

Biodiversity Challenge Funds Projects Darwin Initiative, Illegal Wildlife Trade Challenge Fund, and Darwin Plus Half Year Report

Note: If there is any confidential information within the report that you do not wish to be shared on our website, please ensure you clearly highlight this.

Submission Deadline: 31st October 2023

Project reference	IWT101
Project title	Disrupting international wildlife trafficking networks in West and Central Africa
Country(ies)/territory(ies)	Nigeria and other West and Central African countries
Lead partner	Environmental Investigation Agency UK
Partner(s)	Africa Nature Investors Foundation
Project leader	Mary Rice
Report date and number (e.g. HYR1)	HYR3 – 31/10/2023
Project website/blog/social media	https://eia-international.org/wildlife/

Outline progress over the last 6 months (April – Sept) against the agreed project implementation timetable (if your project has started less than 6 months ago, please report on the period since start up to end September).

Although we are not looking for specific reporting against your indicators, please use this opportunity to consider the appropriateness of your M&E systems (are your indicators still relevant, can you report against any Standard Indicators, do your assumptions still hold true?). The guidance can be found on the resources page of the relevant fund website.

Output 1

The EIA Intelligence and Investigations Unit continues to gather valuable, actionable intelligence on wildlife trafficking networks operating in Nigeria through online and field investigations. Pertinent intelligence in the form of intelligence documents, briefings, reports and red-flag documents have been shared with relevant stakeholders including law enforcement agencies such as EFCC, NCS and NFIU, as well as international NGOs such as FCS, WCS and WJC.

Output 2

The second Financial Investigations Training Course successfully took place the 20-22 June 2023 in Lagos, with the aim of developing public-private collaboration and information exchange to effectively support financial investigation of crimes linked to IWT. The event served as a crucial platform for sharing experiences, knowledge, and best practices, enhancing the collective efforts in combatting IWT in Nigeria. We can report that we were able to secure Standard Chartered Bank and the NFIU as co-hosts of the event, while the course was facilitated by EIA and ANI. A total of 34 officials joined the event including participants and speakers from the Association of Chief Compliance Officers of Banks in Nigeria (ACCOBIN), Central Bank of Nigeria, Customs, EFCC, Federal Ministry of the Environment, NESREA, NFIU, South African Anti-Money Laundering Integrated Task Force (SAMLIT), British High Commission and compliance officers

from 14 of Nigeria's largest financial institutions. The objectives of the event were to: (1) build a sustainable common intelligence picture and understanding of the financial crime risks relating to IWT, (2) ensure that law enforcement and other relevant competent authorities prioritise resources to investigate money laundering from IWT, (3) enhance the quantity and quality of suspicious transaction reports from the private sector in line with identified risk profile, and (4) provide the private sector with mechanisms to support the development of a financial crime framework that covers IWT to detect related illicit flows, and collection of evidence to support reporting to regulatory authorities and law enforcement.

The course enabled EIA and ANI to continue to forge and cement strong connections with several key law enforcement agencies and private financial institutions in Nigeria. Similar to the first course, the success of the event has boosted the reputational standing of EIA and this project within those agencies and banks, including at high levels of senior management (Permanent Secretary of the Federal Ministry of the Environment and EFCC Chief of Staff). The sessions facilitated by members of SAMLIT, including from the South African Police and Financial Intelligence Centre, discussing their experiences establishing a successful private-public partnership were very well received by participants. In particular, the lengthy remote presentation and Q&A session with SAMLIT Director Xolisile Khanyile, Chair of the Egmont Group, was especially rewarding. Another noteworthy success of the event was that EIA received verbal commitments to share STRs with NFIU from 13 of the financial institutions in attendance. Furthermore, the NFIU Chief of Staff, Mohammed Ahmed, committed to provide feedback to the banks on the STRs they submit.

All participants, from both the public and the private sector recognised the benefits of enhanced collaboration to combat IWT in Nigeria. They also agreed that collaboration will help asset-tracing and support prosecutions. The collaborative efforts between EIA, ANI, Standard Chartered Bank, and the NFIU proved instrumental in making this event a resounding success and a significant step forward in the ongoing fight against financial crimes related to IWT in the region. Furthermore, we helped establish an informal working group amongst the attendees, using email and WhatsApp, to share knowledge, build cohesion and encourage inter-agency collaboration.

Output 3

EIA conducted an outreach trip to Yaoundé, Cameroon from 18-27 September 2023. The primary objectives of the trip were: (1) establish and consolidate its relationships with key governmental and non-governmental stakeholders in Cameroon who are actively involved in addressing wildlife crime and organized crime in a broader context, (2) raise awareness among stakeholders about regional and international dynamics related to IWT, highlighting existing gaps in response strategies and enforcement measures, and (3) identify potential law enforcement participants for a regional roundtable event planned for early 2024 to discuss obstacles to regional cooperation.

During the outreach trip, EIA met with a range of stakeholders, including the U.S. Embassy to Cameroon, National Anti-Corruption Commission, Director General of Customs, Ministry of Justice, Ministry of Forestry and Wildlife – CITES Management Authority, National Agency for Financial Investigation, WCS Cameroon Office, EAGLE/LAGA, ZSL, TRAFFIC, WWF and INTERPOL.

The meetings conducted during the outreach trip provided valuable insights. Cameroonian government agencies are cognizant of their role as a source and transit country for a significant portion of wildlife products trafficked to Nigeria, where they are subsequently stockpiled before being transported to prospective buyers in Asia. However, it became evident that the law enforcement response to transnational IWT is currently minimal, with investigations and prosecutions following seizures dependent primarily on efforts by NGOs such as LAGA. Stakeholders provided insights that higher-level traffickers are rarely prosecuted owing to weak enforcement, low prioritisation, and corruption. It is understood that very little regional cooperation is taking place regarding the transnational investigation and prosecution of higher-level wildlife criminals. Many officials acknowledged that existing environmental legislation is inadequate to combat this form of transnational organised crime. Notably, ongoing efforts, supported by funding from GIZ, are in place within MINFOF to enhance this legislation though it is understood that adoption of the new legislation has been pending for years. Furthermore, the Ministry of Justice and MINFOF confirmed that a MOU between Nigeria and Cameroon has been drafted, signed by Cameroon, and is currently awaiting final approval and signature from the Nigerian Federal Ministry of Environment. This MOU is intended to facilitate collaboration between the two countries in the investigation and prosecution of individuals involved in illegal wildlife trafficking, however it is understood that the MOU has been pending for nearly a decade. Overall, the outreach trip to Cameroon served as a crucial step in engaging stakeholders, identifying challenges, and building relationships, which will be instrumental in advancing EIA's efforts to combat wildlife trafficking and improve the communication and cooperation amongst key countries in the region.

2. Give details of any notable problems or unexpected developments/lessons learnt that the project has encountered over the last 6 months. Explain what impact these could have on the project and whether the changes will affect the budget and timetable of project activities.

In recent months, Gabon has experienced significant political instability due to a coup d'état and the subsequent formation of a new government. The coup was a reflection of the political tensions and power struggles that had been simmering in Gabon for some time. The formation of a new government is still ongoing, which significantly complicates our ability to engage effectively in Gabon. As a result of these developments, we have made the decision to modify our project's focus countries, shifting our attention from Gabon to the Republic of Congo.

Conditions in the Republic of Congo are currently more conducive for cooperation and wildlife trafficking disruption activities, offering a relatively stable and secure environment for project implementation, and we have initiated discussions with relevant stakeholders in the country to ensure a smooth transition.

EIA's intelligence indicates that the Congo is a key source country for elephant ivory, home to 20% of Africa's forest elephant population.¹ Furthermore, elephants and pangolins are the most poached species in the country.² EIA intelligence indicates that organised crime groups involved in IWT operate in and around Pointe Noire, which is believed to be an exit point for illegal wildlife products exported from Africa to Asia. EIA's intelligence further indicates that illegal wildlife products sourced from the Congo are smuggled to Nigeria, the region's primary exit point, via Cameroon. The Congo is also understood to be a transit country for illegal wildlife products sourced from other countries in the region, including the DRC. Therefore, as a source and transit country, the Congo plays a key role in West and Central African IWT.

Our project's primary objective remains encouraging cooperation between Nigeria, Cameroon, and now the Republic of Congo, to disrupt intermediary and higher levels of transnational wildlife trafficking networks and our commitment to combating wildlife trafficking and fostering collaboration across the region remains steadfast. We are currently preparing a formal Change Request for submission to NIRAS in November 2023.

3. Have any of these issues been discussed with NIRAS and if so, have changes been made to the original agreement?

Discussed with NIRAS: No (not yet)

Formal Change Request submitted: No (not yet)

Received confirmation of change acceptance No

Change request reference if known:

4a. Please confirm your actual spend in this financial year to date (i.e. from 1 April 2023 – 30 September 2023)

Actual spend: £ [REDACTED]

4b. Do you currently expect to have any significant (e.g. more than £5,000) underspend in your budget for this financial year (ending 31 March 2024)?

Yes No Estimated underspend: £

5. Are there any other issues you wish to raise relating to the project or to BCF management, monitoring, or financial procedures?

No

Please send your **completed report by email** to BCF-Reports@niras.com. The report should be between 2-3 pages maximum. **Please state your project reference number, followed by the specific fund in the header of your email message e.g. Subject: 29-001 Darwin Initiative Half Year Report**

¹ <https://congo.wcs.org/Wildlife/Forest-Elephant.aspx>

² <https://enactafrica.org/enact-observer/central-africas-guardians-of-the-forest-slaughtered-for-myths-and-meat>