



LIFE Project Number  
**LIFE14 GIE/UK/000043**

**Final Report**  
**Covering the project activities from 16/07/2015<sup>1</sup> to 17/07/2020**

Reporting Date<sup>2</sup>  
**09 November 2020**

LIFE PROJECT NAME or Acronym  
**LIFE-ENPE**

Data Project

<b>Project location:</b>	Bristol, England, UK
<b>Project start date:</b>	16/07/2015
<b>Project end date:</b>	17/07/2020
<b>Total budget:</b>	€ 1.072.400
<b>EU contribution:</b>	€ 643.439
<b>(%) of eligible costs:</b>	

Data Beneficiary

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<sup>1</sup> Project start date

<sup>2</sup> Include the reporting date as foreseen in part C2 of Annex II of the Grant Agreement

**This table comprises an essential part of the report and should be filled in before submission**

Please note that the evaluation of your report may only commence if the package complies with all the elements in this receivability check. The evaluation will be stopped if any obligatory elements are missing.

<b>Package completeness and correctness check</b>	
<b>Obligatory elements</b>	<b>✓ or N/A</b>
<b>Technical report</b>	
The correct latest template for the type of project (e.g. traditional) has been followed and all sections have been filled in, in English <i>In electronic version only</i>	✓
Index of deliverables with short description annexed, in English <i>In electronic version only</i>	✓
<u>Final report</u> : Deliverables not already submitted with the MTR annexed including the Layman's report and after-LIFE plan Deliverables in language(s) other than English include a summary in English <i>In electronic version only</i>	✓
<b>Financial report</b>	
The reporting period in the financial report (consolidated financial statement <b>and</b> financial statement of each Individual Beneficiary) is the same as in the technical report with the exception of any terminated beneficiary for which the end period should be the date of the termination.	✓
Consolidated Financial Statement with all 5 forms duly filled in and signed and dated <i>On paper (signed and dated originals*) and in electronic version (pdfs of signed sheets + full Excel file)</i>	N/A
Financial Statement(s) of the Coordinating Beneficiary, of each Associated Beneficiary and of each affiliate (if involved), with all forms duly filled in (signed and dated). The Financial Statement(s) of Beneficiaries with affiliate(s) include the total cost of each affiliate in 1 line per cost category. <i>In electronic version (pdfs of signed sheets + full Excel files) + in the case of the Final report the overall summary forms of each beneficiary on paper (signed and dated originals*)</i>	✓
Amounts, names and other data (e.g. bank account) are correct and consistent with the Grant Agreement / across the different forms (e.g. figures from the individual statements are the same as those reported in the consolidated statement)	✓
Mid-term report (for all projects except IPs): the threshold for the second pre-financing payment has been reached	N/A
Beneficiary's certificate for Durable Goods included (if required, i.e. beneficiaries claiming 100% cost for durable goods) <i>On paper (signed and dated originals*) and in electronic version (pdfs of signed sheets)</i>	N/A
Certificate on financial statements (if required, i.e. for beneficiaries with EU contribution ≥750,000 € in the budget) <i>On paper (signed original) and in electronic version (pdf)</i>	N/A
<b>Other checks</b>	
Additional information / clarifications and supporting documents requested in previous EASME letters (unless already submitted or not yet due) <i>In electronic version only</i>	✓
This table, page 2 of the Final report, is completed - each tick box is filled in <i>In electronic version only</i>	✓

*\*original signature by a legal or statutory representative of the beneficiary / affiliate concerned*

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## 2. List of key-words and abbreviations

Associated Beneficiary (AB) – a project partner within an EU LIFE project (non-financing)  
Co-ordinating Beneficiary (CB) – a project partner leading an EU LIFE project  
Co-Financer (CF) – a project partner providing funding to an EU LIFE project  
Court of First Instance East Flanders, Section Ghent; an affiliate body of EUFJE (see below)  
Defra – the (UK government) Department for Environment, Food and Rural Affairs  
DG Environment – (EC) Directorate General for Environment  
EA – Environment Agency (England, UK)  
EC – European Commission  
(EC) EASME – (European Commission) Executive Agency for Small and Medium-Sized Enterprises  
(EC DG Environment) ECA – Environmental Compliance Assurance initiative  
EJTN – European Judges Training Network  
ENPE – European Network of Prosecutors for the Environment  
ENPE aisbl – ENPE incorporated in Belgium as an ‘association internationale sans but lucratif’  
EnviCrimeNet – a network of police officers and others fighting environmental crime in Europe  
EPA – Environmental Protection Agency (Ireland)  
ERA – European Law Academy  
EU – European Union  
EU Exit (‘Brexit’) – the UK leaving the EU on 31/01/20 as per the June 2016 referendum  
EUFJE – European Union Forum of Judges for the Environment  
Eurojust – the European Union’s Judicial Co-operation Unit  
Europol – the European Union’s Law Enforcement Agency  
FP – Functioneel Parket, the Public Prosecutor’s Office for Serious Fraud and Environmental Crime in the Netherlands; a LIFE-ENPE Associated Beneficiary  
Grondwettelijk Hof – Cour Constitutionnelle (Constitutional Court, Brussels); an affiliate body of EUFJE  
IMPEL – European Network for the Implementation and Enforcement of Environmental Law  
INECE – The International Network for Environmental Compliance and Enforcement

INTERPOL – the International Police organisation

LIFE-ENPE – The five year EU LIFE programme funded project for ENPE (EU LIFE project)

LIFE Natura-Themis (LIFE N-T) – a LIFE funded project focussing on tackling environmental crime on the island of Crete, Greece, with which LIFE-ENPE had signed a Declaration of Co-operation

LIFE Reason for Hope (LIFE RfH) – a LIFE project focussed on protecting a rare species of bird, the Bald Ibis from Poaching, with which LIFE-ENPE had signed a Declaration of Co-operation

LIFE Smart-WASTE (LIFE S-W) – a LIFE funded project focussing on waste regulation with which LIFE-ENPE had signed a Declaration of Co-operation

Mid-term Report (MtR) – Report to register project progress at Mid-term

MILIEU – An independent consultancy service providing legal and policy advice

NEEMO – NEEMO EEIG the organisation responsible for the monitoring of LIFE projects

Progress Report – LIFE reporting during the project (x2)

REMA – Riksenheten for Miljo- och Arbetsmiljomal, the National Environmental Crimes Unit (Sweden); a LIFE-ENPE Associated Beneficiary

THEMIS - an informal regional network of national authorities responsible for natural resources management and protection, and for the development, implementation and enforcement of environmental laws, focussed on South Eastern Europe

U Ghent - The University of Ghent - an affiliate body of EUFJE (see above)

UNEP - United Nations Environment Programme

### 3. Executive Summary

This **EU LIFE programme Final Report** presents a summary of the activities and findings of the ENPE Board at the conclusion of the **LIFE-ENPE project** (reference: **LIFE14/GIE/UK/000043**) reporting from the project start date (16/07/15), to its end (17/07/20).

The project has a total budget of **€1.072.400** with **€643.439** as EU financial contribution via the EU Life Environmental Governance and Information programme and **€428,961** provided as contributions from the project's Associated Beneficiaries and Co-Financer.

The project Co-ordinating Beneficiary is the Environment Agency, England (EA) and the original four project partners were a Co-Financer – the Environmental Protection Agency, Ireland (EPA); and three Associated Beneficiaries - Riksenheten for Miljö-och Arbetsmiljomal, Sweden (REMA); Functioneel Parket, the Netherlands (FP) and the European Union Forum of Judges for the Environment, Belgium (EUFJE). Her Majesty's Government's (UK) Department for Environment, Food and Rural Affairs (Defra), was added as an additional Associated Beneficiary in 2018.

The project's aim and over-arching objective is: ***“to improve compliance with EU Environmental Law by addressing uneven and incomplete implementation across Member States through improvements to the efficiency and effectiveness of prosecutors and judges in combating environmental crime”.***

Its objectives are to:

- 1. Build a Self-sustaining Network of Environmental Prosecutors;**
- 2. Improve the Collation and Dissemination of Information on Environmental Crime; and**
- 3. Improve Capacity and Consistency in Europe for Combating Transnational Waste, Wildlife and Chemicals (Air Pollution) Crimes.**

At the conclusion of project activities on 17 July 2020, interim project reporting had already demonstrated that all three objectives have been met. The over-arching project aim has been addressed, although verification as to whether it has been fully achieved in the long term will require more time and resource to assess more widely and in greater depth. The Board believe that over time this will reflect a positive impact upon the implementation of environmental legislation and combatting environmental crime by prosecution across the EU. This is supported by feedback from key stakeholders, evidenced in the benefits questionnaire survey (Annex 3 (i)).

During the course of the project, unforeseen external and internal factors have affected the project progress requiring adjustments in project management. These factors, and the steps taken to mitigate them to minimise their negative impact on the project outcomes, are discussed in more detail below.

The project has enabled ENPE to be formally established as an active, internationally-recognised and respected network of specialist prosecutors - **ENPE aisbl** – comprising both prosecuting organisations and individual prosecutors from across Europe and beyond. The latest membership number was 29 members and 12 observers (41 in total).

Through the development and promulgation of best practices in fighting waste crime, wildlife crime and air pollution, and in sanctioning environmental crimes in general, ENPE, facilitated by the LIFE-ENPE project, has evolved into an organisation with a central role in shaping and delivering EU Policy in combating environmental crime.

Project activities and key project deliverables for each of the three project objectives were provided in line with the time frames set out in the original proposal, and are listed below:

1. Build a Self-sustaining Network of Environmental Prosecutors

Key deliverables & outputs demonstrating this objective has been met were:

- (i) the incorporation of ENPE as an international non-profit association (ENPE aisbl), formalised by Royal Decree (Belgium) on 01 September 2016;**
- (ii) the expansion of the ENPE network to 41 different organisations and individuals registered as members and observers, representing 28 different European countries by the project close date (17/07/2020), exceeding the expected results in this area as set out in the project proposal;**
- (iii) convening four annual conferences in May 2016, September 2017, October 2018 and October 2019 attended by over 550 delegates in total, which, although was one less than expected, there were additional unforeseen project benefits of (i) ENPE's central role in the European Commission Directorate General for Environment's Environmental Compliance Assurance (ECA) initiative and (ii) the extension of ENPE activities and membership beyond Europe.**

2. Improve the Collation and Dissemination of Information on Environmental Crime

Key deliverables & outputs demonstrating this objective has been met were:

- (i) the publication of the Capitalisation & Gap-filling (project baseline) report delivered, via government prosecuting organisations, to prosecutors and specialists in all 28 EU Member States and in total, 45 countries worldwide meeting the expected results for this action as set out in the project proposal;**
- (ii) the establishment of the ENPE website including the environmental crimes caselaw database (January 2016); and**
- (iii) publishing and sharing 13 ENPE newsletters including all ENPE activity details, updates and case reports.**

3. Improve Capacity and Consistency in Europe for Combating Transnational Waste, Wildlife and Chemicals (Air Pollution) Crimes

Key deliverables & outputs demonstrating this objective has been met were:

- (i) the convening of four specialist LIFE-ENPE Working Groups, providing workshops and training materials over three years; this included each group publishing two Interim Reports (Dec 2017; June 2019) and one Final Report (August 2020);**
- (ii) promulgation of the Working Group outputs including awareness-raising and training materials to more than 1,000 enforcement and prosecution specialists across Europe, exceeding expected results, through a combination of face-to-face delivery, online webinar and remote third party dissemination (December 2017-July 2020);**

**(iii) project monitoring information, including collating Benefits Realisation evidence demonstrating increased transnational collaboration and co-operation between prosecutors and jurisdictions facilitated by LIFE-ENPE activities.**

External factors outside of the control of the project, in particular, the terrorist attacks on targets in Brussels on 22 March 2016 and the effect of the global COVID-19 pandemic from February 2020, required necessary adjustments in project management (Action E1). This included the cancellation of project Board meetings, and two workshops planned for late March and mid-May 2020 due to travel restrictions affecting delegates and presenters. These adjustments included undertaking project engagement activities differently e.g. by holding LIFE-ENPE Project Board meetings remotely (by teleconference) and gaining feedback for the workshops by correspondence (questionnaire survey).

Administrative adjustments to the project were required in November 2018 following a structural re-organisation of the EA, and the inclusion of project affiliates. It was also apparent from an early stage in the project that additional travel and subsistence costs would be needed for ENPE members to enable attendance at ENPE events.

In terms of project progress, some of the project outcomes were not realised as originally intended or to the original proposed timescale. For example, the incorporation of ENPE as an international non-profit association took longer than anticipated. More detail on this and other adjustments that were necessary during the management of the project are included in section 6.2 below.

Another learning point from the project was that the environmental crimes database (Action D2) has not been utilised as fully by members as was initially expected. Although entries have been added to the database, the number of cases remains low, given the length of time available for expansion and the degree of engagement (including communications shared with ENPE members and stakeholders relating to this resource), to encourage more participation in uploading and sharing cases. This aside, feedback from members suggests the database has been useful in sharing information and comparing cases in different jurisdictions (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy).

From a policy development perspective, in addition to the meeting of the key LIFE-ENPE project objectives, ENPE's role in the EC's Environmental Compliance Assurance (ECA) initiative, and its forthcoming involvement with the EU's Biodiversity 2030<sup>3</sup> initiative and Zero Pollution ambition<sup>4</sup> reflect how significant the network has become. It is now developing a central role in policy development in the EU's ambition to improve environmental compliance (Action E3). It is hoped that funding will be made available for ENPE to continue its activities into and beyond the 'After-LIFE' period in order to contribute to the Commission's agenda and further strengthen the important fight against environmental crime.

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<sup>3</sup> [https://ec.europa.eu/info/sites/info/files/communication-annex-eu-biodiversity-strategy-2030\\_en.pdf](https://ec.europa.eu/info/sites/info/files/communication-annex-eu-biodiversity-strategy-2030_en.pdf)

<sup>4</sup> [https://ec.europa.eu/info/research-and-innovation/strategy/european-green-deal/call/zero-pollution-toxic-free-environment\\_en](https://ec.europa.eu/info/research-and-innovation/strategy/european-green-deal/call/zero-pollution-toxic-free-environment_en)

## 4. Introduction

In the LIFE-ENPE project proposal (2014), it was estimated that globally, international environmental crime costs around \$213 billion per year<sup>5</sup>. This figure has since been revised upwards to \$258 billion per year<sup>6</sup>, given the expansion of criminal activity reported in the six years elapsed since then.

The need to address, tackle and reduce this type of crime has clearly become even more pressing since the project started. Given its geographic, political and economic position at the centre of the global economy, Europe could, (unenviably), be described as the hub for transnational environmental crime, with wildlife crime particularly prevalent<sup>7</sup>. By focussing on this issue in Europe, it was hoped that LIFE-ENPE would impact not only the European, but also the wider global environmental crime problem.

The project's over-arching aim is: *“to improve compliance with EU Environmental Law by addressing uneven and incomplete implementation across Member States through improvements to the efficiency and effectiveness of prosecutors and judges in combating environmental crime”*.

As set out in the project proposal, this aim would be underpinned by three clearly defined project objectives:

1. Build a Self-sustaining Network of Environmental Prosecutors;
2. Improve the Collation and Dissemination of Information on Environmental Crime;
3. Improve Capacity and Consistency in Europe for Combating Transnational Waste, Wildlife and Chemicals (Air Pollution) Crimes.

Each objective would be met through the carrying out of specific project Actions, with assigned & prescribed deliverables, activities, and set timeframes for delivery within the 5- year project duration.

It was also suspected - and subsequently confirmed in the publication of the baseline Capitalisation and Gap-filling report, (Action A1) - that there was inconsistency in the way in which environmental crimes were reported, prosecuted and sanctioned across Europe (Deliverable: (Capitalisation & Gap-filling) Follow-up report 28/03/17).

Instilling consistency in how environmental crime is prosecuted in Europe had to be a key ambition for the project to be effective and the convening of, and outputs from, the four LIFE-ENPE Working Groups have played a central role in meeting this ambition (Deliverable: Working Group Final Reports with recommendations 30/0720). The baseline (Cap & Gap) report has also served as a useful guide to focus the groups' activities by identifying particular themes and topics where training, guidance and general awareness-raising in tackling crime was most needed (Deliverable: First Stage Interim Reports and training materials 31/12/17).

Alongside the setting of the project baseline via the Cap & Gap report, the establishment of the project's audience (Action A2) comprised the cataloguing of all organisations (supra-national;

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<sup>5</sup> INTERPOL & UNEP estimates 2014.

<sup>6</sup> European Environmental Bureau (EEB) Crime and Punishment Report March 2020

<sup>7</sup> <https://www.dw.com/en/europe-a-silent-hub-of-illegal-wildlife-trade/a-37183459>



national; regional/municipal and individual) engaged in the prosecution or adjudication of non-compliance of EU environmental legislation (Deliverable: Matrix of contacts 30/05/18). Feedback on project activities, outputs and general progress from this stakeholder group, as well as ENPE members (Deliverable: Survey results, questionnaires, feedback forms etc. pursuant to the monitoring plan 04/08/20), has assisted in the measurement of project benefit via ongoing project monitoring, including Benefits Management (Action C1; Deliverable: Monitoring plan (updated 11/06/18); Annex 3.0 LIFE-ENPE Benefits Realisation Strategy).

As a LIFE Environmental Governance and Information project, communications, activities and information sharing have been core project activities (Action D1). The LIFE-ENPE communications plan (Deliverable: Communications Plan LIFE-ENPE 19/12/16) sets out the ‘three-phase’ approach the project has taken in order to target stakeholders most effectively.

This phased approach to communications management is both flexible and agile and will ensure continuity of LIFE-ENPE communications well into the ‘After-LIFE’ period with a clearly defined work-plan and communications strategy developed in order to sustain the network activity beyond the end of the project (Deliverable: After-Life Plan 17/10/20). Project communications, in general, are considered to have been more than adequate as evidenced in the growing awareness of the ENPE network and LIFE-ENPE project in the stakeholder feedback exercises (Deliverable: Survey results, questionnaires, feedback forms etc. collected pursuant to the Monitoring plan 04/08/20).

In terms of project outputs and outcomes, it has been pleasing to note the evidence of improved transnational co-operation in the prosecution of environmental crime as reported in the LIFE-ENPE Second Impact Survey (Action C1; Annex 7.0). This was a key project aim as set out in the project proposal, and a crucial part of meeting the project objectives.

However, reporting in other areas has shown that there is still work to do, such as expanding the ENPE crimes database which was anticipated to be central to the sharing of European environmental crime case law. Although the database has been accessed regularly, with cases added, engagement with prosecutors has not been as successful as planned, with lower numbers of crimes added and accessed during the period of project activity.

Monitoring of the Project’s impacts was improved through the application of Benefits Management<sup>8</sup> as well as the Key Project Indicators (Action C1). This has resulted in a more accurate method of identifying and reporting on the project benefits including ‘Emerging Benefits’ that were not foreseen at the start of the project (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy).

The Benefits Questionnaire survey (Annex 3.(i)), which was carried out to gain feedback from key stakeholders in place of the cancelled Benefits workshop (originally planned for March 2020 but cancelled due to Covid-19 travel and group corporate event restrictions), revealed evidence of the *social* and *societal benefits* arising from the project activities. In particular, the reporting of behavioural changes in relation to wildlife crimes in certain jurisdictions as a result of LIFE-ENPE project interventions in the form of awareness raising, guidance and training (Annex 3 (i) LIFE-ENPE Benefits Questionnaire 2020) was particularly welcome. More generally, however, the hoped-for behavioural changes resulting in *reduced environmental crimes overall* were not in evidence, and rather, the questionnaire feedback suggested a general

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<sup>8</sup> A monitoring tool to assist in identifying, categorising, tracking and reporting on project benefits described in the LIFE-ENPE Benefits Management Strategy, section 4.3 in Annex 20.0 Deliverable – Monitoring Plan.

increase in these crimes. Given the measured increase in these types of crimes globally, then this is not an unexpected development, with a possibly unrealistic ambition of behavioural changes resulting in a reduction in these crimes in such a short timeframe. More detail on the benefits realisation reporting, including discussion around this specific area is included in 6.4 below.

On a more positive note, the ENPE network's prominent role in the European Commission Directorate General for Environment's (DG ENV) Environmental Compliance Assurance (ECA) initiative and the expansion of ENPE activity and engagement (including ENPE Membership) with prosecuting organisations outside of the EU (Actions D2 & E3) are considered very valuable outcomes, neither of which were planned for at the project start.

The ongoing involvement of ENPE in the ECA initiative together with the influence that the ENPE network has had in providing a framework for similar network activities overseas e.g. in China<sup>9</sup>; and in contributing to similar networks in North America and Canada and in Latin America.) are all welcome developments, with potential for replication in other regions. Going forward, it is anticipated that ENPE will continue to have a central role contributing to EU Policy-making in relation to tackling environmental crime through the Biodiversity Strategy 2030 and the Zero Pollution ambition. ENPE continues to grow as a network as more organisations and individuals join.

## 5. Administrative part

The Environment Agency, England (EA) is the Co-ordinating Beneficiary (CB) of the LIFE-ENPE project. As a non-departmental public body with responsibility for environmental regulation in England, it has a significant role in the enforcement of environmental law and prosecuting certain environmental crimes. Its expertise is wide-ranging, but with particular responsibility for the prosecution of *waste crime* and a key role in regulating emissions to land, water and the atmosphere in England. It also has significant experience in managing LIFE-funded projects<sup>10</sup>, and as a founding member of ENPE, was well-placed to lead this project.

The original four project partners are all organisations with similar roles and responsibilities, albeit in different EU Member States. The project Co-Financier (CF) is The Environmental Protection Agency, Ireland (EPA), responsible for environmental enforcement in Ireland; and the three Associated Beneficiaries (ABs) are: 1) Riksenheten for Miljö-och Arbetsmiljomal, Sweden (REMA) – a specialist state prosecuting unit in Sweden dealing only with environmental crimes; 2) Functioneel Parket of The Netherlands (FP) – the state prosecuting office that is responsible for serious fraud and environmental crime and whose representative was the custodian of the IMPEL Trans-frontier Shipment of Waste database; and 3) the European Union Forum of Judges for the Environment, Belgium (EUFJE) – a transnational network of European environmental judges. Her Majesty's Government's (UK) Department for Environment, Food and Rural Affairs (Defra), was added as an additional Associated Beneficiary in 2018 following internal re-structuring in the EA resulting in the LIFE-ENPE finance support team moving to Defra. Project partner representatives are all legal specialists bringing unique and specific skills to the project covering a wide range of environmental

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<sup>9</sup> Personal contact from Dimitri de Boer, SPP 29/03/18

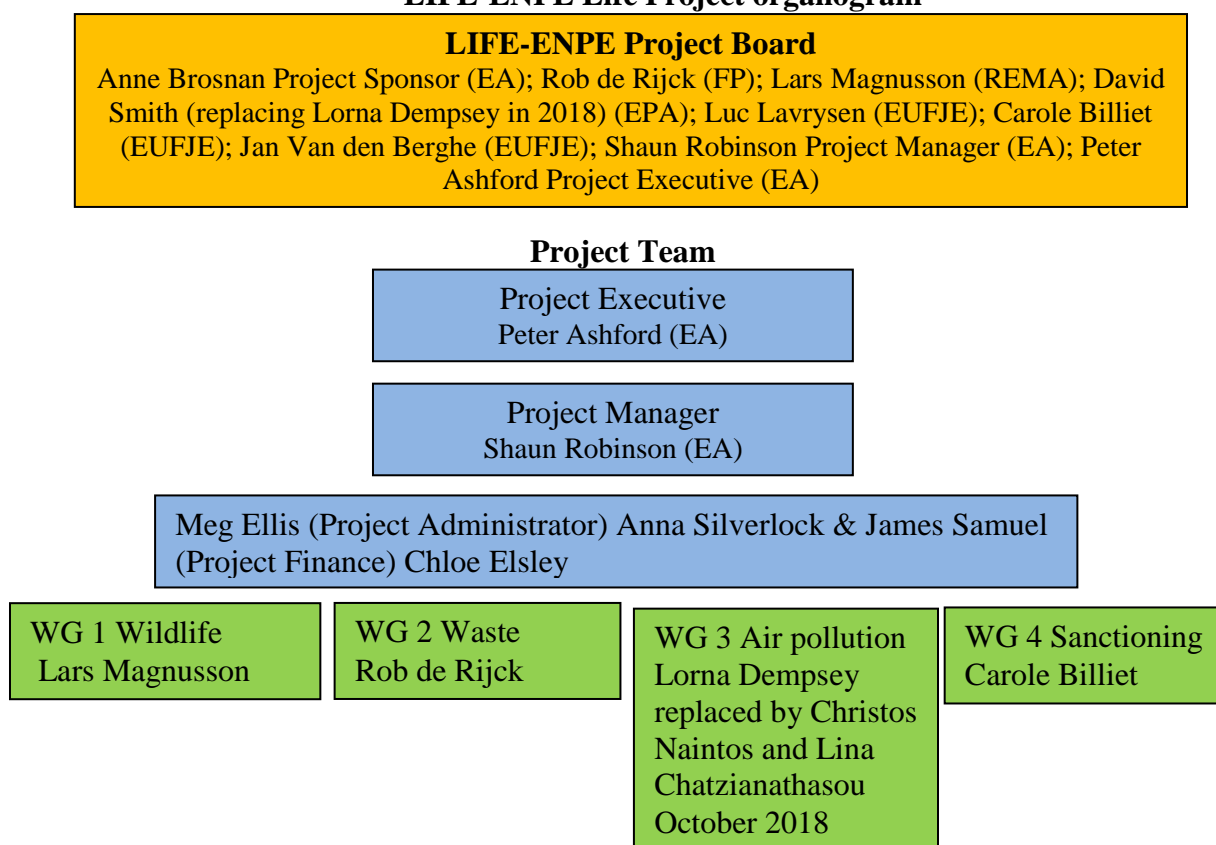
<sup>10</sup> LIFE-ENPE Project Proposal (Technical application Forms Part A – administrative information p13-14)

expertise (Annex 20.0 project partner contact biographies). This expertise guided the allocation of Working Group chair roles, and contributions made by Board members for and to each group.

Governance of the LIFE-ENPE project follows a standard LIFE project management structure comprising a Project Board, Project team and specific Working Groups (specialised teams):

- Project Board (including Project Sponsor and all partner representatives);
- Project Executive;
- Project Manager and other support roles, including financial and administrative support;
- Working Groups (x4).

#### **LIFE-ENPE Life Project organogram**



The project management process has been led on a day-to-day basis by the Project Manager, with regular contact and interaction with members of the Project Team and Board. Over the course of the project, the Board met on 18 occasions (Deliverable: Project Board agendas, minutes & reports 30/07/20). Furthermore, the Project Team met on at least a monthly basis to cover day-to-day issues and ensure regular discussion of project progress, management, activities and financial matters with specialist support staff contributing as and where needed.

There were personnel changes within the project governance structure during the project activity period including the replacement of the original Project Sponsor (Jonathan Robinson) with the former Project Executive (Anne Brosnan), and the inclusion of a new Project Executive (Peter Ashford), formerly the project's Commercial Lawyer, in May 2016. In addition, Project Administrator Meg Ellis was replaced by Chloe Elsley and the LIFE-ENPE project Co-financier partner (EPA) replaced their Board member – Lorna Dempsey with David Smith, in June 2018.

The project governance structure, including the collegiate approach adopted to dispense project Board activities, has worked well.

All project partner (AB and CF) representatives have played, and continue to play, an active part in the project, bringing significant added value through their experience and ‘day-job’ activities. In addition to chairing the LIFE-ENPE Working Groups – WGs - (Deliverables: LIFE-ENPE WG First and Second Stage Interim reports 31/12/17 & 31/03/19; WG Final Reports 30/07/20), they have attended, published or contributed to, in combination, 36 external events, articles or publications during the reporting period (Deliverables: Presentations provided at external conferences Annex 11.0 22/07/20; Comms Plan provided 23/10/20 ).

Each project partner’s organisational specialisms in environmental crime enforcement has added significant value to the WG outputs. For example, EUFJE, as the chair partner of the WG focussed on sanctioning and judicial process (WG4), was able to call upon a number of its members – all European Judges - to provide input to their comparative study into gravity factors for consideration when sanctioning environmental crimes. The comprehensive reports provided as outputs by this group (Deliverable: LIFE-ENPE WG Final reports 30/7/10 - Annex 12 (ii)), reflect the knowledge and experience from each representative, adding breadth and depth of subject matter to the reporting.

Equally, REMA’s expertise in the area of wildlife crime, as Chair organisation for the WG focussed on this area (WG1), led to valuable collaborative work with the United Nations Environment Programme (UNEP) Convention for Migratory Species (CMS), including a well-attended workshop held in Segovia Spain in May 2018 (Deliverable: LIFE ENPE WG Second Stage Interim Reports 31/03/19).

LIFE-ENPE has maintained regular contact with the external monitors (NEEMO) and EASME, with six LIFE-ENPE/NEEMO Missions having been convened in total. Representatives from NEEMO and/ or EASME have also attended the annual ENPE conferences in 2017 (Oxford) and 2019 (The Hague).

Changes were made to the LIFE-ENPE Grant Agreement via e-proposal, in order to properly describe the EUFJE organisations contributing to the project as ‘affiliates’, with some minor budget amendments (re-allocation of EUFJE budget to affiliates) also necessary. At the same time, following an internal re-structuring exercise at the EA (the project’s CB), an additional AB (DEFRA), has been added to the project. These changes were activated in July 2018.

Deviations from the work-plan were necessary due to travel restrictions imposed following the Belgian terrorist attacks of March 2016 and June 2017 requiring that Project Board meetings were held remotely via teleconference. The Covid-19 global pandemic (February 2020- ongoing at time of reporting) required that two final workshops, planned for March and May 2020 were cancelled with delegate contribution and feedback provided by correspondence. At the time of reporting Covid-19 related travel restrictions continued to impact certain project activities with some delays in translation and publication of reports because of staffing and resourcing issues experienced by suppliers. As a result, the invoicing for these services has been delayed.

In spite of the difficulties outlined above, the Project Board is pleased to report on a very satisfactory work programme over the last five years with all deliverables provided and

milestones met. Furthermore, the three main project objectives have been met in full, and within the project budget allowances as set out and approved at the outset<sup>11</sup>.

## 6. Technical part (maximum 25 pages)

### 6.1. Technical progress, per Action

As a LIFE Environmental Governance and Information project, LIFE-ENPE has needed to be structured in such a way that maximises the opportunity for the project outputs and deliverables to be easily shared, and where necessary, replicated within and between the stakeholders and wider project audiences. The project proposal sets out the eleven project Actions by category, comprising *Preparatory Actions* (Actions A1-2), *Core Actions* (Actions B1-3), *Monitoring Actions* (Action C1), *Communication and dissemination Actions* (Actions D1-D2) and *Project Management Actions* (Actions E1-3)<sup>12</sup>.

Preparatory actions (Action A1 – Capitalisation and Gap-filling; Action A2 – Establish the project’s audiences) were linked actions necessary to set the project baseline and establish stakeholders and the wider project audiences. This group, collectively, would go on to make up the widest interest group, a community numbering in excess of 430 organisations and individuals.

The project baseline was, in summary, the level of prosecution activity in relation to environmental crime in Europe including information, records of prosecution, case law and details of the organisations involved at the start of the project (16/07/15).

It was necessary, as a first step, to undertake a thorough review of all published literature and information available, (including previous work carried out on this subject), in the form of a report which would not only identify the extent of environmental crime prosecution in European Member States, but also confirm the project audiences by investigating the organisations, bodies, and agencies involved. This was also needed to direct the work topics and overall themes of the LIFE-ENPE Working Groups (Action B2 – Working Groups to improve consistency & capacity) which would develop training and awareness-raising outputs in order to instil consistency across the EU in prosecutions of crimes of this type.

The Core Actions (Action B1 – Establish the network - platform for co-operation; Action B2 – Working Groups to improve consistency & capacity and Action B3 – Annual conference) were the main ‘doing’ actions of the project where the ENPE network was formally incorporated (Action B1), the project’s awareness-raising guidance and training delivered (Action B2), and where most networking took place (Action B3).

Monitoring and communication actions (Action C1- Monitor ENPE’s impacts; Action D1 – Communicate and disseminate ENPE’s results and Action D2 – Network with other Life and/or non-LIFE projects) were important activities throughout the project’s duration, as were the actions associated with project management and reporting of project progress (Action E1 – Project management; Action E2 – Compile information for indicator tables/ Project reporting

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<sup>11</sup> LIFE-ENPE Project proposal (Technical Application Forms Part F – financial information p95)

<sup>12</sup> LIFE-ENPE Project proposal (Technical Application Forms Part C – detailed technical description of the proposed actions p44-88)

and Action E3 – After-LIFE plan). Given the significant role ENPE assumed in EU policy development in tackling environmental crime during the project through the ECA initiative, preparing for the After-LIFE plan started earlier than expected and has developed into an additional core action, due to its significance.

The first Action – Action A1 - comprised the publication and dissemination of a Capitalisation and Gap-filling report which was commissioned following a tendering exercise in February 2016, building on published work, such as that by MILIEU (2004, 2010, 2014) and INTERPOL (2015). The project beneficiary responsible for implementation was the CB (EA) with the report foreseen to be delivered by November 2016.

### **Preparatory action: ACTION A1 – Capitalisation & Gap filling**

**Foreseen start date:** October 2015 **Actual start date:** December 2015

**Foreseen end date:** November 2016 **Actual end date:** March 2017

#### **Expected results for Action:**

	Number in proposal	Actual number achieved
Distribution of reports	<b>30 states</b>	<b>41 states</b>

### **Deliverable – Capitalisation & Gap-filling: Follow up report provided 28/03/17**

*“The prevailing finding of this analysis was that systematic data on environmental crimes, their enforcement and their sanctioning is still piecemeal, incomplete and inconsistent across the European Union”<sup>13</sup>*

This action was completed through the provision of a key project deliverable – the Capitalisation and Gap-filling (Cap & Gap) report (Deliverable: Cap & Gap Follow-up report 28/03/17). This report was to ‘set the scene’ for LIFE-ENPE, and to contribute to the identification of the project audiences (including key stakeholders and more general interested parties) as well as shaping the work areas and topics of focus for the four Working Groups (WGs). It was published in March 2017 via a third party following a competitive tender process and was central to the completion of the action. The key observation, as set out in the quote above, was the lack of consistent reviewable data on prosecution of environmental crime in Europe, something which was suspected, but had yet to be confirmed at the outset of the project. This did not have a material effect on project progress, but did serve to underline the fact that the project aim and objectives were appropriately ambitious, given the dearth of information available at the time. Additionally, the lack of existing data meant that each Working Group decided to supplement the findings through conducting their own questionnaire survey of stakeholders to ascertain the training needs required (Deliverable: LIFE-ENPE WG First Stage Interim reports 31/12/17).

Delivering the report was facilitated through three project milestones, each of which was met but with delays reported (see below). Although the tendering exercise proceeded broadly as planned, there were delays in getting the drafts produced and approved by the project Board.

A significant factor in causing the reported delays was the lack of available data for the report authors to review. Records of environmental crimes simply did not (and do not) exist in many European countries, and where available, access is complicated and information fragmented.

However, the report was completed and a total of 45 states had received the report by the end of the project (17/07/20) which exceeded the target figure of 30 set out in the project proposal<sup>14</sup>.

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<sup>13</sup> LIFE-ENPE Capitalisation and Gap-filling report, Executive Summary, p6; March 2017

<sup>14</sup> LIFE-ENPE Project proposal (Part C – detailed technical description of the proposed actions p49)



## Environmental prosecution report

tackling environmental crime in Europe

March 2017

LIFE14 GIE/UK/000043

The dependent actions were Action A2 – Establish the project's audiences, whereby the information on prosecuting organisations and bodies dealing with environmental crime would be used to confirm (and probably augment) the project audiences, and Action B2 – Working Groups, whose areas of focus were to be set by the findings of the Cap & Gap report. The delays in the production of the report did not adversely affect these actions since many of the project audiences (prosecuting organisations, enforcements networks, interest groups and specialists) had been identified during the drafting of the project proposal and the Cap and Gap report would identify additional bodies and organisations rather than the main stakeholders who were already known. The WG chairs were also the project Board representatives and in the review of the drafts, could identify topics of focus (i.e. 'Gaps'), as the report evolved.

### **The LIFE-ENPE Capitalisation & Gap-filling report March 2017**

As noted in the LIFE-ENPE Mid-term report (30/06/18) a project benefit that arose as a result of this action, outside of the LIFE-ENPE project and following the sharing of this report, has been an improved dialogue between ENPE and other European enforcement networks (e.g. EnviCrimeNet), who upon receiving the report, wanted to discuss the findings and improve ways to address the gaps identified.

Delays in the provision of a suitable final draft due to the difficulties in sourcing adequate data for interrogation, resulted in some slippage in meeting the project milestones as set out above. However, the WG chairs (as LIFE-ENPE Board members) were involved at every stage in the review of the report drafts and were able to incorporate relevant findings in the objectives and aims of each WG before the (delayed) publication. This input was necessary to ensure the groups could start their work, even though the final version of the Cap & Gap report had not been published.



The report was shared with all 28 EU Member States and with state prosecutors in 41 countries in total provided with the report by 05/12/17, exceeding the target of 30 states as set out in the proposal, and with 45 countries by the end of the project.

A related preparatory action, where the Cap and Gap report outcomes would be used, was Action A2 – Establish the project’s audiences - through the identification of prosecuting organisations, agencies and bodies in European states that needed to be included as LIFE-ENPE project stakeholders and/ or interested parties.

Although all project partners (CB, ABs & CF) had their own contacts with other prosecuting bodies, agencies and networks involved in the prosecution of environmental crimes, it was vitally important to accurately map the project stakeholders and wider project audiences at an early stage. This mapping, and the subsequent review and updating of the Stakeholder Matrix (Deliverable: Matrix of contacts (updated) 30/06/18), would continue into the project as the ENPE network was established and expanded.

### **ACTION A2 – Establish the project’s audiences**

**Foreseen start date:** October 2015    **Actual start date:** October 2015

**Foreseen end date:** June 2016        **Actual end date:** June 2016

#### **Expected results for Action:**

	Number in proposal	Actual number achieved
Contact in targeted states	<b>39 states</b>	<b>45 states</b>

#### **Deliverable – Matrix of contacts provided 23/04/16 (update provided 30/06/18)**

This action was completed on time through the provision of a key project deliverable - the Matrix of Contacts (provided 23/04/16; and updated 30/06/18). It was necessary to review this matrix as the ENPE network became more established, as it evolved and as it became involved in more activity and initiatives to fight environmental crime in Europe (e.g. DG ENV ECA). The matrix has been regularly updated with a second version supplied as a deliverable, along with the MtR on 30 June 2018.

More recently, LIFE-ENPE project interaction with other LIFE projects, as advised by EASME in recent Mission visits (Annex 1.0 Issues to be addressed from 29.10.18, 31.10.19 & 08/09/20 Mission visits) and with other environmental crime enforcement networks, agencies and bodies through collaborative and co-operative activity (Annex 2.0 ENPE Collaboration with other Agencies, Networks and Bodies), has expanded this matrix. Although the main activity period for this Action was set out in the first project year, the work is ongoing and will continue into the After-LIFE (Deliverable: Annex 5.0 LIFE-ENPE After-LIFE report 17/10/20).

The responsibility for this Action lies with the CB, with updates to reflect changes in contacts incorporated as and where needed, resulting in the widest stakeholder group (i.e. reflecting all those with an interest in ENPE and its activities who receive the ENPE newsletter) comprising more than 430 organisations, networks, bodies and individuals.

However, it was very much a shared activity as all project partners (ABs & CF) were involved in the preparation of the Matrix and continued to be involved in the wider project action as the network has grown. This involvement continues as the ENPE network expands, with linked actions benefitting from this interaction (Action B1 – Establish network platform for co-operation; Action B3 – annual conference).

An unforeseen Project Benefit (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy), has been the increased awareness of the LIFE-ENPE project and ENPE association and its activities from beyond Europe, in particular from the Americas, Australia and China whose representatives from environmental crime prosecuting organisations have attended and presented at ENPE annual conferences. The Stakeholder Matrix has expanded to include *global* organisations involved in environmental prosecution (e.g. Interpol; INECE) and ENPE representatives have attended and presented at events outside of Europe to address global audiences, for example the INECE/AELERT annual conference (Adelaide, Australia January 2020), the El Paccto programme<sup>15</sup> Latin American & European Crime Impact conference (Lima, Peru 2019), International Association of Prosecutors conference on Wildlife crime (Bangkok, Thailand November 2017) and the 8<sup>th</sup> World Water Forum, (Brasilia, Brazil September 2018) ENPE International Vice-President Jean-Philippe Rivaud is pictured at the event, above.



Our activities (e.g. LIFE-ENPE Air pollution Working Group WG3 & Waste crime Working Group WG2 training outputs), have also resulted in invitations to contribute to organisations with wider international and global remits extending beyond environmental crime prosecution, such as the United Nations Climate Change (UNCC) COP25 event, hosted by Chile in December 2019 and held in Madrid, where our expertise in waste and air pollution was sought.

ENPE Vice-President and LIFE-ENPE Waste crime Working Group chair Rob de Rijck is pictured presenting at the UN Climate Change conference COP25 in Madrid, Spain in December 2019 alongside LIFE-ENPE air pollution Working Group member Dr Horst Buther and ENPE Director, Dr Antonio Vercher.

Dr Antonio Vercher is also pictured on the right where he was invited to present at the El Paccto conference in Lima, Peru in October 2019, bringing together specialists in environmental crimes from Latin America and Europe.



<sup>15</sup> [https://ec.europa.eu/international-partnerships/events/innovating-fight-against-environmental-crimes\\_en](https://ec.europa.eu/international-partnerships/events/innovating-fight-against-environmental-crimes_en)



**The opening of the INECE/ AELERT conference, held in Adelaide, Australia and attended by Anne Brosnan, ENPE President, included an official welcome from an Aboriginal Elder, Major Sumner AM, of the Ngarrindjeri/Kaurna people known as Uncle Moogy (pictured left).**

**In opening the conference, its organisers acknowledged and recognised the historic claims and rights of the first peoples of Australia. They in turn, through Uncle Moogy provided a Welcome to Country explaining the relationship between local people and the land, welcoming conference delegates and setting out their view that all people should tread gently and foster their relationship with the land and the local environment.**

The identification of stakeholders and establishment of project audiences is a necessary action for any enforcement network and should continue beyond the end of the LIFE-ENPE project. The hard work has already been done and ENPE intends to build upon its first successful project work in the After-LIFE planning for the network.

The LIFE-ENPE core actions comprised the main operational activity as project outputs were developed and promulgated and the network was established. This first, and arguably the most important action, pursuant to the first project objective – *to build a self-sustaining network of environmental prosecutors*, was Action B1 – establish a platform for co-operation.

### **ACTION B1 – Establish network platform for co-operation**

**Foreseen start date:** October 2015    **Actual start date:** October 2015

**Foreseen end date:** July 2020        **Actual end date:** July 2020

#### **Expected results for Action:**

	Number in proposal	Actual number achieved
Members from prosecuting organisations	<b>25 EU states</b>	<b>25 EU states</b>

**Deliverable – network statutes & incorporation documents signed 18/11/16**

**Deliverable - Network governance documents (Board papers etc.) provided 15/07/20**

**Deliverable – Network membership list and other stat registers provided 29/07/20**

**Deliverable – Network sustainability strategy provided 29/07/20**



**ENPE Secretary General Lars Magnusson is pictured signing the incorporation documents on 04 July 2016**

This action comprised preparing, organising and delivering the formally incorporated ENPE association, registered in Belgium as an international non-profit association (ENPE aisbl). All documentation was signed at a Board meeting on 04/07/16 and incorporation was achieved, via Royal Decree on 01/09/16.

**ENPE Secretary General Lars Magnusson is pictured**

The network continues to grow as new members join, with 41 organisations and individuals from 30 different states (28 European states, 25 MS) confirmed as members and observers as the time of reporting. The ambitious figure of 25 targeted EU states represented by the end of the project, as set out in the proposal<sup>16</sup> has been met, with the continuation of the growth of the network, including members from outside of Europe (State Prosecution services in the Kingdom of Morocco and Republic of Brazil are Observer members).

This action was led by the CB, but all project partners were necessarily involved in preparation of statutes and the signing and approval as required in July 2016 (Deliverable: ENPE aisbl statutes 18/11/16).

<sup>16</sup> LIFE-ENPE Project proposal ( Technical application Forms Part C - detailed technical description of proposed actions p57)

The unforeseen requirement of obtaining Royal approval for sign-off of ENPE asbl resulted in a delay of some six months in the deliverable associated with this action (Deliverable: network statutes and incorporation documents signed 18/11/16). This delay did not have any material effect on the growth of the network or general project progress since the project activities and membership continued to expand, (albeit informally), in the meantime.

Incorporation of the ENPE association (ENPE asbl) as an internationally recognised enforcement network has assisted in widening the extent of activity and engagement, including, most notably, ENPE's central involvement in the (EC) DG ENV Environmental Compliance Assurance (ECA) initiative.

This followed significant contact with DG ENV representatives via the European Enforcement Experts



2018/F1/DOC1rev

#### Environmental Compliance and Governance Forum



Inaugural meeting  
13 March 2018,  
10h-17h  
Brussels, BERL building  
(Robert Schuman Room)

preparation of the After-LIFE plan (Action E3) was necessary at an earlier juncture of the project than was anticipated, given the desire and will to continue to develop the ENPE association's activities beyond the project through ECA activities (this is reflected in a higher than expected commitment of project staff time to Action E3 as a result).

Furthermore, the expansion of the network since incorporation has continued with 41 members and observers representing 30 different states (28 European, 25 MS) at the time of project close (17/07/20). This has been a significant increase from the project start date.

Efforts to expand the network have continued throughout the project duration, including targeted 'mailshot' letters to State Attorneys and prosecuting organisations for European states that were not yet members (June 2016 & January 2018). Collaborative work with Eurojust<sup>17</sup> (also ENPE Observer Members), resulted in two additional MS prosecuting organisations (Office of the General Prosecutor of Hungary; The Prosecutor General's office, Lithuania)

<sup>17</sup> An informal group established after the 2016 Utrecht conference by the four European enforcement network heads together with DG Environment representatives to further collaborative working in ensuring Environmental Compliance in Europe

<sup>18</sup> <http://www.eurojust.europa.eu/Pages/home.aspx>



Steering Group<sup>17</sup> and has strengthened the reputation of the ENPE association, enabling ENPE to become more involved in co-ordinated activities to tackle environmental crimes alongside other enforcement networks via regular workshops and forum meetings (see also Action D2 – Networking with other LIFE and/ or non-LIFE projects below (Annex 2.0 Collaboration with other Agencies, Networks & Bodies; Annex 5.0 After-LIFE plan).

Consideration of, and commitment to the

joining as members before the end of the project in March 2020. If ENPE is to continue as a network, which is very much to be hoped, then this action must continue beyond the end of the LIFE-ENPE project.



The establishment of, together with the activities and outputs from, the four Working Groups (WGs) to build capacity and consistency in the implementation of EU environmental law was the second LIFE-ENPE Core Action – Action B2. As set out in the project proposal<sup>19</sup>, three of the groups would have a specific focus (i.e. a topic area) of EU environmental law, and the fourth would focus on over-arching sanctioning, prosecution and judicial practice.

Early engagement with stakeholders during the preparation of the project proposal revealed that waste, wildlife and chemical pollution crimes were likely to be most in need of awareness-raising guidance and training to instil consistency and improve practices in the prosecution of related crimes.

These were included in the proposal as likely WG topic areas with flexibility to adapt the focus of each group, given that the preparatory project actions (Action A1 - Capitalisation and Gap-filling report in particular), would inform the WG work in each case.

### **ACTION B2 – Working Groups to improve consistency & capacity**

**Foreseen start date:** November 2016

**Actual start date:** December 2016

**Foreseen end date:** October 2019

**Actual end date:** Anticipated October 2019

#### **Expected results for Action:**

- 4 WGs with 8 topical experts in 3 workshops/ meetings per year producing written findings, recommendations for measures to improve environmental prosecution and adjudication, together with recommendations for further follow-up work;  
**Achieved** (NB with changes in WG membership in WG2s & 3)
- Presentations on WG findings at 3 ENPE conferences with at least 75 delegates present;  
**Achieved**
- 4 suites of training materials for prosecutors and judges on WG topics, to include slides, guidance on minimum standards and best practice, case studies;  
**Achieved**
- Dissemination of WG outputs to prosecution and/ or judicial organisation in at least 30 states;  
**Achieved**
- Dissemination of training materials through 1 website/ sharepoint receiving at least 50 hits per month;  
**Achieved**
- Training sessions based on WG outputs, delivered through seminars, webinars and working with third part training organisations to at least 20 organisations by the end of the project;  
**Achieved**
- Improvements in the capacity and consistency of environmental prosecutors and judges through at least 10 agencies adopting ENPE best practice in their environmental crime work  
**Not achieved** (5 cases reported via questionnaire surveys)

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<sup>19</sup> LIFE-ENPE Project proposal (Technical Application Forms Part C- detailed technical description of the proposed actions p58-59)



**Deliverable – LIFE-ENPE WG First Stage Interim Report & training materials provided 31/12/17**

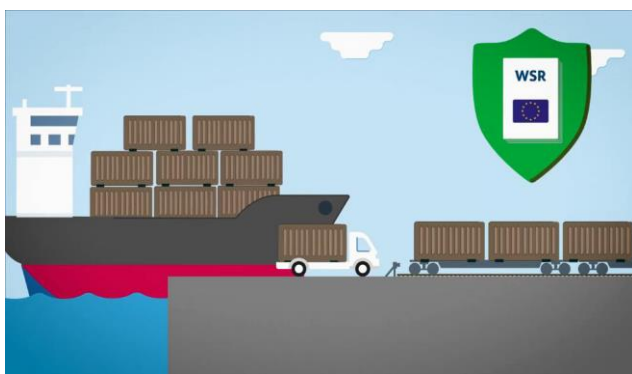
**Deliverable - LIFE-ENPE WG 2<sup>nd</sup> Stage Interim Reports & training materials provided 31/03/19**

**Deliverable - LIFE-ENPE WG Final Reports & training materials provided 03/08/20**

This key project action, central to the aim of the LIFE-ENPE project, continued from December 2017 until the end of 2019. The groups would be populated with specialist (prosecutor) members or technical (non-prosecutor) specialists with direct experience of prosecuting environmental crimes. A clear timetable of activity, from ‘kick-off meeting’ (December 2016) to publication of the final report (July 2020) was set out with two interim reports (Deliverables: LIFE-ENPE WG First Stage Interim report 31/12/17 & Second Stage Interim report 31/03/19) to be supplied which would present the progress being made on developing awareness raising guidance and training material for each group. Although the project CB provided a central co-ordinating role, it was the ABs that led on this action with each providing a Chair for the different groups.

It was important to examine the current ‘state of play’ in terms of environmental crime prosecution for each topic area covered by the groups, and following the limited information available in this regard from the Cap & Gap report (Action A1), questionnaire surveys were undertaken to further drill down on the training needs of prosecutors in each area and guide the focus of the outputs (Deliverable: LIFE-ENPE WG First Stage interim report 31/12/17). This exercise resulted in a refinement in the subject area for WG3 changing its topic from (more general) chemicals pollution, to air pollution, including odour investigation.

The WG activities and outputs have varied with a volume of work including awareness-raising slide packs on Illegal Killing and Taking of (Wild Migratory) Birds (Deliverable: LIFE-ENPE WG1 Second Stage Interim report 31/03/19); animation for training in Waste Shipment Regulations (Deliverable: LIFE-ENPE WG2 Final report 03/08/20); and guidance documentation (Deliverable: LIFE-ENPE WG4: Second Stage Interim Report 31/03/19).



**LIFE-ENPE WG2 Waste Shipment Regulation animation**

A key aspect of Action B2 has been the sharing and promulgation of outputs. Through the convening of workshops and meetings, and updates at each annual conference (Action B3), it has been possible to deliver much of the awareness-raising and training on a ‘face-to-face’ basis, as originally planned.

Workshops convened jointly with the UNEP CMS in Segovia, Spain in May 2018 (WG1 – wildlife crime) and in Nicosia,

Cyprus in March 2019 (WG2 & WG3 waste crime & air pollution, Deliverable LIFE-ENPE WG Second Stage Interim report 31/03/19), were attended by 37 and 35 delegates in each case, with representation extending beyond the EU into North Africa.

Collaboration with other organisations has been evident throughout all four WG activities including providing a response to the consultation on the EU Waste Shipment Regulation (April 2018); contribution to the UNEP CMS MIKT initiative (Deliverable: LIFE-ENPE WG Second Stage Interim Report); the provision of training such as WG2 members delivering specialist training on the Waste Shipment Regulation at IMPEL training workshops; together with attendance and support at WasteForce training workshops and involvement with ERA and EJTN events (Deliverable: LIFE-ENPE WG Second Stage Interim reports 31/03/19; LIFE-ENPE WG Final reports Annex 12.(i) & (ii) 03/08/20).



**A panoramic view of the training delivery at the joint LIFE-ENPE & CMS workshop, Segovia**

Travel restrictions imposed by the Covid-19 pandemic and other factors have necessitated the development of specific training outputs for sharing remotely by correspondence (e.g. WG3 training slide pack; Deliverable: LIFE-ENPE WG3 Final report Annex 12.(i) & (ii) 03/08/20) and by webinar (Waste Regulation training for ERA, May 2020).

Through using a variety of different media to deliver the WG outputs over the course of the project, outreach activities have continued in spite of unforeseen impediments, and in accordance with the targets and ambition as set out at the start of the project with each group reporting the dissemination of outputs to over 1,000 recipients each (Annex 4.0 Summary of LIFE-ENPE outreach).

The ‘knock-on’ effect of the reduction in the total number of annual conferences from five to four (as agreed with the project monitors, NEEMO), continued throughout the WG activities. Although this has resulted in some slippage in meeting milestone dates, it has not had any material effect on the wider progress of the actions.

For WG3 (air pollution) in particular, there was a notable break in activity when the WG Chair position remained vacant for several months following staff movements. Recruiting a replacement Chair proved more challenging than expected due to lack of time resources available to WG 3 members who were therefore reluctant to take on this role. It was resolved by having two WG members take on the duties of the Chair on a shared basis. The learning from this exercise includes the need to perhaps advertise the benefits of the WG Chair role more widely, including involving other project stakeholders and / or collaborating partners (e.g. DG ENV; IMPEL) and set aside resources for assistance and support for those willing to apply, given the very limited time available for most prosecutors to undertake the role due to its voluntary status.

In summary, this action, in spite of the challenges noted above, reflected a wide range of countries participating in the groups, proving beneficial in the provision of a multi-national approach to tackling the specific WG topics. This was evidenced by the questionnaire survey feedback captured in WGs 1 & 3 (Deliverable: LIFE-ENPE First Stage Interim reports

31/12/17), and in the different national approaches to gravity factors as provided in the outputs from WG4 (Deliverable: LIFE-ENPE WG Final Reports 03/08/20).

All four groups reported very positive feedback from members (Deliverable: WG Final reports 30/07/20), and from the wider project audience in receipt of training (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy). It is hoped, and indeed anticipated, that the groups continue their work into the 'After-LIFE' period and beyond.

The third core action, closely linked to the preparatory (Actions A1 & A2) and communication actions (Actions D1 & D2), is Action B3 – Annual conferences. Delays experienced at the start of the project resulted in slippage in the deliverables and milestones required for the first LIFE-ENPE annual conference. It was agreed with the project monitors that a reduction in the number of annual conferences (from five to four) would be needed to recover lost time and target the four remaining conferences accordingly.

The learning and outcomes of related actions (notably Action A2 – Establish the project's audiences and Action B1 – Establish network – platform for co-operation), enabled ENPE to quickly develop key relationships with other enforcement networks and projects with similar objectives. This led to discussions, and then agreement and organisation of several co-hosted annual conferences to realise efficiencies and build on the synergies of collaborative activity.

### **ACTION B3 – Annual conferences**

**Foreseen start date:** November 2015  
**Foreseen end date:** November 2019

**Actual start date:** May 2016  
**Actual end date:** January 2020

#### **Expected results for Action:**

At least 75 delegates from the target audience attending each of 5 annual conferences (365 delegates in total)

**Achieved** – 558 delegates in total attending 4 conferences (one conference not held).

**Deliverable –First annual conference agenda, delegates list, delegates pack provided 09/06/16**

**Deliverable - Second annual conference agenda, delegates list, delegates pack provided 22/09/17**

**Deliverable –Third annual conference agenda, delegates list, delegates pack provided 19/10/18**

**Deliverable –Fourth annual conference agenda, delegates list, delegates pack provided 25/10/19**

The first ENPE conference, was held in Utrecht, Netherlands on 12-13 May 2016 (194 delegates – pictured below), the second was on 21-22 September in Oxford, UK (160 delegates) and the third in Heraklion, Crete on 23-24 October (104 delegates) all included multiple hosting organisations with shared aims and goals in tackling environmental crime. The fourth (and final) conference was held in The Hague, and although the number of delegates was lowest overall (100 delegates), the group had the highest proportion of prosecutors and proportionally, the widest spread of MS attendance. This collaborative approach to organising and hosting annual conferences has worked well.

The action was the responsibility of the CB with significant contributions from the ABs who were involved in the conference steering groups. The related project deliverables reflected the slippage resulting from the cancellation of the first conference due to delays in the appointment of the project team. By aligning the remaining conferences with other networks (IMPEL, EUFJE and EnviCrimeNet) in order to jointly organise and host them, significant benefits have been realised.



**Four Networks conference delegates at Utrecht Dom Church 2016**

Budget re-allocation following the reduction in annual conferences from five to four was included in the Grant Agreement Amendments (Action E1).



**Delegates are pictured at the ENPE annual conference, Heraklion, 2018**

Furthermore, the enhanced exposure provided by the joint conferences has resulted in wider participation from stakeholders, including the EC DG ENV whose representatives attended the 2016 conference and provided keynote speeches to the 2017 and 2018 conferences (Deliverables: Second; Third Annual conference agenda, delegate list, delegate pack; 22/09/17; 19/10/18).

Representation from a large number of Nation States, including most EU MSs has been reported at each of the annual conferences. The first conference (Utrecht, 2016) included delegates from 35 countries, including 26 out of 28 MSs; for the second conference (Oxford, 2017) there were 37 countries represented with 25 of 28 MSs attending as well as 5 EU MS candidate countries and 1 potential candidate country; for 2018 (Heraklion), 25 countries were represented including 21 MSs, 1 EU MS candidate countries and 1 EU MS potential candidate country and for 2019 (The Hague), there were 32 countries represented including 24 out of 28 MSs.

The attendance from international environmental prosecution specialists across all four events has also been significant and widespread. This has led to these conferences having global impact and providing excellent networking opportunities. The non-European specialists and delegations have included prosecutor and Ministry of the Environment groups from China in

By ensuring maximum attendance and opportunities for the networks involved by holding joint conferences with other enforcement networks going forward, for example 2017 (ENPE, IMPEL & EnviCrimeNet), and 2018 (ENPE, LIFE Natura-Themis; LIFE Reason for Hope & IMPEL Water crimes group), the impact of this reduction in the number of conferences has been lessened.

2017, 2018 and 2019, invited keynote speakers from the US Department of Justice and INTERPOL Pollution Control Working Group in 2017 & 2019; INECE representatives in 2018 & 2019, the General Prosecutor's Office of Brazil, 2019 the Public Prosecution Service of Canada and Australia (NSW Planning and Environment Dept; and RecAp consultants 2017, 2018 & 2019). The positive feedback from delegates and stakeholders (Annex 3(i) LIFE-ENPE Benefits Questionnaire 2020) indicates that an annual conference is a necessary and worthwhile event to maximise networking opportunities and share ENPE outputs. This is an action that needs to continue after the LIFE-ENPE project has been completed.



Measuring the progress of the LIFE-ENPE project and its impact was carried through Action C1 – Monitor ENPE’s impacts. This action relates to all three project objectives and continued up to the end of project activities (17/07/20).

To improve measurement and impact of LIFE-ENPE outputs and outcomes, a Benefits Realisation Strategy (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy) was developed and published, with all LIFE-ENPE project benefits mapped, monitored, updated and reported on throughout the duration of project activity. This additional monitoring activity resulted in valuable feedback on how LIFE-ENPE had benefited the project audiences, as well as helping to guide future direction for the After-LIFE period.

### **ACTION C1 – Monitor ENPE’s impacts**

**Foreseen start date:** June 2016      **Actual start date:** June 2016

**Foreseen end date:** September 2020 **Actual end date:** July 2020

#### **Expected results for Action:**

Monitoring plan demonstrating ENPE has met its objectives and achieved expected results

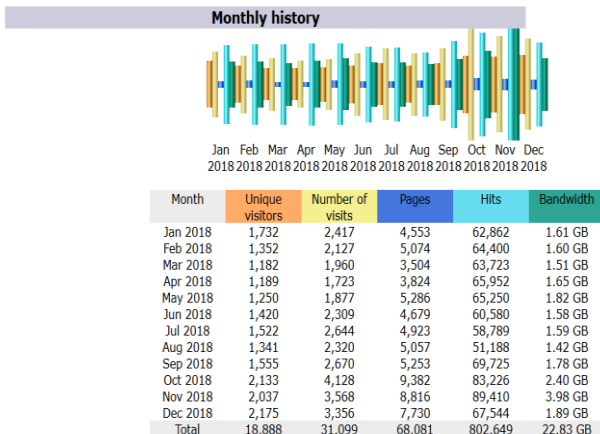
- **Achieved** (see Deliverables below).

#### **Deliverable – Monitoring plan 20/07/16; 11/06/18 (including Benefits Realisation Strategy)** **Deliverable – Survey results, questionnaires, feedback forms etc. collected pursuant to the monitoring plan provided 04/08/20**

This Action was the responsibility of the CB with two associated project Deliverables: LIFE-ENPE Monitoring plan 20/07/16 and 11/06/18 (updated); and Survey results, questionnaire, feedback forms etc. collected pursuant to the monitoring plan, 04/08/20. The plan was an important project tool that was used to monitor the project’s progress including the indicators, as the project completed.

The LIFE-ENPE project has augmented its monitoring through the adoption of Benefits Management (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy). By developing and implementing a Benefits Realisation Strategy, the LIFE-ENPE project has identified and categorised project benefits which were tracked and reported during the project life. This included unforeseen ‘emerging’ project benefits that arose out of complementary actions and synergies between activities (for example, the expansion of the ENPE network into South America and Africa with observer member organisations in Brazil and Morocco).





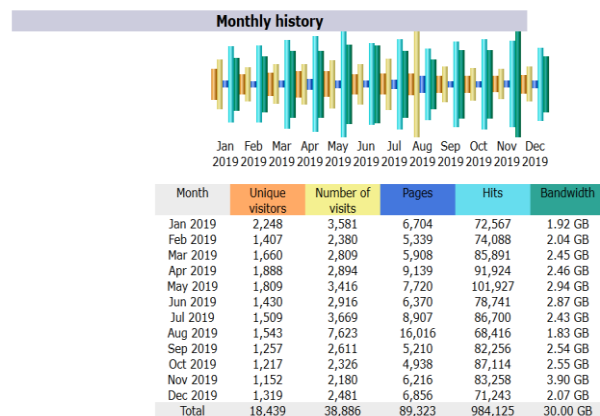
Other project actions related to this action include Actions B2 (Working Groups) and B3 (Annual conference), where project activities that are critical to progress could be measured and reported on, and Action E2 (Compile information for Indicator tables; Deliverable: Indicator table 23/10/20 Annex 5.0). Project milestones, in particular, the First and Second Impact Surveys (Annex 6.0; Annex 7.0), reported on the progress of this action via feedback received from a consistent set of metrics:

1) questionnaire surveys of conference

delegates from all ENPE annual conferences with reporting on the impact of ENPE interventions; 2) online activity reported over four years of the project (i.e. “without” and “with” LIFE-ENPE interventions), and 3) reporting on the changes in ENPE (aisbl) membership over the course of the reporting period.

ENPE website visits and hits statistics 2018 and 2019 are shown above and below to the right.

Analysis and interpretation of all three metrics suggests that LIFE-ENPE has had a significant and positive impact on tackling environmental crimes in Europe. In particular, the ‘visibility’ of the ENPE network and LIFE-ENPE project has increased, with more member and stakeholder recognition and participation in activities such as annual conferences and training workshops, from a wider section of the enforcement community. Furthermore, interest in, and interaction with the ENPE website has increased significantly from 2017-2019.



Benefits management, described and reported in the LIFE-ENPE Benefits Realisation Strategy (Annex 3.0), was added as an additional tool to measure the project progress and impact during the main period of project activity, including delivery of key project outputs (January 2018-July 2020). Priority, Intermediate and End Benefits were identified and mapped at the start of the project (Deliverable: Monitoring plan 11/06/18).

The Priority & End Benefits had specific measurement and review dates to monitor progress and adjust, merge or remove the benefit as needed. Using the EU LIFE programme description of benefits<sup>20</sup>, they were further categorised using the descriptors included in 6.4 below (**1. Environmental benefits** through to **7. Policy implications**).

Different methods were used as a measurement of benefit impact for example:

- Ongoing surveys during delivery and into realisation (e.g. First & Second Impact surveys)
- Feedback from events (e.g. WG workshops)

<sup>20</sup> see Section 6.4 below



- Questionnaire surveys (e.g. following workshops and annual conferences)
- Network participation (e.g. attendees at conferences, workshops)
- Ad hoc comments received (e.g. via email).

A simple ‘red, amber green’ (RAG) system of measuring and reporting the progress of each benefit was used to monitor progress against target figures (if and where applicable) over the period of reporting.

The outcome of this exercise was a valuable additional measurement of project impact, directly linked to the categories of benefits used by the LIFE programme reporting template (section 6.4 below). In summary, it was clear that most of the LIFE-ENPE Benefits identified and reported were *social* benefits, as well as benefits relating to *replicability, transferability and co-operation*, and *best practices* with *policy implications* also particularly well represented through clear evidence and examples provided (Annex 3.0; Section 7.5).

With reference to the LIFE-ENPE Grant Agreement, Section B3, these examples of project benefits having been realised reflect the “EU added value of the project and its actions” well. This Action was mostly project-specific, in that its objectives reflected the reporting needs of the LIFE-ENPE project. Nevertheless, it would be good practice to continue with similar project monitoring activities, following the completion of the project.

One of the two obligatory Communication & Dissemination Actions, Action D1 (Communicate and disseminate ENPE's results), was key to the project success or otherwise given that the LIFE-ENPE is an Environmental, Governance and Information project under the LIFE programme. Communications activities have been prioritised throughout the project since its start, with an early deliverable provided in the form of the LIFE-ENPE Communications plan (01/04/16 & 19/12/16 (updated)).

Another key project deliverable from this Action has been the inauguration of the ENPE website (Deliverable: project website 15/08/15) and the environmental crimes database which was expanded to include wildlife crimes so as to contribute towards delivering the European Commission's Action Plan against Wildlife Trafficking<sup>21</sup>. Communications activities proposed for ENPE after the conclusion of the LIFE-ENPE project are included in the After-LIFE plan (Annex 5.0 LIFE-ENPE After-LIFE plan).

### **ACTION D1 – Communicate & disseminate ENPE's results**

**Foreseen start date:** January 2016    **Actual start date:** January 2016

**Foreseen end date:** July 2020        **Actual end date:** July 2020

#### **Expected results for Action:**

	Number in proposal	Actual number achieved
Disseminate ENPE results	39 states	45 states
Bi-annual newsletter	10	13
Project website hits/ month by 2020	>50	>500
Project noticeboards at ENPE partner offices	5	5
Communications plan (see deliverable)	1	1
Layman's report (see deliverable)	1	1

#### **Deliverable – Communications plan provided 01/04/16 (updated 19/12/16)**

#### **Deliverable - project website provided 15/08/15**

This cross-cutting action, linked to all the other 10 LIFE-ENPE Actions, is the primary responsibility of the CB, although the ABs have all contributed through their activities in promulgating LIFE-ENPE findings through their individual networks and stakeholder groups in their own countries.

LIFE-ENPE project management (Action E1), is reliant on a coherent and applicable communications plan to enable accurate and timely communications directed at the correct groups – both stakeholders and the wider project audiences (Deliverable: Communications plan 19/12/16; After-LIFE plan Annex 5.0 17/10/20).

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<sup>21</sup> COM(2016) 87 final.

A LIFE-ENPE project communications log (Annex 8.0) was maintained as a 'live' reporting tool to record all LIFE-ENPE communications activities, including outreach, stakeholder and wider project audience contacts, sharing of outcomes and preparations for next steps post-LIFE.

One of the two project milestones associated with this Action is the development and publication of the ENPE bi-annual newsletter which is now produced and distributed to more than 430 contacts comprising all ENPE Members, stakeholders and other organisations and individuals with an interest in the network's activities. This newsletter has been issued on 13 occasions during the period of project activity and is distributed directly to all contacts via email as well as being posted on the ENPE website. The content includes updates on project progress, ENPE activities, events, presentations and cases as well as updates on the outputs from the four LIFE-ENPE Working Groups, where available.

## European Network of Prosecutors for the Environment

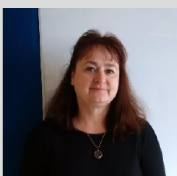
Réseau des Procureurs Européens pour l'environnement



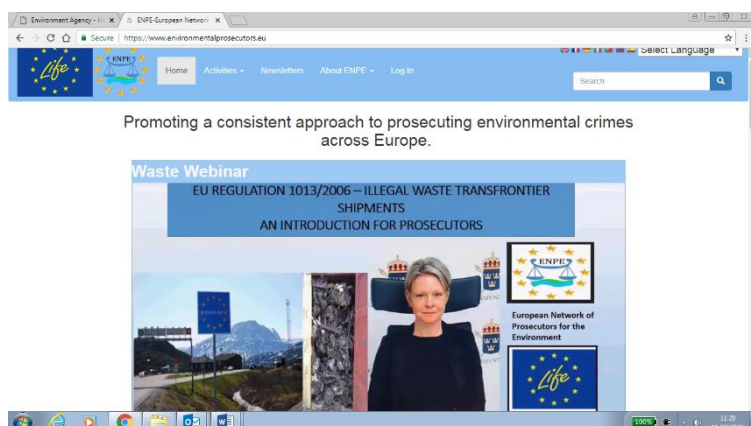
### ENPE newsletter - Issue 6

18 May 2018

#### Message from ENPE President Anne Brosnan



Dear colleagues, It is a busy time. We are approaching the midway point of our ENPE- LIFE project which began in July 2015 and runs until 2020. It is a good time to take stock of what we have accomplished already and what we still have planned and you will find in this newsletter details of some of the achievements of our fantastic working groups. I'd like to pay tribute to the hard work of the Group Chairs who have ensured that we have kept up a cracking pace on the project work and delivered real outcomes. As a practitioner network, the true test of our success is the value and benefit our members can draw from our work.



Project noticeboards have been erected in all AB head offices, and a mobile demountable project poster was designed and procured for use at all LIFE-ENPE events, such as meetings, workshops and at the annual conference.

For the 2018 & 2019 annual conferences (Action B3), the conference reports and proceedings were provided in a

video 'E-zine' format to ensure maximum engagement with the project audience and enable efficient and up-to-date access to the project outputs and metrics<sup>22</sup> including all presentations, interviews, feedback and delegate lists. These have been particularly well received.

ENPE members have also had a central role in assisting in communications activities, for example, member organisations in Morocco and Spain have shared their involvement and contributions to the ENPE network in their national media<sup>23</sup>.

In spite of the largely successful undertaking of this action, there have been some useful learning points where intended outcomes have not been realised as originally anticipated. The environmental crimes database, for example, has not been as widely accessed or updated as was hoped at the outset of the project. This was probably due to the lack of time available for members to access and update the database, and the need for a more fully resourced databased 'gatekeeper' to oversee access permissions, updating of cases and general maintenance. On

<sup>22</sup> <https://www.environmentalprosecutors.eu/conference2019/index.html>

<sup>23</sup> <https://www.infomediaire.net/environnement-le-maroc-devient-membre-observateur-au-reseau-des-procureurs-europeens/>

reflection, although the database was widely publicised through the newsletter and at the annual conferences, targeted and strategic communication activities to widen the base of users might have resulted in more engagement from the ENPE membership and wider stakeholder group.

Feedback from EASME and LIFE-ENPE project monitors, NEEMO, at the Missions in October 2018 and 2019 (Annex 1.0 Issues to be addressed from Mission visits) included recommendations to increase the extent and intensity of the outreach activities to ensure that LIFE-ENPE deliverables and outputs, particularly those related to promulgating training and awareness raising, were shared with as wide an audience as possible. Accordingly, additional stakeholder and project audience engagement activities were commissioned in the final few months of the project to meet this requirement (Annex 4.0 Summary of LIFE-ENPE outreach & Annex 2.0 ENPE Collaboration with networks, bodies and agencies).

Other learning points noted in this general area of project activity included the use of social media platforms which was, in the context of the project as a whole, used with only limited success. Although ENPE events and activities were publicised on Twitter and LinkedIn, on reflection, both of these platforms could have been more regularly used to share ENPE activities with an even wider audience. Continuation of this action, beyond the end of the LIFE project is a vital activity, if the network is to remain active.

The second communication and dissemination action was Action D2 – Network with other LIFE and/ or Non-LIFE projects. This was necessary to ensure the profile of ENPE and its related activities were shared amongst the stakeholder group and wider project audiences, and to enable ENPE results, and correspondingly, the results of aligned projects, bodies and initiatives to be shared as widely as possible.

Through existing connections with the project partners, a number of organisations were known and already engaging with ENPE at the LIFE-ENPE proposal stage<sup>24</sup>, for example, IMPEL, INECE and LIFE Smart-Waste. However, the preparatory actions (A1 – Capitalisation and Gap-filling report and, in particular, A2 – Establish the project audiences) revealed a number of additional organisations and projects that offered similar synergistic and complementary activities. It was important to establish working links with these bodies and projects, as well as look to engage more widely with other organisations that had related interests (e.g. UNCC; UNEP CMS), set out in more detail in the related communication action (Action D2 Network with other Life and/ or non-Life projects), below.

### **ACTION D2 – Network with other Life and/or non-Life projects**

**Foreseen start date:** July 2015

**Actual start date:** July 2015

**Foreseen end date:** July 2020

**Actual end date:** July 2020

#### **Expected results for Action:**

	Number in proposal	Actual number achieved
Beneficiary attendance at external conferences:	1x each p.a.	3x each p.a.
Beneficiary attendance at external meetings:	2x each p.a.	3x each p.a.
Supplying ENPE workshop training material to ERA & EJTN - (webinar)		Achieved (in person & via webinar)

### **Deliverable - Presentations provided at external conferences provided 22/07/20**

This key action was closely linked to action D1 (Communications) and remained in progress throughout the project duration (July 2015-July 2020). Primarily the responsibility of the CB, the project partners had an important role in this action and indeed the partner organisations, as well as the enforcement networks working closely with ENPE and other LIFE-funded projects, made up the main group of organisations and projects that collaborated and co-operated with the LIFE-ENPE project (Annex 2.0 Collaboration with other Agencies, Networks and Bodies).

Three LIFE programme ‘Declarations of Co-operation’ with related projects were agreed and signed by LIFE-ENPE, and several other LIFE-funded projects with similar aims and objectives were both formally and more informally engaged as the project progressed (e.g. Letters of Support provided, contributions made to workshops and conferences).

The ENPE network has necessarily enjoyed a close working relationship with other enforcement networks and following its first annual conference (2016) which was held in partnership with EUFJE, IMPEL and EnviCrimeNet, the concept of developing the ‘Chain of Compliance’ was formalised in an historic signing of a Memorandum of Understanding at the second annual ENPE conference in Oxford in 2017. The importance of collaboration and co-

<sup>24</sup> LIFE-ENPE Project proposal (Part B – Technical summary and overall context of the project p28-29)

operative working, particularly in the context of tackling trans-national crimes was demonstrated at the 2019 ENPE annual conference – which was held jointly with Eurojust and included a breakout workshop to examine and report on this important theme<sup>25</sup>.

This relationship has evolved, leading to the formation of the European Enforcement Experts Steering Group, with validation of this collaborative working arrangement provided by DG ENV through their involvement of the networks in the Environmental Compliance Assurance (ECA) initiative, and in particular its Environmental Compliance and Governance Forum - a pan-European specialist group that is tackling environmental compliance weaknesses through a targeted nine-point Action Plan<sup>26</sup>, and to which ENPE is a key contributor.

More widely, an Emerging Benefit, as reported in the LIFE-ENPE Benefits Realisation Strategy (Annex 3.0), is how ENPE continues to strengthen its links through contributing expertise and knowledge to other networks *beyond* Europe, including interventions via presentations and training to share best practices. Examples include the INTERPOL Pollution Control Working Group (PCWG), which recently invited ENPE President Anne Brosnan to sit on their Board following successful collaborative training; INECE, of which ENPE is an Associate Member and El Paccto, a collaboration between environmental prosecutors in Latin America and Europe, whose conference ENPE was invited to attend and present at in October 2018.



This is reflected in more than anticipated LIFE-ENPE staff time being spent on Action D2 although a restricting factor is the level of resource available to the LIFE-ENPE project (both staff time and funding) to enable the project and Working Group members to meet the demand for our contributions on related work packages with shared aims and objectives across Europe and the globe.

**ENPE President Anne Brosnan is pictured left receiving the Environmental Enforcement Innovation Award at the annual INECE conference, in Adelaide, Australia, January 2020**

<sup>25</sup> <https://www.environmentalprosecutors.eu/conference2019/international-collaboration/index.html>  
<https://www.environmentalprosecutors.eu/conference2019/wp-content/uploads/2019/11/BREAKOUT-Grant-Pink.pdf>

<sup>26</sup> <https://circabc.europa.eu/ui/group/cafdbfbb-a3b9-42d8-b3c9-05e8f2c6a6fe/library/6c71679a-2173-4a6d-ae33-c9bd34b0852c/details>

The final group of obligatory project actions related to the overall management of the project (Action E1 – Project Management), together with the important reporting of project progress (Actions E2 – Compile information for indicator tables/ General project reporting; & E3 – After-LIFE Plan).

#### **ACTION E1 – Project management**

**Foreseen start date:** October 2015    **Actual start date:** October 2015

**Foreseen end date:** July 2020        **Actual end date:** July 2020

#### **Expected results for Action:**

- A signed partnership agreement – **Achieved**
- Project management and direction via Project Board and Executive – **Achieved**
- Project reports (including progress, mid-term and final reports) - **Achieved**
- Overall delivery of ENPE on time and to budget - **Achieved**

#### **Deliverable: Project Board agendas, minutes & reports provided 30/07/20**

This action was the responsibility of the CB, and was essential to ensure project progress through the general running of the project, the timely and accurate provision of the project deliverables and outputs, and to meet the project milestones, objectives and aim.

The Action was completed through the establishment of a clear governance structure as described in Section 5. above. There were some personnel changes during the project activities (as would be expected over the course of five years) but re-organisation of the project roles, as described above ensured that project progress was not impeded.

The CB provides the project manager, is responsible for the running of the project, and is supported by a project team comprising a project administrator, finance specialists and others as appropriate, with regular monthly project team, and quarterly project board meetings convened to plan, track and report on project progress (Deliverable: project board agendas, minutes & reports, Annex 13.0 30/07/20).

A delay in the recruitment of the project manager, and in the establishment of the project team resulted in some slippage on the delivery of the first ENPE conference (Action B3). Impacts were mitigated through re-allocation of resources, together with a commitment to expand the annual conferences to include joint hosts wherever possible. This was to maximise the breadth and depth of delegate organisations represented, and ensured that this did not adversely affect delivery of outputs.

There were several personnel changes during the course of LIFE-ENPE project activities. The original LIFE-ENPE Project Sponsor (Jonathan Robinson) left his position at the EA in June of 2016, resulting in him being replaced by the former Project Executive (Anne Brosnan), and the inclusion of a new Project Executive (Peter Ashford, formerly a project legal advisor). This has ensured continuity in transition with these key post-holders all having previous experience of working on the LIFE-ENPE project. In addition, the CF representative, Lorna Dempsey, left her role at the Irish EPA to take up an external secondment. This required a change in the CF representative and David Smith took over Lorna's duties in that regard in July 2018.





**LIFE-ENPE Board meeting, January 2016, Brussels**

Other project management changes included the transfer of several business areas of the EA to Her Majesty's Government Department for Environment, Food and Rural Affairs (Defra) in November 2017. The project's Business Finance team, based in the CB organisation (the EA), and with a role in assisting its Life projects, was included in this transfer and became a part of Defra

on 1 November 2017. Although the team's role in provision of financial support and services to the LIFE-ENPE continued for the duration of the project (until July 2020), it was necessary to add Defra to the project as an AB through a change in the Grant Agreement.

At this time, it was also necessary to re-position the role of the three contributing organisations of EUFJE (an AB), as LIFE-ENPE project 'affiliates', in accordance with LIFE guidance.

EUFJE continued in its role as having sole legal responsibility for carrying out the project and complying with the Grant Agreement to ensure that contractual provisions applicable to it were also applicable to its affiliates. Full descriptions of each affiliate body involved, including the contributions of each to the project, were required as an amendment to the Grant Agreement. All of the above amendments were made and approved via e-proposal.

External factors also had an impact on project progress. Terrorist attacks on targets in Brussels, particular the attacks on 22 March 2016, required that project board meetings were re-arranged and conducted remotely. Travel restrictions also limited the attendance of LIFE-ENPE project representatives at events planned for that time. Risks around travel to and from Belgium and surrounding countries were re-quantified and managed through additional precautionary procedures that were put in place and remained relevant throughout the project's duration.

The effect of the global COVID-19 pandemic from February 2020 (ongoing) has been significant and also required necessary adjustments in project management. Travel restrictions and risks to delegate health and safety required the cancellation of a Project Board meeting and two workshops planned for late March (Benefits Realisation workshop) and mid-May 2020 (LIFE-ENPE WG1 – IKB training workshop) due to travel restrictions.

Again, project management adjustments were required, including undertaking activities differently e.g. by holding Project Board meetings remotely (by teleconference) and gaining feedback for the first workshop (Benefits Realisation, March 2020) by correspondence (questionnaire survey) and for the second workshop (IKB training, May 2020) by issuing the slides by email.

It is acknowledged that events such as workshops benefit very much from the additional delegate (and trainer) interaction and feedback that the 'face to face' environments provide. Even though useful information was reported via the remote methods used, it is recognised that because of this, each of the three cancelled events would've been better served as 'face-to-face' meetings, had that been possible.



The second of the actions required for project management and monitoring of project progress was Action 2 – compile information for indicator tables. This Action also included the general reporting of LIFE-ENPE activities and linked closely with both Action C1 – Monitor ENPE’s impacts and Action E1 – Project Management.

### **ACTION E2 – Compile information for indicator tables**

**Foreseen start date:** June-Dec 2016 **Actual start date:** June-Dec 2016

**Foreseen end date:** March-Sept 2020 **Actual end date:** Sept 2020

### **Expected results for Action:**

Indicator tables to accompany first progress report and Final report – **Achieved**

**Deliverable – Indicator tables for the first project report provided 21/12/16**

**Deliverable – Indicator tables for the final report provided 23/10/20**

This action was necessary to report on the project metrics as set out in the proposal – the project indicators, presented in indicator tables at different points in the project, as part of the first progress reports (Jan 2017), and at the end of the project as part of the final report (October 2020). These were the main project metrics to demonstrate (or otherwise) progress, including key deliverables. The action is linked to all of the project actions, in particular Action C1 – Monitor ENPE’s impacts, and Action E1 – Project Management.

The reporting of LIFE-ENPE was augmented through the application of the Benefits Management process which included consideration of project indicators in the discussion and interpretation of project Benefits Realisation (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy). Although the action was the responsibility of the CB, all project partners contributed and assisted in compiling the indicator figures as and where necessary. The indicator figures set out at the start of the project were broadly appropriate even though most were achieved (or exceeded) comfortably. Developments in technology, particularly in terms of website communications and general access to the internet, explain how the web-based figures (e.g. 12.1.1: *number of ENPE unique visit website ‘hits’*) were exceeded comfortably (18,439 as set against the 3,000 target figure). This also accounts for some of the ‘delegates trained’ figures (e.g. 13.1.1: *Network and other professional training* 300 as set against 200 target figure), where some of the training was delivered by LIFE-ENPE WG members remotely (e.g. via ERA waste shipment regulations training delivered via webinar, March 2020). More detail on KPIs, including discussion, is included in section 7. below.

There were also some figures that proved difficult to fully measure such as 15.3: *Savings/ revenue expected in case of replication/ transfer/ continuation after the project*. More detail on how the project maintains activities, including direct contributions to the outcome of cases, is needed before this can be fully measured. Going forward, some additional KPIs that could be incorporated into the metrics to measure ENPEs’ continued progress post-LIFE could include:

- No. of ENPE members per continent (given the increasingly global environmental crime )
- No. of environmental prosecution cases (total and per country and/or continent)
- No. of collaborative cases involving other enforcement networks (e.g. INTERPOL, IMPEL)
- Savings/ costs recovered as a result of ENPE facilitated crime cases prosecuted
- Crimes by category (waste; wildlife; air pollution; water pollution etc.)

To ensure consistency, a common method of calculation would be needed, as would a repository for data (e.g. global database).

The third action associated with project management and monitoring of project progress is Action E3 – After-LIFE plan. This action became a focus of activity at an earlier stage of the project than would normally have been anticipated due to the involvement of ENPE in related activities such as the DG ENV ECA initiative. More resource and time was expended on this activity due to the need to plan for future ENPE engagement and contribution to this, and other initiatives and projects going forward.

**ACTION E3 – After-LIFE plan**

**Foreseen start date:** March 2020

**Actual start date:** January 2018

**Foreseen end date:** Sept 2020

**Actual end date:** September 2020

**Expected results for Action:**

After-LIFE plan - **Achieved**

**Deliverable: After-LIFE Plan provided 23/10/20**

The After-LIFE plan (Annex 5.0) is the responsibility of the CB and is closely linked to the establishment of ENPE as an incorporated stand-alone organisation (ENPE aisbl). This was a key part of Action B1 - Establish Network – platform for co-operation (Deliverable: ENPE aisbl statutes 18/11/16).

Responsibility for this action was with the CB, and a key element comprised project planning and communications activities. Networking and planning for the future has helped to enable ENPE to become a recognised actor in co-ordinated European and Global activities to tackle environmental crimes alongside other enforcement networks, for example, ENPE is an Associate Member of INECE and has recently been invited onto the Board of the INTERPOL Pollution Crimes Working Group. As such, project activity relating to this Action started at an earlier stage than anticipated in the proposal, and also involved project partners as well as the CB.

A critical aspect of the After-LIFE plan has been the establishment of realistic options for future funding. Together with other European environmental enforcement networks (e.g. IMPEL, EUFJE & EnvirCrimeNet); ENPE has been encouraged to consider participating in the DG ENV Framework Partnership Agreement (FPA), which provides a vehicle for future funding to enable active participation in the ECA initiative. The After-LIFE plan includes work on the financial planning to facilitate the participation of ENPE in the FPA (Annex 5(i)).

## 6.2. Main deviations, problems and corrective actions implemented

The LIFE-ENPE project, as would be expected for a five-year project of this type, experienced a number of issues, both internal and external that have required corrective actions. These issues were identified, reported and discussed in good time with NEEMO through regular quarterly progress update reports and *ad hoc* discussions as necessary.

There were two broad categories of issue reported:

### **Internal to the project (administrative), comprising**

- Delays in the appointment of the project team;
- EA staff changes (project governance);
- Royal Decree to establish ENPE aisbl;
- Delay in Cap & Gap report (baseline report) publication;
- The LIFE-ENPE project financial team moving from the CB (EA) to Defra;
- The inclusion of EUFJE affiliates in the Grant Agreement and in project reporting.

### **External to the project (political & environmental) comprising**

- Terrorist attacks on Brussels and Paris;
- UK exit from the EU (Brexit);
- Covid-19 global pandemic.

More detail on each of these issues, along with their impact on the project and the project management adjustments needed to mitigate negative impacts, is included below.

### Internal issues and corrective action implemented

The first of these was the delay experienced in the recruitment of the LIFE-ENPE project team, the impact of which was a corresponding delay (slippage) in the organisation of the first annual ENPE conference. Discussions with the LIFE-ENPE project monitoring team (NEEMO) resulted in agreement to reduce the total number of ENPE annual conferences from five, as originally planned, to four.

Corrective actions included exploring opportunities for jointly hosting the four conferences with projects and/ or networks with similar objectives to ENPE, thereby extending networking opportunities, creating efficiencies through economies of scale (e.g. sharing venue hire costs) and realising synergies across different interest groups. The first LIFE-ENPE conference comprised a jointly hosted Four Networks event (Deliverable: First annual conference agenda, delegates list and delegates pack 09/06/16), held in Utrecht in May 2016 and co-organised by ENPE, IMPEL, EUFJE and EnviCrimeNet. This was to mark the start of a strong working arrangement between all four networks, resulting in the signing of a Memorandum of Understanding to commit to collaborative work, in the second joint conference hosted in Oxford in 2017. Subsequent annual conferences held in 2017, 2018 & 2019 were organised in the same way, thereby ensuring efficiencies were created and synergies realised. Positive feedback from the delegates indicated that this approach was successful and well-received as evidenced in the questionnaire surveys (Deliverable: Survey results, questionnaires, feedback forms etc. collected pursuant to the monitoring plan 04/08/20).

A second internal project issue was due to staff changes within the EA in June 2016 (section 5. above) requiring adjustment to the project governance. These changes were undertaken

smoothly and without consequence, ensuring continuity in the changed project roles (Project Sponsor and Executive) through assignments of staff from within the project team.

Risk mitigation of any impact on project progress included the promotion of the Project Executive (Anne Brosnan) to the Project Sponsor role, following the departure of Jonathan Robinson, and correspondingly, the promotion of Peter Ashford, from the Project Team to the role of Project Executive. This ensured continuity with staff role movement within the project.

At around the same time, there followed agreement with the LIFE-ENPE project monitors (NEEMO), to re-allocate some of the annual conference budget (Action B3), initially categorised as 'External Assistance' budget, to 'Other Costs' to be made available to fund travel costs for WG members to attend meetings where their organisations were unable to support them to do so. This was an issue that had become apparent in discussions with speakers and delegates during the organisation of the first annual conference (Utrecht 2016).

Slippage was reported in two early deliverables – firstly the incorporation of ENPE (ENPE aisbl) as a formally registered non-profit international association, and secondly in the publication of the Cap & Gap (project baseline) report. The delay in incorporation was due to: 1) the need to reschedule a planned meeting to conclude necessary paperwork caused by travel restrictions following a terrorist attack in Brussels (see 'external issues and corrective action implemented' below); and 2) by the complexity of Belgian legal requirements (i.e. obtaining necessary paperwork for appointing members and directors, translation and obtaining a Royal Decree for incorporation).

The delay in incorporation caused negligible effects on dependent and complementary project actions, and was necessary to formalise the ENPE network and enhance its reputation. To minimise any impact on the project, before and during the incorporation process, when ENPE already existed as an informal organisation, all activities continued on a 'business as usual' basis and membership continued to grow during this time.

Delays in provision of tenders for the Cap & Gap report to complete the work led to a delayed start date for the associated deliverable – the (Cap & Gap) Follow-up report. Furthermore, the first two drafts of the report provided by the contractors needed amendments with suggested improvements provided by the LIFE-ENPE partners. Mitigation of impact of this delay on other related actions (e.g. Action B2) included the project partners (who were also the WG Chairs) involvement in the drafting of this key document to ensure that the report delivered its conclusions in order to inform related project actions (e.g. setting the agenda for Action B2 Working Groups), without undue delay.

At a later stage in the project (June 2018), internal restructuring of the EA meant that the most financial specialist staff, including those on the LIFE-ENPE project team, were moved to Defra, which for the purposes of the administration of the LIFE-ENPE project, had to be considered as a separate organisation within the project. Following consultation with NEEMO, it was agreed that the most straightforward and accurate way to recognise this change, whilst retaining the crucial services provided by the finance team, was to add Defra as a fourth AB.

At the same time, given that this required an amendment to the project agreements via e-proposal, it was decided to more accurately reflect the role of the EUFJE organisations by adding each of them as Project Affiliates. All of these changes were submitted via e-proposal

and approved by the LIFE programme in December 2018. The changes necessitated some specific budget and costs adjustments but without any significant impact on project progress.

The three external issues comprised political and environmental factors that were outside of the control of the project. Each had an impact on the project progress requiring changes to planned activities. The first was the terrorist attacks in Brussels and Paris in 2016 and 2017. The attacks in Brussels on 22 March 2016 in particular were most significant resulting in heightened risks to human health, and associated general wellbeing concerns. Restrictions to travel at that time led to the cancellation of project Board meetings and other events planned to be held in Brussels. Mitigation of risks, both to human health and to project progress, via amendments to the LIFE-ENPE risk register (Action E1, project management), included the use of virtual meetings at this time, such as conducting ENPE Board meetings by teleconference.

The second external issue to affect the project has been the UK's exit from the EU (Brexit). This has significantly and adversely impacted future involvement of UK organisations, including the EA, in European enforcement network activities and organisations. Defra and the Environment Agency have both confirmed that UK organisations' membership of ENPE and some other organisations can continue as before. Although not having a direct impact on the project progress, the wider implications, in particular for future UK activities and contributions to other related projects (e.g. other LIFE projects) in the After-LIFE period, are significant.

Mitigation of risks relating to this issue has included discussions and communications with partner organisations and stakeholders, such as IMPEL and DG ENV in order to agree ways in which the UK can maintain its contribution to ENPE work.

The third and most significant of all external issues affecting the project has been the (ongoing) Covid-19 pandemic where associated risks to health and wellbeing have required necessary travel restrictions across most of Europe. Since most restrictions were imposed in March 2020, this has drastically reduced the amount of LIFE-ENPE 'face-to-face' project activity in the last 6 months with a huge reduction in international travel in Europe generally, with all planned face-to-face events being cancelled or postponed. This has affected the LIFE-ENPE project outreach activities which included planning for two workshops to be held before the project end, both of which were subsequently cancelled.

Mitigation of risks to human health and the impact on the project from Covid-19 included the sharing of information relating to each workshop remotely (via email), and gaining of delegate feedback by correspondence thus removing the requirement to travel, but maintaining contact with, and feedback from, all delegates. Although not an ideal solution, given the ongoing threat from the pandemic, more remote methods of working are likely to be required in future.

### 6.3.Evaluation of Project Implementation

The LIFE-ENPE project is an Environmental Governance and Information project with the over-arching project aim:

*“To improve Compliance with EU Environmental Law by addressing uneven and incomplete implementation across Member States through improvements to the efficiency and effectiveness of prosecutors and judges in combating environmental crime.”*

The three project objectives (Section 3. above), were addressed through eleven project actions (Section 6.1 above) set out in a logical sequence of activities which have resulted in tangible project deliverables being produced. These deliverables have been provided broadly in line with the timeframe set out in the project proposal with all slippage reported and agreed with the project monitors, NEEMO.

Underpinning all project activities, reflecting the fact that LIFE-ENPE is an Environmental Governance and Information project, has been a commitment to communication & networking, often in combination with other similar organisations, for example, joint conferences comprising ‘breakout’ workshops organised and hosted by other bodies or projects, such as the IMPEL Water Crimes workshop in 2018, the RECAP collaborative working workshop in 2019.

Given the global problem being addressed, all project activities have been framed in an international context, with *preparatory & communication, co-operation* and *collaboration* phases evident – in that order, increasing in significance as the project has progressed.

The communication activities as set out in the LIFE-ENPE communications plan (Deliverable: communications plan 19/12/16 (updated); Annex 8.0. Communications log), reflect this three-phase development of the project – from initial networking and the building of the project audiences (communication), through to the development of project outputs via the WGs, workshops and conferences (co-operation), through to the delivery of outputs and their promulgation via conferences and training events (collaboration). However, not all activities have proceeded as planned with clear learning points noted. For example, for the initial communications phase, although the traditional communications routes identified in the plan were effective (notably the website, newsletters and email updates sent to all members) and delivered immediate results<sup>27</sup>, the use of social media to share ENPE activity was not fully explored or pursued.

In the five years since the project started (2015-20), social media use has grown hugely, and has proven effective in encouraging stakeholder engagement, particularly in wildlife and conservation-themed topics<sup>28</sup>. This represents something of a missed opportunity since ENPE activity in this area (e.g. via twitter and LinkedIn) was focussed only when updating on major events such as conferences and workshops. More widespread and regular use of social media platforms, including specialist areas at this key period of the project, would certainly have extended the ‘reach’ of the project resulting in a wider project audience.

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<sup>27</sup> Website traffic 2016; 2017 First Stage Impact report

<sup>28</sup> <https://iopscience.iop.org/article/10.1088/1748-9326/ab9ed1/meta>

Where more contemporary communications methods were used, such as the use of the conference ‘E-zines’, instead of the traditional reports and proceedings for the 2018 and 2019 conferences, the results were evident with increased numbers of website users accessing the outputs<sup>29</sup> and very positive feedback from those who had viewed the conference materials.

Collectively, these preparatory & communications Actions (A1 & A2; D1 & D2) with a budget of approximately €150K and with spend in line with the budget, were considered to be cost-efficient given the project outputs delivered and communications- related benefits realised at the conclusion of the project (Section 6.4 below; Annex 3.0 LIFE-ENPE Benefits Realisation Strategy). On reflection, some additional staff time resource directed specifically at training and use of social media may have been worthwhile to expand this area of activities.

The *co-operation* phase of the project, notably the WG activity and outputs has progressed broadly in accordance with the proposed timeframe, delivering the outputs as planned. The main issue – lack of funds for WG members to travel to attend meetings and workshops – was addressed early in the project through re-allocation of budget, as agreed with NEEMO (see 6.2 above). There were also delays experienced in progressing activities in WG3 (Air pollution) following the departure of the WG chair in 2018. Replacing the chair from within the group proved difficult, resulting in some uncertainty around the group’s direction and governance. It was clear that since the WG members did not have sufficient time available to take on the role, additional resource should probably have been diverted to maintain the group momentum, and perhaps more work in ‘selling the role’ of Chair was needed to encourage more interest in it.

The outcome was favourable in the end however, with two group members stepping up into the Chair role on a joint basis and contributing significantly to the main training output – a highly successful workshop held in Nicosia, Cyprus in March 2019 (Deliverable: LIFE-ENPE WG Second Stage Interim reports 31/03/19; Annex 4.0 Summary of LIFE-ENPE outreach ).

The *collaboration* phase of the LIFE-ENPE project has proved largely fruitful with efficiencies realised in holding joint annual conferences with other networks and projects. The final ENPE conference held in conjunction with Eurojust was particularly successful in getting the largest number of MS prosecutors attending (24 out of 28 representatives).

External issues, in particular the Covid-19 pandemic (see Section 6.2 above), have also affected how the final ‘collaboration’ phase of the project has been undertaken, with sharing outputs by correspondence replacing the proposed ‘face-to-face’ workshops to mitigate health risks and recognise the travel restrictions affecting most of Europe at the time.

The group of project actions relating to the *co-operation & collaboration* phases are the core (B1, B2, B3) & monitoring Actions (C1). Amounting to approximately €600K, these actions represent the main portion of the LIFE-ENPE budget with spend again broadly in line with the budget. It is difficult to assess the cost-efficacy of each action since so many are interlinked, but in general, in particular with the WG deliverables provided in accordance with the proposal and in line with the time frame as set out, and with such positive feedback received from the conferences, this phase of the project should be considered to represent good value for money.

The final group of actions relate to the project management and reporting (E1, E2 & E3) with a budget of approximately €238K. These actions are necessary for LIFE projects and the

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<sup>29</sup> See 24 above – download figures included in Second Impact Survey report.

activities are usually similar and without deviation from the project proposal. Spending was in line with the budget and the allocation is considered to have been cost-effective.

A limitation to the general methodology of using time-limited activities such as Action A1 – Capitalisation and Gap-filling), as set out in the MtR, is that *beyond* the duration of the project, there is less scope (i.e. no resource) to continue with them and that some of these activities may not be undertaken for a long enough time to be fully appreciated. Revisiting Action A1 towards the end of the project, using the information and data gained over the interim three years, would have added significant value to the exercise, providing an up-to-date commentary on the environmental crime prosecution landscape in Europe from 2015-2020.

In summary, it is considered that the LIFE-ENPE project methodology used, closely reflected the requirements of the project category (Environment, Government and Information projects) and provided a ‘fit-for-purpose’ approach to meeting the project objectives. Some adjustments may have improved the communications activities, but overall it proved an appropriate and cost-effective way to address the project aim.

The project objectives, with actions and target results, whether or not these were achieved and the dates they were achieved by are included below (from Grant Agreement, Section B1):

#### **Objective 1 - Build a Self-Sustaining Network of Environmental Prosecutors**

<b>Action, description, target result, deadline</b>	<b>Target achieved/ number/ date</b>
<b>A2</b> - Mapped agencies responsible for prosecuting/adjudicating environmental crime in 39 targeted states (by Jan 2016)	Yes, and updated matrix provided with Mid-term report, June 2018, 45 states included
<b>A2</b> - Developed stakeholder matrix outlining roles and competences of target audience/stakeholders (by Jan 2016)	Yes, as above (NB competences not commented on)
<b>B1</b> - Established ENPE network (by Oct 2015), with at least 25 EU MS represented (by Jul 2020) and agreed a network sustainability strategy (by Mar 2020)	Yes, 25 MS; 30 states represented in total (28 European) by July 2020
<b>B3</b> - Facilitated contact between agencies, with at least 10 instances of trans-national cooperation facilitated by the network that lead to the successful prosecution of environmental crime	Yes, as evidenced in questionnaire surveys (* first and Second impact survey & stakeholder benefits questionnaire)

#### **Objective 2 - Improve the Collation and Dissemination of Information on Environmental Crime**

<b>Action, description, target result, deadline</b>	<b>Target achieved/ number/ date</b>
<b>A1</b> - Supplied Capitalisation & Gap-filling Report to environmental prosecutors and judges in at least 30 states (by Mar 2016). Incorporated findings into working groups (by Sept 2016)	Yes, 41 states included by project end, incorporation into WGs delayed by 4 months due to report delay
<b>B2</b> - Supplied outputs from working groups (by Jan 2017 - Nov 2019) to judicial and prosecution agencies in at least 30 states	Yes, all 28 EU MS plus non-EU ENPE Members (e.g. candidate countries)
<b>B3</b> - Held 5 annual conferences, on each occasion disseminating information to at least 75 delegates from 30 states (2015 - 2019)	Yes, >550 delegates over four conferences following amendment (agreed with NEEMO & EASME)



<b>D1</b> - Developed website, including a SharePoint hosting shared common resources (by Jan 2016), receiving at least 50 hits/month (by Jul 2020)	Yes, > 500 hits / month
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### **Objective 3 - Improve Capacity and Consistency for Combating Transnational Waste, Wildlife & Chemical Crimes**

<b>Action, description, target result, deadline</b>	<b>Target achieved/ number/ date</b>
<b>B2</b> - Established 4 working groups (2016 - 2019), each holding 3 meetings/ workshops a year, producing best practice and training materials (by Feb 2020)	Yes, 3 meetings or workshops per year, some training materials delayed due to covid-19
<b>B2</b> - Directly or indirectly provided training sessions based on materials developed by working groups to at least 20 prosecution or judicial agencies (by Jul 2020)	Yes, >20 (approx. 80) by July 2020
<b>B2</b> - Improved capacity and consistency through at least 10 agencies adopting elements of ENPE best practice in their environmental crime work	Not evident yet, 5 confirmed cases by July 2020

### **All objectives**

<b>Action, description, target result, deadline</b>	<b>Target achieved/ number/ date</b>
<b>C1</b> - Produced monitoring plan (by Jul 2016) and undertaken monitoring (by Mar 2018/Jun 2020) to support production of mid-term and final project reports (by Jun 2018/Sept 2020)	Yes, updated for MtR and Annex added (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy) for Final Report
<b>D1</b> - Produced communications plan (by Jan 2016) and Layman's report (by Sept 2020)	Yes, Communications plan delayed by 3 months; Layman's report delayed by 1 month
<b>E1/E2</b> - Signed Partnership Agreement, delivered quarterly project progress reports for Project Board with progress toward results and claims against financial profile and indicator tables (by Jan 2017) and the final report (by Sept 2020)	Yes, all achieved, indicator table 1 month later (October 2020)
<b>E3</b> - Produced After-LIFE Plan explaining how dissemination and communication of ENPE's results will continue beyond 2020	Yes, Annex 5.0 LIFE-ENPE After-LIFE plan

More details on the results achieved from each project action with reference to visibility, metrics, outcome and lessons learned (including whether the action should continue into After-LIFE) for each, are included in the table below.

Action	Foreseen in the revised proposal	Achieved	Evaluation
A1 – Cap & Gap report	<p>Objectives: to analyse and collate existing information on environmental crimes in Europe to set a baseline report for the project</p> <p>Expected results: to be shared with 39 states and to set the agenda for the Working Groups (Action B2).</p>	<p>Results were immediately visible with the report published and distributed to 39 European States (2 months late); 45 by close of project</p> <p>Agenda for WG set but not in full due to delays in publication with results delayed.</p>	<p>Objectives met but publishing the report delayed. The CB's rigid and inflexible internal framework structure for appointing contractors, together with contractors missing deadlines due to a lack of data. Project deliverable and milestones achieved in accordance with the project indicator (39 states receive report) in the proposal but with some slippage. No other deviations.</p> <p>Lessons learned: more time to complete tender, more contact with contractors, report revisited at end of project.</p>
A2 – Establish Project's Audiences (stakeholder matrix)	<p>Objectives: To maximise impact of ENPE by ensuring outputs are shared with correct organisations and countries</p> <p>Expected results: Establishment and updating of a stakeholder matrix completed using input from project ABs for use in sharing and promulgating LIFE-ENPE information, deliverables and outputs.</p>	<p>Results were immediately visible. The matrix was established in line with project timeframes.</p> <p>Continues to be used and updated as project progresses.</p>	<p>Objectives for Action were achieved (and continue to be achieved as the matrix is updated) in accordance with deliverable and milestone timings. A critical database that the project will continue to use throughout its duration and usefully shared with ENPE (and others) at the end. No deviations from the original proposal reported.</p> <p>Lessons learned: a valuable exercise, worthy of additional resources and to continue in After-LIFE</p>
B1 – establish network platform for co-operation	<p>Objectives: a formal network as a vehicle for delivering ENPE project objectives &amp; outputs</p> <p>Expected results: ENPE established as a formal entity with 39 targeted states as members by the end of the project.</p>	<p>The network was established but not in accordance with timeframes due to delays in administration. Membership target met. No immediately visible results since the</p>	<p>ENPE aisbl formally established as per the deliverable but not by due date. This was due to administrative issues e.g. requirement for Royal Decree. The delay did not materially affect project progress.</p> <p>Lessons learned: improve and speed up appointment of</p>

		network already existed & operated informally before incorporation. In due course, however, ENPE aisbl became more visible and membership grew.	contractors, fully investigate aisbl requirements.
B2 – Working Groups	<p>Objectives: to build capacity and improve consistency in implementing environmental law.</p> <p>Expected results: Production and dissemination of materials to support environmental prosecutors and judges to improve consistency in implementing environmental law.</p>	<p>WGs established but T&amp;S funding needed increasing. Vacant chair led to loss of direction and slippage for WG3. ‘Catch up’ actions resulted in limited adverse impact and all groups delivered outputs as planned. Results were not immediately visible but were produced on time (1<sup>st</sup> &amp; 2<sup>nd</sup> stage interim reports).</p>	<p>A critical path item which progressed relatively smoothly although personnel issues (WG3) resulted in a delay in the production of outputs. Additional T&amp;S funding required. External factors (covid-19 pandemic) affected outreach activities.</p> <p>Lessons learned: engagement with WG members to ‘sell’ idea of membership and benefits of Chair role. Ensure funding for T&amp;S for all WG members; continuation After-LIFE would be of benefit.</p>
B3 Annual conference	<p>Objectives: To hold annual conferences to bring prosecutors and judges together to build a network of contacts, provide training and exchange information and experiences.</p> <p>Expected results: x5 Annual conferences convened and held for between 75-100 delegates from at least 30 of the 39 targeted state attending.</p>	<p>4 of 5 annual conferences held (as agreed with monitors) – 1 less than the proposal due to delays in appointing the PM. Agreement (with NEEMO and EASME) to reduce the number of conferences to 4 and reallocate budget accordingly. Immediately visible results – conferences well received and targets met.</p>	<p>LIFE-ENPE project team staff were not in place in time for the first conference (Nov 2015). Formally agreed via Grant Agreement Amendment to reduce the total number of conferences from 5 to 4. This has resulted in making additional funding available for WG members to attend meetings through increased T&amp;S budget (see above).</p> <p>Lessons learned: collaborative approach to hosting conferences benefits all, use of social media and ‘e-comms’ of benefit. Continuation of action into After-LIFE period valuable.</p>

C1 Monitor ENPE's impacts	<p>Monitor the impact of ENPE's actions to ascertain the extent to which ENPE contributes to the improved compliance with EU environmental law.</p> <p>Expected results: detailed monitoring plan, establish indicators and other methods to track ENPE's impact and progress.</p>	<p>Monitoring plan produced &amp; improved with use of Benefits Management. Immediately visible results in tracking and reporting project impact. Indicators all met or exceeded –some indicators N/A</p>	<p>The Monitoring plan (Deliverable) was provided on time and updated to incorporate the application of Benefits Management. This has enabled an over-arching method of monitoring impact in addition to and complementary with the indicators (KPIs) used to track progress (Action E2). Feedback on the use of Benefits Management has been good.</p> <p><b>Lessons learned: in-project review of KPIs would assist in checking on relevance; use of Benefits Management to measure impact.</b></p>
D1 Communicate & disseminate ENPE's results	<p>Objectives: to communicate effectively with the stakeholders and target audience in accordance with a communications plan and in order to share ENPE progress and outputs.</p> <p>Expected results: a valid and workable communications plan that identifies the target audience and enables efficient and effective sharing of ENPE information.</p>	<p>Related Deliverable (Communications plan) developed and issued on time; 'live' comms log to record all ENPE-related communications activities has been very useful. Immediately visible results as ENPE exposure increased.</p>	<p>As a key project activity, good communications is central to the LIFE-ENPE project success. The plan is reviewed on a regular basis and the log is a useful tool to record how and when we communicate.</p> <p><b>Lessons learned: more use of social media &amp; targeted comms activities. Continuation of the Action into After-LIFE essential.</b></p>
D2 Network with other Life and non-Life projects	<p>Objectives: to increase the profile of ENPE and ensure that ENPE incorporates the results and outputs of other projects in its work</p> <p>Expected results: ongoing and regular networking with key stakeholders and actors in the European environmental regulatory sphere. Sharing of outputs and planning, maximising</p>	<p>Related networks were already well-known to ENPE and development of close working relationships (e.g. via MoU &amp; join conferences) have contributed to the ECA initiative. Specific LIFE project networking through DoCs &amp; shared workshops</p>	<p>A key activity with Co-operation &amp; Collaboration phases of project have proceeded well due to this Action. Joint conference hosting has been a huge success with good feedback from all involved. More specific networking with related targeted projects and organisations (e.g. Life SMART-WASTE; Reason for Hope; Life Natura-Themis) and INECE, realising synergies has proved beneficial to all (e.g. 2018 conference).</p>

	opportunities for collaboration.	have proved invaluable. Results not immediately visible - improvements made over time as network extended beyond Europe (e.g. China, INECE, Interpol).	Lessons learned: extension of the network beyond Europe has been of benefit for trans-national environmental crime enforcement e.g. IKB. Essential that this action continues into After-LIFE.
E1 Project Management	<p>Objectives: appointment of a project manager reporting through the appropriate project governance structure to ensure smooth running of the project and deliverables and milestones produced and met on time.</p> <p>Expected results: project manager and team recruited and established in good time. Regular meetings. Effective governance and management of project risks. Good reporting.</p>	<p>Positive feedback from monitors and EASME in Missions reporting. Changes to the project governance &amp; staffing agreed and approved via e-proposal. Adjustment necessary due to internal and external issues. Immediately visible result of project team being in position (Jan 2016).</p>	<p>Slippage in the related deliverables reported (e.g. annual conference) due to delays in appointing of the team. Internal admin issues (inc Governance and budgetary) addressed via e-proposal. External issues have affected how certain actions have proceeded (e.g. Action B2 – outreach/ promulgation of training via webinar).</p> <p>Lessons learned: succession planning for chairs of WGs would be of benefit. ‘Front-foot’ start possible following timely appointment of Project team. This Action must continue if ENPE is to continue into After-LIFE.</p>
E2 Compile information for indicator tables	<p>Objectives: All project indicators identified, reported and shared as required.</p> <p>Expected results: Project indicators are measured and collated for reporting in a timely fashion and interrogated to measure project impact.</p>	<p>Project Indicators have been developed. Most are appropriate for purpose however some are not applicable given lack of data. Reporting in line with required timeframes. Not immediately visible.</p>	<p>Indicator figures collated and reported as needed and in accordance with proposal and timeframe for Life programme. No issues reported.</p>
E3 After-LIFE plan	Objectives: the creation of an After-LIFE plan for	Early engagement with this Action due	This remains a key Action – setting out the means and

	inclusion as a separate chapter in the final report. To incorporate lessons learned and enable ENPE to continue beyond Life.	to ENPE involvement in the ECA initiative. No visibility of results as yet.	mechanisms for ENPE to continue. Lessons learned not yet clear.
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Internally, the replication of project actions, such as the annual conference (Action B3), has resulted in positive results and good feedback from delegates and the wider project audiences (Annex 17.0 Layman's report). Joint organisation and hosting expands the scope of the topic areas, and increases the numbers of states and organisations represented.

Outreach and dissemination activities (Annex 4.0) have comprised a mix of both face-to-face events (e.g. Segovia Workshop, Spain May 2018 Deliverable: LIFE-ENPE WG Second Stage Interim Reports 31/03/19); delivery of training via webinar (e.g. WG2 contribution to the ERA WSR training, May 2020) and sharing training outputs by correspondence (e.g. WG3 training slide pack). The results of replication of these methods for promulgation of LIFE-ENPE materials are that more than 1,000 specialists have been able to receive awareness raising guidance and/ or training from the LIFE-ENPE WGs.

Externally, the reputation and influence of ENPE has grown sufficiently for it to be used as a "model network" for similar network activities overseas e.g. in China. Request for ENPE specialist input to similar networks have also increased in number, for example in South and North America (section 6.1 above, Action A2). In a European context, ENPE continues its work with the ECA initiative and has an equally valuable role going forward in EU Policy making in relation to tackling environmental crime through the Biodiversity Strategy 2030 and the Zero Pollution ambition.

The work of LIFE-ENPE WGs, with group members and workshop delegates presenting input from European MSs, has also contributed to and added value to EU Policy, for example the public consultation on the Evaluation of the Waste Shipment Regulation (WG2 - submitted on 25 April 2018); the contribution of WG1 (wildlife crime) to the (UNEP CMS) Intergovernmental Task Force on the Illegal, Killing and Taking and Trade of Migratory Birds<sup>30</sup> and the work of WG4 on Gravity factors as set out in its reporting (Deliverable: LIFE-ENPE WG Final Reports 30/07/20).

As an Environment, Governance and Information project, all LIFE-ENPE activities, outputs and deliverables are focussed on this area of EU environmental policy. However, the LIFE-ENPE project 'reach' extends into other related policy areas having either already reported, or due to report a positive impact on the following:

**Nature & Biodiversity:** an anticipated increased biodiversity in Europe through deterring illegal poaching through appropriate and consistent sanctions for related crime across Europe  
– evidenced in WG1 work with CMS (Joint IKB training Workshop, MIKT and score-card)  
– Deliverable: LIFE-ENPE WG Final Reports 30/07/20;

<sup>30</sup> <https://www.cms.int/en/taskforce/mikt>

**Environment & Resource Efficiency:** expected improvements in the environment through species and habitat protection through deterring illegal poaching through robust and consistent sanctions for related crime across Europe as evidenced in the reporting of cases on the ENPE crimes database, particularly those involved in prosecuting threats to habitats (e.g. rivers and groundwater) and in collaborative work with other project and enforcement networks

- evidenced in the sharing of case studies in prosecution of pollution at the IMPEL Water Pollution crimes workshop and LIFE Reason for Hope project held at the ENPE 2018 annual conference;

**Climate Action:** climate change mitigation: a reduction in chemical air emissions through improvements in prosecution of related crimes across Europe via the training and guidance issued by LIFE-ENPE Working Group 3 (Air pollution) evidenced in

- the WG3 training workshop (Nicosia March 2019) and presentation translated and shared with all EU MSs (January 2020); and
- the ENPE WG3 contribution to UN CC COP25 event in Madrid, December 2019.

## 6.4. Analysis of benefits

In order to provide a full and detailed report of the project benefits delivered by the outputs and activities of the LIFE-ENPE project, ‘Benefits Management’ was used.

Benefits management is a project management tool that “*aims to make sure that desired business change or policy outcomes have been clearly defined, are measurable, and provide a compelling case for investment – and ultimately to ensure that the change or policy outcomes are actually achieved.*”

In this context a ‘benefit’ is defined as “*an outcome of change that is perceived as positive by a stakeholder.*”<sup>31</sup>

A list of LIFE-ENPE **Priority, Intermediate and End** Benefits drafted using the LIFE-ENPE project objectives and the actions & deliverables required to meet them, was drawn up at the first LIFE-ENPE Benefits Workshop, held in Bristol on 19/06/2017 (pictured right). Each Priority and End benefit (i.e. the most significant ones), was assigned a benefit profile providing a more detailed description, in some cases a target figure (where applicable) and evidence of realisation through reporting (see Annex 3.0(ii) LIFE-ENPE Benefit profiles). The profiles also included, where applicable, an estimate of the **benefit valuation (i.e. economic impact in €)** of the benefit, in terms of estimated savings arising from the benefit on the wider European economy based on the estimates of environmental crime costs applicable to wildlife and waste in the EU.<sup>32</sup> The benefits where this was applied, including estimates of valuation (economic impact on €) are listed below:



- B4 – Better trained judges and prosecutors  
Benefits valuation: An increase in 10% of successful prosecutions (value tbc but estimated at around 10% of fines imposed for environmental crimes in Europe )
- B19 – Increased observance of EU Directives  
Benefit valuation: €0-200 million based on European fraction of INTERPOL assessment of cost of global international environmental crime (€213bn)
- B21 – Reduced time and cost of developing cases  
Benefit valuation: €10-20million based on estimated efficiencies in European cases
- B22 – Reduced income from environmental crime and criminals  
Benefit valuation: €500m-1billion based on successful European cases
- B23 – Reduced environmental crime  
Benefit valuation: €9-25bn based on 10% of estimated (total) global environmental crime ‘worth’

Regular interrogation of the project metrics, such as the KPIs (Deliverable: Compile information for indicator tables 17/10/20), alongside other ad hoc reporting (e.g. emails related to the benefit area), measurable project activity and interventions at four review

<sup>31</sup> Taken from Environment Agency internal document OGC Managing Benefits – An Overview

<sup>32</sup> <https://efface.eu/reports-quantified-impacts-and-costs-environmental-crime>



periods during the main project activity (January 2018- July 2020), enabled a record of all LIFE-ENPE project benefits to be compiled (Annex 3.0 LIFE-ENPE Benefits Realisation Strategy; Annex 3(ii) LIFE-ENPE Benefit profiles). ‘Emerging Benefits’ (unforeseen at the outset) and project ‘dis-benefits’ (i.e. negative impacts) are also recorded, where apparent, from the project activities and metrics as the project has progressed.

The four review points also provided an opportunity to reflect on the relevance of each benefit, with some being merged and others removed as appropriate. The final review point (July 2020) was due to include the results from a planned Benefits Realisation Workshop involving all key project stakeholders in late March 2020, but which was cancelled due to Covid-19 related travel restrictions. Instead, this review comprised a summary of the results from key stakeholders, including all ENPE members, involved in the Benefits questionnaire survey (Annex 3(i)).

To ensure alignment with EU Life programme reporting, each of the LIFE-ENPE benefits in were grouped into the EU Life benefits (listed Environmental benefits through to Policy implications) for discussion and interpretation.

The LIFE-ENPE project benefits are listed and described below:

<b>Benefit code</b>	<b>Description of benefit</b>	<b>Owner</b>
B1	Closer co-operation and collaboration between prosecutors across borders	ENPE
B2	Better trained judges & prosecutors	OM (RdR)
B3	Harmonised understanding of key environmental law concepts across member states	EUFJE (JVdB/LL/CB)
B4	Improved communication between national prosecutors e.g. through website forum	REMA (LM)
B5	Improved co-ordination with other steps in the enforcement chain (i.e. inspectors, police & judges)	
B6	Greater awareness of barriers to efficient, effective prosecution of environmental crime	
B7	Better trans-national co-operation	
B8	More effective prosecutions – increased deterrence	
B9	More effective, successful, prosecutions	
B10	Better sharing of intelligence	
B11	Increased awareness of impact of crime on the environment	
B12	Improved feedback to national and EU policy makers from on the ground practitioners	
B13	Better information exchange (case studies)	
B14	Greater awareness of best practises (merged with B18)	
B15	Increased innovation to overcome problems	
B16	Better sanctioning, judgement and prosecutions	
B17	Increased number of successful prosecutions	
B18	Improved take-up of best-practice approaches across Europe	OM (RdR)
B19	Increased observance of EU Directives	ENPE (SR)
B20	Better consistency of legislation across the EU	ENPE (SR)
B21	Reduced time and cost for developing cases	EPA (LD/AK)
B22	Reduced income from environmental crime and criminals	ENPE (SR)
B23	Reduced levels of environmental crime	ENPE (SR)

*Key*

	Priority benefit ('must do')
	Intermediate benefit
	End benefit

Some of the LIFE-ENPE benefits were difficult to measure, requiring a longer timeframe for reporting. This was evident in the benefits questionnaire feedback. In particular:

B22	Reduced income from environmental crime and criminals
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where there was little evidence available to demonstrate this and that there would need to be a much longer and in-depth report on sentencing across Europe needed to comment in more detail; and

B23	Reduced levels of environmental crime
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where it was noted that a much longer time period of reporting, together with a comprehensive survey of reported crimes across Europe would be needed to test this and indeed, reports from stakeholders that crime of this type had actually increased over the project reporting period.

The reporting also demonstrated that most of the LIFE-ENPE benefits realised were from the following four EU Life benefit categories: ***Social benefits; Policy Implications, Best Practice lessons and Replicability, transferability and co-operation.***

The most significant examples of LIFE-ENPE benefits for each EU Life category from 1) **project activities, interventions & outputs**, and 2) **reported by key stakeholders via the benefits questionnaire survey (Annex 3(i))**, are included below:

## Environmental benefits

### a. Direct / quantitative environmental benefits:

It is expected that all LIFE-ENPE project activities and outputs have benefitted, and will benefit the environment in many and varied ways. Given the focus on capacity building and information sharing, much of the evidence of these benefits will take time to appear as, for example, best practices are adopted by prosecutors in Europe, and positive outcomes in prosecution cases are only realised as practices are embedded and applied.

However, over the course of this project, there are already clearly defined areas where LIFE-ENPE project activities and outputs have produced direct and quantitative environmental benefits:

### LIFE-ENPE project benefits evident from project activities, interventions & outputs

B2	Better trained judges & prosecutors
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This **Priority Benefit** relates to providing prosecutors and judges training for consistent approaches to prosecuting, and imposing consistent sanctions, for environmental crimes in Europe. This is a key benefit, central to the purpose of the LIFE-ENPE project and will result in direct environmental improvements through improved prosecution practices leading to appropriate sanctions.

It relates in particular to LIFE-ENPE project **Objective 2: “Improve the capacity and consistency for combatting environmental crime across the EU”**. An associated Emerging Benefit is: **E2 ERA/ other training initiatives** (for example, WG2 & WG4) with evidence of this being realised towards the end of the project (e.g. LIFE-ENPE WG2 contributions to ERA waste training March & May 2020). More detail on this, and all LIFE-ENPE Priority & End Benefits can be found in Annex 3.0(ii) LIFE-ENPE Benefit Profiles.

Good examples of this benefit being realised include the LIFE-ENPE Working Group workshops (WGs 1, 2, & 3) held in Segovia, Spain (WG1) and Nicosia, Cyprus (WGs 2&3) where LIFE-ENPE awareness raising and training was promulgated directly to **over 70 prosecutors and specialist** environmental crime professionals from **over 20 countries** in combination across Europe; and the collaborative training that ENPE members and LIFE-ENPE WG members have contributed to including, for example, the WasteForce project; the DOT.COM project and ERA workshops.

Through the activities of the LIFE-ENPE Working Groups in particular and the promulgation of their outputs, **over 1,000 delegates** have been provided with training, awareness-raising or guidance through a variety of media including face-to-face training, webinar and correspondence via email, **meeting the target figure for training for this benefit**. The **target figure of 28 countries** (i.e. all EU MS) **in receipt of WG outputs has also been met**. [For a full summary of all training and outreach please see Annex 4.0 Summary of LIFE-ENPE outreach.]

B18	Improved take-up of best-practice approaches across Europe
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This **End Benefit** was realised towards the end of the project after the final phase of dissemination activities, with evidence that ‘best-practice’ approaches, developed and shared as part of the LIFE-ENPE project, are being taken up more widely and regularly by prosecutors and associated enforcement professionals across Europe.

It also relates to project **Objective 3: “Improve the capacity and consistency for combatting environmental crime across the EU”**. The **target figure included** reflects KPI 11.1.3 (see below Section 7.) where there are **10 instances of ENPE best practice** (from a baseline of 0) adopted by prosecutors and judges. The final **figure reported was 5 instances**, however this does not account for ongoing cases reported where ENPE best practice has been applied and the outcome is not yet known (see Benefits questionnaire survey Annex 3.0(i)). More detail on this and all Priority & End Benefits can be found in Annex 3.0(ii).

#### LIFE-ENPE project benefits reported by key stakeholders (Annex 3 (i))

B3	Harmonised understanding of key environmental law concepts across member states
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This **Priority Benefit** was reported as being realised by a significant number of key stakeholders in the benefits questionnaire survey. It reflects improvement in the shared understanding of key environmental law principles and concepts across all MS by judges and prosecutors and other key stakeholders involved in the enforcement of environmental crimes

and has a significant and direct benefit on the environment in terms of instilling consistency in regulation generally, and ins so doing, benefitting the wider environment.

It relates to *Objective 1: “By 2020, build a self-sustaining network with a membership of a minimum of 25 Members States” & Objective 3: “Improve Capacity & Consistency for combating environmental crime in the EU”*. An Emerging Benefit which would be expected (but not yet evident) would be – E3 improved consistency of sentencing.

Over 90% of the practitioners taking part in the survey agreed that this benefit was evident through the LIFE-ENPE project activities. Given that most are practising prosecutors dealing with environmental crimes, this is a heartening response. Comments from stakeholders providing evidence of this benefit, include:

- (Example of benefit) “Improving communication, learning about key issues we are dealing with”
- (Example of benefit) “Gave attendees something to think about to take back to their member states.” (in relation to a training event)

Looking forward, some suggestions from stakeholders for further work in this area include:

- “Seminars for environmental prosecutors together with other law enforcement authorities at a European and a national level authorities’ cooperation.”
- “The participation of prosecutors should increase. Not only one / a few prosecutors from each country.”

**b. Qualitative environmental benefits**

Less easily measured qualitative environmental benefits, where project metrics have not been assigned and recorded, are reported through the **wider project activities**, in particular **general co-operative and collaborative working** between prosecutors across jurisdictions and borders and an overall increased level of observance of EU directives (stakeholder feedback from the benefits questionnaire survey Annex 3.0(i)).

*LIFE-ENPE project benefits evident from project activities, interventions & outputs*

B1	Closer co-operation and collaboration between prosecutors across borders
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This **Priority Benefit** ensures that prosecutors across Europe are in contact with one another across Member States and jurisdictions, and not just the EU, to instil consistency. It relates to all project objectives, in particular: *Objective 1 “Build a self-sustaining network of Environmental Prosecutors” & Objective 3 “Improve the capacity and consistency for combatting environmental crime across the EU”*.

Furthermore, a separate, but linked Emerging Benefit – **E1 Global context with improving Chinese; Latin American & North American networks links** has arisen through networking and collaborative working with other networks outside of Europe such as El Paccto, INTERPOL and INECE (see Section 61. Action A2; Action D2):

***“I’ve really enjoyed all the exchanges we’ve had over the years, and I know the (Chinese SPP) prosecutors here feel the same way. It’s been very productive, so that’s worth emphasizing to LIFE” (Chinese Supreme People’s Procuratorate delegation facilitator).***

The targets set for this benefit is: **35 Instances of ENPE-facilitated trans-national cooperation between environmental prosecutors/judges; 28 states** with a prosecution organisation as a member of the network; and **39 states having received Cap & Gap report. Both targets were all either met or exceeded**, with the process of Letters of Request (LoRs), linked to Waste Shipment Regulations improving via ENPE membership:

***“My own view is that the ENPE group has allowed us to develop relationships and facilitate (Letters of) requests a lot quicker than before. This applies equally to requests for assistance within Europe and away from Europe.” (UK prosecutor & LIFE-ENPE WG2 member).***

In addition, the following LIFE-ENPE project benefit was also reported:

B19	Increased observance of EU Directives
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Evidence that countries are reflecting an improved awareness and observance of EU Directives relating to Environmental Crime, across Europe. It relates again directly to ***Objective 1: “By 2020, build a self-sustaining network with a membership of a minimum of 25 Members States” and Objective 3: “Improve the capacity and consistency for combatting environmental crime across the EU”.***

The **target** set for this benefit was the same as that for the related KPI (11.3) whereby **30 stakeholders** would be **in receipt of LIFE-ENPE project deliverables**. This target was **exceeded** with **44 stakeholders provided with the outputs** over the course of the project.

*LIFE-ENPE project benefits reported by key stakeholders (Annex 3 (i))*

B1	Closer co-operation and collaboration between prosecutors across borders
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This Priority Benefit was reported extensively by key stakeholders in the benefits questionnaire survey too with 100% of participants stating that the benefit had been realised. One good example of supporting evidence is a quote related to benefit & its impact from a practising prosecutor:

- *(Example of benefit) “In Romania there were only 3 cases in which cross-border cooperation was necessary, with Spain, Italy, France and Germany, Hungary and the UK”*
- *(Impact of benefit) “One of the cases had a major impact on the local sport fishing communities in those states”*

B8	More effective prosecutions – increased deterrence
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Evidence of this **Intermediate Benefit** having been realised is well supported by the stakeholder benefits questionnaire survey with 60% of respondents agreeing that the benefit had been realised and several practitioner examples provided:

- (Example of benefit) *"In Spain we measure our capacity of deterrence through the number of convictions we obtain, and this is the third year we obtain more the one thousand convictions per year"*
- (Example of benefit) *"Better awareness on EU law"*

B11	Increased awareness of impact of crime on the environment
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Another LIFE-ENPE **Intermediate benefit**, evident in 60% of the key stakeholder responses - a key qualitative environmental benefit realised. Examples provided included:

- (Example of benefit) *"It is obvious right now in my country, especially on crimes related to urbanism and land planning. The task is still quite complex, since the connection between urbanism and corruption is more than evident"*
- (Example of benefit) *"Joint conferences of partner networks gave the opportunity to look at case studies and discuss the possible approaches for enforcement."*
- (Impact of benefit) *"This helps to apply strong sanctions and reduce illegal activities."*

## Economic benefits

In addition to the environmental damage wrought by waste, wildlife and air pollution crimes, monetary costs are also significant. A recent EEB report estimates that the global costs of environmental crimes exceed \$258billion per year (see section 4. above) – not an insignificant amount.

Estimates of economic impact (i.e. 'benefit valuation' - cost savings in € as a result of the benefit being realised based on estimates of costs of environmental crimes affecting Europe) have been made for each Priority and End benefit where applicable. For the most reported LIFE-ENPE benefits from project activity and those reported by the key stakeholders from the questionnaire survey, discussions around economic benefit are included below:

### LIFE-ENPE project benefits evident from project activities, interventions & outputs

B19	Increased observance of EU Directives
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[see above for description]

The most significant activity related to this benefit is the involvement of ENPE in the DG ENV ECA initiative, including contributions to the specialist Workshops, Governance Forums and guidance development and promulgation in pursuant to undertaking the specific ECA Actions, to which ENPE has contributed (see Section 6.1. Actions A2, B1 above & Annex 5.0 LIFE-ENPE After-LIFE plan).



The over-arching purpose of the initiative is to instil consistency in environmental compliance across Europe, with a central theme being the observance of EU Directives. It is expected that ENPE will continue its involvement in the ECA initiative as well as contributing to the EU 2030 Biodiversity Strategy and Zero-pollution ambition (Annex 5.0 LIFE-ENPE After-LIFE plan).

More evidence of this benefit being realised includes the promulgation of WG training and guidance via a variety of different media (Annex 4.0 Summary of LIFE-ENPE outreach) where EU directives, such as the Industrial Emissions Directive, have formed the main driver of training (WG3 air pollution workshop, Nicosia); the contributions that LIFE-ENPE WG2 (Waste crime) made to the Waste Shipment Regulations consultation (May 2018), and the project's involvement in other compliance monitoring exercises (e.g. Compliance study by the Sustainability College Bruges in February 2019). Other economic benefits have been reported in feedback from key stakeholders.

*LIFE-ENPE project benefits reported by key stakeholders (Annex 3 (i))*

B15	Increased innovation to overcome problems
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A project benefit that will stimulate economic activity through the involvement of others, creating efficiencies in prosecution practices for example, the use of drones for footage of illegal waste sites; the use of satellite tracking equipment to report on the fate of rare migratory species such as the Northern Bald Ibis<sup>33</sup> (Deliverable –Third annual conference agenda, delegates list, delegates pack 19/10/18). A smaller proportion (around 40%) indicated that this benefit had been realised, but there were some good examples from key stakeholders, including:

- *(Example of benefit) “Good ideas from foreign colleagues on special investigative techniques in combating wild life crime and waste crime” (provided at conference);*
- *(Example of benefit) “direct exchange of knowledge during workshops and conferences”*
- *(Impact of benefit) “increase in efficiency”.*

## **Social benefits**

As with generic environmental benefits, it could reasonably be argued that *all* LIFE-ENPE activities, interventions and outputs would result in social benefits, given the inter-dependencies between the environment, society and behaviours on local, regional, national and global levels.

Nevertheless, there are several clearly identifiable LIFE-ENPE project benefits that are reported as having significant social benefits, above other benefit categories:

*LIFE-ENPE project benefits evident from project activities, interventions & outputs*

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<sup>33</sup> LIFE Reason for Hope project; LIFE-ENPE annual conference, 2018 Heraklion, Greece

The LIFE-ENPE benefits that are considered as social benefits are all longer-term outcomes that will develop further from project activities, as the results of ENPE interventions (such as training) is felt in wider communities. However, there was already evidence reported that social benefits were being realised towards the end of the project, for example, the benefits of the IKB workshop towards changing behaviour in one of the country organisations completing the benefits questionnaire.

B3	Harmonised understanding of key environmental law concepts across member states
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LIFE-ENPE contributions to Europe-wide regulatory initiatives, via the Working Groups, such as the (UN CMS) Rome Strategic Plan to protect Wild Migratory Birds in Europe and North Africa (WG1), and the development of guidance relating to sanctioning crimes, for example through consideration of Gravity factors (WG4) - Deliverable: LIFE-ENPE WG Final Reports Annex 12.0(i) & (ii)), are both examples of *harmonising the understanding of key environmental law concepts* in Europe. By instilling consistency in this area, social benefits are realised through better environmental crime enforcement and effective and dissuasive sanctions.

#### LIFE-ENPE project benefits reported by key stakeholders (Annex 3 (i))

Additionally, from the Benefits questionnaire survey of key stakeholders, the following benefits relating to social impact were evident:

B8	More effective prosecutions – increased deterrence
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An Intermediate Benefit related closely to B3 above, this benefit helps in preventing future environmental crimes through effective sanctioning. Social benefits would arise from a subsequent reduction in environmental crimes. A significant proportion of respondents confirmed that this benefit had been realised in their experience, with the following examples provided from practitioners taking part in the benefit questionnaire:

- *(Example of benefit) “In Flanders and especially in Antwerp there is a crime investigation team active that made a tremendous progress and produce lots of interesting cases with five JITS (Joint Investigation Team approaches).”*
- *(Impact of benefit) “The impact is that the team is reinforced and take more opportunities to launch investigations in big fraud cases.”*

B11	Increased awareness of impact of crime on the environment
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Increased awareness of impact of crime on the environment is another Intermediate Benefit, linked to both B8 and B3, and another social benefit affecting both potential criminals, and the wider (non-criminal) community. There was positive feedback on this from approximately 60% of respondents. Examples include:



- (Example of benefit) “The transmission of materials by ENPE can show the impact of crime on the environment in other EU countries.”
- (Example of benefit) “yes, a lot of presentations that show this Problem”
- (Example of impact) “better understanding”

EMERGING BENEFIT E11 – social/ community behaviour changes to improve local environment

A good example of this Emerging benefit was in the results of a specific multi-agency fisheries conference, with ENPE represented, in Romania in September 2019:

**“The conference took place at Carpitaly, the international fisheries exhibition focusing on international activities to combat fish poaching that took place on 14.09.2019. It was found from the feedback that crime in the reference area has decreased significantly, to a minimum, as a result of coordinated actions.”** (Romanian prosecutor, Annex 3.0(i) June 2020).

### Replicability, transferability, cooperation

The meeting of the LIFE-ENPE over-arching project aim, requires that the project outputs are easily transferred and replicated, via effective communication and sharing with stakeholders and the wider project audiences. All awareness-raising, training and guidance has been produced in the most user-friendly way for this to be possible (e.g. the WG2 WSR animation training). ENPE involvement in the DG ENV ECA initiative, and the MoU committing to collaborative working with other European environmental enforcement networks, is evidence of the collaboration ENPE has undertaken to achieve its aim.

More generally, the *organisational structure* of ENPE – a specialist environmental prosecutor network - has been considered for replication in global regions beyond Europe (e.g. Chinese SPP; Latin America Paccto).

Evidence of project activities, interventions and outputs reflecting all of the above, including feedback from stakeholders via the benefits questionnaire survey, is set out below:

#### LIFE-ENPE project benefits evident from project activities, interventions & outputs

B3	Harmonised understanding of key environmental law concepts across member states
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An important **Priority Benefit** central to the LIFE-ENPE project achieving its aim, evidence of this benefit being realised can be seen in the contribution ENPE has made to various international initiatives and forums (see above). Moreover, the guidance produced by WG4, related to sanctions, and judicial practices (Deliverable – LIFE-ENPE WG Final Reports 17/07/20 Annex 12.0(ii)), has and will be shared widely through MS prosecuting and judicial organisations.

B18	Improved take-up of best-practice approaches across Europe
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B19	Increased observance of EU Directives
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As set out above, both these **End Benefits** relate to instilling consistency across MS in observance of EU Directives. It would be expected that as the LIFE-ENPE project outputs are shared and utilised, common approaches to prosecution would be evident across MS (see Annex 4.0 Summary of LIFE-ENPE outreach).

*LIFE-ENPE project benefits reported by key stakeholders (Annex 3 (i))*

From the stakeholders benefits questionnaire survey, the following benefits were also reported, most of which are related to opportunities for replication and transferring of techniques and technologies for tackling environmental crimes provided by the LIFE-ENPE project at conferences and training events:

B6	Greater awareness of barriers to efficient, effective prosecution of environmental crime
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A high proportion (around 70%) of respondents indicated that this benefits had been realised with some really good evidence provided as examples:

- *(Example of benefit) "We believe that joint conferences raised awareness towards better implementation of environmental law."*
- *(Example of impact) "Inspectors, police, prosecutors and judges shared experiences and raised awareness regarding environmental"*
- *(Example of impact) "the barriers still exist and are not eliminated. It is an old problem that environmental crime is not taken serious."*

And a suggestion for improvement:

- *"Member states should be awakened to invest in environmental crime"*

B14	Greater awareness of best practises (merged with B18)
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Around 65% of respondents confirmed that this benefits had been realised with the following practitioner offering examples of benefit and impact:

- *(Example of benefit) "in Crete I presented on biodiversity offsetting which was a new concept to many. At The Hague I presented on land use planning concepts which were equally novel to some attendees".*
- *(Example of impact) "Gave attendees something to think about to take back to their MS".*

B15	Increased innovation to overcome problems
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- *(Example of benefit) "Good ideas from foreign*

*colleagues on special investigative techniques in combating wild life crime and waste crime”*

- *(Example of impact) “Not so much, because domestic law doesn’t always allow all modern investigative techniques against any type of environmental crime. Only against the most serious.”*

Fewer numbers of respondents (40%) confirmed that this benefit had been realised, and there were two who suggested it had not. However, overall, from the project reporting, it is clear that the activities and outputs have demonstrated transferability and replicability, with much of the outputs arising through collaborative and co-operative working.

### **Best Practice lessons**

Evidence of this benefit is primarily through the specific LIFE-ENPE project training outputs, notably from the four Working Groups (Deliverable LIFE-ENPE WG Final Reports 30/07/20) included training materials that had been compiled using specialist input from across Europe over a period of almost three years. The sharing of these best practice approaches developed to assist the prosecution of environmental crime (Annex 4.0 Summary of LIFE-ENPE outreach) has resulted in clear examples of the following LIFE-ENPE benefits having been realised in this category:

#### *LIFE-ENPE project benefits evident from project activities, interventions & outputs*

B2	Better trained judges & prosecutors
B3	Harmonised understanding of key environmental law concepts across member states

Both important **Priority Benefit** central to the LIFE-ENPE project achieving its aim, the evidence of these benefit being realised can be seen not only in the outputs from the Working Groups, but also in the contribution ENPE has made to various international initiatives and forums (see above).

#### *LIFE-ENPE project benefits reported by key stakeholders (Annex 3 (i))*

The following LIFE-ENPE benefits were evident from the benefits questionnaire survey:

B14	Greater awareness of best practises (merged with B18: Improved take-up of best practice approaches across Europe)
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A really positive set of responses from stakeholders with around 65% indicating that the benefit had been realised and the following examples provided:

- *(Example of benefit) “The videos presented in seminars were very helpful”*  
*(Example of impact) “Better understanding of domestic wild life crime”*

- (Example of benefit) “Joint conferences of partner networks gave the opportunity to share best practices.”
- (Example of impact) “Inspectors, police, prosecutors and judges came together, and they discussed best practices over case studies.”

## Policy implications

The policy implications of ENPE and the LIFE-ENPE project activities, interventions and outputs are the most significant benefits delivered over the last five years.

Since its inception, the project (and the ENPE network) has worked closely with regional, national and supra-national organisations involved in the regulation of environmental crime, initially in Europe, but also, as the project and network evolved, on a global scale (Deliverable – Matrix of contacts - updated provided 30/06/18; Annex 2.0 ENPE collaboration with other Agencies, networks and bodies).

The project outputs, including specific deliverables related to training provided by the Working Groups (Annex 12. (i) & (ii) Deliverable: WG 1&2 Final reports; WG3 &4 Final reports) have been shared with the EC DG ENV, the department responsible for EU policy on the environment and its protection. This has led to ENPE being a central organisation in the development of environmental policy such as the ECA initiative, and in being responsible for key training Actions on environmental prosecution. More recently, ENPE has been requested to take a key role in the regulation of waste and wildlife crime in the Biodiversity Strategy 2030, and more widely, in the zero pollution ambition through its expertise in prosecuting pollution crimes.

### LIFE-ENPE project benefits evident from project activities, interventions & outputs

The Policy implications of the LIFE-ENPE project are best summarised via the following LIFE-ENPE project benefits:

B2	Better trained judges & prosecutors
B3	Harmonised understanding of key environmental law concepts across member states
B4	Improved communication between national prosecutors e.g. through website forum

More specifically, ENPE and the LIFE-ENPE project via its Working Groups have contributed to shaping and delivering environmental regulatory policy reflecting all of the above project benefits via the following organisations based and/ or funded in or via the EU:

- **(EC) Directorate General for Environment - DG ENV** with representatives attending and presenting at joint meetings, workshops and annual conferences (2016;

2017; 2019). ENPE has contributed significantly to the **DG ENV Environmental Compliance Assurance (ECA) Initiative Action plan (Actions 3,4 & 7)** and will have a key role in the EU's 2030 Biodiversity Plan and Zero Pollution ambition (Annex 5.0 ENPE After-LIFE plan; Annex 11 Deliverable D2: External presentations).

LIFE-ENPE Working group 2 (waste crime) was also a **key consultee to the EU Public consultation on the Evaluation of the Waste Shipment Regulation consultation (April 2018 Deliverable: LIFE-ENPE WG Second Stage Interim reports & training materials 30/03/19)**. More widely, ENPE and its members have consulted on the **Evaluation of the Environmental Liabilities Directive** and associated constituent parts<sup>34</sup>.

- **EU El Paccto programme** the joint EU Latin American EL PACCTO Programme, set up to exchange good policing and prosecutorial practices in the framework of the EnviCrimes, together with Europol and Eurojust (see below), promoting cooperation, develop bi-regional specialised networks and addressing the topic from strategic and operational levels. ENPE presented findings to this group at the El Paccto conference in Lima, Peru in October 2019.
- **EnviCrimeNet** - an informal network of police officers and environmental crime specialists supported and funded by Europol set up in 2011 to enhance the fight against organized environmental crime in Europe. EnviCrimeNet works collaboratively with ENPE and the LIFE-ENPE project with representatives attending LIFE-ENPE project events, and **signing the Memorandum of Understanding to commit to closer working relationships in tackling environmental crime** in Europe, alongside ENPE, IMPEL and EUFJE in Oxford in 2017.
- **EUROJUST** - an EU-funded co-operation unit with representation from across the EU set up to reinforce the fight against organised crime, including environmental crime. **Eurojust is a Full Member of ENPE and in 2019 jointly hosted its annual conference with ENPE at its offices in The Hague, Netherlands.**
- **European Judges Training Network (Belgium) – EJTN** is supported from the Justice Programme of the EU and is the principal platform and promoter for the training and exchange of knowledge of the European judiciary. The LIFE-ENPE project has participated in some of these events, including **providing Board Members to present on project activities and outputs (e.g. WG4 interim reports)**, as well as **ENPE Members participating in the annual EJTN exchange programme.**
- **The European Network for the Implementation and Enforcement of Environmental Law (IMPEL)** - a network of European regulators concerned with the implementation and enforcement of environmental legislation. The network is an organisation that shares experience and information on the practical application of environmental legislation across Europe.

IMPEL has worked closely with ENPE from the start, **contributing specialist members to the LIFE-ENPE Air Pollution Working Group (WG3) and training materials to the Wildlife crime Working Group (WG1)**. IMPEL also agreed to

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<sup>34</sup> <https://ec.europa.eu/environment/legal/liability/index.htm>

formally hand over its **crimes database to ENPE at the start of the LIFE-ENPE project** which has since **developed and expanded** and can be accessed through the ENPE website.

Together with EUFJE and ENviCRimeNEt, **IMPEL signed a Memorandum of Understanding (MoU) with ENPE** to commit to and protect future collaborative working in tackling environmental crime at the environmental enforcement networks conference in September 2017 in Oxford, UK.

IMPEL has also jointly hosted, with ENPE and others, **joint annual conferences** in 2016 and 2017 and contributed a break-out **workshop focussed on Water Pollution crimes at the 2018 annual ENPE conference** in Heraklion Crete.

- **European Law Academy (ERA)** – is the European Academy of Law and is focussed on the training of legal specialists, including prosecutors operating in EU Member States in all aspects of EU law. ENPE provides Members to train delegates at ERA events, and through the **LIFE-ENPE Working Groups, and has provided speakers and prepared training presentations for use in virtual webinars** (WG2, March & May 2020).
- **European Heads of Environment Protection Agencies Network (EPA Network) (Norway) Better Regulation Interest Group** - established in 2003, NEPA is an informal forum for heads of environment protection agencies in Europe to share their experience and knowledge, at a strategic level, on the implementation of environmental policy and the state of the environment in Europe. In addition to sharing project outputs, good and best practice guidance and information on project activities via the newsletter and direct correspondence, **ENPE has attended and presented on activities at their Better Regulation Interest Group meetings** (2016; 2017); senior EPA Network representatives have **delivered keynote speeches at ENPE annual conferences** (2017; 2019).

B1/ E1	Closer co-operation and collaboration between prosecutors across borders; Global context with improving Chinese; Latin American and North American networks links
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In a global context, and reflecting the Emerging LIFE-ENPE project Benefit **E1 Global context with improving Chinese; Latin American & North American networks links** the LIFE-ENPE project has impacted policy in the following areas:

- **United Nations Environment Programme (UNEP)** - which has sought to work collaboratively with ENPE via a number of projects and initiatives including the **Convention for Migratory Species (CMS) which has worked closely with ENPE and the LIFE-ENPE project Working Group 1 (Wildlife crime)** including contributions to the **MIKT ‘scorecard’<sup>35</sup> and a joint workshop and training package** delivered which focused on stopping the illegal killing and taking of wild birds;

<sup>35</sup> <https://www.cms.int/en/taskforce/mikt>

- **United Nations Climate Change programme (UNCC)** - with ENPE representatives recently hosting and speaking at the **UNEP CCOP 25 event in Madrid in December 2019.**
- **United Nations Convention against Transnational Organised Crime** – a UN network fighting organised (including environmental) crime which held its 10<sup>th</sup> conference in Vienna at which ENPE, through its President Anne Brosnan, gave a keynote address via video presentation and received the following feedback:

***“On behalf of my delegation, I would like to deeply thank you for your intervention to our side event on environmental crimes. Thank you so much for sharing your experience and expertise on this matter! Your intervention contributed to raising awareness about those crimes and we really appreciate. Thank you for the time you granted us.”***

The LIFE-ENPE project has also worked collaboratively with other global enforcement networks and organisations with the over-arching aim to improve and strengthen the fight against environmental crime, including, in particular:

- **Chinese Supreme People Procuratorate (SPP)** – the Chinese organisation responsible for the adjudication of environmental crime in the Peoples Republic of China, with whom **ENPE has successfully organised several reciprocal exchange training visits** including Chinese prosecutors and judges attending three ENPE annual conferences, and **ENPE Board members delivering training in China.**
- **International Network for Environmental Compliance and Enforcement (INECE)** – a global organization focused exclusively on achieving compliance with environmental law through effective compliance promotion and enforcement strategies, including administrative, civil, criminal, and judicial enforcement. **ENPE is an Associate Member of INECE** and has provided keynote speeches to its conferences (most recently Adelaide, 2020 where ENPE president Anne Brosnan was presented with an award for environmental enforcement innovation), as well as inviting senior INECE representatives to attend and deliver keynote speeches at the ENPE annual conference (2018; 2019).
- **INTERPOL Pollution Control Working group (PCWG)** - a network of global experts who advise and assist on criminal investigations and projects concerning pollution crimes. Interpol’s PCWG has worked closely with ENPE for a number of years with specialists attending and speaking at ENPE annual conferences in 2017 and 2019 and **ENPE President, Anne Brosnan recently invited to the PCWG Board.**

[For a full summary of these, and other networks, bodies and projects that ENPE and the LIFE-ENPE project has worked with please see Annex 2.0 ENPE collaboration with other Agencies, networks and bodies.]

### LIFE-ENPE project benefits reported by key stakeholders (Annex 3 (i))

The most significant policy implication of the LIFE-ENPE benefits evident from the benefits questionnaire survey was:

B5	Improved co-ordination with other steps in the enforcement chain (i.e. inspectors, police & judges)
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This benefits has arisen from the close collaborative working relationships established between the European enforcement networks, in particular those signed up to the Memorandum of Understanding to commit to co-operative working in tackling environmental crimes, signed in Oxford in 2017, and subsequently the EU DG ENV ECA initiative.

Around 65% of respondents confirmed that this benefit had been realised with examples provided by practitioners in the benefits questionnaire survey including:

- *(Example of benefit) "In the case of Holland, information quite valuable was provided to the Spanish Prosecution Service by the Dutch colleague."*
- *(Example of impact) "High. This is the best way to fight criminal networks."*
- *(Example of benefit) "The specificity of environmental crime obliges law enforcement authorities to coordinate. In the absence of these coordinations, the completion of the operative files will not be successful."*

### Going forward

Given the time needed to incorporate best practices, guidance and awareness raising into procedural aspects of tackling environmental crimes, a separate analysis, reporting on the wider impact of specific judgements, decisions and prosecutions arising out of ENPE activity in 3-5 years would be very useful to report more fully on this impact. For example, reporting such as the reduction (number) of wild migratory birds killed or taken in a particular jurisdiction following prosecutions arising from LIFE-ENPE WG1 training (Segovia workshop, 2018), would be evident in due course but not within the time period of this project.



## 7. Key Project-level Indicators

Key Project-level indicators (KPIs) have been used to measure project progress and contribute to assessment of project management using the EC templates.

All activity related to the LIFE-ENPE KPIs has been the responsibility of the CB. Project partners have contributed as and when appropriate, in particular in the compilation of figures related to the original project metrics.

Careful consideration of the LIFE-ENPE project actions, timelines for actions and specific areas of focus was needed in setting the indicator values during the drafting of the project proposal.

The appropriate categories of indicator were used and the target figures (project metrics) agreed upon, with measurement taken and reported against these metrics at key stages of the report. Interim reporting of KPIs (LIFE-ENPE First progress report) was limited to two categories – 11.1 and 11.1.2 (see below) which, when reported, were both on course to be met<sup>36</sup>.

The final LIFE-ENPE project KPI figures are included as Annex 9.0 (Deliverable: Indicator tables for the final report 17/10/20) with a summary of each category and sub-category, along with interpretation included below.

The **Governance** category comprises six KPI figures: 11.1 which describes the number of ENPE facilitated transnational co-operation between prosecutors

**Target KPI at end of project = 10; Actual final figure = 15;**

11.1.2 (a) which describes the number of states that have prosecuting organisations as members of the ENPE network)

**Target KPI at end of project = 25; Actual final figure = 28;**

11.1.2 (b) the number of states in receipt of the Cap & Gap (baseline) report

**Target KPI at end of project = 30; Actual final figure = 41;**

11.1.2 (c) the number of states in receipt of the WG outputs (training materials)

**Target KPI at end of project = 30; Actual final figure = 34;**

11.1.3 which describes instances of ENPE best practice adopted by prosecutors/ judges

**Target KPI at end of project = 10; Actual final figure = 5;**

and 11.3 which describes the number of stakeholders in receipt of the ENPE deliverables

**Target KPI at end of project = 25; Actual final figure = 44.**

These metrics relate most closely to three (EU Life programme) categories of Benefit as set out in 6.4 above: 4) Replicability; transferability and co-operation benefits (for example, 11.1.2 (a) & 11.1.3); 5) Best Practice lessons (for example 11.1.2. (c), 11.1.3 & 11.3) and 6) Innovation and Demonstration value (11.1.2 (c)). The actual final figures support the assertion as set out in the discussion in 6.4 above that these are the benefit areas that LIFE-ENPE has most clearly realised.

Most of the target KPI figures have been met or exceeded. The relative closeness of the KPI *target* and *actual* figures also suggests appropriate and reasonable ambition when the figures were set. For the 11.1.3 – instances of best practice adopted by prosecutors, judges, this figure has been difficult to measure with absolute certainty. Feedback from the questionnaires, notably the conference questionnaires and final benefits management questionnaire (Annex 3.0 (i)) have been used to verify the figure, but this has proven unsatisfactory given a lack of details around

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<sup>36</sup> LIFE-ENPE Mid-term Report, Section 7.

the answers. In this case, the ‘face-to-face’ nature of the benefits workshop proposed (but cancelled due to covid-19) would’ve provided more certainty, (and possibly differences) in the final figures. More time for analysis and interpretation to establish the figures with more certainty would’ve been helpful. Revisiting this figure in time would also be a highly valuable exercise to assess ENPE’s impact in this area.

The second category of benefits measured was the *Information and Awareness* category (12).

12.1.1 comprised three sub-categories, each reporting on website use:

12.1.1 (a) ENPE website hits, number of individuals

**Target KPI at end of project = 2000; Actual figure = 18,439 (Dec 2019);**

12.1.1 (b) recurring hits, number of hits

**Target KPI at end of project = 1000; Actual figure = 38,886 (Dec 2019);**

12.1.1 (c) goal completion high rate good (above 50%)

**Target KPI at end of project = 1600; Actual figure = N/A (not measured);**

12.1.1. (d) bounce high rate bad (below 50%)

**Target KPI at end of project = 1400; Actual figure = N/A (not measured).**

12.1.3 comprised two sub-categories, focussed on the extent of countries engaged, including:

12.1.3 (a) Target audience mapping, states covered (stakeholder matrix)

**Target KPI at end of project = 39; Actual figure = 45**

12.1.3 (b) Capitalisation and gap-filling report – states covered

**Target KPI at end of project = 28; Actual figure = 41.**

Progress in this important area of the project was measured using appropriate KPI target figures at the time of the preparation of the proposal (2014). However, the increased development and usage of the internet, and the importance of the website since then (6 years of activity to 2020) could not have been anticipated. The results were very high website use figures, in relation to the target figures where measurement was possible (NB for 12.1.1 (c) and (d), relating to goal completion and bounce, there was no facility to measure this. Instead, measurement of individual pages visited and bandwidth used (e.g. for downloads) was reported<sup>37</sup>).

The KPIs for the engagement with states included in the ENPE stakeholder matrix, and those in receipt of the Cap & Gap report, were appropriate, reflected a reasonable and accurate level of ambition and were met, (in both cases, exceeded).

The *Capacity Building* KPIs were divided into three sub-categories:

13.1 (a) number of individual trained (conferences)

**Target KPI at end of project = 345; Actual figure = 550;**

13.1 (b) number of individuals trained (WG attendees)

**Target KPI at end of project = 50; Actual figure = 71;**

13.1 (c) number of individuals training (via prosecution/ judicial organisations)

**Target KPI at end of project = 200; Actual figure = 1000+ (estimate)**

All KPI target figures in this category were exceeded, with, broadly speaking, reasonably accurate estimates reflecting an ambition that was achievable. As with the website hits-related KPIs (category 12.1.1), it could not have been anticipated how the use of web-based platforms would be used, particularly how the growth of ‘virtual’ and remote training and awareness-raising as technology in this area has progressed so much since the LIFE-ENPE proposal as drafted. This explains the anomalously high figure for 13.1 (c) – number of individuals trained

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<sup>37</sup> These figures are reported and discussed in the LIFE-ENPE Second Impact survey

via prosecution/ judicial organisation - where (in part due to Covid-19 related travel restrictions) the use of remote platforms for delivery of training, for example, the sharing of the WG2 WSR training outputs (animation and webinar), has enabled the audience to be much more widespread and numerous than traditional ‘face-to-face’ training delivery, with more 1000 delegates included in this way (Annex 4.0 Summary of LIFE-ENPE outreach)

KPI categories **14. (Jobs) and 15 (Economic Growth)** relate to the future economic impact of ENPE, following the completion of the LIFE-ENPE project, and in particular the financial commitment required to continue with ongoing operations. Action E3, described in more detail in 6.1 above, After-LIFE report (Deliverable: LIFE-ENPE After-Life report, Annex 5.0 17/10/20) has included the preparation of financial requirements for ENPE to continue as a viable operation.

The Target KPI for Full Time Equivalent (FTE/ staff) at the project conclusion was estimated at 1.87. This figure is considered to be an accurate reflection of the FTE required, as a minimum, for the operational activity of ENPE to continue (comprising one full time project manager, financial support and specialist input from the Board as and where necessary). The financial commitment (15.1 Total Project Eligible costs) is estimated to be around €250,000, as against the KPI of €214,000, reflecting inflationary increases and a more accurate understanding of the funding mechanism to be used<sup>38</sup> which will comprise both co-financing and match funding. However, the savings estimated (15.3) will not be immediately realised since it is not proposed to request membership fees, meaning the financial commitments as set out in 15.1 will be needed for the foreseeable future.

In summary, the KPIs were set at an appropriate level, and in general terms, all were either met or exceeded. Most were accurate in anticipating what metrics would be significant and, importantly, measurable, going forward. Some were, however, not partly or wholly applicable for example, the website goal completion and ‘bounce’ figures were not reported, and the ‘hits’ figure was under-estimated. This was perhaps due to a lack of appreciation as to the expansion of internet-based research use over the five years since the project started (more detail on the website metrics used can be found in Annex 6 & 7 first and Second stage impact reports).

Broadly speaking, the KPIs used would be applicable for similar analysis for a similar project in the future.

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<sup>38</sup> See LIFE-ENPE After-LIFE report; Annex 5.0

## 8. Comments on the financial report

### 8.1. Summary of Costs Incurred

PROJECT COSTS INCURRED			
Cost category	Budget according to the grant agreement in €*	Costs incurred within the reporting period in €	% **
1. Personnel	700,057	638,311	91.2%
2. Travel and subsistence	45,010	30,969	68.8%
3. External assistance	196,864	190,991	97.0%
4. Durables goods: total <u>non-depreciated</u> cost			
- <i>Infrastructure sub-tot.</i>			
- <i>Equipment sub-tot.</i>			
- <i>Prototype sub-tot.</i>			
5. Consumables	7,040	844	12.0%
6. Other costs	55,680	50,289	90.3%
7. Overheads	<b>67,749</b>	<b>59,986</b>	88.5%
<b>TOTAL</b>	<b>1,072,400</b>	<b>971,393</b>	<b>90.6%</b>

\*) If the EASME has officially approved a budget modification through an amendment, indicate the breakdown of the revised budget. Otherwise this should be the budget in the original grant agreement.

\*\*) Calculate the percentages by budget lines: e.g. the % of the budgeted personnel costs that were actually incurred

As demonstrated in the table above, the project has remained within the 20% budget heading tolerances and has spent well within budget. The project had one major budget modification submitted in 2018. The modified budget is shown in the table above.

Environment Agency, Defra and REMA recorded their costs in the Sterling/SEK and converted at the applicable monthly exchange rate taken from:

[http://ec.europa.eu/budget/contracts\\_grants/info\\_contracts/inforeuro/index\\_en.cfm](http://ec.europa.eu/budget/contracts_grants/info_contracts/inforeuro/index_en.cfm)

The LIFE template for financial statements has been amended to allow us to use this method for reporting costs and has been extensively tested to ensure it is accurate. Other beneficiaries have the Euro as their base salary.

The full statements of expenditure for the beneficiaries are included as an Annex (Annex 21.0).

As the Environment Agency is able to recover Value Added Tax (VAT), costs have been claimed Net. Other beneficiaries did not incur substantial external costs. REMA and FP have claimed some travel costs and VAT has been removed from any hotel costs where applicable.