### **Annual Review**

<b>Title:</b> International Consortium of Combating Wildlife Crime's 2023-2026 Strategic Action Plan (2030 Vision)					
Programme Value £ (full life): Up to £5 million Review date: 02/23-12/23					
Programme Code: P-30873	<b>Start date:</b> February 2023	End date: March 2027			

**Summary of Programme Performance** 

Year	2023				
Overall Output Score					
Risk Rating					

DevTracker Link to Business Case:	
DevTracker Link to results framework:	N/A

### A. SUMMARY AND OVERVIEW

This is the first annual review of the Contribution to the International Consortium on Combating Wildlife Crime (ICCWC) multi-donor Vision 2030 ('the Vision programme') and its associated Strategic Action Plan for 2023-2026. This review assesses The Vision programme programme's performance from year 1 (February 2023 to December 2023) — covering an initial planning, design, and measure progress against for this period. This annual review assessment is therefore based on the quality of expected outputs from the design and inception phase and the qualitative evidence of the programme's overall progress thus far.

The International Consortium on Combating Wildlife Crime is a partnership between the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Secretariat, INTERPOL, the United Nations Office on Drugs and Crime (UNODC), the World Bank and the World Customs Organisation (WCO). The Vision programme aims to strengthen criminal justice systems and provide coordinated support at national, regional and international level to combat wildlife and forest crime. The programme also contributes to poverty alleviation by addressing wildlife crime in some of the world's poorest countries and helps conserve and safeguard biodiversity by strengthening law enforcement capabilities to protect threatened and endangered species and wildlife.

DEFRA's voluntary contribution of up to £5 million supports the implementation of the Vision programme through the Strategic Action Plan for 2023-2026. The Vision programme will work towards a world free of wildlife crime by 2030, following a robust Theory of Change designed to support and strengthen law enforcement and criminal justice systems to respond to and address wildlife crime.

The CITES Secretariat manages and coordinates the implementation of funds from the UK for ICCWC, and activities are delivered by a lead agency, in close coordination with relevant partners. Activities in year 1 (2023) are largely funded by the UK. Activities from year 2 (2024) onwards will be largely cofunded by other contributions from additional donors to ICCWC, including the European Union and Monaco. The contribution supports the implementation of <a href="Decision 19.27 adopted at CoP19">Decision 19.27 adopted at CoP19</a> (Panama, November 2022).

### Summary supporting narrative for the overall score in this review

#### Score: B

This programme has scored a B, indicating that it is 'off track – moderately below expectations'. This scoring is due to the lack of a logical framework (logframe) and set of key performance indicators (KPIs) at the time of writing this review, which suggests that there are currently no clear targets or results and therefore there is not currently enough confidence to be able to score this programme an A (on track). The score of B is aligned with other Defra programmes which have been unable to present a output scoring or a logframe at the time of writing the first annual review.

It should be noted that a logframe and a set of key KPIs for the programme were not envisaged to be developed prior to the start of the programme. As highlighted in the ICCWC Strategic Action Plan 2023-2026, it was envisaged that targeted milestones for each approach would be developed during the inception of the Action Plan (envisaged January - June 2023) and that implementation was expected to take place between July 2023 and December 2026. Taking this into account, ICCWC partners, in close cooperation with DEFRA, developed a specific workplan for the contribution from DEFRA towards the programme. Due to delays with the finalisation of the workplan as well as a lack of Defra resource with appropriate expertise, the development of the logframe and KIPs was put on hold. To advance this work, DEFRA and ICCWC commissioned an external monitoring and evaluation consultant to develop a robust logframe and KPIs, and the final draft is expected to be designed and approved by DEFRA and ICCWC by April 2024. At the time of writing this review, these products have been circulated to ICCWC partners for review and feedback to ensure that the logframe contains indicators that are realistic and reasonable for them to report against, whilst being as robust as possible and meet Official Development Assistance (ODA) reporting criteria. The logframe will be implemented ahead of the next annual review period. ICCWC will be expected to report programme progress against the logframe and associated indicators annually for the remaining duration of the programme.

This annual review assessment is therefore based on the quality of outputs from the design and inception phase, as outlined in the programme workplan, and the qualitative evidence of the programme's overall progress thus far. Defra is pleased with the progress that the programme has made in its initial year and expects further progress as the programme advances through the lifecycle.

The Vision programme has delivered the necessary CITES Secretariat-led planning and administrative activities in year 1 as outlined in the business case and Defra expects the programme to be on track to contribute to the expected outcomes and impact. The business case details that during year one of the programme, the Vision programme would streamline its focus and activities once the level of funding and donor priorities had been confirmed, which occurred in Q2 2023. A work programme detailing partner-led activities was expected to be finalised by June 2023. Whilst there was a slight delay caused by the need for various discussions to clarify the allocation of funds to some activities, the programme workplan was drafted and approved by ICCWC partners and Defra by September 2023. With acknowledgement of the absence of a logframe, Defra is content that the programme is on track against the year one activity expectations included in the programme business case. CITES Secretariat-led planning activities and partner-led activities are ready for mobilisation in year two, as planned.

Defra is satisfied with the strong relationship between itself and the CITES Secretariat and will seek to maintain this relationship throughout the programme lifecycle to monitor delivery, remain aware of potential areas of emerging risk and seek further opportunities to engage with the global community using ICCWC's existing connections to make a significant step forward in using combined action to address IWT. Defra will use this strong relationship to action the recommendations below, with a particular importance on Gender Equality and Social Inclusion (GESI).

### Major lessons and recommendations for the year ahead:

### **Programme management:**

- A programme logframe should be developed and agreed between Defra and ICCWC no later than six months prior to the next annual review (December 2024), to ensure that the programme is able to report against the logframe outputs. At the time of writing, Defra and ICCWC have been working with external monitoring and evaluation expertise to develop a robust logframe and indicators and expect the final draft to be designed and approved by Defra and ICCWC by April 2024. The logframe is expected to report against ICF KPI15 on transformational change to satisfy ICF reporting requirements. Additionally, where individuals will be tracked within the logframe, data will be disaggregated, including by gender.
- Defra Programme Responsible Officer (PRO) to develop a GESI Action Plan to achieve the defined programme level ambition (GESI Sensitive) before December 2025. A detailed gender and social analysis should also be conducted by the Defra PRO prior to the next annual reporting period.
- Defra PRO to build change frame template into the programme logframe by Q2 2024 to ensure any reasons for change are recorded and approvals captured.
- Defra PRO to determine whether the programme is aligned to the Paris Agreement and to consider whether a Climate Risk Assessment is required by end of March 2024.
- Defra PRO to upload all relevant programme documents to DevTracker by end of March 2024.

#### Risk management:

- CITES Secretariat to clearly communicate to Defra upcoming programme and activity milestones, particularly where there may be a risk of delay to target start dates.
- CITES Secretariat to report during recurring monthly meeting any changes in residual risk impact of likelihood, or any areas of potential emerging risk following monthly review of risk register with Senior Experts Group (SEG) and Technical Experts Group (TEG).
- CITES Secretariat to provide an update for Defra on any safeguarding against sexual exploitation and abuse and harassment (SEAH) issues identified during recurring monthly meetings, and promptly follow the reporting requirements outlined in the voluntary contribution Terms of Reference as necessary.

 Defra PRO to work with ICCWC to separate the existing GESI risk into individual GESI and Safeguarding risks by April 2024.

### Stakeholder and donor engagement:

- CITES Secretariat to schedule and invite Defra PRO to future donor coordination meetings and any other relevant opportunities for wider engagement with ICCWC partners by Q2 2024.
- Defra PRO to build understanding of which countries ICCWC activities are planned and engage with relevant Posts to build stronger relationships and consider any additional contextual information or considerations that may impact activity delivery.

### Resourcing:

Defra SRO to ensure there is sufficient internal resource to manage contract delivery and minimise the slippage of programme deliverables or milestones by Q2 2024 (e.g. logframe development, reporting requirements). (Completed – dedicated 0.6 HEO FTE resource onboarding in late February 2024).

### **B: THEORY OF CHANGE AND PROGRESS TOWARDS OUTCOMES**

Addressing the illegal wildlife trade (IWT) while tackling poverty is imperative for advancing the UK's biodiversity, development, and security objectives, as outlined in key policy documents such as the Integrated Review Refresh, the International Development White Paper, and the 2030 Strategic Framework for International Climate and Nature Action. The UK already plays pivotal role in combating global IWT and is widely regarded as a global leader on this issue.

The IWT programme objective is to contribute to halting and reversing biodiversity loss and the alleviation of poverty by tackling the illegal trade and illegal use of wild species. We will support delivery of this objective through:

- Targeting strategic gaps in the criminal justice response. Focus on tackling the Africa to Asia illicit trade corridor, leveraging UK's comparative advantage.
- Catalysing innovation and scalable solutions. Led by the flagship IWT Challenge Fund, supporting projects globally.
- Maintaining global momentum and capacity internationally on tackling the IWT. Collaboration
  with the ICCWC, Convention for International Trade in Endangered Species of Wildlife Fauna
  and Flora (CITES) and other partners to build capacity and sustain efforts internationally.

A key mechanism to deliver these policy and programme objectives is through the ICCWC programme. ICCWC complements broader work to tackle IWT, which largely focus on broader conservation and livelihood programmes, such as the Global Environment Facility's Global Wildlife Programme and the UK Biodiverse Landscapes Fund, and the IWT Challenge Fund which looks at innovation, local capacity and scaling lessons on what works.

The intended impact of the Vision programme 2030 programme is "a fit for purpose law enforcement and criminal justice system in place that effectively addresses wildlife crime". The Vision programme 2030 programme seeks to achieve its impact by accelerating the shift towards a high-risk low-reward environment for those taking part in the IWT, therefore reducing the incentives. The ICCWC Vision 2030 programme and its associated Strategic Action Plan for 2023-2026 will guide the Consortium's work in the decade to come, working towards a world free of wildlife crime.

The Vision programme was built on successes achieved and lessons learned through the implementation of the ICCWC Strategic Mission 2014-2016 and previous ICCWC Strategic Programme and taking into consideration inputs received from a broad range of stakeholders. A list of notable successes of the ICCWC Strategic Programme are included in Annex 1 which evidences how ICCWC are uniquely placed to provide further comprehensive coordinated support across various countries in

the 2030 Vision programme to achieve the programme's outcomes by replicating past successful activities and building on key learnings.

The ICCWC Vision 2030 is based on a Theory of Change (ToC) (Annex 2) to support wildlife authorities, police, customs and entire criminal justice systems, building capacity and further strengthening responses to wildlife crime. ICCWC recognises the importance of both proactive and reactive responses to combating wildlife crime, and consequently, the Theory of Change identifies five critical ICCWC outcomes:

- a) reduced opportunity for wildlife crime;
- b) increased deterrence of wildlife crime;
- c) increased detection of wildlife crime;
- d) increased disruption and detention of criminals; and
- e) evidence-based actions, knowledge exchange and collaboration, as a basis for the achievement of the first four outcomes and to drive ICCWC's impact.

Progress towards the programme outcomes will be monitored in future reports through a project logframe with measurable indicators that will be used to measure if the desired impact has been achieved. During the first year of the programme (2023), ICCWC and Defra held targeted discussions to identify measurable indicators that could be reported upon. These included:

- Number of countries with increased score using the ICCWC Indicator Framework.
- Number of countries that actively participate in ICCWC facilitated support to regional and global operations.
- Number of countries participating in transnational, regional and global initiatives to increase coordination and collaboration.
- Number of institutions implementing corruption risk-based measures to deter illegal wildlife trade.
- Number of countries with improved capacity to conduct specialized investigative techniques, including financial investigations.
- Percentage of female beneficiaries engaged in ICCWC activities.
- Number of target countries under CITES compliance processes supported.
- Number of countries with enhanced prosecutorial and judiciary processes.
- Number of criminal networks disrupted through ICCWC supported initiatives.
- Enhanced national and regional coordination with relevant stakeholders.
- Enhanced awareness of wildlife crime as a serious crime and increased political will to counter it.

#### **IWT and Poverty Reduction**

Wildlife crime not only drives many wild animal and plant species towards extinction, it also represents a significant barrier to achieving the UN Sustainable Development Goals. It exacerbates hunger and poverty, creates conflict and instability, poses a risk to the health of our communities and undermines the rule of law and good governance. Strategies and interventions to tackle the illegal wildlife trade, when done well, can also have wider benefits on poverty alleviation and sustainable development. Notably, poverty and lack of employment can enable wildlife crime to flourish. The promise of easy money lures in impoverished communities, which in turn thwart efforts to gain sustainable livelihoods (SDG1). Additionally, IWT can damage legal and sustainable wildlife trade, wildlife-based economies (e.g., tourism) and financial systems. By tackling IWT we can support legal jobs, tax revenue, fosters economic growth through sustainable enterprises, and diversifies affected communities' livelihoods. Targeting drivers of IWT can reduce public sector inefficiencies (SDG8).

ICCWC recognises that preventing or deterring wildlife crime from occurring is more beneficial to preserving biodiversity than apprehending criminals after the fact. To this end, ICCWC has identified the five critical outcomes, stated at points a to e above. The first defence against IWT is to reduce the need for wildlife crime, for example through sustainable development that alleviates poverty and strengthens local economies, or through demand reduction and behaviour change initiatives that remove the consumer demand for illicitly traded wildlife products. Whilst ICCWC activities to do directly

focus on poverty alleviation, ICCW's scope to reduce IWT will indirectly contribute to poverty alleviation by encouraging only the legal and sustainable trade in wildlife, lessening the impact on wildlife-based economies such as wildlife tourism, and support legal jobs and employment and tax revenue.

Whilst the evidence linking IWT to poverty is still emerging, Defra will work with ICCWC to continue to build, refine and assess emerging evidence throughout the programme lifecycle regarding the link between IWT and poverty, and incorporate this in to monitoring and evaluation practices where possible.

This Theory of Change has been reviewed by local ICCWC partner representatives to raise potential concerns that could result in areas of emerging risk to the programme or challenges to the original programme design of ToC.

## Describe where the programme is on/off track to contribute to the expected outcomes and impact. What action is planned in the year ahead?

As outlined in the programme business case, the first year of the programme was intentionally designed to be a planning and design phase, prior to the implementation of partner-led activities from year two onwards. First-year CITES Secretariat-led activities included:

- the confirmation of funding from co-donors
- the drafting and approval of the UK workplan and arranging agreements with ICCWC partners for the transfer of funds for their respective activities.

Ensuring the first year of the programme was dedicated to planning allowed time for slippage, should there be any delays in the approval of the UK workplan and/or confirmation of agreements with partners, as these could directly impact the implementation of partner activities in year two.

As mentioned above, an overall UK workplan for the implementation of the Strategic Action Plan was developed (Annex 4), based on the approaches identified in the ICCWC Vision 2030 and which identifies which ICCWC partner will deliver the activity and the expected activities to be conducted from the Strategic Action Plan 2023-2026.

In late May 2023 the draft workplan was submitted to Defra for review and approval, and throughout Q2 and Q3 Defra and the CITES Secretariat held various discussions to clarify some of the activities as well as to discuss specific questions related to the workplan and activities envisaged. In particular, it was agreed that specific activities will be targeted to priority countries and regions (UK funding in particular will target Nigeria and Viet Nam, among other priority countries currently being identified, with a focus on West and Central Africa where possible and noting the list of ODA-eligible countries provided). It was also noted that activities from year two onwards will be co-funded with other donors to ICCWC to maximise efficiency of delivery and value-for-money for the investment.

Agreements with INTERPOL, UNODC and WCO were initiated upon the approval of the workplan to transfer the funds for the respective activities each partner leads on as per the agreed UK workplan. The agreements include activities up to the end of year 3 as per the agreed workplan, and include funds received under the first disbursement (2023) as well as the expected funds disbursements of January 2024 and January 2025, respectively. This will enable the CITES Secretariat to mobilise the funds for upcoming years immediately upon receipt of such funds from Defra.

At the time of writing the agreements are being finalised and all funds for activities included in the workplan have been allocated. It is expected the agreement with UNODC will be signed in January/February 2024. Agreements with INTERPOL and WCO are expected to be finalised in Q1 2023 and will be disbursed as soon as the contribution for year two is received as funding has only been allocated to INTERPOL/WCO activities from year two onwards.

# Justify whether the programme should continue, based on its own merits and in the context of the wider portfolio.

Based on the above, Defra is content that the programme is on track to deliver the expected activities, outcomes and impact. The scoring of this review is reflective of administrative delays that were outside

of ICCWC's control, however there should be a strong future focus on activity delivery, programme reporting and finalising the programme logframe as per the above list of recommendations.

### C. DETAILED OUTCOME SCORING

As the programme does not yet have a formally agreed logframe or set of key performance indicators to report against, this section instead includes an overview of activities implemented since the programme's inception that have contributed to each outcome.

Outcome title	capa	city of mem	tunity for wildlife crime: ICCWC wiln ber states to reduce opportunities to confor crime is a proactive, crime prevent	commit wildlife crime. Reducing
Outcome number: 1		1	Outcome Score:	Α
Impact weighting (	%):	NA	Weighting revised since last AR?	NA

Indicator(s) / Activities	Milestone(s) for this review	Progress
Activity 1.1.1. Support improved governance by strengthening institutions mandated to regulate and combat wildlife crime risks (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 1.1.2. Strengthen capacity to identify illicit specimens and illegal wildlife consignments (CITES, INTERPOL and WCO)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2 (CITES and Interpol), Year 3 (WCO)
Activity 1.1.3. Promote and facilitate enhanced controls and interventions at crime hotspots and illegal markets (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 1.1.4. Facilitate the implementation of enhanced measures to prevent, reduce and mitigate corruption (CITES)	Planning – Year 1 Implementation – Year 2	Secretariat provided an update at SC77 on activities that have been supported as part of CoP19 Decision 19.79, which include trainings and events with partners. CITES Secretariat has received funding and activities to be initiated in Year 2 as planned.
Activity 1.2.1. Strengthen capacity to identify and prevent money laundering with respect to wildlife crimes (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 3
Activity 1.2.2. Strengthen capacity to trace, freeze and seize the proceeds of crime (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date - Y2

CITES Standing Committee (SC77) November 2023 - Year 1	ICCWC held two informative side events that highlighted efforts and successes of Parties to combat wildlife crime and included various updates on the work of ICCWC and support available through it.
N/A - Not started. Activity included in agreements with partners.	Target start date - Y2
	Committee (SC77) November 2023 - Year 1  N/A - Not started. Activity included in agreements with

### Briefly describe the output's activities and provide supporting narrative for the score.

The progress of activities listed under Outcome 1 have met expectations. The first year of the Vision programme covered an initial planning and mobilisation period and therefore, many of the activities listed have not yet commenced, however all have been listed in the UK workplan with clear target start dates and are included in agreements with partners. Where activities did have a target start date of Year 1, these activities have been implemented as planned and without challenge.

A summary of achievements and progress to date under Outcome 1:

### Activity 1.4.4. Facilitate the implementation of enhanced measures to prevent, reduce and mitigate corruption (CITES)

- The work envisaged under this activity is focused on measures to prevent and combat money laundering. Work led by UNODC on corruption has been funded through other sources.
- CoP19 Decision 19.79 requested the Secretariat to work with ICCWC partners, FATF, ECOFEL
  to provide Parties with guidance on measures to combat money laundering associated with
  wildlife crime and promote integration of financial crime investigations (see CoP19 Doc. 33 for
  details).
- At the 77<sup>th</sup> meeting of the CITES Standing Committee (Geneva, November 2023), the Secretariat provided an update on activities that have been supported in support of the Decision, including supporting various trainings and events and the work of partners in this regard. For full details, see <u>SC77 Doc. 39.1</u> on enforcement. The Decision is co-funded and additional funding was being sought to implement this decision.
- At the time of writing the Secretariat has received sufficient funding to initiate this work in Y2.
   Activities will be conducted in close collaboration with ICCWC and relevant partners. A further update will be provided in due course.

### Activity 1.3.1. Raise awareness of the seriousness of wildlife crime among national authorities, decision makers and other key stakeholders (CITES)

• The 77th meeting of the CITES Standing Committee (SC77, Geneva, November 2023) provided an opportunity for ICCWC to report on progress with the implementation of its work and activities and get feedback from the Committee to further help guide ICCWC support and interventions. In the margins of the meeting, ICCWC held two side events that highlighted efforts and successes of Parties to combat wildlife crime and included various updates on the work of ICCWC and support available through it. The topics covered included illegal trade data and evidenced-based interventions, along with enhanced responses to wildlife crime.

- Illegal trade data and evidence-based interventions: Illegal trade data and evidence-based interventions are fundamental tools in the fight against wildlife crime. On 7 November, the CITES Secretariat and the United Nations Office on Drugs and Crime (UNODC) presented the CITES Illegal Trade Database and launched the new database dissemination platform. The event also included a sneak peek into the preliminary findings of the 3rd edition of the World Wildlife Crime report (2024).
- Enhanced responses to combat wildlife crime: During a second side event on November 8, the
  Consortium highlighted existing and available ICCWC responses and support, to support efforts
  of Partis to combat wildlife crime. Contributions from INTERPOL, UNODC and CITES
  highlighted specific responses and targeted operational support at a global, regional and
  national level, the importance of mobilizing wildlife forensics to combat wildlife crime and
  ongoing ICCWC support to West and Central Africa.
- A targeted social media campaign was developed for the event.

Outcome title	towar comn so. IC	ds effectiv nit wildlife o CCWC part	rence of wildlife crime: ICCWC will be sanctions that deter criminals, so crime. Actors willing to commit a criminers will work with member states to ustice system.	that actors are less willing to e must be deterred from doing
Outcome number	r: 2 Outcome Score: A			
Impact weighting	g (%): NA Weighting revised since last AR? NA			

Indicator(s) / Activities	Milestone(s) for this review	Progress
Activity 2.1.1. Strengthen capacity in maintaining the chain of custody to secure admissibility of cases to court (INTEROL, UNODC)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 2.1.2. Strengthen capacity in case file preparation and presentation (WCO)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 2.2.2. Strengthen capacity to prosecute wildlife crime including the use of a combination of applicable national legislation and criminal law (UNODC)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 2.2.3. Facilitate cooperation in investigations and prosecutions (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 2.3.1. Sensitize the judiciary on the importance of combating wildlife crime and encourage sanctions appropriate to the nature and gravity of the crime (UNODC)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 2.3.2. Strengthen judicial capacity to speedily administer justice, including increased digitization (UNODC)	N/A - Not started. Activity included in agreements with partners.	Target start date - Y2

Activity 2.3.3. Support and strengthen judicial cooperation on wildlife and forest crime, including efforts to combat corruption (UNODC)	N/A - Not started. Activity included in agreements with partners.	Target start date - Y2

The progress of activities listed under Outcome 2 have met expectations. The first year of the Vision programme covered an initial planning and mobilisation period and therefore, the activities listed in Outcome 2 have not yet commenced, however all have been listed in the UK workplan with clear target start dates and are included in agreements with partners. There is no evidence suggesting that there are any areas of emerging risk or challenge that could impact the implementation of the above activities.

Outcome title	Increased detection of wildlife crime: ICCWC will build capacity of member states towards effective detection of wildlife crime. If an offender remains undeterred, then wildlife crime must be detected for law enforcement to react appropriately.						
Outcome number	:	3	Outcome Score:		Α		
Impact weighting	(%):	NA	Weighting revised	since last AR?	NA		
Indicator(s) / Act	tivities			Milestone(s) fo	or	Progress	
implementation of profiling practices  Activity 3.1.2. Ini	Activity 3.1.1. Support development and implementation of good risk management and profiling practices (CITES, INTERPOL, WCO)		Year 1 (CITES planning) Year 2 (CITES implementation / Interpol / WCO)		Across 2022-2023, several activities were implemented to support the outcomes of the Timber Task Force and provide training on physical inspection of timber shipments in regions significantly affected by illegal trade in CITES-listed tree species. This does not include activities from Interpol and WCO as these have not started. These activities are included in agreements with partners.  Target start date — Year 2 (Interpol)		
Activity 3.1.2. Initiate and continue targeted interregional, regional and global law enforcement operations and provide post-seizure investigative support (INTERPOL, WCO)				Activity included agreements wit partners.		Year 2 (Interpol), Year 3 (WCO)	
Activity 3.1.3. Strengthen capacity in information and intelligence analysis and intelligence exchang between relevant authorities across the illegal trad chain (INTERPOL, UNODC, WCO)			gence exchange s the illegal trade	N/A - Not starte Activity included agreements wit partners.	d in	Target start date – Year 2 (Interpol / UNODC), Year 4 (WCO)	

		WCO activities in Y4 are subject to additional funds and are not included in the present agreement.
Activity 3.2.1. Strengthen capacity in crime scene management (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 3.2.2. Promote and support the use of DNA and digital forensic technology to combat wildlife crime (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 3
Activity 3.2.3. Strengthen capacity in the use of interception techniques and specialized investigation techniques (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 3
Activity 3.2.4. Strengthen capacity to detect and investigate wildlife crime linked to the Internet (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date - Y2

The progress of activities listed under Outcome 3 have met expectations. The first year of the Vision programme covered an initial planning and mobilisation period and therefore, some activities listed under Outcome 3 have not yet commenced, however all have been listed in the UK workplan with clear target start dates and are included in agreements with partners.

A summary of achievements and progress to date under the Outcome 3:

# Activity 3.1.1 Support development and implementation of good risk management and profiling practices (CITES, INTERPOL, WCO)

- Across 2022-2023, several activities were implemented to support the outcomes of the Timber Task Force and provide training on physical inspection of timber shipments in regions significantly affected by illegal trade in CITES-listed tree species. This included targeted training and included synergies with ongoing support being provided to West and Central Africa and was funded through existing projects from the ICCWC Strategic Programme.
- In December 2023 the second phase of this work concluded, and at the time of writing the Secretariat is working with ICCWC partners to develop and initiate a third phase, which will be build based on lessons learned, additional needs identified, and support the implementation of CoP19 Decision 19.90 para b). It is expected the activity will be implemented in 2024.
- It should be noted however that the above does not include activities from INTERPOL and WCO as these have not started. These activities have been included in agreements with partners.

Outcome title	ICCV	Increased disruption and detention of criminals.  ICCWC will build capacity of member states to effectively disrupt criminal activities and to facilitate the detention of criminals, where appropriate.				
Outcome number: 4		4	Outcome Score:	Α		
Impact weighting (%): NA		NA	Weighting revised since last AR?	NA		

Indicator(s) / Activities	Milestone(s) for this review	Progress
Activity 4.1.1. Strengthen capacity for global, subregional and cross-border enforcement cooperation (CITES, INTERPOL, UNODC, WCO)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2 (CITES / Interpol / UNODC) Year 4 (WCO)
Activity 4.1.2. Strengthen capacity to investigate and address money laundering and illicit financial flows (INTERPOL)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2

The progress of activities listed under Outcome 4 have met expectations. The first year of the Vision programme covered an initial planning and mobilisation period and therefore, the activities listed in Outcome 4 have not yet commenced, however all have been listed in the UK workplan with clear target start dates and are included in agreements with partners.

Outcome title	Evide	nce-based	actions, knowledge exchange, and	collaboration drive impact.
Outcome number:		5	Outcome Score:	Α
Impact weighting (%	<b>%</b> ):	NA	Weighting revised since last AR?	NA

Indicator(s) / Activities	Milestone(s) for this review	Progress
Activity 5.1.1. Promote and support analysis, measurement, and monitoring of national responses to wildlife crime through implementation of the ICCWC Toolkit and Indicator Framework (UNODC)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 5.1.3. Promote and conduct research and analysis on wildlife crime and crime trends (CITES, WCO)	Year 1 (CITES) Year 3 (WCO)	The funding has been allocated towards the extension of hosting and maintenance of the CITES Illegal Trade Database for the storage, management and

		dissemination of illegal trade date collected through annual reports, cofunded with other sources as well as for support with online workshops in regions with low submission rate of annual illegal trade reports. An agreement was signed with UNODC in September 2023 to conduct this work and the project is ongoing (expected duration 2 years).
Activity 5.1.4. Implement Decisions and Resolutions adopted by the CITES Conference of the Parties and governing bodies of ICCWC partners (CITES)	N/A - Not started. Activity included in agreements with partners.	Target start date – Year 2
Activity 5.2.2. Strengthen national, regional and international collaboration among law enforcement agencies and support the operationalization of regional and sub-regional enforcement networks (CITES, UNODC, WCO)	Year 1-2 (CITES) Year 2 (UNODC/WCO)	Planning underway to convene the 2 <sup>nd</sup> CITES Rhino Task Force. Discussions with UNODC regarding implementation of Decision 18.294 (CoP 19).
Activity 5.3.1. ICCWC programme implementation and coordination (CITES, INTERPOL, UNODC, WCO)	Year 1 (CITES/ UNODC) Year 2 (INTERPOL/WCO)	Resourcing of positions are ongoing, and it is expected the CITES support officer will be onboarded in Q1 or Q2 2024 at the latest.
Activity 5.3.2. Implement the ICCWC communications and visibility strategy (CITES)	Year 1	Funds allocated for Y1 were used to cofund the position of the ICCWC communications officer and to extend this position from December 2023 to October 2024.
Activity 5.3.3. Monitor and evaluate ICCWC's impact (CITES)	Mid-term evaluation at the end of Year 2 planned (to be conducted Q1-3 2025).	N/A

The progress of activities listed under Outcome 5 have met expectations. The first year of the Vision programme covered an initial planning and mobilisation period and therefore, some activities listed under Outcome 5 have not yet commenced, however all have been listed in the UK workplan with clear target start dates and are included in agreements with partners.

Below is a summary of achievements and progress to date under the Outcome 5:

### Activity 5.1.3 Promote and conduct research and analysis on wildlife crime and crime trends (CITES, WCO)

- UK funding has been allocated towards the extension of hosting and maintenance of the CITES
  Illegal Trade Database for the storage, management and dissemination of illegal trade date
  collected through annual reports, co-funded with other sources as well as for support with online
  workshops in regions with low submission rate of annual illegal trade reports. The activity
  supports the implementation of Decision 19.80 paragraphs a) and b).
- An agreement was signed with UNODC in September 2023 to conduct this work and the project
  is ongoing (expected duration 2 years). The Secretariat will provide a full report in due course.
  It is expected that this activity will significantly contribute to an increase in reports received, as
  well as the quality of the data in the reports received.
- In addition, the Secretariat and UNODC supported throughout 2023 several online meetings to
  update Parties on the CITES illegal trade database. This included, amongst other a Thematic
  Workshop hosted by the Amazon Cooperation Treaty Organization on the Management of
  Information on Illegal Wildlife Trafficking in the Amazon Region for 8 Parties in the region in
  October 2023 and various other online meetings and training events.
- A platform for Parties to use the database was launched at SC77 (November 2023). The CITES
  Illegal Trade Database dissemination platform is now available for use by Parties and enables
  direct access to data recorded in the CITES Illegal Trade Database for which the reporting
  Party indicated that it should be made available to Parties for research and analysis of wildlife
  and forest crime as it affects them, and to the members of ICCWC for ICCWC global research
  and analysis studies on wildlife and forest crime. See Notification 124/2023 for further details.
- Note: the update does not include activities from WCO as these have not started. The activity
  was included in the agreements with WCO.

# Activity 5.2.2 Strengthen national, regional and international collaboration among law enforcement agencies and support the operationalization of regional and sub-regional enforcement networks (CITES, UNODC, WCO)

- At the time of writing plans are underway to convene the 2nd CITES Rhino Enforcement Task Force, in cooperation with ICCWC to further strengthen responses to address rhino poaching and trafficking. At SC77 the Secretariat noted sufficient funding is now available to organize the Task Force, thanks to co-funding from a broad range of donors. The Task Force will be convened in accordance with Decision 19.120 paragraph a). The Secretariat initiated discussions with potential host countries at SC77 and it is expected the Task Force will be held in Q3 2024.
- The Secretariat is also in discussions with UNODC regarding the implementation of Decision 18.294 (Rev. CoP19) on totoaba, including support, in cooperation with ICCWC partners, activities outlined in the online Meeting of Range, Transit and Consumer States of Totoaba agreed outcomes document and study on vaquita and totoaba. The work envisaged includes a WIRE to support range, transit and destination countries of totoaba to implement the measures of the outcome document and identify priority activities and actions. The activity is expected to take place in 2024.
- Note: the updated does not include activities from UNODC as these have not started. The
  activity included in agreements with partners.

### Activity 5.3.1 ICCWC programme implementation and coordination (CITES, INTERPOL, UNODC, WCO)

- Funding for the Secretariat co-funds the positions of the ICCWC Coordinator and ICCWC Support Officer at the CITES Secretariat. This enabled CITES to extend the position of the ICCWC coordinator, and to proceed to advertise the position of ICCWC Support Officer (vacant since December 2022). The position was advertised and the job posting closed on 8 December 2023. At the time of writing, evaluations for the positions are ongoing and it is expected the support officer will be onboarded in Q1 or Q2 2024 at the latest.
- To note is that funding for the ICCWC coordinator was secured though other projects for up to March 2024. From March 2024 onwards this position will be co-funded by the present project.
- Note: the updated does not include activities from partners as these have not started. The
  activity has been included in agreements with partners.

### Activity 5.3.2 Implement the ICCWC communications and visibility strategy (CITES)

- This work supports the implementation of the ICCWC communications and visibility strategy.
  The funds allocated for Y1 were used to co-fund the position of the ICCWC communications
  officer and to extend this position from December 2023 to October 2024. Activities in 2023 were
  largely funded through other sources.
- Activities envisaged in 2024 include the evaluation of the existing ICCWC communications and visibility strategy, the development of a new strategy for 2024-2026, the ICCWC annual report for 2023, the update of the ICCWC website, and the development of a range of success stories as well as updates on key ICCWC tools and services, including the revision of the ICCWC menu of services (ongoing). ICCWC partners and donors to the ICCWC Strategic Action Plan (including DEFRA) will be contacted in Q1 2024 to participate in partner interviews that will contribute towards the development of the new strategy. Additional activities will be identified based on the new strategy.

# Assess the VfM of the outcomes compared to the proposition in the Business Case, based on performance over the past year.

There have been no notable changes in the cost of activities to deliver the programme and ICCWC remain confident that the activities can be delivered within the agreed budget (see Annex 4 for the UK workplan with allocated funding against each activity).

Describe any changes to the outcomes during the past year, and any planned changes as a result of this review.

There have been no notable changes to the outcomes since the inception of the programme in February 2023. Despite a short delay in the approval of the UK workplan, ICCWC has not advised of any subsequential delays to the finalisation of agreements with partners or the implementation of activities because of this.

Progress on recommendations from the previous AR (if completed), lessons learned this year and recommendations for the year ahead.

### D: RISK

### Overview of risk management

Since the programme's inception in February 2023, no residual risks have materialised and the programme has been able to deliver year 1 activities outlined in the workplan as planned without any amendments to residual risk exposure. We expect additional risks to be added to the risk register once core activities have been implemented and plan to utilise the strong relationship with the CITES Secretariat and their connections with the SEG and TEG to consistently review and mitigate any operational risks where necessary.

Where appropriate, risks have been mitigated from the outset using effective administrative planning to reduce the likelihood of impacts on operational delivery and activity timelines. Risk 2 in the risk register (Annex 5) is regarding the possibility of delay with internal arrangements between partners and subsequential insufficient coordination of activities between ICCWC members. Partner activities were therefore scheduled to begin from year two onwards. This granted the programme sufficient time to ensure that agreements were finalised during year 1 of the programme and account for any potential slippage, prior to planned activity implementation in year 2. Many of the key programme risks are in relation to activities (e.g. Risks 4,5,7), which have not yet mobilised and therefore have not materialised.

To date, the CITES Secretariat has provided Defra with the opportunity to engage with ICCWC consortium members on a frequent basis through priority country meetings which has allowed Defra to remain aware of any emerging areas of risk and pool intelligence on country needs, plans and gaps. These calls have assisted Defra in gaining an understanding of current partner activities, and open opportunities for influence and contribute to aligning efforts. It is expected that the CITES Secretariat will arrange donor coordination calls for similar purposes once all funding has been confirmed in Q1-Q3 2024.

The programme has clearly considered lessons learned from previous projects and experiences to build robust mitigating actions where necessary (Risk 8). Acknowledging the impact of the COVID-19 pandemic and related restrictions delaying the implementation of activities of the previous ICCWC Strategic Programme, mitigation measures have been implemented to ensure that the programme can deliver hybrid or virtual work where necessary, however with acknowledgement that this approach may reduce the overall impact of activities.

The programme acknowledges and supports the requirement for a zero tolerance for inaction approach to safeguarding against sexual exploitation and abuse and harassment (SEAH) and has a sufficient risk management strategy, including mitigating measures, in place to monitor and report any instances related to SEAH or safeguarding to Defra in accordance with the voluntary contribution terms of reference and guidance in the programme business case. Additionally, several measures have been established by ICCWC partners that deal routinely with sensitive information, and safeguards are in place in accordance with the internal rules and regulations of the different organisations in this regard. To date, there have been no reported occurrences of SEA, SA or safeguarding instances by ICCWC or any partner organisations, and Defra and the CITES Secretariat will continue to monitor this risk closely.

Prior to the programme's implementation, a due diligence assessment was carried out on the CITES Secretariat which confirmed that there are existing United Nations-led procedures and processes in place that mitigate against fraud and risk, including the procurement policy and the division of duties by the Senior Experts Group (SEG) and Technical Experts Group (TEG). In addition, the CITES Secretariat complies with the applicable UN regulations and rules, its internal policies and as needed with the United Nations Office of Internal Oversight Services (OIOS) to report fraud and corruption and ensure that the necessary actions are taken. The CITES Secretariat is responsible for ensuring that each ICCWC delivery partner has sufficient policies which are then applied to any downstream delivery partners.

The CITES Secretariat is responsible for the ownership and maintenance of an ICCWC risk register (Annex 5), which is reviewed frequently with partner organisations. Defra and the CITES Secretariat meet on a consistent and frequent basis to share programme updates and draw attention to any factors that may result in changes to risk impact or likelihood, and review any emerging areas of risk, ensuring that they are clearly communicated, and mitigating actions or contingency plans are implemented at the earliest opportunity to reduce overall risk impact.

# E: PROGRAMME MANAGEMENT: DELIVERY, COMMERCIAL & FINANCIAL PERFORMANCE

#### **Delivery**

The programme has experienced no implementation challenges during the reporting period. As the Vision programme is largely at its inception phase, only a limited number of (CITES Secretariat-led) activities could be initiated while the agreements with partners are being finalised, as noted above. Defra and the CITES Secretariat will continue to monitor potential risks or challenges to delivery as partner-led activities are mobilised in Year 2.

### **Gender Equality and Social Inclusion (GESI)**

The 2030 Vision programme is fully compliant with the International Development (Gender Equality) Act 2014. Although the programme GESI results are indirect as the focus will be on combating wildlife crime, the theory of change has been designed for the work conducted to contribute towards gender equality as it is recognised that there are many elements that are intrinsically linked. In the business case, ICCWC has committed to taking a gender-sensitive and inclusive approach and will strive to:

- Provide equitable access to project resources and opportunities to men and women, both individually and in groups.
- Take measures to ensure women and men's equitable access to and full participation in power structures and decision-making in the project. Contribute to the goal of gender equality in staffing.
- Include gender and disability access assessments as part of the situation analysis for activities, where appropriate.
- Generate and disseminate gender-disaggregated data through monitoring and evaluation in the process of the implementation of its logframe and related targets.
- Define the implementation and monitoring requirements concerning gender and access for people with disabilities in agreements with any potential partner organisations.

ICCWC have their own success indicator which will show the percentage of female beneficiaries engaged in ICCWC activities. During the development of the programme logframe, Defra and ICCWC agreed that where individuals are measured, data will be disaggregated by gender for the purposes of monitoring and evaluation. The Defra PRO is to develop a GESI Action Plan to achieve the defined programme level ambition (GESI Sensitive) before December 2025. A detailed gender and social analysis will also be conducted by the Defra PRO prior to the next annual reporting period to satisfy ODA reporting requirements.

### Commercial

ICCWC has a multi-tiered governance structure to demonstrate strong decision-making processes, allowing for adaptive management and providing accountability to wider audiences, particularly donors. ICCWC achieves this through regular meetings of the SEG and TEG. Each of the five partner organisations are represented in the SEG and the TEG and both groups are chaired by the Secretariat. The SEG provides strategic oversight and executive decision making while the TEG coordinates ICCWC's activities and makes day-to-day decisions. Monthly meetings with the SEG and TEG have proceeded as planned and have a recurring agenda, which includes a risk register review.

As already mentioned, the programme workplan which includes key milestones, activities and targets was drafted and approved by September 2023 and this will form the basis of management, reporting and MEL for the project. The implementation of future activities will be monitored through monthly TEG calls and quarterly SEG meetings to monitor overall progress and identify any gaps or additional needs. Progress will be reported upon in the yearly narrative reports as outlined in the business case, which will be complemented by relevant ICCWC 'Activity reports' that are submitted by partners when activities are completed for reporting purposes and for monitoring progress.

#### **Financial Performance**

The voluntary contribution from Defra towards the implementation of the ICCWC Vision 2030 and its associated Strategic Action Plan 2023-2026 is of up to 5 million GBP and forms part of a multi-donor fund, which demonstrates cost-effectiveness. The CITES Secretariat manages and coordinates the implementation of funds from the UK for ICCWC, and activities are delivered by a lead agency, in close coordination with relevant partners. Activities in year 1 (2023) are largely funded by the UK. It is expected activities from year 2 (2024) onwards will be largely co-funded by other contributions from additional donors to ICCWC, including the European Union and Monaco. The contribution supports the implementation of Decision 19.27 adopted at CoP19 (Panama, November 2022).

The initial contribution of 1 million GBP was received on 27 February 2023 in the amount of 1,190,777.52 USD. An additional contribution of 1.8 million GBP is expected on the review and assessment of the programme's annual report, in Q1 2024. This review uses considered evidence from the programme's first annual report. A further contribution of 1.2 million GBP is expected in January 2025.

A conservative exchange rate has been applied for the total of 4 million GBP currently pledged, amounting to approximately 4.7 million USD. Excess funds due to positive exchange rate from future contributions will be allocated to pre-approved activities or to additional activities identified by ICCWC, in close consultation with DEFRA. Funding has been fully allocated for year 1 - year 3 (with year 4 to be confirmed and subject to additional contributions) to enable future funds to be disbursed as soon as possible upon receipt.

The activities conducted as part of this project from year 2 onwards will be complemented by additional activities conducted by ICCWC partners with funding from other donors as noted above.

The table below includes overall UK funding received for all activities and details on funds allocation to date.

Work element	Funding from Defra (received, in USD)	Amount spent (to date)	Amount committed	Amount remaining	Amount committed Y2	Amount Committed Y3
TOTAL ACTIVITIES		N/A	967,000		2,063,000	1,488,000
PSC 13%	1,190,777.5 2 USD	N/A	125,710		268,190	193,440
GRAND TOTAL*		N/A	1,092,710		2,331,190	1,681,440
I	Excess funds/ro	emaining an	98,067			

The evidence available for this programme does not directly align with the value for money definition of efficiency and therefore clear efficiency metrics could not be developed at the time of writing the business case. However, efficiencies of scale were expected as a result of ICCWC's existing relationships and synergies from close collaboration with five intergovernmental organisations, national agencies combining technical expertise, operational support, best practice training, evidence-based interventions, and global convening power to develop law enforcement and criminal justice capacity within member countries. Additionally, the ICCWC 2016-2020 Strategic Programme workstreams and projects achieved a range of both quantitative and qualitative benefits. It should be noted that several lessons learned from the implementation of the ICCWC Strategic Programme have been implemented, with positive results thus far.

There has been clear progress with CITES Secretariat-led work activities as expected in the programme workplan, with no evidence of challenges or emerging risks. As previously discussed, there is evidence that the programme provides a unique opportunity for the UK to engage with ICCWC partners and help the global community make a significant step forward in enhancing governance arrangements to tackle IWT. Defra expects to continue to utilise its strong relationship with the CITES Secretariat to monitor the mobilisation of activities in year 2 and identify opportunities for engagement with consortium members and other donors throughout the programme lifecycle.

Date of last narrative	NA	Date of last audited	NA
financial report		annual statement	

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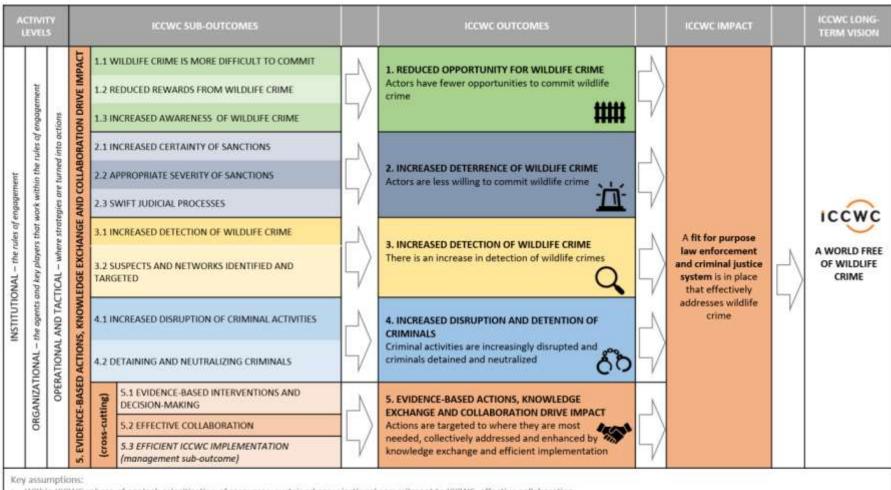
### Annex 1 – Successes of the ICCWC Strategic Programme

Throughout the 2016-2020 Programme, ICCWC conducted activities in 129 member countries, achieving significant success throughout. The successes listed below are not exhaustive and do not capture all the achievements of ICCWC, but rather help to articulate the diversity of activities conducted under the auspices of the Consortium. The major achievements included:

- 1. Supporting and initiating the THUNDER law enforcement operations, during which approximately 7,284 seizures were made including over 2,000 tonnes of wood and timber, over 5.6 tonnes of ivory, more than 13 tonnes of pangolin scales, approximately 38,000 live reptiles and 14,650 live birds, 17.6 tonnes of plants and more than 74 tonnes of marine wildlife. More significantly, these operations resulted in the identification of more than 2,300 suspects and the arrest of more than 1,300 offenders.
- 2. Building regional and inter-regional cooperation such as through Regional Investigative and Analytical Case meetings (RIACM) designed to support investigations and operational analytical work and Wildlife Inter Regional Enforcement (WIRE) meetings offering a specialised platform to convene officials of the same profession e.g., Customs, to build bridges among like-minded professionals from different countries.
- 3. Implementing the ICCWC Toolkit and the ICCWC Indicator Framework, based on country requests. ICCWC engaged 33 countries using the Toolkit or Indicator Framework, with 12 countries, including the UK, having completed Toolkit implementation, providing recommendations on priority measures and activities to implement in order to combat wildlife crime.
- 4. Conducting National Risk Assessments for Cameroon, Cote d'Ivoire, Madagascar, Mozambique, Namibia, Zambia, and Zimbabwe, providing valuable information related to environmental crime prioritisation and needs.
- 5. In the period 2018-2020, ICCWC conducted more than 60 trainings for over 2,500 participants to enhance the skills of wildlife crime investigators, enforcement officers, prosecutors, and judicial authorities. This included training in wildlife forensic science, anti-corruption measures, anti-money laundering investigations and the use of specialised investigation techniques.
- 6. Supporting member countries to develop and adopt appropriate legislation to combat wildlife crime and effectively prosecute criminals, such as in Gabon and Viet Nam.
- 7. Supporting the implementation of anti-corruption measures and strategies in several countries including Bolivia, Botswana, Malawi, and Mozambique.
- 8. Implementing mentorship programmes, seconding international mentors to support the development of national capabilities, such as in Gabon and Tanzania.
- 9. Deploying Wildlife Incident Support Teams where requested, in support of ongoing investigations, for example, to Viet Nam in 2019, in response to large-scale ivory and pangolin seizures.
- 10. Developing ICCWC's Menu of Services to provide easy guidance for beneficiaries on an indicative list of the training courses, tools, and services available through ICCWC to develop the requisite capabilities.
- 11. Providing several best practice tools, including the Toolkit, Indicator Framework, Guidelines on methods and procedures for ivory sampling and laboratory analysis, a Best Practice Guide for Forensic Timber Identification, and several national-level Rapid Reference Manuals.
- 12. Playing an important role in information management and analysis support at a national level. Maintained secure databases and communication systems to enable sharing of information between relevant law enforcement agencies.
- 13. Contributing to important global research reports such as the 2018 and 2020 World Wildlife Crime Report, and the threat assessment of wildlife crime in West and Central Africa.
- 14. Increasing awareness of the scale and seriousness of wildlife crime through high-level events showcasing ICCWC's tools and resources, technical documents, various task forces and other activities.

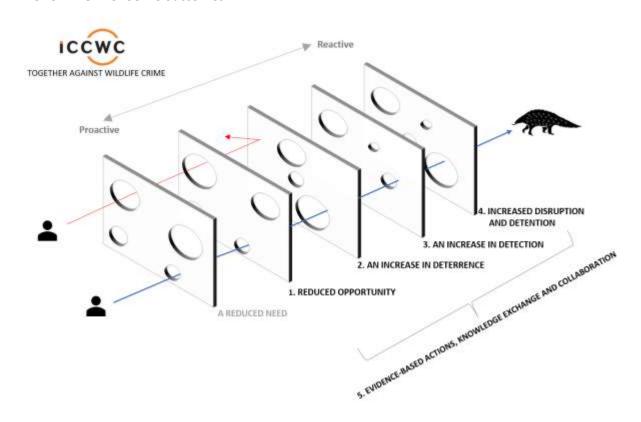
Further information is included in the 2020 annual report and 2021-2022 biannual report.

### Annex 2 - Theory of Change



- Within ICCWC sphere of control: prioritization of resources; sustained organizational commitment to ICCWC; effective collaboration.
- Within ICCWC sphere of influence: competent partner agencies; sufficient and sustained funding; political will (national strategies, policy, support from current administration).
- Outside the ICCWC sphere of influence; social acceptance; wildlife crime market forces.

### Annex 3 - The five ICCWC outcomes



Ranging from proactive to reactive defences. The first layer of defence with greyed-out text indicates areas that fall outside of the core scope of ICCWC.

### Annex 4 – UK Workplan

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
1.1.1. Support improved governance by strengthening institutions mandated to regulate and combat wildlife crime risks	INTERPOL	RB/ NCB Environmental Desks Coordination meetings and scoping missions; and National Environmental Security Seminars; training on I24/7 and use of policing capabilities in two priority countries  Possible development of ICCWC standard enforcement course on info exchange and international cooperation (CITES, INTERPOL and WCO) and cooperation with police schools and academies to include this into curricula	60,000 + Co- funding	0	20,000	20,000	20,000
1.1.2. Strengthen capacity to identify illicit specimens and illegal wildlife consignments	CITES	19.203 c) Training on pangolin identification 19.203 d) support efforts of Parties to combat illegal trade in pangolins, in cooperation with ICCWC partners (exact activity TBC)	60,000 + Co- funding	0	60,000	0	0
	INTERPOL	Training on port/airport control and concealment methods in priority countries  Training in additional identified target countries	100,000 + Co- funding	0	50,000	50,000	0
	WCO	Training on enforcement of CITES provision and the role of Customs in detection, interception and dealing with the illegal wildlife crime cases on a national level. Increase of the customs knowledge for effective detection of shipments that contains illegal wildlife specimens (any form) by utilizing the risk assessments principle based on past case analysis and seizure data stored in the WCO Customs Enforcement Network (WCO CEN)	50,000 + Co- funding	0	0	50,000	0

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
1.1.3 Promote and facilitate enhanced controls and interventions at crime hotspots and illegal markets	INTERPOL	INTERPOL/WCO – Hot-spot targeted operations in selected countries	60,000 + Co- funding	0	30,000	30,000	0
1.1.4. Facilitate the implementation of enhanced measures to prevent, reduce and mitigate corruption	CITES	Work with ICCWC partners, FATF, ECOFEL to provide Parties with guidance on measures to combat money laundering associated with wildlife crime and promote integration of financial crime investigations (Decision 19.79, CoP19 Doc. 33) – work to be conducted in close consultation with ICCWC partners	100,000 + Co- funding	100,000	0	0	0
1.2.1 Strengthen capacity to identify and prevent money laundering with respect to wildlife crimes	INTERPOL	Training courses on financial investigation of wildlife crime with involvement of IFCCAC and in-field mentorship in 2 countries per year and participation of selected countries, involved in specific cases	120,000 + Co- funding	0	0	80,000	40,000
1.2.2 Strengthen capacity to trace, freeze and seize the proceeds of crime	INTERPOL	Facilitate involvement of FIUs into wildlife crime investigations through relevant trainings; promotion of guiding tools in 3 priority countries per year and selected countries; development of the guide with practical case studies in the first 2 years	30,000 + Co- funding	0	10,000	10,000	10,000
1.3.1. Raise awareness of the seriousness of wildlife crime among national authorities, decision makers and other key stakeholders	CITES	Side events at SC77 (2023), SC78 (2024) and CoP20 (2025) - possibly also at SC81 (2026) subject to remaining funds	20,000 + Co- funding	10,000	10,000	0	0
1.3.2 Increase awareness across the criminal justice system on the need to enhance national and international collaboration across	INTERPOL	Training on INTERPOL Notices and Diffusion in 3 target countries	30,000	0	10,000	10,000	10,000

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
source, transit, and destination countries			+ Co- funding				
2.1.1 Strengthen capacity in maintaining the chain of custody to secure admissibility of cases to court	INTERPOL	Training LEAs on crime scene management and digital forensic, including twinning programs with advanced labs and mentorship with INTERPOL DFL for priority countries and "champion" countries	90,000 + Co- funding	0	30,000	30,000	30,000
	UNODC	Mentorship and training support, including training in the chronological and careful documentation of evidence to establish its connection to an alleged crime; training in crime scene investigation, including on evidence collection, storage and transfer; training in the use of digital forensics to address wildlife crime	300,000 + Co- funding	0	150,000	100,000	50,000
	WCO	Training on the WCO Customs and Operational Practices for Enforcement and Seizures. Case preparation and development for further steps under the criminal justice system chain	40,000 + Co- funding	0	40,000	0	0
2.2.2 Strengthen capacity to prosecute wildlife crime including the use of a combination of applicable national legislation and criminal law	UNODC	Development of a Rapid Reference Guide for Investigators and Prosecutors on the relevant laws together with sample charges, including restraint and confiscation, for use by authorities in identified target countries; training for criminal justice system actors on illicit wildlife trafficking and on the application of the Rapid Reference Guide; training for law enforcement agencies to apply and mobilize a combination of applicable national legislation and criminal law to prosecute wildlife crime (e.g. racketeering, organized crime, illegal possession of firearms and ammunition, trespassing)	150,000 + Co- funding	0	50,000	50,000	50,000

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
2.2.3 Facilitate cooperation in investigations and prosecutions	INTERPOL	RIACMs, ISTs and deployment missions to investigate cases requiring regional cooperation, including with participation of judicial authorities	90,000 + Co- funding	0	30,000	30,000	30,000
2.3.1 Sensitize the judiciary on the importance of combating wildlife crime and encourage sanctions appropriate to the nature and gravity of the crime	UNODC	Sensitization of judges on illicit wildlife trafficking; awareness raising of the judiciary on the illicit trafficking in wildlife as serious transnational organized crime (covering LAC, Africa, Asia – co-funding for 1-2 meetings)	30,000 + Co- funding	0	30,000	0	0
2.3.2 Strengthen judicial capacity to speedily administer justice, including increased digitization	UNODC	Support digitization of the key courts, including setting up infrastructure, equipment, and developing/updating existing databases; development of Case Digests to support the judiciary and other criminal justice practitioners on the evidential issues typical to wildlife trafficking cases and equip them with possible creative solutions and case practices that can be referenced; enhance the capacity of judicial clerks supporting substantive case file review(s); development of guidelines or practice directions on disposal of cases; development of a practice direction that codifies discounts on sentencing when a guilty plea is offered	50,000 + Co- funding	0	50,000	0	0
2.3.3 Support and strengthen judicial cooperation on wildlife and forest crime, including efforts to combat corruption	UNODC	Conduct annual regional seminars for judges and prosecutors to build networks of like-minded practitioners to increase cooperation among countries exposed to the threats of wildlife trafficking, with seminars to focus among other on requests of mutual legal assistance (MLA), enhancing the capacity to investigate transnational criminal networks and the efficiency in the exchange of evidence and information	50,000 + Co- funding	0	50,000	0	0

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
3.1.1 Support development and implementation of good risk management and profiling practices	CITES	Implement outcomes of the Timber Task Force and in particular provide training on physical inspection of timber shipments in regions significantly affected by illegal trade in CITES-listed tree species – to be done in cooperation with UNODC/WCO CCP (Decision 19.90 para b, CoP19 Doc 35)	50,000 + Co- funding	50,000	0	0	0
	INTERPOL	Training on profiling of suspects for 3 priority countries and development and promotion of an e-learning module	180,000 + Co- funding	0	60,000	60,000	60,000
	WCO	Training in priority countries on Customs risk assessment utilization and interception of shipments/consignments based on the risk indicators and wildlife trade profiles. Training for the Customs officers in seaports, land boundaries and airport border crossing points	30,000 + Co- funding	0	30,000	0	0
3.1.2 Initiate and continue targeted inter-regional, regional and global law enforcement operations and provide post-	INTERPOL	Continue Global Operations series Thunder and conduct regional operations with specific targets. Co-funding for Thunder 2024, 2025 (and 2026)	70,000 + Co- funding	0	25,000	25,000	20,000
seizure investigative support	WCO	Operational activities related to outcomes of the Global Thunder Operations. Enhancing administration efficiency in preparing better objectives for the Operation and further strengthening cooperation with other law enforcement agencies, wildlife-related national agencies and enhancing synergies with the private sector. Activities TBC, related to follow up from Thunder 2023/2024 and previous activities	60,000 + Co- funding	0	0	60,000	0
3.1.3 Strengthen capacity in information and intelligence analysis and intelligence	INTERPOL	Development of analytical network and conducting of basic and advanced courses for 2 priority countries	120,000	0	40,000	40,000	40,000

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
exchange between relevant authorities across the illegal trade chain			+ Co- funding				
Citalii	UNODC	mentorship support to active inter-regional investigations, co-shared with the budget line supporting WIRE and bilateral meetings	80,000 + Co- funding	0	80,000	0	0
	WCO	Strengthening capacities of Customs administrations in data collection, information extraction from WCO tools and open sources that can be used for better tailor-made IWT-related risk indicators. That will consequently lead to more seizures, and more cases being generated by Customs for the purpose of investigation or hanging them over to police /prosecutors for further development. Training on the WCO communication tool (WCO CENcomm) for secure information exchange among Customs administration and also training on Environet, WCO platform for best practices and knowledge sharing on cases	50,000 + Co- funding	0	0	0	50,000
3.2.1 Strengthen capacity in crime scene management	INTERPOL	Update of the INTERPOL e-learning module and development of practical guides targeting specific species; national training courses for field officers; incorporation of these into curricula of police schools and academies in 2 priority countries per year	120,000 + Co- funding	0	40,000	40,000	40,000
3.2.2 Promote and support the use of DNA and digital forensic technology to combat wildlife crime	INTERPOL	Action weeks and training on use of DNA, digital forensic and OSINT technologies, including through twinning programmes and mentorship events (2 events per year)	60,000 + Co- funding	0	20,000	20,000	20,000
3.2.3 Strengthen capacity in the use of interception techniques	INTERPOL	Development and promotion of INTERPOL guidelines on using controlled deliveries techniques; delivery of	30,000	0	0	20,000	10,000

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
and specialized investigation techniques		trainings on CDs and undercover techniques to priority countries – co-funding for Y3-4 activities	+ Co- funding				
3.2.4 Strengthen capacity to detect and investigate wildlife crime linked to the Internet	INTERPOL	Promote deployment of INTERPOL Guidelines on combating wildlife crime linked to Internet at regional and global levels; organize cyber-patrolling for further integration into regional and global operations; deliver 2 regional training courses on combating cyber-enabled wildlife crime, OSINT etc/year – co-funding for targeted support to Viet Nam and/or Nigeria in Y2-3 activities	10,000 + Co- funding	0	5,000	5,000	0
4.1.1 Strengthen capacity for global, sub-regional and cross-border enforcement cooperation	CITES	Invite INTERPOL and ICCWC members to support source, transit and destination Parties to combat illegal trade in live cheetahs – RIACM by INTERPOL suggested (19.105 Secretariat comments to CoP19. Doc 59)  Targeted activities on tortoises and freshwater turtles, which could include preparatory support for global operations, convening a further INTERPOL RIACM and/or a UNODC WIRE specifically targeting illegal trade in tortoises and freshwater turtles (CoP19 Doc 78, 19.124 para a)  Co-funding for one of the above activities or partial cofunding for both (TBC)	60,000 + Co- funding	0	60,000	0	0
	INTERPOL	Regional and trans-continental operational meetings addressing organized criminal networks (RIACMs, ISTs, intelligence exchange and deployment missions) – cofunding (focus on Nigeria, Viet Nam and W/C Africa)	10,000 + Co- funding	0	10,000	0	0
	UNODC	Training on cross-border cooperation - bilateral support/travel costs of countries in triborder areas to increase joint-investigations, combined with mentorship –	50,000	0	50,000	0	0

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
		minimum of 1 mentorship or co-funding for various activities	+ Co- funding				
	WCO	Strengthening the capacities of the WCO Regional Intelligence Liaison Offices on IWT, performing effectively information-led IWT operations and actions, and data collection for better regional risk assessment to better understand regional IWT and actions to be taken to mitigate it	60,000 + Co- funding	0	0	0	60,000
4.1.2 Strengthen capacity to investigate and address money laundering and illicit financial flows	INTERPOL	Advanced training courses in 2 priority countries/ year with special focus on practical exercises - co-funding (focus on Nigeria, Viet Nam and W/C Africa)	10,000 + Co- funding	0	5,000	5,000	0
5.1.1 Promote and support analysis, measurement, and monitoring of national responses to wildlife crime through implementation of the ICCWC Toolkit and Indicator Framework	UNODC	Implementation of the ICCWC Analytic Toolkit and/or Indicator Framework. Co-funding for either 1 toolkit or 2 co-funded and 2 IF or various co-funded, TBC	250,000 + Co- funding	0	50,000	100,000	100,000
5.1.3 Promote and conduct research and analysis on wildlife crime and crime trends	CITES	Extension of hosting and maintenance of the CITES Illegal Trade Database for the storage, management and dissemination of illegal trade date collected through annual reports (contract with UNODC) – co-funding with other sources (Dec. 19.80 para a)  Online workshops in regions with low submission rate of annual illegal trade reports (19.80 para b)	200,000 + Co- funding	150,000	50,000	0	0
	WCO	Preparing regional/global threat assessment by utilizing all WCO available data tools (CEN, CENComm) and also combining partner or open source information to have a more detailed picture of the IWT hot spots, and crime	20,000	0	0	10,000	10,000

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
		areas and understand criminal behavior. This will allow Customs to initiate actions and activities to identify cases based on the risk assessment and identified new trends	+ Co- funding				
5.1.4 Implement Decisions and Resolutions adopted by the CITES Conference of the Parties and governing bodies of ICCWC partners	CITES	Targeted support to West and Central Africa (CoP19 Docs 36.1 and 36.2 and comments from Secretariat), including 19.87 a)  • 3 RIACMs on key issues identified for support for West and Central Africa (INTERPOL lead Y2-3)  • Additional funding for further work required to implement CoP/SC Decisions or recommendations not included elsewhere (specific decisions recommendations TBC)	200,000 + Co- funding	0	50,000	100,000	50,000
5.2.2 Strengthen national, regional and international collaboration among law enforcement agencies and support the operationalization of regional and sub-regional enforcement networks	CITES	Convene 2 <sup>nd</sup> CITES Rhino Enforcement Task Force, in cooperation with ICCWC to further strengthen responses to address rhino poaching and trafficking (19.120 para a), CoP19 Doc. 75) – co-funding (Y1)  Rhino report to CoP - co-funding (Y2)  Implementation of Dec. 18.294 (Rev. CoP19) on totoaba, including support, in cooperation with ICCWC partners, activities outlined in the online Meeting of Range, Transit and Consumer States of Totoaba agreed outcomes document and study on vaquita and totoaba – Co-funding for WIRE (Y1)	100,000 + Co- funding	60,0000	40,000	0	0
	UNODC	Support to ASEAN Senior Officials Meeting on Transnational Crime (SOMTC) and/or SudWEN – cofunding for activities	10,000 + Co- funding	0	5,000	3,000	2,000

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
	WCO	Training on inter-agency collaboration based on the IWT cases, identifying enforcement challenges and increment of the joint activities during the seizure phase or in post-seizure case development. Inclusion of all national key stakeholders that are part of the national response towards IWT. Inclusion of the WCO RILO officers as regional centres for illegal wildlife trade information gathering, exchange and analysis – co-funding for activities	50,000 + Co- funding	0	10,000	20,000	20,000
5.3.1 ICCWC programme implementation and coordination	CITES	Decision 19.27: Costs for ICCWC coordinator and support officer at the CITES Secretariat, includes travel for SEG meetings - co-funded  Note: Co-funding for the positions will also be sought from other sources	745,000 + Co- funding	352,000	208,000	135,000	50,000
	INTERPOL	INTERPOL ENS/ILM Programme Manager (25%) and INTERPOL ICCWC Project Manager (100%) – co-funded	200,000 + Co- funding	0	80,000	80,000	40,000
	UNODC	Global staff directly implementing activities + coordination – co-funded	700,000 + Co- funding	120,000	300,000	140,000	140,000
	WCO	The budget line for ICCWC IWT Programme officer and ICCWC support officer for the duration of the whole 4 years (incl. travel) – co-funded	150,000 + Co- funding	0	50,000	50,000	50,000
5.3.2 Implement the ICCWC communications and visibility strategy	CITES	ICCWC comms strategy update and implementation – co- funded (includes consultant to implement the strategy and development of materials/printing)	170,000	50,000	40,000	40,000	40,000

ICCWC approach	ICCWC partner	Expected funds use (activities)	TOTAL BUDGET	Y1	Y2	Y3	Y14 (TBC)
			+ Co- funding				
5.3.3 Monitor and evaluate ICCWC's impact	CITES	Mid-term evaluation (UK-ICCWC funds) at the end of Y2 (to be conducted in Q1-3 2025)  2 evaluations envisaged as part of the programme.  Second evaluation to be funded from other sources (Y2 UK and Y4 TBC)	60,000		60,000		
General Project Support	CITES	Project Finance Assistant: co-funding (50%) for a project finance officer	300,000	75,000	75,000	75,000	75,000
TOTAL Activities			5,635,000	967,000	2,063,000	1,488,000	1,117,000
PSC (13%)			732,550	125,710	268,190	193,440	145,210
GRAND TOTAL*			6,367,550	1,092,710	2,331,190	1,681,440	1,262,210
Excess funds/remaining amount (Factivities**	Received in Y1	<ul> <li>Allocated as per workplan), to be allocated to Y2</li> </ul>		98,067			

Annex 5 - 2030 Vision Risk Register

	Risks	Risk management and mitigation strategy	Action taken and expected resolution
1	lack the political will to prioritize and address the issues related to WLFC, the adoption of Protocols, agreements	Maintain regular engagement with the countries at site, national and regional levels     Seek support of stakeholders, donors, regional organisations, media, and civil society to raise awareness of WLFC	Risk has not been encountered
	and implementation of action plans	<ul> <li>Advocacy at international level on country specific efforts to combat WLFC will be promoted</li> <li>Assumptions</li> <li>High level political commitment to work with ICCWC</li> <li>Provision of high quality and timely technical advice</li> <li>High convening power of UN organisations at site, country and regional level</li> <li>Donors can adjust the prioritisation and timing of activities</li> </ul>	
2	Delays with internal arrangements between partners (agreements) and insufficient coordination of activities between ICCWC members	Ensure good coordination and communication with donors and timely preparation and submission of relevant reports     Engage with ICCWC members in advance to make arrangements for the development of agreements     ICCWC Senior Expert Group regularly exchanges information via meetings, phone and email and plans joint field missions     Real time workplan will be accessible to all ICCWC members	Risk was mitigated from the outset and partner activities were largely organized for Y2 onwards to enable the agreements to be finalized in time. Funding for the full project has also been included in the agreements to reduce any administrative challenges in the future.  Co-funding for activities has also been adapted to ensure activities can continue until other funding is received.
		Funds are disbursed by donors to ICCWC partners on time     Standard agreements are used between CITES and ICCWC members to disburse funds for activities identified in the ICCWC Strategic Programme     Agreements are developed, finalized and signed and funds are disbursed to partners in a timely manner     ICCWC conducts joint activities and coordinates field work     ICCWC highly committed to delivering work 'as one'	

		<ul> <li>ICCWC regularly exchanges information and presents joint visibility of the project</li> <li>ICCWC updates calendar of activities and country roadmaps of existing and forecast activities</li> </ul>	
3	of activities with donors	ICCWC shares regular updates with donors on activities     ICCWC and donors openly share any concerns during the ICCWC Donor Council  Assumptions	Risk has not been encountered to date. CITES and DEFRA maintained good communication with regular calls and updates.
		<ul> <li>CITES and DEFRA maintain good communication throughout the implementation of the project and discuss any issues that may arise in a timely manner</li> </ul>	
4	National governments lack capacity to implement activities	Maintain regular engagement with the countries at site, national and regional levels     Seek support of stakeholders, donors and regional organizations to build capacity	Risk has not been encountered to date
		Assumptions  Required infrastructure and staff available to organize and implement activities  ICCWC can adjust activities based on local capacities.	
5	Reluctance of law enforcement agencies to work together in sharing information and engaging in joint operations	Risk Management Strategy:	Risk has not been encountered to date.

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		<ul> <li>Results will be promoted and attributed to all participating agencies, reducing the risk of conflict.</li> </ul>	
		Assumptions	
		Provision of high quality and timely technical advice	
		Officers will receive sufficient support from their supervisors/management to	
		attend trainings and other collaborative activities	
		Trainees are motivated to put in practice the techniques taught during the	
		trainings, or on the ground mentorships	
		<ul> <li>Political buy-in to address WLFC promotes law enforcement and the fight</li> </ul>	
		against corruption	
		Law enforcement agencies support multi-agency cooperation and there is	
		national level commitment to implement the objectives of the project	
		<ul> <li>The government recognizes capacity building needs and ensures they are addressed with the project support</li> </ul>	
6	Recipient countries		Risk has not been encountered to date.
O	avoid ICCWC	Risk Management Strategy.	Risk has not been encountered to date.
	interventions that will un-	ICCWC members triangulate information about the country from multiple	
	earth corruption	sources, to identify where corruption is being concealed, before, during and after	
	·	working within that country	
		<ul> <li>ICCWC partners secure political commitment and provide practical solutions</li> </ul>	
		to different challenges	
		ICCWC supports implementation of the anti-corruption strategy	
		Assumptions	
		National agencies are committed to working with ICCWC, including in	
		addressing corruption	
		Trust is built and maintained between key beneficiary agencies and ICCWC	
7		Risk Management Strategy:	Risk has not been encountered to date.
	in proactive intelligence-		
	led investigations and	ICCWC works closely with key national agencies, collecting intel and	
	prosecutions of criminals	information and support network building of key focal points who are committed to	
	UIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	<ul> <li>address WLFC</li> <li>ICCWC establishes and maintains its presence on the ground through</li> </ul>	
		embedded mentorships to ensure that adequate support is provided to	
		prosecutors and law enforcement, including through intel sharing, information	
		exchange, supporting MLA requests, supporting regional cooperation	

		Assumptions  • Police and other front-line agencies increase intelligence-led investigations, including the use of specialized investigative techniques to address WLFC  • Prosecutors work closely with investigators and ICCWC in building quality cases admissible to court	
8	Activities cannot be delivered due to national security and international health issues		Risk has not been encountered during the project to date. Based on previous experiences and projects and on lessons learned from the COVID-19 pandemic, the Consortium can deliver hybrid/virtual work where necessary, albeit this reduces the impact of activities.
		Assumptions  The activities in the country do not present significant security/health risks to staff involved  ICCWC can adjust the type of activities and timeline based on security/health risks identified	
9	Activities or hiring processes are not inclusive or may result in harm or exploitation to staff or participants		Risk has not been encountered to date. There is an ongoing agenda item for all SEG/TEG meetings to provide partners an opportunity to raise any issues of concern. Any cases would be reported to DEFRA at the earliest possibility.
		Assumptions  • Consideration in recruitment of staff is based on the highest standards of efficiency, competence, and integrity, with due regard to geographic diversity. All decisions are based on qualifications and organizational needs.	

<ul> <li>Participating countries respond positively and nominate delegates regardless of gender identity, sexual orientation, race, religious, cultural and ethnic backgrounds or disabilities</li> <li>ICCWC partners have measures in place to address sexual exploitation, abuse and harassment and include such measures in sub-contracts with third parties. Implementing partners take all reasonable steps to prevent SEAH by both its employees and any implementing partner and respond appropriately when reports arise.</li> </ul>	
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