



Department  
for Environment  
Food & Rural Affairs



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

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

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

**Submission Deadline: 30<sup>th</sup> April 2022**

### IWT Challenge Fund Project Information

Project reference	IWT101
Project title	Disrupting international wildlife trafficking networks in West and Central Africa
Country/ies	Nigeria and other West and Central African countries
Lead partner	Environmental Investigation Agency UK
Project partner(s)	Africa Nature Investors Foundation
IWTFCF grant value	£560,000.00
Start/end dates of project	01/04/2021* – 31/03/2024
Reporting period (e.g. April 2021-Mar 2022) and number (e.g. Annual Report 1, 2, 3)	01/04/2021* – 31/03/2022; Annual Report 1
Project Leader name	Mary Rice
Project website/blog/social media	<a href="https://eia-international.org/wildlife/">https://eia-international.org/wildlife/</a>
Report author(s) and date	Philip Rekret, Justin Gosling – 30/04/2022

**\*Actual project date commencement was 01 September 2021**

### 1. Project summary

West and Central Africa is a major hub for the trafficking of high-value illicit wildlife between Africa, with Nigeria as the epicentre, and Southeast 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. This project seeks to alleviate this pressure by reducing the international trafficking of elephant ivory and pangolins in West and 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 and address corruption and illicit financial flows from ivory and pangolin trafficking in Nigeria. Second, the project will increase awareness among relevant criminal justice system professionals in relation to these issues. Third, 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.

African elephants have recently been classified as two distinct species, and those two species have been classified as Critically Endangered (African forest elephant - *Loxodonta cyclotis*) and Endangered (African savanna elephant - *Loxodonta africana*) on the IUCN Red List, mainly as a result of poaching levels, which remain high.<sup>1</sup>

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.<sup>2</sup> 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.

While there have been several large-scale seizures in Nigeria (e.g. January 2021,<sup>3</sup> July 2021 seizure<sup>4</sup>) or believed to be connected to Nigeria and 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. 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.

This project complements a grant awarded to EIA/ANI from the U.S. State Department Bureau of International Narcotics and Law Enforcement Affairs (INL) (30/09/2020 – 29/09/2023), entitled “*Strengthening the Criminal Justice Response and Regional Law Enforcement Cooperation to Counter Wildlife Trafficking in Nigeria*”. The aim of this project is to significantly reduce the role of Nigeria as a transit and export point in transnational wildlife trafficking by disrupting and deterring wildlife trafficking networks which currently operate with impunity in Nigeria and across the region.

## 2. Project partnerships

In this project, the Environmental Investigation Agency UK (EIA) based in London, UK is the lead institution, and the main partner is Africa Nature Investors Foundation (ANI). ANI is based in Nigeria and their stated goal is to demonstrate that conservation can be a catalyst for investment and development, benefitting local communities and other stakeholders.

The partnership between EIA and ANI emerged through engagement between the respective Executive Director of each organisation, when it was identified that collaboration on combatting pangolin and elephant ivory trafficking would deliver mutual benefits. Moreover, ANI has been able to draw on its established network of high-level contacts in the Nigerian government, private sector and NGO community, making the partnership invaluable to achieving the project's objectives. ANI collaborates with EIA on strategic planning as well as implementation of activities on law enforcement capacity building; involvement of civil-society and the media;

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<sup>1</sup> <https://www.iucn.org/news/species/202103/african-elephant-species-now-endangered-and-critically-endangered-iucn-red-list>

<sup>2</sup> <https://www.sciencedirect.com/science/article/pii/B9780128155073000162>

<sup>3</sup> <https://eia-international.org/news/huge-ivory-and-pangolin-scale-bust-in-nigeria-is-a-chance-to-disrupt-wildlife-crime-networks/>

<sup>4</sup> <https://eia-international.org/news/nigeria-seizes-seven-tonnes-of-pangolin-scales-as-study-launches-to-help-it-fight-wildlife-crime/>

information dissemination; and engagement with the banking sector in Nigeria. ANI has 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. The EIA-ANI partnership was formalised through a sub-grant agreement that was signed by the Executive Directors of each organisation. The agreement specifies the details of the DEFRA IWT101 sub-grant, compliance requirements, and procedures for collaboration on project implementation, monitoring and evaluation, and information sharing. Although the project is still in its early stages due to the fact it only formally began on 1 September 2021, and as a result of global travel restrictions, the working relationship between EIA and ANI has so far been extremely successful.

EIA also works closely with the Economic and Financial Crimes Commission of Nigeria (EFCC). EFCC is a Nigerian law enforcement agency that investigates financial crimes such as advance fee fraud (419 fraud) and money laundering. The EFCC is empowered to prevent, investigate, prosecute and penalise economic and financial crimes. It has a strong track record in investigating and prosecuting individuals for financial crime offences. In January 2021, EIA signed a 12-month Memorandum of Understanding (MOU) with EFCC to facilitate intelligence sharing and cooperation between the two organisations to combat wildlife crime. In March 2022 EIA and EFCC renewed this MOU and will continue to work closely to share intelligence, coordinate multi-agency investigations and build capacity for parallel financial investigations, facilitated significantly through the capacity building activities under this project.

EIA has established proactive engagement with Eco-Activists for Governance and Law Enforcement (EAGLE), a non-governmental organisation that work closely with law enforcement in Cameroon and surrounding countries. EIA and EAGLE have exchanged intelligence during Year 1, approximately twice weekly, and will continue to do so to obtain a better understanding of trade flows from neighbouring countries into Nigeria. Furthermore, we continue to maintain communications and exchange intelligence documents with STR Africa, a Gabonese company that specialises in telecommunications, security, civil engineering and international business. The Gabonese government nominated STR Africa to be a focal point of information shared by EIA and ANI.

### **3. Project progress**

#### **3.1 Progress in carrying out project Activities**

With the project only officially commencing on 1 September 2021, many activities are still in the early, planning stages, although this planning and preparation is essential to the success of the project, and progressing as planned.

In the interest of context and completeness, the progress described below includes reference to complementary projects in West and Central Africa, all of which serve as valuable preparatory activities for those under the IWTFCF and will undoubtedly add value to the impact of the project.

***Activity 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***

EIA is regularly collecting and analysing intelligence on ivory and pangolin trafficking in Nigeria through research, field investigations (first of which occurred in February 2022, funded under our complementary grant from INL) and social media monitoring in relevant languages and, as appropriate, investigations are also targeting wildlife trafficking networks in other countries closely linked with wildlife trade flows into Nigeria. EIA has been regularly disseminating intelligence in the form of briefings and documents to key law enforcement authorities, including such as the EFCC, Nigerian Financial Intelligence Unit (NFIU), Nigerian Customs Service (NCS), and the U.S. Department of Homeland Security, and civil society organisations, such as Focused Conservation Solutions (FCS) and the Wildlife Justice Commission (WJC). Intelligence disseminations include information on individuals involved in wildlife trafficking, where such activities are taking place, the scale of ivory and pangolin trafficking, financial flows and profits associated with the trade, and methodology used for trafficking.

A total of 157 intelligence reports were generated on wildlife trafficking in Nigeria (please note that this figure does not include intelligence reports generated on wildlife trafficking in other countries of West and Central Africa) in Year 1 of the project. A total of 50 of the 157 intelligence reports generated in Year 1 concern networks of interest, referring to networks we are actively investigating. Most of these 50 reports are based on information gathered through direct engagements with members of networks of interest. Furthermore, 59 of the 157 intelligence reports generated in Year 1 contain information on the methodology of wildlife traffickers (for example, the means of payments used by traffickers, their preferred means of concealment for maritime shipments etc.). Gathering information on the methodology of traffickers enhances our understanding of the illegal wildlife trade in West and Central Africa and allows us to identify the most impactful disruption opportunities.

EIA investigations are also generating intelligence on operations of wildlife trafficking networks in key source and transit countries linked to Nigeria, including key trafficking areas such as the border regions between Nigeria and Cameroon and between Cameroon and Gabon. EIA have shared a total of six intelligence documents with Gabonese law enforcement agencies. EIA and EAGLE (Cameroon) have been regularly exchanging intelligence in Year 1, approximately twice weekly, and will continue to do so to obtain a better understanding of trade flows from neighbouring countries into Nigeria, with a focus on suspects who are of interest to both organisations.

A significant development to our intelligence gathering activities occurred during a highly successful Nigerian field investigation in February 2022 (funded under the complementary INL grant) which focused on the IWT trade in Lagos. Our undercover operatives met with eight persons of interest over fourteen meetings and gathered valuable covert video and audio footage from each. We met our three objectives for the field investigation: (i) deepen our understanding of one of the major wildlife trafficking networks EIA has been investigating, (ii) engage Chinese persons of interest, with a view to gaining better understanding of the involvement of Chinese nationals in wildlife trafficking in Lagos, and (iii) understand the involvement of shipping agents to further explore the role of corruption and any involvement of enforcement agency personnel engaged in facilitating the illegal trade of wildlife.

EIA published one public-facing output in Year 1 (funded under another project) describing the footprint of Vietnamese IWT networks operating in Africa (*Vietnam's Footprint in Africa: an analysis of the role of Vietnamese criminal groups in wildlife trafficking*<sup>5</sup>). This report highlighted the significant role of Vietnamese wildlife crime networks operating in Africa, the scale of illegal trade from Africa to Asia facilitated by such syndicates and its impact on Africa's wildlife. The report found that Nigeria is the primary African country implicated in ivory and pangolin scales seizure destined for Vietnam and that there is an urgent need for cooperation between law enforcement authorities from the two countries to tackle wildlife trafficking more effectively. EIA were interviewed by Nigerian media on the release of the report<sup>6</sup>, and the report was covered by multiple international outlets<sup>7,8</sup>.

Furthermore, EIA/ANI were recently awarded a complementary grant from the Pangolin Crisis Fund (PCF) to prepare a draft law to amend Nigeria's weak legislation on wildlife trafficking, increase awareness of key governmental and non-governmental stakeholders, and develop a strategy to secure political support for the adoption of the new law (01/01/2022 – 31/12/2022).

EIA is currently in the planning stages of further field investigations in Nigeria and other countries in West and Central Africa in 2022-2023.

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<sup>5</sup> <https://eia-international.org/report/vietnams-footprint-in-africa-an-analysis-of-the-role-of-vietnamese-criminal-groups-in-wildlife-trafficking/>

<sup>6</sup> <https://www.youtube.com/watch?v=sisVSYyocHc>

<sup>7</sup> <https://news.mongabay.com/2021/11/wildlife-trade-hub-vietnam-is-also-hub-of-impunity-for-traffickers-report-says/>

<sup>8</sup> <https://www.rfa.org/english/news/vietnam/wildlife-gangs-11242021162718.html>

## **Activity 2: Enhanced government capacity and public-private sector collaboration in Nigeria to conduct financial investigations for serious and organised wildlife trafficking**

EIA has been regularly sharing intelligence and continuing to build on existing relationships with NCS, EFCC, NFIU and FCS to assist, as appropriate, in the disruption of wildlife trafficking networks. EFCC and NFIU continue to conduct investigations on the back of EIA intelligence, and this has resulted in generating more intelligence on the network believed by EIA to be associated with recent IWT seizures.

EIA have now formally renewed the MOU with EFCC to incorporate a more operational approach and what this might look like, which was signed in late Year 1. The specific objective of the MOU is to set out terms of reference for cooperation between the EIA/ANI and EFCC to advance further investigations into significant persons of interest believed to be involved in wildlife trafficking and other offences in Nigeria including illegal import, export, dealing and possession of prohibited species, money laundering and corrupt practices.

EIA have identified an internationally recognized specialist financial crime expert with significant experience in the planning and implementation of financial investigations. This consultant has extensive experience delivering financial investigations training to law enforcement officials in multi-cultural environments, including African countries. They will undertake a scoping mission to Nigeria in early Year 2 to provide detailed insight into the specific needs and deficiencies of relevant agencies in Nigeria's anti-money laundering sector. This assessment will assess the current capacity for financial investigations and identify gaps and opportunities for providing enhanced capacity support. The findings will be captured in a written output (gap analysis) which can be disseminated as appropriate.

In February 2022, EIA staff conducted several initial capacity scoping interviews with relevant Nigerian government officials whilst in-country during an event jointly facilitated by EIA, ANI and UNODC in Abuja. This capacity-building event for judges, prosecutors and investigators, "*Wildlife Trafficking in Nigeria – Law and Practice*", was primarily funded under the INL grant, however additional officials from NFIU were invited to introduce the topic in advance preparation of our planned financial investigations trainings (Output 2) (see **Annex 4A** for event agendas). These interviews were conducted with the assistance of a comprehensive list of relevant questions prepared in advance by our staff in conjunction with the financial crime expert who was unable to travel due to unforeseen circumstances. The findings are a starting point for the planned scoping trip. Furthermore, EIA used the opportunity of being in-country in February 2022 to engage with senior officials from relevant agencies, introducing them to our objectives under this project and our plans for future events such as the financial investigations trainings.

The process of planning for the financial investigation training activities has begun, with valuable relationships being formed during EIA's trip to Abuja and Lagos in February 2022. In Year 2, EIA/ANI will run a financial investigation training course for approximately 20 public sector officials in Nigeria, particularly investigators and prosecutors from relevant government agencies, and financial sector officials (funded under INL grant). The tailor made, scenario-based course will take place over five days and will be based on recent real-life examples of wildlife crime cases in Nigeria. The course will encourage staff from different agencies to work together in groups, and walk through a scenario, learning as they progress. The outcomes from this course will then be used to update the live capacity and gap analysis document mentioned above. They will also be used in conjunction with attendee feedback to develop and if necessary, evolve a similar course for 20 to 25 new delegates during 2023, in Nigeria, which is funded under this project.

The use of specialist speakers from key Nigerian agencies will also be used to provide local context, garner engagement and encourage lasting collaboration amongst attendees of the financial investigations training course. With this in mind, we invited representatives from NFIU to participate in our event for prosecutors, investigators and the judiciary in February 2022. This will ensure they have the underlying knowledge of wildlife trafficking legislation to benefit fully from the financial investigations trainings planned for 2022-2023.

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

EIA have already held preliminary discussions with the FATF Secretariat and other countries on the Nigerian Mutual Evaluation Report, identifying those areas of the report that show deficiencies in international cooperation. EIA also attended the FATF 'Methods and Trends' Group Webinar on Environmental Crimes, hosted by the German President, using this webinar to make first contact with GIABA and GABAC representatives.

A Nigerian red-flag document for the transport sector has already been completed and submitted to the United for Wildlife Transport Taskforce for global dissemination (see **Annex 4B** for a copy of the red-flag document). A second Nigerian red-flag document for the global financial services sector has been drafted and will be finalised and sent to the United for Wildlife Financial Taskforce for dissemination in Year 2.

## **3.2 Progress towards project Outputs**

As mentioned above, the project only officially commencing on 1 September 2021, so many activities are still in the early, planning stages, but progress towards the stated Outputs is continuing as planned.

Output 1.1: EIA undercover operatives engaged with 8 target persons of interest through a field investigation in February 2022 [baseline of 9 target persons of interest engaged].

Output 1.2: A strategic intelligence assessment report (with network charts) is currently being developed on networks of interest on the back of remote and field investigations.

Output 1.3: A total of 157 intelligence documents were generated on wildlife trafficking in Nigeria (please note that this figure does not include intelligence documents generated on wildlife trafficking in other countries of West and Central Africa) in Year 1 of the project [baseline of 20 intelligence documents]. A total of 50 of the 157 intelligence reports generated in Year 1 concern networks of interest, hereby referring to networks we are actively investigating. Most of these 50 reports are based on information gathered through direct engagements with members of networks of interest. Furthermore, 59 of the 157 intelligence reports generated in Year 1 contain information on the methodology of wildlife traffickers (for example, the means of payments used by traffickers, their preferred means of concealment for maritime shipments etc.).

Output 1.4: Planning for this event currently in progress. We have already begun liaising with various media outlets in Nigeria, who have begun covering our work (see footnote no. 6 above).

Output 2.2: EIA have identified a specialist financial crime expert with significant experience in the planning and implementation of financial investigations. They have been engaged to produce a capacity assessment to review the current capacity for financial investigations and identify opportunities for providing enhanced capacity. This gap analysis will be used to design the financial investigation training courses, each featuring approximately 20 public (particularly investigators and prosecutors) and financial sector officials in Nigeria (one funded under the INL grant and another funded under this project). The tailor made, scenario-based course will take place over five days and will be based on recent real-life examples of wildlife crime cases in Nigeria. The course will encourage staff from different agencies/sectors to work together in groups, and walk through a scenario, learning as they progress.

Output 2.3: EIA/ANI will be providing criteria and encouraging law enforcement agencies and financial sector bodies to select at least 30% women participants when they nominate representatives to attend the financial investigations workshop.

Output 3.1: Planning for this output is still in progress, however EIA have already held preliminary discussions with the FATF Secretariat and other countries on the Nigerian Mutual Evaluation Report, identifying those areas of the report that show deficiencies in international cooperation. EIA also attended the FATF 'Methods and Trends' Group Webinar on Environmental Crimes, hosted by the German President, using this webinar to make first contact with GIABA and GABAC representatives.

Output 3.4: The names of 62 wildlife traffickers operating in West and Central Africa were submitted to the Know Your Customer databases (e.g. Thomson Reuters World-Check/Dow Jones) since 1st September 2021. Of those names submitted, 27 have resulted in new or updated profiles on their databases.

### 3.3 Progress towards the project Outcome

*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*

We are still in the early stages of project outputs, due to an agreed delayed start to the project, and ongoing COVID-19 travel restrictions. However, the project is on track to achieve the Outcome by the end of funding period and the indicators remain appropriate for measuring the intended Outcome.

### 3.4 Monitoring of assumptions

**Assumption 1:** 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

**Comments:** Although travel restrictions as a result of the global COVID-19 pandemic led to EIA/ANI needing to submit a Change Request to Defra in September 2021, these are now beginning to ease. EIA Campaign, Intelligence and Investigations staff were able to travel to Nigeria for the first time in February 2022, and we remain hopeful that efforts to control transmission of COVID-19 will not affect the delivery of project outputs and activities.

**Assumption 2:** Nigerian and other West/Central African governments remain committed to disrupting serious and organised wildlife trafficking

**Comments:** Based on the many interactions, both remotely and in-person during the EIA Staff trip to Nigeria in February 2022, we have had with Nigerian and other West/Central African governments, they all remain committed to disrupting serious and organised wildlife trafficking. However, we have so far been unsuccessful in opening lines of communication with law enforcement agencies in Cameroon and the Democratic Republic of the Congo in Year 1 of the project as originally planned, primarily as a result of being unable to travel to these countries to establish formal relationships due to COVID-19 travel restrictions. We remain confident we will be able to establish formal relationships with these governments in the near future, and a scoping visit to DRC under a complementary project is taking place in May 2022.

**Assumption 3:** Corruption and government bureaucracy do not affect efforts to arrest and prosecute individuals implicated in wildlife trafficking

**Comments:** Upon reflection, this assumption clearly needs revising, given that the existence of corruption is a major known impediment to tackling wildlife trafficking. Nevertheless, EIA and its partners are working to identify opportunities within agencies and to navigate the challenges in the region.

**Assumption 4:** Limited government resourcing does not impede law enforcement investigations and prosecutions

**Comments:** Upon reflection, this assumption clearly needs revising, given that if the government resources were sufficient and corruption levels were low, overseas aid may not be unnecessary. Nevertheless, EIA and its partners are working to ensure that government agencies are able to investigate and prosecute wildlife offences despite limited resources and corruption, thereby minimising the impact.

**Assumption 5:** Disruption of wildlife trafficking networks will alleviate poaching pressure on pangolins and elephants in source countries

**Comments:** This assumption still holds true.

**Assumption 6:** Safety and security situation in project countries sufficient to allow planned activities to take place

**Comments:** Following our first field trip to Abuja and Lagos, Nigeria, in February 2022, this assumption still holds true and we continue to monitor and mitigate safety and security issues.

**Assumption 7:** Government agencies continue to cooperate with national and international conservation NGOs

**Comments:** Based on the many interactions, both remotely and in-person, we have had with government agencies, they all remain committed to disrupting serious and organised wildlife trafficking by working with national (ANI) and international (EIA) conservation NGOs.

**Assumption 8:** Vetted wildlife law enforcement units in Nigeria exist to handle confidential and sensitive intelligence

**Assumption 9:** 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

**Comments:** FCS have recently set up a vetted wildlife law enforcement unit within Nigerian Customs, but they remain in the early stages of operational activities. We remain in close contact with senior Customs officials and FCS (international organisation tasked with setting up the unit) and they have responded positively to intelligence shared with them, and they remain willing to cooperate at the international level.

**Assumption 10:** Nigerian media are committed to covering biodiversity issues

**Comments:** We have built relationships with local media in Nigeria and they have already covered some of our events and activities in country, and reported on our publications<sup>9</sup>.

**Assumption 11:** Governments respond to pressure from NGOs, civil society organization and media to strengthen criminal justice responses to wildlife trafficking

**Assumption 12:** Nigerian government remains committed to improving its criminal justice system capability to combat wildlife trafficking

**Comments:** This assumption still holds true. EIA/ANI were recently awarded a complementary grant from PCF to prepare a draft law to amend Nigeria's weak legislation on wildlife trafficking, increase awareness of key governmental and non-governmental stakeholders, and develop a strategy to secure political support for the adoption of the new law. Following a number of virtual and in-person meetings with the Honourable Minister of Environment, we received her full support to proceed with the drafting of the bill - *The Endangered Species Conservation and Protection Bill 2022*. The Honourable Minister has stated that she wants to proceed with the draft bill as an "executive bill" and directed EIA and ANI to request audience with the Environment Committees of both chambers of the National Assembly to provide context and highlight salient provisions of the bill. She also agreed to send the bill to the Attorney General of the Federation and complement EIA and ANI's efforts with the Environment Committees with her own letters to the leadership of the National Assembly.

**Assumption 13:** Law enforcement agencies, prosecutions department, FIU and financial sector remain willing to participate in capacity building initiatives focused on combating wildlife trafficking

**Comments:** This assumption holds true. We continue to liaise closely and exchange intelligence with EFCC and NFIU. Furthermore, EIA/ANI have an MOU with EFCC to share intelligence, coordinate multi-agency investigations and build capacity for parallel financial investigations, in particular during the training event planned under this project.

**Assumption 14:** Nigerian FIU and banking sector are willing to engage with each other on intelligence sharing

**Assumption 15:** Banks regard potential exposure to money laundering linked to wildlife crime as an issue of concern

**Assumption 16:** Women hold an appropriate level of seniority in government positions relevant to the project's capacity building activities

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<sup>9</sup> <https://www.youtube.com/watch?v=sisVSYocHc>



**Comments:** These assumptions still hold true as far as we are aware, but still in early stages.

**Assumption 17:** Regional FIUs and FATF-style bodies are willing to engage with EIA and respond to information on wildlife trafficking and financial crime

**Comments:** EIA have already held preliminary discussions with the FATF Secretariat and other countries on the Nigerian Mutual Evaluation Report, identifying those areas of the report that show deficiencies in international cooperation. EIA also attended the FATF 'Methods and Trends' Group Webinar on Environmental Crimes, hosted by the German President, using this webinar to make first contact with GIABA and GABAC representatives.

**Assumption 18:** Representatives from West/Central Africa law enforcement agencies are willing to engage with EIA and with each other on regional cooperation

**Comments:** See comments under Assumption 2.

**Assumption 19:** Banks' customer due diligence procedures are sufficiently robust to avoid offering services to individuals and companies implicated in wildlife trafficking included in databases

**Comments:** This assumption still holds true as far as we are aware, but still in early stages.

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

We remain confident that 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 and 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 involving a range of Nigerian government agencies.

Direct beneficiaries will be those that are supported through capacity building, multi-agency coordination and intelligence sharing activities (e.g. Output 2.4). This includes government agencies such as the NFIU, EFCC, NCS and NESREA. These agencies will benefit from enhanced skills, knowledge, access to information and opportunities to improve coordination and build trust. Alongside the NFIU and EFCC, the new Special Wildlife Crime unit embedded in the NCS will be a beneficiary of intelligence analysis that will enable them to effectively target the intermediate and high levels of wildlife trafficking networks. Furthermore, private sector financial institutions will benefit from access to knowledge and relationships that will enable them to better prevent the abuse of their services by wildlife traffickers for money laundering.

## **4. Thematic focus**

### **1. Ensuring effective legal frameworks and deterrents**

The project continues to 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. The project also affords us the opportunity to engage with prosecutors in Nigeria and offer our support to the prosecution of ongoing cases in the country.

### **2. Strengthening law enforcement**

EIA is regularly collecting and analysing intelligence on ivory and pangolin trafficking in Nigeria through research, field investigations and social media monitoring in relevant languages and,

as appropriate, investigations are also targeting wildlife trafficking networks in other countries closely linked with wildlife trade flows into Nigeria (Outputs 1.1, 1.2, 1.3). EIA has been regularly disseminating this intelligence in the form of briefings and documents to key law enforcement authorities, such as FCS, EFCC, NFIU and NCS. Intelligence disseminations include information on who is involved in wildlife trafficking, where such activities are taking place, the scale of ivory and pangolin trafficking, financial flows and profits associated with the trade, and methodology used for trafficking.

EIA intelligence indicates that financial payments for wildlife trafficking are being made through formal banking institutions in Nigeria, meaning financial investigations into illegal wildlife trafficking offer a critical opportunity to flag and identify wildlife traffickers, thereby presenting opportunities for disruption of criminal activities. The legal analysis commissioned by EIA found a clear legal basis upon which to initiate such financial crime investigations in Nigeria and EIA will conduct a scoping visit and a gap analysis led by a specialist consultant to generate a detailed insight into the specific needs and deficiencies of relevant agencies in Nigeria to do this. The findings of this exercise will be presented to relevant law enforcement agencies during the financial investigations training events (Output 2.2), thereby increasing the capacity of Nigerian law enforcement agencies to disrupt trafficking networks.

## **5. Impact on species in focus**

The wildlife sourcing footprint of criminal networks operating in Nigeria extends across the region's globally important tropical forests and savannas, including in Cameroon, Gabon, Central African Republic, Republic of Congo, Democratic Republic of Congo and Liberia. This is a major threat to the survival of both species of African elephants and all four African pangolin species. 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. This project seeks to alleviate this pressure by reducing the international trafficking of elephant ivory and pangolins in West and Central Africa.

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. Although it is too early to state that this specific project is having a positive, direct effect on populations of elephants and pangolins in West and Central Africa, it is contributing to a wider programme of work which should benefit these severely threatened species. For example, perpetrators are under increased scrutiny through EIA's sharing of intelligence on persons/networks of interest with Nigerian and regional law enforcement agencies (Output 1.3), and they are more likely to be prosecuted successfully and sentenced appropriately through amendments to Nigeria's primary wildlife legislation (complementary grant).

## **6. Project support to poverty reduction**

Communities affected by pangolin scale and elephant ivory trafficking include those living in and around wildlife source areas across West and Central Africa. Activities implemented will raise awareness amongst the public and government agencies, and build disincentives that discourage criminal networks from sourcing wildlife from marginalised and underdeveloped rural areas, which will have a twofold outcome for poverty reduction (e.g. Outputs 1.3, 1.4, 1.5, 2.1, 2.4, 2.5, 2.6, 3.2, 3.3, 3.4).

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).

## **7. Consideration of gender equality issues**

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. 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 develop criteria and encourage 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.

## **8. Monitoring and evaluation**

Given the fact we are still very much in the early stages of the project, with all of the major activities and outputs scheduled for Year 2, it is difficult to assess the indicators of achievement at this time. We have not made any changes to the M&E plan over the reporting period, and do not envision any changes in the near future.

EIA and ANI have regularly weekly meetings and have remained in close contact throughout the reporting period of 01/09/2021 – 31/03/2022. In addition, EIA and ANI have quarterly, full-day meetings on M&E and planning of project activities and outputs. Regular monitoring of overall project progress is shared between EIA's Wildlife Project Officer and newly recruited Senior Project Coordinator, as well as ANI's Wildlife Policy Coordinator.

EIA is also in the process of testing project management software (*Microsoft Project*) which may assist with project tracking, automated task allocation, and reporting.

## **9. Lessons learnt**

Two key members of the project team, Shruti Suresh (Deputy Campaign Lead) and Chris Hamley (Deputy Campaign Lead) resigned in late 2021 and early 2022 respectively and have moved to exciting opportunities elsewhere in the sector. Whilst this initially created a significant gap in capacity, we have quickly reassigned responsibilities across other members of the team to ensure we continue to meet our commitments. This has also afforded us the opportunity to reconfigure those responsibilities into a single role, Senior Project Coordinator, that was filled in March 2022 by Justin Gosling. Justin brings over 30 years of experience as a law enforcement specialist, working across the globe on counter-trafficking projects, including those supported by INL. Justin is a former police detective, has worked for organisations including the UN Office on Drugs and Crime and Interpol, and has trained hundreds of law enforcement officers in over 20 countries. Justin has a sound understanding of EIA, having first worked with us in 2006, facilitating counter-ivory trade workshops in East Africa. Justin also has extensive experience of

the Defra IWTCF having served for several years as a member of the fund's Advisory Group. Please see **Annex 4C** for his CV.

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

N/A

## **11. Other comments on progress not covered elsewhere**

All relevant comments on progress and problems encountered have been covered elsewhere in this report.

## **12. Sustainability and legacy**

Our planned exit strategy is still valid and we have no current plans to make changes to what was originally proposed. The project is a component of EIA's long-term strategy in West and Central Africa, through which we have made an institutional commitment to continue activities addressing wildlife trafficking in the region over a period of 5 to 10 years. This will be funded through the delivery of a fundraising strategy targeting philanthropic and bi-lateral donors.

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 cooperation amongst government agencies at national and regional levels. Intelligence generated will enable governments and NGOs to strategically plan advocacy, law enforcement and demand elimination interventions to combat wildlife trafficking across West and Central Africa. By supporting the growth of ANI, the project will enhance the capability of civil society in Nigeria to deliver beyond the timeframe of the project.

The project will boost the functioning of the NFIU's Natural Environment and Wildlife Trade Crimes Analysis Unit (NEWTCU) and support UNODC in their implementation of the (recently launched) Nigerian National Strategy on Wildlife and Forest Crime and the ICCWC Wildlife and Forest Crime Analytic Toolkit in Nigeria (planning for this is in progress). The project will also support the U.S. 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.

## **13. IWT Challenge Fund identity**

IWT101 is recognised as part of a larger EIA/ANI programme in West and Central Africa. This programme and project has been publicised during remote and in-person engagements with Nigerian and regional stakeholders over the past 7 months of the project, in particular during our private meetings in Abuja and Lagos in February 2022.

We will of course further publicise the IWT Challenge and its UK Government sponsors on any external outputs, event and promotional materials and during engagements with relevant stakeholders in 2022-2024, particularly during the delivery of activities and outputs planned under this project for Years 2 and 3.

## **14. Impact of COVID-19 on project delivery**

Global travel restrictions as a result of the COVID-19 pandemic have had a significant effect on project activities. The activities affected by the pandemic are largely related to travel to focus countries and due to the fact we did not believe travel restrictions would ease during Year 1 one of the project, and because the project didn't begin in earnest until September 2021, we applied for a Change Request in September 2021, which was accepted by Defra. Many of the activities were therefore moved from Year 1 to Year 2, or Year 2 to Year 3. However, EIA Campaign, Investigations and Intelligence staff were finally able to travel to Nigeria in February 2022, where they were able to conduct a capacity-building event and field investigation (funded

under a complementary grant). Furthermore, EIA investigators have been successful in conducting remote covert investigations between September 2021 and March 2022.

We continue to monitor government travel regulations regularly. We are hopeful that with restrictions now easing in many regions, EIA Investigations, Intelligence and Campaign staff will be able to travel safely to the region in 2022-2023 to implement activities planned under this project.

EIA management and all staff are mindful of staff welfare and well-being. A number of members of staff have become infected and ill with COVID-19 as recently as April 2022, so we are conscious that this pandemic is far from over. London-based staff are welcome to return to the office but are not required to do so. We are in close and regular contact with project staff and when travel is planned, we ensure that we meet and exceed safety requirements.

EIA’s activities under this project aim to ensure the prevention of long-term trafficking of wildlife, including pangolins, which may reduce the risk of future pandemics, particularly those caused by zoonoses and the exploitation of wildlife. EIA continues to engage with and monitor global efforts to reduce the risk of pandemics through wildlife trade.

EIA has internal policies that aim to minimise travel, particularly air travel, consistent with our programmes on Climate. We have embraced the use of the “Microsoft Teams” ecosystem within the organisation and with our project partners.

## 15. Safeguarding

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

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

No safeguarding concerns have been raised during this project.

EIA maintains regular and frequent contact with its partners and there have been no adverse issues related to health, safety or welfare.

EIA has a number of policies that ensure the safety of staff, partners and external contacts that EIA may engage with directly or indirectly. These include policies on: Safeguarding Adults, Children and Young People; and Safeguarding Codes of Conduct, Whistleblowing.

In January 2021, EIA completed an assessment and report on Social Safeguards in the Countering of Wildlife Crime in Nigeria which explored safeguarding related to Investigations, Information Management including sources of information (“informants”), and State criminal justice and law enforcement responses in Nigeria. It raised prevention and mitigation measures for each issue along with a proposed monitoring mechanism.

To ensure uniformed guidance across the organisation, EIA is developing the Social Safeguards in the Countering of Wildlife Crime in Nigeria report into a Policy which will include a number of ethical issues. This will be made available to Defra upon request.

## 16. Project expenditure

**Table 1: Project expenditure during the reporting period (April ~~September~~ 2021-March 2022)**

Project spend (indicative) since last Annual Report	2021/22 Grant (£)	2021/22 Total actual IWT Costs (£)	Variance %	Comments (please explain significant variances)

Staff costs (see below)	████████	████████		
Consultancy costs				
Overhead Costs	████████	████████	██████	
Travel and subsistence	██████	██████	██████	
Operating Costs				
Capital items (see below)				
Others (see below)				
<b>TOTAL</b>	████████	████████		

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

Given the fact the project only officially began in September 2021, it would be premature to report any outstanding achievements during this shortened reporting period.

## Checklist for submission

	Check
Different reporting templates have different questions, and it is important you use the correct one. Have you checked you have used the <b>correct template</b> (checking fund, type of report (i.e. Annual or Final), and year) and <b>deleted the blue guidance text</b> before submission?	X
<b>Is the report less than 10MB?</b> If so, please email to <a href="mailto:IWT-Fund@itsi.co.uk">IWT-Fund@itsi.co.uk</a> putting the project number in the subject line.	X
<b>Is your report more than 10MB?</b> If so, please discuss with <a href="mailto:IWT-Fund@itsi.co.uk">IWT-Fund@itsi.co.uk</a> about the best way to deliver the report, putting the project number in the subject line.	
<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.	X
<b>Do you have hard copies of material you need to submit with the report?</b> 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/A
Have you involved your partners in preparation of the report and named the main contributors	X
Have you completed the Project Expenditure table fully?	X
Do not include claim forms or other communications with this report.	