Applicant: **Pitman, Helen** Organisation: **Chagos Conservation Trust**

Funding Sought: £73,672.00

DPR9S2\1006

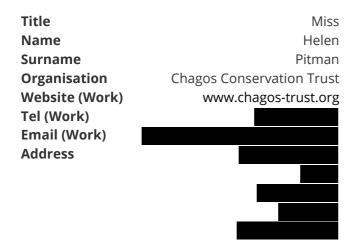
Filling knowledge gaps to enable rewilding of the Chagos Archipelago

The seabirds and corals of the Chagos Archipelago are inextricably linked. Seabirds provide nutrients that help the corals survive but, on some islands, because of the presence of invasive rats that eat seabird eggs and chicks, seabirds have disappeared, breaking this important link.

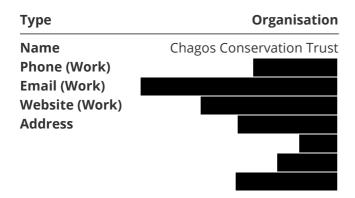
The aim of this project is to collect data to fill knowledge gaps and inform a robust and effective Rat Eradication Operational Plan to successfully remove rats, allow rewilding and ultimately boost biodiversity across the archipelago.

Section 1 - Contact Details

PRIMARY APPLICANT DETAILS



GMS ORGANISATION



Section 2 - Title, Dates & Budget Summary

Q3a. Project title

Filling knowledge gaps to enable rewilding of the Chagos Archipelago

Q3b. What was your Stage 1 reference number? e.g. DPR9S1\10008

DPR9S1\1004

Q4. UKOT(s)

Which eligible UK Overseas Territory(ies) will your project be working in?

☑ British Indian Ocean Territory (BIOT)

* if you have indicated a territory group with an asterisk, please give detail on which territories you are working on here:

Q4b. In addition to the UKOTs you have indicated, will your project directly benefit any other Territories or country(ies)?

No

Q5. Project dates

Start date: End date: Duration (e.g. 2 years, 3

01 July 2021 30 June 2023 **months):**

2 years, 0 months

Q6. Budget summary

Year:	2021/22	2022/23	2023/24	2024/25	Total request
Darwin funding request (Apr - Mar)	£8,594.00	£60,782.00	£4,296.00	£0.00	£ 73,672.00

Q6a. Do you have proposed matched funding arrangements?

Yes

What matched funding arrangements are proposed?

CCT is contributing a total of £ to this project, broken down as follows: Funding a Chagossian research assistant on the expedition = £ CCT Director's time (in kind to lead the project = £

The Bertarelli Programme in Marine Science has agreed in principle to cover the costs of BRS and the Chagossian research assistant joining their 2022 expedition to a total of £ This significantly reduced the costs required to run this project. Chartering a vessel to conduct conservation activities in the Chagos Archipelago can run into the hundreds of thousands therefore sharing a vessel amongst different projects makes economic sense and reduces the overall footprint of the project.

Total match funding = £

Q6b. Proposed matched funding as % of total project cost (total cost is the Darwin request <u>plus</u> other funding required to run the project).

Section 3 - Project Summary and Conventions

Q7. Summary of Project

Please provide a brief summary of your project, its aims, and the key activities you plan to undertake. Please note that if you are successful, this working may be used by Defra in communications e.g. as a short description of the project on <u>GOV.UK</u>.

Please write this summary for a non-technical audience.

The seabirds and corals of the Chagos Archipelago are inextricably linked. Seabirds provide nutrients that help the corals survive but, on some islands, because of the presence of invasive rats that eat seabird eggs and chicks, seabirds have disappeared, breaking this important link.

The aim of this project is to collect data to fill knowledge gaps and inform a robust and effective Rat Eradication Operational Plan to successfully remove rats, allow rewilding and ultimately boost biodiversity across the archipelago.

Q8. Biodiversity Conventions, Treaties and Agreements

Please detail how your project will contribute to the aims of the agreement(s) your project is targeting. What key OT Government priorities and themes will it address? You should refer to Articles or Programmes of Work here. You should also consider local, territory specific agreements and action plans here.

1. BIOT environmental priorities

The BIOT Administration has identified eleven conservation and environmental priorities to ensure the protection of the Chagos Archipelago for the future. CCT is working in partnership with the Administration to address three of these priorities:

- (1) restoring the islands through eradicating invasive rats and controlling invasive plants, which threaten native seabird populations and impact the delicate balance of BIOT's ecosystem
- (2) understanding more about BIOT's unique terrestrial environment and
- (3) Protecting BIOT from invasive flora and fauna
- 2. UK government's Overseas Territory Biodiversity Strategy

This project will contribute to the Strategy's priorities of:

- (1) preventing the establishment of invasive alien species, and eradicating or controlling species that have already become established
- (2) developing ecosystem-based initiatives for the conservation and sustainable use of the marine environment relevant in the rats, birds and coral linkages
- 3. UK government's 25 year plan

This project will contribute to the target "Coral reefs are under direct and sustained pressure. The UK's ambition is to champion and support their conservation and biodiversity in UK and Overseas Territories' (OTs') waters and around the world."

The overarching themes of each of the above is the eradication of invasive species and the recovery of native biodiversity. This project will increase the understanding of the terrestrial environment specifically to protect the archipelago from invasive rats by filling knowledge gaps identified by CCT's Feasibility Study. Once gaps are filled the Rat Eradication Operational Plan can be updated and eventually used to specifically remove the threat of invasive rats to the ecosystem, which in turn will allow native biodiversity, specifically seabirds and coral reefs, too recover.

4. Convention on Biological Diversity

Though BIOT has not acceded to the CBD, the UK Government has expressed its intention to conserve the Chagos Archipelago, most notably by declaring it a Marine Protected Area in 2010.

- 5. Darwin Plus' top three priorities of:
- increasing the effectiveness of marine protected areas by collecting data to develop an effective Invasive Predator Eradication Technical Strategy that will result in tripling the area available to native species once invasive rats are eradicated
- conserving and managing coral reefs through the increase of nutrients available to reefs and mangrove forest ecosystems by confirming the size of mangrove forest on one of the two islands where these are found in the archipelago
- tackling invasive non-native species by confirming the distribution of invasive species and collecting vital data to develop an effective Invasive Predator Eradication Technical Strategy.

6. BIOT Biodiversity Action Plans

These were developed to inform BIOTA's environmental priorities and consist of four habitat level BAPs and four species level BAPs, including one for Sooty Tern. This project will specifically contribute to, Using aerial baiting assisted by ground teams on islands where necessary, eradicate Rattus rattus from all islands of the Chagos Archipelago, except Diego Garcia, to assist island ecological restoration and Sooty Tern recovery, by providing data on baiting methodology for CCT's Rat Eradication Operational Plan that will be used to achieve this action.

Section 4 - Lead Organisation Summary

Q9. Lead organisation summary

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

Yes

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

Reference No	Project Leader	Title
DPLUS041	CCT/Pete Carr	Creating a Terrestrial Action Plan for the Chagos Archipelago
DPLUS011	CCT/Pete Carr	lle Vache Marine Restoration Project
No Response	No Response	No Response
No Response	No Response	No Response
No Response	No Response	No Response
No Response	No Response	No Response

Have you provided the requested signed audited/independently examined accounts? If you select "yes"

you will be able to upload these. Note that this is not required from Government Agencies.

Yes

Please attach the requested signed audited/independently examined accounts.

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Section 5 - Project Partners

Q10. Project Partners

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

This section should illustrate the capacity of partners to be involved in the project. Please provide Letters of Support for the Lead Organisation and each partner or explain why this has not been included.

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

Lead Organisation name:	Chagos Conservation Trust	
Website address:	www.chagos-trust.org	

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

The Chagos Conservation Trust (CCT) is the lead organisation. It is the only non-government organisation solely dedicated to ensuring that the globally important natural environment of the Chagos Archipelago is well protected, conserved and understood, inspiring the better management and protection of our planet.

The CCT's new Healthy Islands, Healthy Reefs programme is an ambitious, large-scale rewilding project that will remove rats and enable the return of hundreds of thousands of seabirds to the archipelago, helping its coral reefs recover from bleaching and build their resilience to the effects of climate change.

This project is a vital stepping-stone to a rat-free Chagos Archipelago and therefore a priority for CCT with 20% of the Director's time dedicated to the project and her responsibilities will include:

- Project development
- Partner engagement
- Recruitment and contract management
- Programme Manager line management
- Chagossian community engagement
- Financial management of the grant funds
- Project management, monitoring and Evaluation and reporting oversight

The Programme Manager, once recruited, will be responsible for:

- Expedition logistics and management
- Reporting and strategy development
- Update Rat Eradication Operational Plan

Have you included a Letter of Support from this organisation?

Yes

Have you provided a cover letter to address your Stage 1 feedback?

Yes

Do you have partners involved in the Project?

Yes

1. Partner Name: British Indian Ocean Territory Administration (BIOTA)

Website address: https://biot.gov.io

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

The British Indian Ocean Territory Administration (BIOTA) is the government of the Territory where the project will be delivered.

BIOTA's primary role will be to facilitate the delivery of the project, specifically through arranging necessary access and permissions to conduct activities throughout the Territory.

The two full time environment officers work to meet BIOT's conservation priorities, support science expeditions and lead local engagement with military personnel and contractors on environmental issues.

They split their time between the UK and Diego Garcia and as such are ideally placed to arrange permits and resolve any unforeseen issues that crop up over the course of the project.

Noting that BIOT is remote and hard to access, BIOTA is well-placed to support the project logistically as required, including supporting travel, accommodation and transportation around the Territory.

Finally, BIOTA may provide technical and scientific input to the project as required, in support of its environmental and conservation objectives.

Have you included a Letter of Support from this organisation?

Yes

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

Yes

2. Partner Name: Biodiversity Restoration Specialists Limited (BRS)

Website address: http://www.biodivrestoration.co.nz/

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

Biodiversity Restoration Specialists (BRS) Limited are partnering to provide technical expertise. BRS will plan and manage the field research component of the project and undertake analysis and compilation of the results, including technical reports.

Dr Grant Harper's, BRS Director, role as Technical Expert is to collect data to fill knowledge gaps related to confirming the presence of invasive predators on islands where their status is uncertain and assessing the amount of bait off-take by rats and crabs, which will inform the robust and effective Rat Eradication Operational Plan that will be used to successful removal of rats across the archipelago.

Dr Harper is familiar with the Chagos Archipelago, having visited several times in his role as the technical advisor in CCT's successful lle Vache Marine rat eradication project.

His local knowledge and expertise combined with his international expertise on eradication programmes, will assure the quality of the project's outputs.

BRS have been involved with research, planning, control and eradication of invasive species worldwide for over 25 years. They have been involved in a significant number of mammalian and bird invasive species eradications, including the largest black rat and mouse eradication on Macquarie Island, and ground-breaking bird eradications in the Seychelles.

Have you included a Letter of
Support from this organisation?

Yes

3. Partner Name:	No Response
Website address:	No Response
Details (including roles and responsibilities and capacity to	No Response
engage with the project):	
Have you included a Letter of Support from this organisation?	○ Yes ○ No
Have you included a Letter of	_
Have you included a Letter of	
Have you included a Letter of	

○ Yes ○ No	
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○ Yes ○ No	
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○ Yes ○ No	
	tners involved in the Project, please use the te
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	No Response O Yes O Yes O No er details regarding Par

Q11. Project Staff

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

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

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Helen Pitman	Project Leader	20	Checked
Grant Harper	Technical expert	60	Checked
TBC	Programme Manager (part time)	100	Checked
Nadine Atchison-Balmond	BIOT environment officer	10	Checked

Do you require more fields?

No

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

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

- ♣ 1006 CVs and JD
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- pdf 357.21 KB

Have you attached all Project staff CVs?

Yes

Section 7 - Background & Methodology

Q12. Problems the project is trying to address

Please describe the problem your project is trying to address in terms of environment and climate issues in the UKOTs.

For example, what are the specific threats to the environment that the project will attempt to address? Why are they relevant, for whom? How did you identify these problems? How will your proposed project help?

Please cite the evidence you are using to support your assessment of the problem (references can be listed in your additional attached PDF document which can be uploaded at the bottom of the page).

CCT's Healthy Islands, Healthy Reefs programme is a large-scale rewilding programme to increase biodiversity in the Chagos Archipelago through eradicating rats. This will result in the regeneration of a natural, seabird-driven ecosystem, culminating in healthier islands and coral reefs and creating a refuge for native biodiversity.

A CCT-funded Rat Eradication Feasibility Study identified knowledge gaps that need to be addressed before the rat eradication can proceed. These include:

- 1. Bait-loss trials to determine how much bait is consumed by rats and crabs
- 2. Confirmation of rat presence or absence on Ile Manoel
- 3. Confirmation of the absence of mice on Ile de Coin and Ile Diamant
- 4. Bait application methods, durability and palatability
- 5. Confirmation mangrove area on Moresby

CCT's planned expedition to the archipelago will fill gaps and inform final planning for a robust and effective Rat Eradication Operational Plan to remove rats and boost biodiversity across the archipelago.

Rats have been in the archipelago since the 1700s and as a legacy of the coconut plantation era, every island farmed for coconuts has rats. Rats eat seabird eggs and chicks, which has extirpated seabird populations. Ninety four percent of the terrestrial land mass is devoid of breeding seabirds due to rat presence.

Over the last decade, the archipelago has seen two episodes of coral bleaching due to climate change, resulting in approximately 70% of hard corals deaths .

Coral reefs must build resilience to help them recover from the effects of climate change. Scientists studying the impact of introduced predators in the Chagos Archipelago have discovered how rats disrupt seabird-driven nutrient flows across island, near-shore, and coral reef ecosystems.

This research demonstrates that removing rats is the highest priority conservation management action required to restore seabird-driven ecosystems and improve reef resilience and is an environmental priority for the BIOTA.

Q13. Methodology

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

- How you have analysed historical and existing initatives and are building on or taking work already done into account in project design. Please cite evidence where appropriate.
- The rationale for carrying out this work and a justification of your proposed methodology.
- How you will undertake the work (materials and methods).
- How you will manage the work (role and responsibilities, project management tools etc.)

Please make sure you read the **Guidance Notes** before answering this question.

(This may be a repeat from Stage 1 but you may update or refine as necessary)

History

This project builds on work conducted in 2014 when CCT, in partnership with BRS, completed the first successful rat eradication in the Chagos Archipelago, which formed the basis of Healthy Islands, Healthy Reefs.

It will work with graduates of the Connect Chagos programme, created in 2012 to engage with Chagossian communities, and invite them to apply for the role of research assistant.

CCT is working alongside the Bertarelli Programme of Marine Science (BPMS) to establish baseline data required from which researchers can monitor biodiversity change post rat eradication.

Rationale

In 2020, CCT self-funded a Feasibility Study to determine the method for eradicating rats from the archipelago, which highlighted knowledge gaps to be filled in order to carry out a successful eradication. The expedition team (BRS and research assistant) will travel to the Chagos Archipelago with a BPMS expedition in 2022 to collect data to fill these gaps.

Method

They will spend one week on Ile Manoel to confirm the presence or absence of rats, then travel to Ile de Coin and Diamant, where it is possible mice are present as they can be highly cryptic in the presence of rats.

Bait off-take trials will be undertaken, which will inform the operational planning regarding the optimal bait application rate to allow rats access to bait over a four-day period, despite associated bait removal by crabs.

Areas of mangrove are problematic for bait application as the bait is not available for rats because it falls into the water. Trials for bait application will be undertaken to ensure rats in this habitat consume bait.

At the same time biodiversity baseline data will be collected on keystone taxa from rat-infested and rat-free islands by the BPMS teams. The data collected will be provided to CCT and be built into the Rat Eradication Operational Plan.

The collection of this important data will enable CCT to further enhance its capability to plan, manage and implement the rat eradication programme by developing an Invasive predator eradication technical strategy and integrating it into the Rat Eradication Operational Plan along with the biodiversity baseline data collected by the BPMS.

Ultimately BIOTA's capacity and capability to manage invasive species eradications and monitoring across the Chagos Archipelago will increase. The Administration will be provided with an Invasive predator eradication technical strategy, review of the current biosecurity strategy and an updated Rat Eradication Operational Plan.

Management

CCT will take overall responsibility for project management using the Project Management for Wildlife Conservation approach:

- Project management
- Partner engagement
- Recruitment and contract management
- Staff management
- Chagossian community engagement
- Monitoring and evaluation
- Financial management
- Expedition logistics and management
- Reporting and strategy development
- Update Rat Eradication Operational Plan

BRS's responsibilities include:

- Plan and manage the field research
- Data collection to fill knowledge gaps
- Undertake analysis and compilation of the results

BIOTA's responsibilities include:

- Facilitate the delivery of the project through arranging necessary access and permissions to conduct activities throughout the Territory

If necessary, please provide supporting documentation e.g. maps, diagrams, and references etc., as a PDF using the File Upload below.

- △ 1006 references
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Section 8 - Stakeholders and Beneficiaries

Q14. Project Stakeholders

Who are the stakeholders for this project and how have they been consulted (include local or host government support/engagement where relevant)? Briefly describe what support they will provide and how the project will engage with them.

BIOTA is a key stakeholder and have been involved with the development of CCT's Healthy Islands, Healthy Reefs programme from its inception through planning workshops and quarterly meetings. They will facilitate the delivery of the project through arranging necessary access and permissions to conduct activities throughout the Territory and participate in monthly meetings and the review team as part of the monitoring and evaluation plan.

Initial engagement with the Chagossian community has been through the Chagossian Voices group. Connect Chagos graduates that are interested in applying for the role of research assistant will be invited to a workshop outlining the opportunity and how to apply. The Chagossian research assistant will be hold a community workshop after the expedition to share new knowledge.

CCT is working alongside the Bertarelli Programme in Marine Science (BPMS) to ensure that this project compliments research goals for the archipelago and vice versa. Science underpins all CCT's planned conservation actions. Key scientists are involved in the CCT's Healthy Islands, Healthy Reefs working group

and three CCT Trustees are also involved with the BPMS providing excellent oversight of each programme.

Sarah Havery, RSPB, is a CCT Trustee with expertise in island restoration and is also part of the CCT's Healthy Islands, Healthy Reefs working group and is assisting with the programme development.

External eradication and island restoration experts will continue to provide technical advice and reviewing through the Stakeholder Advisory Group including Island Conservation, Island Eradication Advisory Group, Kew and ZSL.

Q15. Institutional Capacity

Describe the lead organisation's capacity (and that of partner organisations where relevant) to deliver the project.

CCT has a proven track record of working on conservation, specifically on rat eradication and island restoration. 2014 CCT completed a successful "proof of concept" project to eradicate rats from Ile Vache Marine. The Trust has the experience and expertise required to lead and deliver this project successfully and has led or partnered on Darwin Plus projects in the past. It has a dedicated staff member working on Healthy Islands, Healthy Reefs, and a chartered accountant as Treasurer to manage finances.

BIOTA oversees all scientific, environmental and conservation projects in the Territory and works with its stakeholders to ensure they are in line with BIOTA's 11 environmental priorities. They issue all permits and guidance on accessing the Territory for scientific expeditions. BIOTA engage two Environment Officers who provide a continuous presence in the Territory. This capacity puts them in a strong position to partner with CCT on rat eradication. CCT and BIOTA have worked together successfully on conservation issues for many years, including the successful eradication of rats on Ile Vache Marine.

BRS specialises in planning and implementation of invasive species control and eradication operations worldwide. Dr Grant Harper has been involved with the Chagos Archipelago since 2014, having participated in CCT's successful rat eradication. Dr Harper provided advice and drafted feasibility documents, operational and biosecurity plans for islands worldwide, with a focus on rodents. He produced "The Feasibility of Eradicating Black Rats Rattus Rattus from the Outer Chagos Archipelago", identifying knowledge gaps to be addressed through this project.

Q16. Project beneficiaries

Who will your project benefit? You should consider the direct benefits as a result of your project as well as the broader indirect benefits which may come about as a result of your project achieving its Outputs and Outcome. The measurement of any benefits should be included in your project logframe.

CCT's technical capacity and capability will increase through project partner, BRS, and recruiting a Programme Manager.

BIOTA's environmental priorities include rat eradication and therefore the Invasive predator eradication technical strategy, reviewed biosecurity strategy and updated Rat Eradication Operational Plan will directly benefit management capabilities and help BIOTA contribute to the OT Biodiversity Strategy and 25-Year Environment Plan.

Increase knowledge of the conservation of Chagos Archipelago within Chagossian community by the research assistant sharing knowledge.

Researchers from the Bertarelli Programme in Marine Science (BPMS) working on the effects of removing invasive species on ecosystems will benefit from the knowledge gaps being filled by CCT, prior to BPMS carrying out an eradication experiment in 2023.

This project also contributes to the Darwin Plus, Round 9, key priorities:

- increasing the effectiveness of marine protected areas by developing an Invasive Predator Eradication Technical Strategy that will result in tripling the area available to native species once invasive rats are eradicated
- conserving and managing coral reefs through seabird-driven nutrient flows and mangrove forest ecosystems by confirming the area of mangroves on Moresby Island
- tackling invasive non-native species by confirming the distribution of invasive species and collecting vital data

Section 9 - Gender and Change Expected

Q17. Gender (optional)

How is your project working to reduce inequality between persons of different gender? At the very least, you should be able to provide reassurance that your proposed work is not increasing inequality. Have you analysed the context in which you are working to see how gender and other aspects of social inclusion might interact with the work you are proposing?

Although CCT does not yet have a specific gender inclusivity policy, it is working towards having an equal gender balance as a guiding principle, as demonstrated by the CCT board of Trustees comprising 30% women, including the Chair.

Our Healthy Islands, Healthy Reefs working group comprises 50% women including Director-level project support. Our wider Stakeholder Advisory Group is comprised of 53% women.

We will strictly adhere to 50:50 gender-balanced sampling in our Chaggosian community questionnaires. We will ensure schedules are flexible to accommodate times, locations, meeting structures, language and facilitation-styles, as well as group composition appropriate for gender-representative participation.

The recruiting process for the Chaggosian community member and the Programme Manager will aim to be as inclusive as possible aiming to mitigate for unconscious bias in the recruiting panel.

Q18. Change expected

Detail the expected changed this work will deliver. You should identify what will change and who will benefit a) in short-term (i.e. during the life of the project) and b) in the long-term (after the project has ended). Please describe the changes for the environment and, where relevant, for people in the OTs, and how they are linked.

Short term

In the short-term the project partners will acquire increased knowledge and data about the presence or absence of introduced predators on the remaining unconfirmed islands. It will determine the optimum bait application rates by considering bait off-take by rats and crabs and develop the specialised requirements for baiting mangroves. It is vital to acquire this information to maximise the probability of successfully eradicating rats, an essential step to rewilding the archipelago.

A member of the Chagossian community will accompany BRS as a research assistant and therefore contribute to filling the knowledge gaps. Their own knowledge of the archipelago especially regarding one of its biggest threats, introduced predators, will increase, and be shared with the wider community through delivering a workshop.

The project will help build capacity within BIOTA and contribute to achieving their environmental priorities. Invasive predators are one of the pre-eminent threats to the biodiversity of the Chagos Archipelago and therefore any increased knowledge acquired will improve the efforts to remove this threat.

CCT will increase its technical expertise and capacity internally to produce the Invasive Predator Eradication Technical Strategy and update the Rat Eradication Operational Plan.

Long term

Information from this project will help finalise the Healthy Islands, Healthy Reefs Rat Eradication Operational Plan. A robust and effective Plan will result in the successful removal of rats. Once implemented this large-scale rewilding programme will regenerate the local ecosystem function previously impacted by introduced predators.

It is hoped that this project will initiate further engagement of the Chagossian communities in the UK and increase participation in conservation work in the archipelago in the future.

CCT and BIOTA, working with researchers from the Bertarelli Programme in Marine Science, can monitor long term change post eradication into the future based on baseline data collected during the 2022 expedition.

Q19. Pathway to change

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

CHANGE - Knowledge gaps filled to improve implementation of large-scale invasive rat eradications in the Chagos Archipelago and on tropical islands worldwide. The development of effective techniques for bait application in mangrove forest, which has been problematic for tropical island eradication management globally. Improved understanding of threats to the Chagos Archipelago by the Chagossian community.

OUTPUTS - The distribution and presence/absence of invasive predators across the Chagos Archipelago to improve the final operational planning stages for the large-scale invasive rat eradication. Effective bait rates determined to enable a successful operation without bait wastage and increased risks for non-target species. Enhance CCT and BIOTA's capability to plan, manage, implement, and monitor invasive predator eradication and project managed and monitored effectively.

OUTCOME - The establishment and initiation of rewilding the Chagos Archipelago via improved knowledge, increased capacity, and effective planning for invasive predator management and increased reliability of a successful outcome.

IMPACT - Biodiversity of the Chagos Archipelago increases in the absence of invasive predators through rewilding seabird islands and increasing coral reef resilience in one of the world's largest Marine Protected Areas.

Q20. Exit strategy

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

CCT's Filling knowledge gaps to enable rewilding of the Chagos Archipelago project is a distinct project within a larger programme of work to rewild the 30 ecologically degraded islands of the outer atolls of the Chagos Archipelago.

On completion of the expedition to collect the data needed to fill knowledge gaps BRS and the Programme Manager will develop the Invasive predator eradication technical strategy, review the Biosecurity Strategy and update the Rat Eradication Operational Plan for BIOTA's approval and to build their management capabilities, contribute to their Environmental Priorities and the UK Government's OT Biodiversity Strategy and 25-Year Environment Plan.

The overall outcome will be effective invasive predator management via improved knowledge, increased capacity, and appropriate planning to enable the eradication phase of Healthy Islands, Healthy Reefs to occur.

As part of CCT's Healthy Islands, Healthy Reefs programme a fundraising campaign will be on-going to ensure the future components of the programme are funded and can be implemented in the future.

Section 10 - Funding and Budget

Q21. Budget

Please complete the appropriate Excel spreadsheet, which provides the Budget for this application. Some of the questions earlier and below refer to the information in this spreadsheet. Note that there are different templates for projects requesting over and under £100,000 from the Darwin Plus budget.

- R9 D+ Budget form for projects under £100,000
- R9 D+ Budget form for projects over £100,000

Please refer to the Finance Guidance for Darwin/IWT for more information.

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

Budgets submitted in other currencies will not be accepted. Use current prices – and include anticipated inflation, as appropriate, up to 3% per annum. The Darwin Initiative cannot agree any increase in grants once awarded.

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Q22. Funding

Q22a. Is this a new initiative or a development of existing work (funded through any source)?

Development of existing work

Please provide details:

This project specifically addresses Objective 1: Build a team of rewilding experts and Objective 2: Research the knowledge gaps of Phase Two of CCT's Healthy Islands, Healthy Reefs programme, the research and development phase.

The three-year research and development stage will:

- 1. Build a team of rewilding experts that will prepare for the Healthy Islands, Healthy Reefs implementation phase, which will eradicate rats from 30 islands and enable the restoration of native habitat
- 2. Research the knowledge gaps identified during the Feasibility Study
- 3. Investigate new technologies that will help monitor biodiversity recovery, and ensure rats do not recolonise the islands, using environmental DNA
- 4. Spread the word about how important the Chagos Archipelago is and why it is so important to help save some of the world's most diverse coral reefs
- 5. Secure funding to enable the £ rat eradication and rewilding programme to be implemented

In Phase one, CCT invested £ into a Feasibility Study that was completed in September 2020 and is currently fundraising for the other Phase Two objectives.

Q22b. Are you aware of any other individuals/organisations/projects carrying out or applying for funding for similar work?

Yes

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

CCT is working alongside researchers that have applied to the Bertarelli Programme in Marine Science (BPMS) for a Rewilding Degraded Tropical Islands: An Experiment In Cross-Ecosystem Recovery project.

This project seeks funding to rewild four ecologically degraded islands in the Chagos Archipelago, as a large-scale research experiment using cutting-edge technology and an interdisciplinary approach, into the impact of rewilding tropical oceanic islands. Year one of the project is primarily focussed on a three-month expedition to conduct baseline surveys, vegetation mapping, establish monitoring protocols and gather data.

CCT has secured two places on this fieldwork expedition as an in-kind contribution to CCT's Darwin Plus project.

Data collected by the BPMS will be shared with CCT and included in the updated Rat Eradication Operational Plan.

Q23. Co-financing

Are you proposing co-financing?

Yes

Q23a. Secured

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

(See Finance for Darwin/IWT and Guidance Notes)

Donor organisation	Amount	Currency code	Comments
Chagos Conservation Trust		£	Funding a Chagossian assistant on the expedition = £ CCT Director's time to lead the project = £
Bertarelli Foundation		No Response	Bertarelli Foundation, through the Bertarelli Programme in Marine Science, has agreed in principle to cover the costs of BRS and Chagossian assistant joining their 2022 expedition
No Response	0	No Response	No Response
No Response	0	No Response	No Response

Q23b. Unsecured

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

Date applied for	Donor	Amount	Currency code	Comments
	organisation			

No Response	Chagos Conservation Trus	t	£	This funding request will be tabled to the CCT board for vessel support funds if required
No Response	No Response	0	No Response	No Response
No Response	No Response	0	No Response	No Response
No Response	No Response	0	No Response	No Response

Do you require more fields?

No

Section 11 - Finance

Q24. Financial Controls

Please demonstrate your capacity to manage the level of funds you are requesting. Who is responsible for managing the funds? What experience do they have? What arrangements are in place for auditing expenditure?

CCT has a well-established financial management system and has managed a number of grants previously including two Darwin Plus grants (2014/15 and 2016/17).

The CCT Treasurer is a chartered accountant and member of the Institute of Chartered Accountants of England and Wales. She is Head of Finance at the charity FareShare where she has experience of overseeing complex grants (£ and fund accounting. Prior to that worked as an auditor for KPMG for over five years focusing on large corporate clients.

CCT's annual report and accounts are available on the Charity Commission's website. In years when CCT exceeds the threshold for an external examination, we will engage external examiners to review the accounts.

Q25. Financial Management Risk

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

CCT has a control system in place to ensure any risk of fraud or bribery is mitigated including:

- All payments through the CCT's bank account have a two tiered approval process
- A procurement policy with limits on approval of expenditure and requirements to obtain certain numbers

of quotes for higher value purchases

- A finance subcommittee of the Board who regularly review expenditure against budget
- Segregation of duties in approving and processing expenditure, other controls in place include monthly bank reconciliations

CCT uses professional cloud based accounting software to track income and expenditure mitigating the risk of data loss and allowing up to date visibility of expenditure.

CCT is partnering with BRS, a well-established company, and specifically the Director who has worked with CCT in the past, therefore CCT believes the risk of failure through non-delivery or the risk of fraud or bribery to be negligible. We have previously undertaken work to assess the suitability and value for money of BRS as a partner as opposed to alternatives.

CCT itself has sufficient reserves (over £1m) that the risk of not being able to contribute our element of the funding is very low.

Q26. Balance of budget spend

Explain the thinking behind your budget in terms of where funds will be spent. What benefits will the Territory see from your budget? What level of the award to you expect will be spent locally? Please explain the decisions behind any funding that will not be spent locally and how those costs are important for the project.

The budget comprises predominately of salaries and expedition expenses in Y2 of the project. This is required to build the capability of CCT to plan, manage, implement and monitor invasive predator eradication from the Chagos Archipelago and includes a Programme Manager and two staff from BRS.

The increase in budget is due to Covid-19 related expenses (BRS is a New Zealand company, which has strict quarantine regulations), increased flight and equipment costs since the Round 1 submission.

The Bertarelli Foundation has agreed in principle to cover the costs of Expedition Team joining their 2022 expedition but CCT is covering salaries, travel costs, equipment and Covid-19 related expenses.

BIOTA will benefit from the results obtained on the expedition and the final output of the Invasive Predator Eradication Technical Strategy and the updated Rat Eradication Operational Plan that will be used to eradicate rats from the outer islands of the Chagos Archipelago once this project is completed.

The British Indian Ocean Territory is uninhabited therefore no funds will be spent directly in the Territory but all outputs will benefit the management of the Marine Protected Area and the knowledge of the Chagossian community in the UK will be increased.

Q27. Capital Items

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

N/A

Q28. Value for Money

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

This project will help to finalise the Rat Eradication Operational Plan that will be used to leverage significant amounts of funding, approximately £5million, for the final phase of Healthy Islands, Healthy Reefs and therefore the project partners all agree that this project is excellent value for money.

Invasive non-native species, specifically rats, have had a significant negative impact on the islands of the Chagos Archipelago by eating seabird eggs and chicks, which has led to the decimation of seabird populations on these islands and the breakdown of the crucial relationship between seabirds and corals.

In order to complete a successful rat eradication of the entire outer archipelago, which would triple the amount of land available for seabirds to return to and therefore increase the nutrients available to corals, CCT needs to fill some knowledge gaps identified through its Feasibility Study.

CCT has a procurement policy and will hold open and competitive processes for recruitment of staff that will ensure the best value for money. CCT has worked with BRS previously, they are endorsed by BIOTA and are extremely familiar with the Chagos Archipelago.

Q29. Outputs of the project and Open Access

All outputs from Darwin Plus projects should be made available on-line and free to users whenever possible. Please outline how you will achieve this and detail any specific costs you are seeking from Darwin Plus to fund this.

CCT developed the Chagos Information Portal, which is a reference library of a science, research and conservation work conducted in the Chagos Archipelago. The portal is a user friendly, interactive and open source website, with information on where to find research papers, scientific expedition reports, photos, videos, and is home to an interactive map.

All outputs from this project will be available through the portal where they will be accessible free of charge to anyone. They include:

- Chagos Archipelago invasive and native species database
- Invasive predator eradication technical strategy
- · Biosecurity review
- Updated Rat Eradication Operational Plan
- Online presentation on project created for use on community platforms

CCT is not seeking any costs from the Darwin Plus fund for this.

It is expected that when the full eradication takes place, its results will appear in a number of conservation journals, as well as certainly on CCT's portal and CCT and BIOTA's website.

Section 12 - Safeguarding

Q30. Safeguarding

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

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

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

CCT's Director is the first point of call for any issue surrounding safeguarding, whistle-blowing or breaches of the Code of Conduct as the project leader. Policies will then be implemented in collaboration with the Chair of the board and representatives from the project partners.

Contractors, consultants and staff are required to sign the policies to confirm and understanding of them and agreeing to adhere to the policies.

All polices will be shared with project partners.

Please upload the Lead Organisation's Safeguarding Policy as a PDF

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- O 11:02:37
- pdf 111.86 KB

Section 13 - Logical Framework

Q31. Logical Framework

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

• Stage 2 Logframe Template

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

Please upload your logframe as a PDF document.

- & 1006 R9 DPlus St2 Logical Framework
- 前 02/02/2021
- ① 11:06:03
- pdf 75.37 KB

Impact:

Biodiversity of the Chagos Archipelago increases through the rewilding of seabird islands, providing improved climate resilience of coral reefs in one of the world's largest Marine Protected Areas

Outcome:

Effective invasive predator management via improved knowledge, increased capacity and appropriate planning to enable the rewilding of the degraded seabird islands of the Chagos Archipelago

Project Outputs

Output 1:

The presence and distribution of invasive predators is better understood and used to inform conservation management of regionally significant wildlife in the Chagos Archipelago

Output 2:

Enhance partners' (CCT/BIOTA) capability to plan, manage, implement and monitor invasive predator eradication from the outer islands of the Chagos Archipelago

Output 3:

No Response

Output 4:

No Response

Output 5:

No Response

Do you require more Output fields?

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

No

Activities

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

- 1.1 BIOTA Environment Officer co-ordinate all permits and permissions for expedition team to access BIOT for research expedition by Mar 2022
- 1.2 Expedition team to collect data from Ile Manoel on presence or absence of rats during expedition to the Peros Banhos Atoll in July 2022
- 1.3 BRS to produce technical report with data confirming presence/absence of invasive rats on selected islands included in Invasive predator eradication technical strategy by Dec 2022
- 1.4 Expedition team to collect data from Ile du Coin and Ile Diamant on presence or absence of mice during expedition to the Peros Banhos Atoll in July 2022
- 1.5 Chagos Archipelago invasive and native species database updated by Programme Manager by 2022
- 1.6 BRS to produce technical report with data confirming presence or absences of invasive mice on selected islands included in Invasive predator eradication technical strategy by Dec 2022
- 1.7 Baseline data collected on key species by BPMS team in July 2022 for inclusion into the Chagos Archipelago invasive and native species database and informing the revised Rat Eradication Feasibility Study and Environmental Impact Assessment
- 1.8 Report received from BPMS team with terrestrial biodiversity survey data by Dec 2022 and integrated into the Rat Eradication Operational Plan by Programme Manager by Mar 2023
- 1.9 All bi-annual reporting requirements completed by Programme Manager
- 1.10 Monthly meetings attended by Expedition Team, Programme Manager, Project Leader and BIOTA Environment Officer
- 2.1 BIOTA Environment Officer and Programme Manager to co-ordinate all permits and permissions for expedition team to access BIOT for research expedition by Mar 2022
- 2.2 Contract BRS by Dec 2021
- 2.3 Recruit Programme Manager by Oct 2021
- 2.4 Recruit Chagossian research assistant by April 2022
- 2.5 Expedition team collect data on bait-take off by crabs and rats during expedition to the Peros Banhos Atoll in July 2022
- 2.6 BRS to produce technical report with data for bait off-take by rats and crabs included in Invasive predator eradication technical strategy by Dec 2022
- 2.7 Expedition team collect data bait application methods and bait durability and palatability for rats during expedition to the Peros Banhos Atoll in July 2022
- 2.8 BRS to produce technical report with data for bait application methods and bait durability and palatability for rats included in Invasive predator eradication technical strategy by Dec 2022
- 2.9 Chagossian community knowledge surveys completed by April 2022
- 2.10 Chagossian research assistant to hold workshop and repeated knowledge surveys conducted by Dec 2022
- 2.11 Biosecurity Plan review produced by BRS by Dec 2022 and submitted to BIOTA Environment Officer
- 2.12 Invasive predator eradication technical strategy produced by Programme Manager by Dec 2022
- 2.13 Invasive predator eradication technical strategy submitted to BIOTA Environment Officer by Jan 2023
- 2.14 Programme Manager to imbed Invasive predator eradication technical strategy and biosecurity measures into Rat Eradication Operational Plan by Mar 2023
- 2.15 All bi-annual reporting requirements completed by Programme Manager
- 2.16 Monthly meetings attended by Expedition Team, Programme Manager, Project Leader and BIOTA Environment Officer

Section 14 - Implementation Timetable

Q32. Provide a project implementation timetable that shows the key milestones in project activities

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

Complete the Excel spreadsheet template as appropriate to describe the intended workplan for your project.

Implementation Timetable Template

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

- ₺ 1006 R9 DPlus Implementation Timetable
- 前 02/02/2021
- ① 11:10:41

Section 15 - Monitoring and Evaluation

Q33. Monitoring and evaluation (M&E)

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

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

M&E responsibilities ultimately fall to the lead application, CCT, and will be overseen by the Project Leader (PL), CCT Director. The Project Leader will report quarterly to the Head, British Indian Ocean Territory Administration on progress.

Responsibility for indicators:

The effective day-to-day management of M&E of the LogFrame indicators will be undertaken by the Programme Manager (PM) in collaboration with the project partners.

Regular project management (virtual) meetings:

Monthly meetings attended by Expedition Team, Programme Manager, BIOTA Environment Officer and Project Leader will ensure the data for each indicator is collected and collated including meeting minutes, datasets, reports, recommendations, and meeting reports. All reporting requirements required by Darwin Plus will be completed by Programme Manager against LogFrame indicators.

On a quarterly basis, the PL and PM will report to the Healthy Islands, Healthy Reefs Stakeholder Advisory Group (HIHRSAG) and progress will be assessed as progress against the LogFrame indicators and budget. The HIHRSAG has been created and will be expanded to include experts in restoration ecology, project management, finance, communication, BIOT law, and other key stakeholders. Specific actions will be set to address any indicators that have not been achieved and the monitoring plan revised accordingly.

The annual project meetings will include an internal evaluation of the project covering technical and financial aspects as official reviews. CCT trustees and BIOTA senior staff will be invited to take part in these

reviews. Not only will these individual be able to see progress, they will be able to assess the quality and efficacy of work undertaken to date and set it in the bigger picture of conservation priorities against the BIOTA Environmental Priorities and also help develop solutions to any challenges the project team might be facing.

Key monitoring areas and responsibilities:

- 1. Project, staff and finance management, partner engagement and M&E: CCT, through the PL, is responsible for all overarching management and engagement indicators.
- 2. Community engagement: CCT, through the PL, is responsible for engagement with the Chagossian community.
- 3. Expedition logistics and management, reporting and strategy development: CCT, through the PM, is responsible for expedition planning and management and the development of outputs related to this such as the Invasive predator eradication technical strategy.
- 4. Field research, data collection, analysis and compilation of the results: BRS is responsible for all data collection, analysis and technical reporting.
- 5. Provision of access and permissions to conduct activities throughout the Territory: BIOTA is responsible for enabling the expedition team to travel to the archipelago and collect data required.

Project Leader: of time dedicated to M&E requirements = £ (this is provided as co-funding by CCT)

Programme Manager: of time dedicated to M&E requirements = £

BRS: of time dedicated to M&E requirements = £

Number of days for M&E:

Monthly team meetings: 6 days (24 x 1/4/ days)

Quarterly working group meetings: 4 days (8 x ½ days)

Annual meetings: 2 days (2 x 1 days)

Project reporting: 8 days (8 x 1 day/quarter)

Total project budget for M&E in GBP (this may include Staff, Travel and Subsistence costs)	£
Number of days planned for M&E	20.00
Percentage of total project budget set aside for M&E (%)	

Section 16 - Certification

Certification

On behalf of the

trustees

of

Chagos Conservation Trust

I apply for a grant of

£73,672.00

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

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

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

Checked

Name	Natasha Gibson
Position in the organisation	Chair
Signature (please upload e-signature)	 № NG signature ★ 02/02/2021 ♦ 11:17:33 ♠ png 3.53 KB
Date	02 February 2021

Section 17 - Submission Checklist

Checklist for submission

	Check
I have read the Guidance documents, including the "Guidance Notes for Applicants" and "Finance Guidance".	Checked
I have read, and can meet, the current Terms and Conditions for this fund.	Checked
I have provided actual start and end dates for this proposed project.	Checked
I have provided a budget based on UK government financial years i.e. 1 April – 31 March and in GBP.	Checked
I have checked that the budget is complete, correctly adds up and I have included the correct final total at the start of the application.	Checked
The application has been signed by a suitably authorised individual (clear electronic or scanned signatures are acceptable).	Checked
I have attached my completed logframe and timeline as a PDF using the templates provided.	Checked

I have included a 1 page CV or job description for all the Project staff identified at Question 11, including the Project Leader, or provided an explanation of why not.	Checked
I have included a letter of support from the Lead Organisation and main partner organisation(s) identified at Question 10, or an explanation of why not.	Checked
I have included a cover letter from the Lead Organisation, outlining how any feedback at Stage 1 has been addressed where relevant.	Checked
I have included a signed copy of the last 2 years annual report and accounts for the Lead Organisation, or provided an explanation if not.	Checked
I have checked the Darwin Plus website immediately prior to submission to ensure there are no late updates.	Checked
I have read and understood the Privacy Notice on GOV.UK.	Checked

We would like to keep in touch!

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

Checked

Data protection and use of personal data

Information supplied in this application form, including personal data, will be used by Defra as set out in the latest copy of the Privacy Notice for Darwin, Darwin Plus and the Illegal Wildlife Trade Challenge Fund available here. This Privacy Notice must be provided to all individuals whose personal data is supplied in the application form. Some information, but not personal data, may be used when publicising the Darwin Initiative including project details (usually title, lead organisation, location, and total grant value) on the GOV.UK and other websites.

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