Central African countries disseminated to trusted Nigerian law enforcement representatives (incl. FIU) and relevant international law enforcement agencies (e.g. USFWS, UK Border Force) increases from a baseline of 20 intelligence documents to 35 documents by March 2024 (27 intelligence documents by March 2023)</p> <p>1.4 Minimum of 20 representatives from</p>	<p>list, pre and post questionnaires</p> <p>1.5 EIA news articles/press releases; public-facing reports</p> <p>1.6 EIA communications outputs such as blog articles, news stories or video</p>	<p>Nigerian media are committed to covering biodiversity issues</p> <p>Governments respond to pressure from NGOs, civil society organization and media to strengthen criminal justice responses to wildlife trafficking</p>
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Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

	<p>Nigerian civil-society and media participate in a roundtable on combating wildlife trafficking and associated money laundering and corruption by September 2022</p> <p>1.5 Number of EIA online communications products (press releases, news stories, public-facing reports, videos or multi-media page) on wildlife trafficking, money laundering and corruption in Nigeria and other West/Central countries increases from a baseline of 2 communication outputs in 2020 to 7 by March 2023 and 15 by March 2024</p> <p>1.6 Women who have made notable contributions to advance wildlife criminal justice in Nigeria identified and celebrated by March 2023</p>		
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Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

<p>2. Enhanced government capacity and public-private sector collaboration in Nigeria to conduct financial investigations for serious and organised wildlife trafficking</p>	<p>2.1 Representatives from a minimum of 5 Nigerian government agencies (including the anti-corruption agency) with the mandate to address financial investigations for serious and organised wildlife trafficking have an enhanced understanding of measures to be adopted for overcoming key challenges by March 2023</p> <p>2.2 Minimum of 20 representatives from Nigerian government agencies with the mandate to address serious and organised wildlife trafficking investigations and prosecutions, and the financial sector (incl. banks), have a better understanding of the tools that can be applied to investigate wildlife crime by participating in a multi-day workshop on financial investigations by March 2023</p>	<p>2.1 Stakeholder engagement summary report and agreed next steps action plan</p> <p>2.2 Workshop summary report, training materials, pre and post questionnaires</p> <p>2.3 Workshop and roundtable participant lists (disaggregated by gender)</p> <p>2.4 Multi-agency coordination mechanism terms of reference; letters of commitment from relevant agencies to coordinate on intelligence sharing</p> <p>2.5 EIA internal intelligence disseminations tracker</p> <p>2.6 Meeting minutes</p> <p>2.7 Meeting minutes and letters of commitment</p>	<p>Nigerian government remains committed to improving its criminal justice system capability to combat wildlife trafficking</p> <p>Law enforcement agencies, prosecutions department, FIU and financial sector remain willing to participate in capacity building initiatives focused on combating wildlife trafficking</p> <p>Nigerian FIU and banking sector are willing to engage with each other on intelligence sharing</p> <p>Banks regard potential exposure to money laundering linked to wildlife crime as an issue of concern</p> <p>Women hold an appropriate level of seniority in government positions relevant to the project's capacity building activities</p>
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Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

	<p>2.3 A minimum of 30% (percentage to be verified at start of project) of participants in financial investigations workshop are women</p> <p>2.4 Nigerian government supports establishment of a multi-agency co-ordination mechanism to share intelligence and information between the FIU, EFCC and agencies involved in investigating and prosecuting wildlife crimes by March 2024 (baseline: no co-ordination mechanism in existence and low levels of information sharing between agencies)</p> <p>2.5 A minimum of 5 high-level meetings (2 meetings by September 2022, and 5 meetings by March 2024) held with the Nigerian public and private banking sector on identifying and assessing exposure to money laundering risks relating to wildlife trafficking (baseline = 0)</p>	<p>submitted to FIU by banks</p>	
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Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

	<p>2.6 Commitments from Nigerian banks to share suspicious activity reports relating to wildlife trafficking with FIU increases from a baseline of XX banks (baseline to be determined in year 1) to 10 banks (5 by March 2023 and 10 by March 2024)</p>		
<p>3. Enhanced West/Central Africa regional law enforcement cooperation and sharing of intelligence on wildlife trafficking and associated financial crime</p>	<p>3.1 Minimum of 3 West/Central Africa (excluding Nigeria) FIUs and FATF-style bodies engaged through meetings to develop awareness on wildlife trafficking related financial crime, and regional law enforcement cooperation by March 2023 (baseline = 0)</p> <p>3.2 West/Central African law enforcement agencies develop an action plan at a workshop on regional cooperation and intelligence exchange for wildlife trafficking investigations by September 2022 (baseline = 0)</p>	<p>3.1 Meeting minutes, internal log of engagements with FIUs and FATF-style regional bodies</p> <p>3.2 Regional law enforcement cooperation action plan document; workshop report, participant list (disaggregated by gender),</p> <p>3.3 EIA internal intelligence disseminations tracker</p> <p>3.4 Log of names submitted that generate</p>	<p>Regional FIUs and FATF-style bodies are willing to engage with EIA and respond to information on wildlife trafficking and financial crime</p> <p>Representatives from West/Central Africa law enforcement agencies are willing to engage with EIA and with each other on regional cooperation</p> <p>Banks' customer due diligence procedures are sufficiently robust to avoid offering services to individuals and companies implicated in wildlife trafficking included in databases</p>

Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

	<p>3.3 EIA intelligence on regional wildlife trafficking disseminated to West/Central Africa regional FIUs (excluding Nigeria), relevant FATF-style regional bodies, UfW Financial Taskforce and the global banking sector through at minimum of 2 in-person or remote briefings, and 10 intelligence documents by March 2024 (1 briefing by September 2022 and 5 documents by March 2023) (baseline = 0 briefings and 0 intelligence documents)</p> <p>3.4 Number of EIA submissions of names of traffickers operating in West and Central Africa to Know Your Customer databases (e.g. Thomson Reuters World-Check/Dow Jones) accepted and resulting in new profiles increases from a baseline of 68 West/Central Africa specific submissions accepted between 2017</p>	<p>new profiles on Thomson Reuters World-Check/Dow Jones</p>	
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Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

	and 2019 to a minimum of 150 by March 2024		
<p>Activities (each activity is numbered according to the output that it will contribute towards, for example 1.1, 1.2 and 1.3 are contributing to Output 1)</p> <ol style="list-style-type: none"> 1. Nigerian and international law enforcement agencies have the information required to conduct operations targeting criminal networks and the corrupt actors facilitating transnational wildlife trafficking, and civil society hold key stakeholders accountable <ol style="list-style-type: none"> 1.1 EIA multi-language research into corruption and money laundering associated with wildlife trafficking networks operating in Nigeria and other West/Central African countries 1.2 EIA field investigation into corruption and money laundering associated with wildlife trafficking networks operating in Nigeria and other West/Central African countries 1.3 Preparation of intelligence outputs on wildlife trafficking in Nigeria and the region, including associated corruption, money laundering and convergence between wildlife and forest crime, and dissemination of these to law enforcement agencies 1.4 Engagement with Nigerian civil society/media through a one day workshop on monitoring and reporting of wildlife trafficking issues, corruption, money-laundering and law enforcement activity 1.5 EIA public facing communications outputs on pangolin scale and elephant ivory trafficking in Nigeria and West/Central Africa, including the role of money-laundering and corruption 2. Enhanced government capacity and public-private sector collaboration in Nigeria to conduct financial investigations for serious and organised wildlife trafficking <ol style="list-style-type: none"> 2.1 Engagement with key Nigerian government agencies to build awareness and generate high-level buy-in for multi-agency measures to conduct financial investigations to address serious and organised wildlife trafficking 2.2 Multi-day capacity building workshop on conducting financial investigations for wildlife cases for investigators, analysts and prosecutors 2.3 Regular dissemination of EIA intelligence (briefings, intel reports/summaries, assessments/typologies) to Nigeria Financial Intelligence Unit (FIU) and Nigerian banking sector (direct and through United for Wildlife Financial Taskforce) 2.4 Engagement with Nigerian public and private banking sector to sensitise them on identifying and assessing exposure to money laundering risks relating to wildlife trafficking and adoption of mitigation measures 2.5 Facilitation of outreach between Nigerian FIU and financial/banking sector to encourage suspicious activity reporting and intelligence sharing relating to wildlife trafficking 			

Project Title: IWTR7S1\1246: Disrupting international wildlife trafficking networks in West and Central Africa

3. Enhanced West/Central Africa regional law enforcement cooperation and sharing of intelligence on wildlife trafficking and associated financial crime

- 3.1 Regional engagement with FIUs and relevant FATF-style regional bodies (i.e. Inter-Governmental Action Group against Money Laundering in West Africa - GIABA and the Task Force on Money Laundering in Central Africa - GABAC) to develop awareness on wildlife trafficking related financial crime, and regional LE cooperation
- 3.2 Inter-agency international joint action planning with representatives of West/Central Africa law enforcement agencies on cooperation and information exchange in the region (depending on investigation findings potential countries incl. Nigeria, Cameroon, Gabon)
- 3.3 Regular dissemination of intelligence and financial typologies (incl. red-flags) to West/Central Africa regional FIUs (e.g. Cameroon, Gabon), relevant FATF-style regional bodies, global banking sector (direct and including via UfW taskforce), and names of traffickers for inclusion in Know Your Customer databases