



Credit: Save the Rhino International

'Follow-the-Money' Interventions to Combat Illegal Wildlife Trade: What Works?

Introduction



This Information Note provides practical guidance for Illegal Wildlife Trade (IWT) Challenge Fund applicants and beneficiaries planning or delivering 'follow-the-money' (FTM) interventions to help tackle the illegal wildlife trade. It is based on an independent study conducted by the Royal United Services Institute for Defence and Security Studies (RUSI), commissioned by NIRAS. This involved a literature review, data analysis of IWT Challenge Fund projects with a FTM element, and interviews with project implementers and other experts and practitioners in the counter-IWT space.

Financial gain is a primary motivator for most wildlife offenders involved in sourcing or trading IWT products. However, those involved in poaching or harvesting crimes typically obtain comparatively little material benefit in practice, whereas the serious and organised criminal actors – and their corrupt facilitators – responsible for facilitating global illicit wildlife flows accrue significant profits.

Over the past decade, FTM approaches have emerged as a strategy to target these higher-level offenders, mirroring approaches taken to tackle other serious and organised crimes. The logic behind 'following the money' is to raise the risk and reduce the rewards available to illicit actors engaging in IWT, by using more incisive investigation techniques targeting the high-level beneficiaries of the crime and their assets. In this way, enforcement action has the potential to both undermine the financial motivations for wildlife trafficking and act as a deterrent.

Such interventions have seen growing momentum over the years, with projects that include a FTM element accounting for approximately 15% of IWT Challenge Fund programming since the fund's inception in 2014. Nonetheless, given the relative novelty of FTM interventions in counter-IWT initiatives, there has been limited focused research into 'what works' and what doesn't on FTM programming to date.



Credit: Planet Indonesia

The information in this document draws on a recent deep-dive review of the effectiveness of IWT Challenge Fund-supported projects with a FTM element and outlines the study's top-line findings on good practice' to guide the design and implementation of future interventions. It begins by explaining the potential of 'following the money' to disrupt IWT networks, then reviews IWT Challenge Fund FTM interventions by assessing what has worked and key barriers to success, and outlines good practice for measuring impact, managing derailment risk and driving transformational change.



Credit: Maxim Koshkin

Why 'Follow the Money'?

Criminal networks involved in IWT are motivated by profit, are highly organised and often operate across borders. FTM approaches, including financial investigations, anti-money laundering tools and asset recovery can be powerful tools to disrupt this activity, with the potential to:

- Disrupt high-level offenders
- Target corrupt facilitators
- Trace proceeds of IWT across jurisdictions
- Reduce the profitability of IWT
- Generate deterrent effects

If impact is sustained over time, there is potential for FTM to drive transformational change in criminal behaviour that reduces pressure on wildlife populations. However, as this Information Note demonstrates, FTM interventions are high-risk and context-dependent, and take time to achieve results. Successful interventions require meaningful partnerships, thoughtful programme design and adaptive project delivery.

Achieving Deterrent Impact

One IWT Challenge Fund project researched various IWT enforcement strategies to understand whether a deterrent impact was being achieved. The project coincided with the investigation and prosecution of high-level suspects from a transnational ivory trafficking syndicate, which included money laundering charges (and subsequent convictions). The research found that these arrests had a significant deterrent impact among known offenders, whereby owners of illegal ivory attempted to destroy or dispose of their contraband, and foreign traders refused to travel to the jurisdiction for fear of arrest, evidencing a clear causal connection between the incisive targeting of senior members of the syndicate using FTM techniques and AML charges and the deterrent impact observed.

Follow-the-Money Interventions

21 IWT Challenge Fund projects with FTM elements. Of the eight project lead organisations involved in these interventions, the majority were international NGOs (86%) instead of local (14%). Project partners were far more numerous and varied (see Figure 1), with 74 in total (including local government, NGO and academic partners, as well as international and regional organisations). Locally led, bottom-up partnerships are still relatively rare (9.5%), with international NGOs leading most initiatives.

Geographically, IWT Challenge Fund projects with FTM components spanned 25 different countries but have been largely concentrated in Sub-Saharan Africa (particularly East and Southern Africa, which accounted for 88% of the projects analysed), followed by Asia (16%) and the Americas (10%).

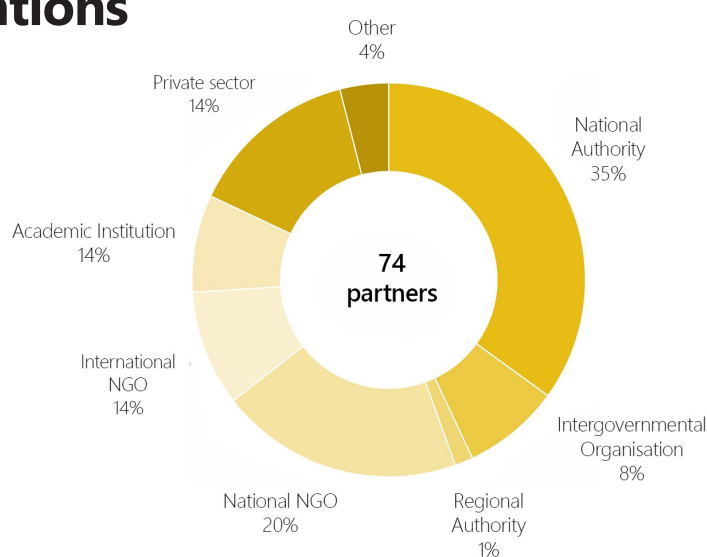
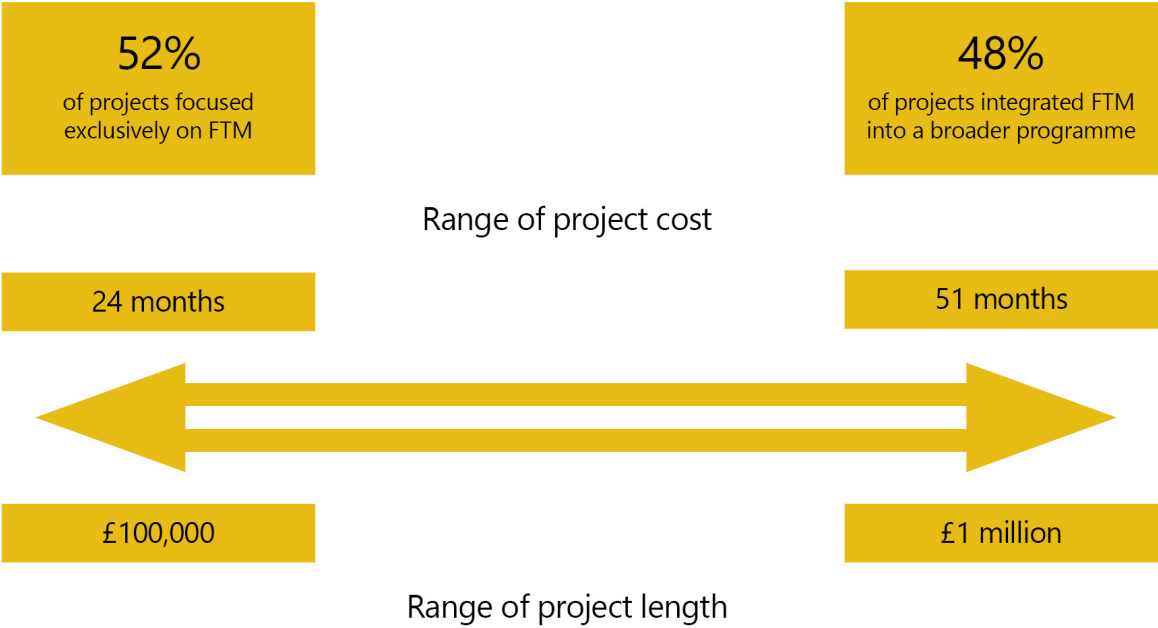


Figure 1: Type of project partners involved in projects with Follow-the-Money Interventions

Projects varied significantly in budget and length and the extent to which FTM factored into project design, with some projects solely focused on FTM and other incorporating it into broader programme with different activities.

Figure 2: Projects varied in budget and length and the extent to which FTM factored into project design.



Out of 10 projects with publicly available project reviews, half were scored highly as moderately or substantially exceeding expected outcomes (A or A+) and half were assessed as moderately or substantially failing to meet the expected outcome (B or C). The research did not identify any particular project characteristics (e.g. partnership composition, length or budget) as contributing to these scores. Instead, quality of monitoring and evaluation, project design and risk management seemed to be some of the most decisive factors.

The early literature on how to mainstream financial investigations in IWT cases agreed on key priority areas, which included raising awareness of IWT as a serious crime and money laundering/terrorist finance threat; developing legal frameworks to treat IWT as a predicate offence for money laundering; building capacity of relevant agencies to conduct parallel financial investigations in IWT cases, and improving coordination between different agencies, jurisdictions and the private sector.

A significant focus has been on conducting financial investigations that lead to money laundering charges and convictions against high-level syndicate members and other facilitators. However, there has been growing recognition of the benefits of the use of alternative offences to secure judicial outcomes – such as non-conviction-based asset forfeiture, unexplained wealth orders and tax investigations – that require a lower burden of proof.



Credit: Marine Drouilly

Table 1 – which includes indicators of success from 17 FTM-related projects with open-access project reports – shows that FTM interventions have sought to address these gaps and reported progress against these themes, by training law enforcement, developing and sharing knowledge products with national, regional and international actors and financial institutions and promoting inter-agency collaboration.

Table 1: Reported project outcomes by activity type

Activity type	Results recorded in project reports
Capacity-building, such as multi-agency law enforcement agency trainings in FTM and/or on-the-job mentorship	• ≥1,734 people received structured and relevant training • ≥122 local or national organisations with enhanced capability and capacity • ≥14 countries reportedly improved financial investigation capacity following trainings
Development of intelligence products, such as typologies or intelligence alerts featuring red flags or risk indicators for IWT-IFFs	• ≥372 best-practice guides and knowledge products • ≥25 criminal networks and related trade routes mapped, in one case leading to 132 arrests and 2 convicted government officials • ≥2,008 records added to publicly accessible databases
Cross-sector community building, including advancing public-private or private-private partnerships	• ≥4 cases handed to another agency • ≥3 multi-agency taskforces established • ≥1 inter-agency cooperation agreement signed
Intelligence sharing with national and international enforcement agencies and/or the private sector	• ≥206 banks received typologies of IWT networks • ≥1 intelligence report exchanged with Interpol or World Customs Organisation
Supporting relevant prosecutions, e.g. with case conferences, brief watching or private prosecution	• ≥8 wildlife crime cases submitted for prosecution • ≥473 people charged for wildlife crime • ≥289 people successfully prosecuted for wildlife crime • ≥6 financial investigations initiated

Although transformational change is difficult to measure from project reports, several IWT Challenge Fund beneficiary countries have made notable progress and secured money laundering convictions or asset forfeiture outcomes, such as:

- Money laundering convictions for high-level members of the Lin-Zhang wildlife trafficking syndicate in Malawi in 2023
- An 18-year money laundering sentence for a rhino horn trafficker in South Africa
- \$6.37 million of assets linked to a wildlife trafficker seized in Thailand
- \$1 million of assets linked to timber trafficking seized in Zambia in 2025

Although these successes cannot be exclusively attributed to IWT Challenge Fund, it is likely that funding contributed in part to building the awareness and capacity that allowed beneficiary countries to reach these judicial outcomes, suggesting there are lessons to be learned from these experiences. Furthermore, since such case outcomes remain relatively rare, it is necessary to consider what factors are key to success.

The study highlighted a range of common factors across FTM interventions that resulted in positive case outcomes or system-wide change. The factors outlined below were identified as fundamental for project success and should be integrated into the early stages of future project design.



Credit: Wildlife Alliance



Key Success Factors

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Deep situational understanding at inception

Projects were found to be most successful when they were adapted to local contexts. To do so, it is important to invest early in:

- Mapping national anti-money laundering (AML) and criminal justice frameworks
- Understanding which agencies have legal mandates for financial investigation and asset recovery
- Assessing baseline capacity and gaps
- Analysing political-economy dynamics, including corruption risks
- Identifying previous and ongoing donor activity

Strong national ownership and political will

FTM approaches depend heavily on the commitment of key state actors. Local buy-in builds institutional commitment, facilitates inter-agency cooperation and ensures more durable impact. Successful projects must therefore:

- Secure high-level endorsement (e.g. from the Prosecutor General or Financial Intelligence Unit Director)
- Allow government partners to own and lead interventions, with NGOs facilitating rather than leading
- Build strong, durable partnerships with local actors that can sustain momentum and drive impact

Thoughtful project design

Project activities often risk meeting donor requirements but failing to deliver meaningful impact. Best-practice has been identified in previous projects that have:

- Tailored trainings for agencies in each relevant jurisdiction, considering their specific mandates and baseline capacity
- Pursued a multi-agency approach to overcome “weak links” in the criminal justice chain and build trust and sustained information sharing
- Delivered longer-term mentorship, including embedded national advisors and case support, which was identified as highly effective and conducive to durable change.

Adaptive project risk management

FTM approaches are often high-risk and can result in unintended harms or ‘derailment’ risks. To navigate this, experience from the projects analysed suggests that implementers must:

- Evaluate whether a ‘hands-on’ or ‘hands-off’ approach is more appropriate, depending on the political context
- Adapt all aspects of delivery to local sensitivities, for example through the use of discreet communication strategies

A ‘Hands-On’ Approach

In one of the cases analysed, a local NGO supported government-led investigations into a rhino poaching syndicate through an embedded data analytics function. This yielded positive results, resulting in the effective application of civil forfeiture approaches and seizures of criminal assets using unexplained wealth orders. Critical success factors included the existence of long-term trusted relationships, buy-in and ‘tone from the top’ on using FTM, and an interdisciplinary, regionally inclusive approach to capacity-building of investigators and prosecutors, encompassing different crime types.

A ‘Hands-Off’ Approach

In another of the cases analysed, an international NGO coordinated and facilitated a bilateral public-private partnership on an in-depth forensic investigation of an IWT network, which led to a landmark 18-year sentence for wildlife-related money laundering offences. The NGO deliberately chose to avoid receiving or managing nominal or intelligence data beyond the requirements for project reporting. This was reported to have had multiple benefits in terms of managing data security and privacy risks, mitigating the risk of political interference, and building trust by ameliorating local sensitivities around foreign access to sensitive or legally protected national criminal data.

Barriers to Success

The study identified key challenges that risked minimising the effectiveness of FTM interventions, which must be considered when developing programming. These included:

Corruption and lack of political will

The presence of corruption was largely considered the most significant obstacle to FTM implementation, given that powerful state or corporate actors can be part of deeply embedded patronage networks that stand to benefit from IWT. Following financial leads linked to these actors or implementing effective AML tools can paradoxically lead to unintended derailment risks, such as:

- Direct retaliation against in-country project staff or government partners
- Withdrawal of political backing
- Hidden pressure on governments to roll back successful AML interventions or tools
- Self-censorship of investigators or prosecutors to avoid exposing high-level beneficiaries

Timescale constraints

The length of key projects was often deemed to be too short to enact meaningful change. Developing the 'building blocks' for a successful project – such as genuine partnerships, baseline understandings of legislation and capacity, gaining political buy-in – can take several years, as shown by the case study below.

Project Red Flags

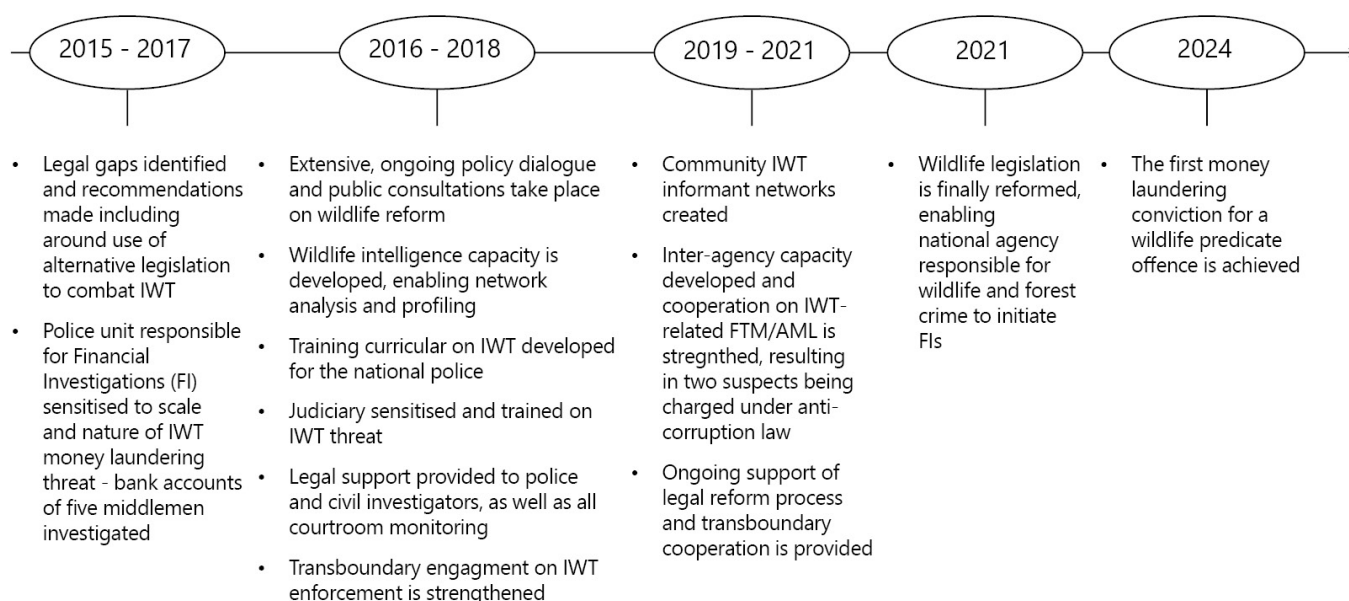
A series of red flags were identified during this research:

- 'One-size-fits-all' programming that doesn't account for country-specific agency mandates, baseline capacity or AML frameworks
- 'Fly-in, fly-out' workshops that don't provide opportunities for skills to be applied in real-life scenarios
- Surface-level in-country partnerships and lack of evidenced local buy-in
- Unrealistic timeframes, which could indicate insufficient time for laying the groundwork
- Narrow stakeholder engagement, with key agencies excluded from activities

Top Tip: Use Evidence Tier grants to set this important groundwork before scaling into Main or Extra Tier interventions.

The Long Road to FTM

FTM interventions exist in a broad programming landscape and often play out over extended periods of time. This makes measuring or attributing impact challenging but emphasises the importance of holistic, collective approaches. Tracing the timeline from policy reform to the first ever conviction for IWT-related money laundering in one country across multiple projects reflects this long and multi-faceted process:





Credit: ZSL

Measuring Success

Monitoring and evaluation of FTM interventions is challenging due to short project lifecycles and confidentiality around data sharing. As a result, indicators of success can be difficult to identify, causing projects to score poorly in evaluations. To address this, some of the projects analysed have relied on surface-level indicators that fail to demonstrate meaningful change.

For example, the following indicators can be problematic in terms of demonstrating outcomes and impact:

- Numbers of arrests or seizures, as these do not necessarily demonstrate successful application of financial investigation tools and could reinforce harmful enforcement practices
- Training headcounts or post-workshop surveys, as these indicate attendance levels and satisfaction of participants, but do not evidence successful acquisition of skills
- Production and dissemination of knowledge tools, such as typologies, intelligence leads and webinars, as it can be difficult to determine whether these are used in practice and to what effect
- Money laundering convictions or number of confiscated assets are positive indicators, but these can be challenging to attain during short funding cycles

It is important to consider indicators of both enforcement outcomes (and the deterrent effect that these can have on criminal activity) and wider system change, including strengthened legal frameworks and resource allocation that prioritises IWT as serious, financially motivated crime and equips enforcement and justice agencies with the tools they need to tackle it.

Top Tip: Use qualitative evidence to supplement quantitative measurements. Testimonies can be a powerful indicator of success and don't require access to sensitive data.

Suggested Indicators

Short-term, institutional uptake

- ✓ Number of parallel financial investigations initiated
- ✓ Number of wildlife-related requests for financial intelligence received by Financial Intelligence Unit

Longer-term, system-level change

- ✓ Number of money laundering convictions
- ✓ Value of assets seized
- ✓ Increased resources allocated to wildlife-related AML and other key functions
- ✓ Wildlife-related AML reforms or inclusion of IWT in national risk assessments
- ✓ New inter-agency / cross-sector protocols or Memorandums of Understanding

The importance of clear reporting

Of the interventions analysed, the most common reason for projects to be rated poorly was for failing to meet their stated outcomes. However, projects that reported clearly and transparently against their chosen metrics and the factors which inhibited success scored more highly. As well as choosing measurable and achievable indicators, project implementers should invest time and resource in strengthening reporting quality, following IWT Challenge Fund guidance on best practice.

Measuring Derailment Risk

As described below in Figure 3, by increasing enforcement pressure against high-level beneficiaries of IWT, FTM interventions can become 'victims of their success', leading criminal and corrupt actors to adapt and engage in 'derailment' strategies which can include aggressive countermeasures, such as intimidation and violence, that create personal and organisational security threats, or weaken financial investigations and sentencing outcomes, such as through plea bargains or political pardons.

Awareness of derailment and safeguarding risks therefore needs to be incorporated into the strategic design of FTM interventions to reduce risks to project staff, mitigate against potential shocks and adapt strategies for more discrete impact. This can include:

- Adopting a more discrete 'hands-off' approach to reduce the visibility of organisational involvement and prevent derailment.
- Incorporating best practice from anti-corruption initiatives, such as building transparency and accountability in criminal justice systems, into programming.
- Focusing on other judicial routes that require a lower burden of proof, such as non-conviction-based asset forfeiture, rather than money laundering convictions.



Figure 3: Enforcement pressure can lead criminal and corrupt actors to adapt and engage in 'derailment' strategies.



Credit: Fauna and Flora

Towards Transformational Change

FTM interventions are not just technical exercises, they are sensitive interventions deployed in systems where power, profit and corruption intersect. Success is therefore highly contingent on political strategy, long-term trust and adaptive risk management. Research findings point to four key factors to deliver transformational change.

Careful project design

Implementers should invest heavily in political economy analysis at inception, including assessments of baseline legal frameworks, institutional mandates and prosecutorial, judicial and AML capacity, mapping of corruption risks, as well as building meaningful partnerships and securing local buy-in. This should ensure that training is tailored to the mandate, capacity and specialism of recipients, distinguishing between different enforcement and justice roles and avoiding generic 'one-size-fits-all' training packages or duplicating effort with other projects. Projects should build long-term mentorship, case-based learning, and multi-agency case conferencing into activity design to build practical capability, support specific case outcomes, and overcome institutional blockages.

Longer-term interventions

Where relevant, interventions should be designed with longer timelines in mind, with the understanding that it can take several years to change AML frameworks, build up capacity and develop robust inter-agency or cross-sector protocols. Indicators should be designed accordingly, with practical short-term indicators to be measured during project lifecycles and longer-term indicators and qualitative evidence monitored beyond the lifespan of the project.

Meaningful partnerships

Of the interventions analysed, the most common Bottom-up – rather than top-down – horizontal and vertical structures spearheaded by local NGOs and other actors may prove to be effective frameworks for future FTM interventions. The involvement of local partners helps to ensure that project design is aligned to contextual realities, forge deep and durable relationships with government stakeholders that can be sustained beyond project lifecycles. Broader coalitions of partners can ensure greater diversity of expertise on FTM to tackle IWT and ensure approaches are holistic and system wide.

Adaptive risk management

Project design should account for derailment risk, building in effective safeguards and aligning the approach to the observed political economy and corruption levels in the country. Implementers must be ready to adapt if unanticipated risks arise or if strategies become victims of their success, including through a more 'hands off' approach with discrete communication strategies and engagement, developing complementary anti-corruption strategies or by pursuing less confrontational but equally disruptive judicial outcomes, such as asset forfeiture instead of money laundering convictions.



Credit: K. Paudel

Credit: Walhi NTT Documentation Team

