



National strategies on combating environmental crime

A package for inspiration





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**European Network of Prosecutors for the Environment
Réseau des Procureurs Européens pour l'Environnement**

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**NATIONAL STRATEGIES ON COMBATING ENVIRONMENTAL CRIME
A PACKAGE FOR INSPIRATION**

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INTRODUCTION AND BACKGROUND

The adoption in 2024 of the new EU Environmental Crime Directive 2024/1203¹ is a landmark for criminal law which aims at combating environmental crime. Even more than the Directive's valuable predecessor from 2008,² it is not just a set of obligations for EU Member States. As is clear from our activities as the *European Network of Prosecutors for the Environment (ENPE)*, it was received as an impulse for all national authorities responsible for enforcement of the rules aimed at protecting the environment and human health. We also see that this is true both for European Union (EU) Member States and for candidate EU Member States.

¹ Directive (EU) 2024/1203 of the European Parliament and of the Council of 11 April 2024 on the protection of the environment through criminal law and replacing Directives 2008/99/EC and 2009/123/EC.

² Directive 2008/99/EC of the European Parliament and of the Council of 19 November 2008 on the protection of the environment through criminal law.

The Directive concerns two levels of Member States' and candidate Member States' authorities. The first is the national legislator, for it is their mandate that national legislation be in accordance with the Directive and, behind that, all other environmental EU legislation. Secondly, and on the basis of the legislators' work, it is for environmental enforcement authorities, i.e. administration, investigation, prosecution and judiciary, to make the legal system function in practice.

Examples can show this twofold working of the Directive. It is for the legislators in the national systems to make *effective, proportionate* and *dissuasive* sanctions available. After that, it is for the enforcement authorities, in their different competences and responsibilities, to work towards such sanctions being imposed if breaches of environmental law occur. It is for the legislator to create the framework through which persons cooperating with the authorities, such as 'whistle blowers', can be protected. And it is for the enforcing authorities to make the system, if necessary, really protect individuals.

One of the new instruments introduced by the 2024 Directive is to be found in its Article 21. This provision holds the obligation for Member States to establish and publish a national strategy on combating environmental criminal offences by 21 May 2027. For EU Member States, this is a direct obligation and for candidate Member States it is relevant as being a part of the EU *acquis*.

The importance of such a strategy can hardly be overestimated. In the interests of the environment and human health, it offers a 'steering course' for enforcement, as it creates coherence and guidance and it is also a reference for the evaluation of enforcement results. As said above, it must not be viewed as a technical obligation, but rather, as a source of inspiration.

Evidently, drafting, adopting and implementing such a strategy is not a task for the legislator. Instead, it is for the enforcement authorities, and the environmental public prosecutor's office is one of these authorities in the EU and the candidate Member States. For criminal enforcement of EU environmental rules, and with that, the functioning of the Directive, they are 'key players'.

Given the role and responsibility of environmental prosecutors, ENPE, as their EU network, took the initiative to develop a template for the strategy introduced by Article 21. This seemed relevant firstly because for those authorities for whom working with a national strategy is new, a helping document may be of use. Here it must be noted that for ENPE itself this is also a new type of activity. And secondly, sharing ideas and concepts is, in itself, a contribution to a level of harmonization of the national strategies.

The ENPE initiative has been, in general, warmly welcomed and this has led to this present document.



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METHODOLOGY AND OVERVIEW

As a starting point, a number of preliminary remarks must be made.

Firstly, the prosecutor's office will probably not be the single authority adopting and implementing the strategy in a Member State. Administrative and investigative authorities are involved and bear responsibility as well. What is offered here, must therefore be considered as *input for a strategy* from the *prosecutor's* point of view. It is for the national environmental prosecutor's office to decide where and how to provide this input.

Secondly, although the Directive's requirements, as part of supranational law, will lead to a certain degree of uniformity, national strategies will inevitably differ as to the adopting authority, their form and, depending on the national situation, in content.

After all, although all Member States share the interest of protecting the environment, the differences between them are considerable :

- Some are federal states, many are not;
- The national authorities which are to adopt and implement the national strategy will be different;
- Some Member States have specialized prosecutor's offices, others have not;
- It is not in all Member States that legal persons can be held criminally liable for offences committed;
- Some Member States already have documents that can be considered as relevant for national strategies or perhaps even as full strategies, others have to take a first step.

Due to this, it became clear during the process of drafting this document that it could not be a template in the form of a 'one size fits all' blueprint to be applied in all Member States.

It must also be noted that there may be a connection between the national strategy as required by Article 21 of the Directive and the coordinating mechanisms prescribed in Article 19. In the Netherlands, for instance, the national strategy is to be designed and adopted by the national strategic forum which itself serves as the coordination mechanism on strategic level.

As a result of all this, the outcome of the ENPE initiative is not a template in the sense of a detailed blueprint. Rather, it is a 'package for inspiration for the designing of a national strategy on combating environmental crime.' This package is presented in five parts.

- Part 1 is a 'bare' description of the contents of Article 21. It points out the minimum which the Directive requires regarding the national strategies by May 21, 2027.
- Part 2 identifies elements in the Directive not in Article 21, but in the Preamble and other provisions, which are nevertheless very relevant to be incorporated in the national strategy.
- Part 3 presents the results of an ENPE "brainstorming" session on the possible content of a national strategy, which took place in Brussels on March 27, 2026.



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- Part 4 is a model for a national strategy, in fact a template in the stricter sense of the word, drafted by the ENPE Members from the Prosecutors Association of Serbia who participated in the brainstorming session.
- Part 5 is a 'sign-posting' guidance document, i.e. a characterization of, and reference to, a number of national documents and presentations already available elsewhere.

In short, Part 1 shows the minimum of what must be done. Parts 2 and 3 offer suggestions for more, coming from the Directive and from the ENPE brainstorming session. Part 4 supplies a concrete model for a strategy, and Part 5 is a guide to some interesting national documents and presentations.

These five parts partly overlap and partly raise different themes. An overlap is in the Directive's pointing at the need for specialisation of enforcement authorities (Part 1) and the brainstorming session's consideration of specialisation as crucial (Part 3). A difference is that the Directive requires the Member States to prioritize their policy areas regarding environmental crime on the basis of a risk analysis (Part 1), whereas this prioritization did not come up in the brainstorming session. On the other hand, the need to more specifically describe the aims of sanctions, also in relation to cases, was only mentioned in that session (Part 3).

Of course, not all ideas and suggestions will be of use for all, but parts 2 and 3 in particular, show how much there is of relevance.

Finally, it must be noted that this package, aimed at offering inspiration, is by no means a binding document. Further, and evidently, the content of the strategy to be adopted must be consistent with the constitutional order of the respective Member States.

We do hope that all the elements and ideas in this package, either consulted in parts or as a whole, are of value for drafting and working with the national strategies on combating environmental crime.

July, 2026

Rob de Rijck, ENPE President
Shaun Robinson, ENPE Program Manager



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PART 1: MINIMUM OF ELEMENTS OF THE NATIONAL STRATEGY REQUIRED BY ARTICLE 21 ECD

Article 21 of the Directive is titled 'National strategy.' Its Section 1 reads :

'Member States shall establish and publish a national strategy on combatting environmental criminal offences by 21 May 2027.

Member States shall take measures to implement their national strategy without undue delay. The national strategy shall address at least the following:

- a. the objectives and priorities of national policy in the area of environmental criminal offences, including in cross-border cases, and arrangements for regular evaluation of whether they are being attained;
- b. the roles and responsibilities of all the competent authorities involved in combatting environmental criminal offences, including as regards coordination and cooperation between the national competent authorities as well as with the competent Union bodies and as regards providing assistance to European networks working on matters directly relevant to combatting those offences, including in cross-border cases;
- c. how specialization of enforcement professionals will be supported, an estimation of the resources allocated to combat environmental crime and an evaluation of future needs in that regard.'

Section 2 of Article 21 instructs the Member States to ensure that their national strategy is reviewed and updated at regular intervals of no longer than five years, on the basis of a risk-analysis-based approach, in order to take account of relevant developments and trends and related threats regarding environmental crime.

Summarized and numbered in a list, a national strategy is to address the following themes.

1. The objectives and priorities of national policy on environmental crime, also with regard to cross-border crime;
2. Regular evaluation of whether these objectives are being attained;
3. The roles and responsibilities of all competent authorities involved, also regarding
 - a. coordination and cooperation between the national authorities,
 - b. with the competent Union bodies, and
 - c. providing assistance to the relevant European networks;
4. Specialization of enforcement professionals;
5. Estimation of the allocated resources; and
6. An evaluation of future needs regarding resources.

The national strategy must be reviewed and updated at regular intervals of no longer than five years, and on the basis of risk analyses. In these analyses, developments, trends and threats regarding environmental crime must be taken into account.



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PART 2: ELEMENTS FOR A NATIONAL STRATEGY ELSEWHERE IN THE ECD

In more than a few provisions other than Article 21 and in the Preamble, the Directive addresses themes or points out principles which are relevant to incorporate into the national strategy or to at least take into account when designing it. These are, with the key terms underlined :

1. The obligation for Member States to establish mechanisms for coordination and cooperation at strategic and operational levels among competent authorities [Article 19]. Such coordination mechanisms shall be aimed at least at:
 - a. ensuring common priorities and understanding of the relationship between criminal and administrative enforcement,
 - b. exchange of information for strategic and operational purposes,
 - c. consultation in individual investigations,
 - d. the exchange of best practices and
 - e. providing assistance to relevant European networks of practitioners.
2. Penalties imposed for infringements of EU law must be effective, dissuasive and proportionate [Recital 4 and Articles 5 and 7, also in all sectoral EU legislation].
3. Complementarity of criminal and administrative law is crucial in combating environmental crime [Recital 4].
4. Accessory penalties are often more effective than financial penalties, especially for legal persons [Recital 31, 42 and Articles 5 Section 3 and 7 Section 2].
5. Illegal profits of environmental crime should be confiscated [Recital 49].
6. Effective investigative tools, including financial investigation tools, must be available for competent authorities [Recital 53].
7. Persons who report environmental crime or otherwise cooperate with the authorities must be assisted and, if necessary, protected [Article 14].
8. Statistical data on investigations, prosecutions and convictions regarding environmental crime must be collected, also to be provided to the European Commission [Article 22].



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PART 3: IDEAS AND SUGGESTIONS FROM THE ENPE “BRAINSTORM”

On March 27, 2026, 9 delegates from 7 countries met in Brussels, Belgium for a “brainstorming” session on the national strategy for combating environmental crime. The participants were: Marina Matic and Lidija Komlen Nikolic (Serbia), Jorgos Sbokos (Greece), María Lucía Girón Conde (Spain), Lena Hartung and Maya Bausmann, (Germany), Lina Chatziathanasiou (Cyprus), Shaun Robinson (United Kingdom) and Rob de Rijck (Netherlands). Six delegates are environmental prosecutors. Marina Matic is President of the Program Council of the Prosecutors Association of Serbia, Lena Hartung is from the federal German ministry of Justice, and Shaun Robinson is from the Environment Agency, England and ENPE Program Manager. Two ENPE Members were unable to attend and sent their apologies. The session was facilitated by Christopher Malapitan from Brussels.

The meeting’s objective was to freely share and exchange ideas, suggestions, inspirations and practices for the national strategies. The method offered by Christopher Malapitan was the so-called “World Café”. Following this structure, the subject was divided into three stations. These were the ‘WHAT’ of the strategy. i.e. its objectives and priorities ; the ‘WHO’, i.e. roles and responsibilities in relation to the strategy, and the ‘HOW’, i.e. mechanisms to support the strategy and its implementation. Split into three groups, the participants rotated to share and discuss their ideas at all three stations. After the first round, each group could build forth on what was said in the same station before.

The session proved very lively and its results are presented below. This presentation does not have the form of a fully edited report or policy document. With that, too much of the spirit and inspiration of the session would be lost. Only a few minor adjustments were made for readability. Hopefully, the meeting’s character of ‘out of the box thinking’ is especially preserved in the notes posted on the flipcharts during the day and copied in the three tables.

3.1 A national strategy, ‘What’: objectives and priorities

Themes identified

1. Set, via a baseline study, a clear introduction of what there is in existing strategies and what needs to be done. This study should assess the current national situation and identify its strengths and weaknesses. This will result in an explanation of the strategy’s rationale.
2. Existing institutions and mechanisms need to be strengthened. Clarify the obstacles in the interaction of the competent authorities & organizations. Identify where to invest.
3. If feasible, legislation needs to be simplified, including legislation regarding the distinction between administrative and criminal enforcement.
4. Define the aim of sanctioning more explicitly, also in order to make clear whether in a certain case or type of case, either administrative or criminal enforcement is most called for.
5. Explore the possibilities of innovation and invest in it.
6. Specialisation of enforcement authorities is crucial.
7. Invest in training for enforcement authorities.



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8. Strengthen cross-border collaboration.

9. Transparency, e.g. in relation to different actors and in statistics.

10. Explore the possibility of a funds for the protection and restoration of the environment, to be financed also out of the results of enforcement (fines and confiscation of criminal assets).

11. If not in national law as yet : explore the possibility of introducing criminal liability of legal persons.

*From the flipchart regarding 'What.'*³

Reinvent the role and scope of investigation forces	Involve (holistic) all approaches (prevention & repression)	Define/set the line between administrative enforcement and penal sanctioning
Embrace new stakeholders (other than the "traditional" ones)	Invite other actors/stakeholders to reflect on the national strategy	Do not let environmental policies relate with / depend on other national policies
Find the matching point of administration and strategy	Define the aim of the sanction and think of new sanctions	Involve a 15 year old child in the discussion, in order to give a voice to a future generation
Adjust investigative measures to the seriousness of environmental crimes	Invite stakeholders to tell what they need from prosecutors and increase transparency towards these stakeholders	Keep the future generations in mind
Comparison between different applicable national legal frameworks	Define the aim of the national strategy / What is the state of environmental policy?	Compare what there is and what is needed in the light of the new Directive. Formulate the reasons for a national strategy.
Strengthen existing institutional and legal	Cross border transparency	Innovation and specialisation / training

³ In this table, the topics 'Connection with bankruptcies' and 'Links with corruption and organized crime' were added after the session.



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organisations and mechanisms		
Transparency, also through statistics	Specialisation of all agencies : police, prosecution, judges. This a priority	Give innovation a central role
Emphasize environmental crimes as serious crimes	Cross border and international cooperation	Strengthen institutional capacities including specialisation & training
Improvement and simplification of the law applicable	Introduce/strengthen criminal responsibility of legal persons	Redefine the relation between administrative and investigating bodies
Connection with bankruptcies	Links with corruption and organized crime	

3.2 A national strategy, 'Who' : roles and responsibilities

Themes identified

1. Identify all relevant stakeholders and their roles. These are not only government authorities, but also NGO's, private sectors, media, banks and insurance companies, labs etc. The number of relevant stakeholders is large.
2. Raise stakeholders' awareness of environmental crime and its effects. Possible difficult questions on this topic are who must be made aware and who is to raise this awareness.
3. Strengthen corporation between organisations, not only between government organisations, but also with other stakeholders. Avoid 'silo' working. Formalization of cooperation would be in line with Article 19 of the Directive, and may prove very helpful.
4. Strengthen institutional capacities : financial resources, staff, training, equipment, etc.
5. Specialisation is crucial for acquiring sufficient knowledge and experience.
6. Involve environmental prosecutors (and investigators) at an early stage of developing new criminal legislation, so that they can advise on its effectiveness.



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From the flipchart regarding 'Who.'

Policy makers	Judiciary (judges and prosecutors)	Environmental police
Administrative authorities (criminal administrative law)	Media	NGO's and citizens education
Networks (ENPE, IMPEL, EnviCrimenet, EUFJE)	Academia	Labs for analysis
Banks, insurance companies, law firms	Satellite surveillance agencies	Corporations, labour unions
Private & state (green) funds	Coordination between roles, specialised enforcement, cooperation	Education and social awareness, promoting environmental culture
International cross border collaboration and cooperation	Certification of evidence and persons/agencies producing evidence	Reform procedural law/clarification
Resource pursuit	In situ agencies (police, forest rangers, customs, protected area agencies)	Feedback & evaluation of measures taken
Statistical analysis & law auditing	Education, & infrastructure & safety & training of enforcement agencies	Involve prosecutors in an early stage of legislation
Strengthen institutional capacities (HR, finance, etc.)	Central leading body to build consensus	Authorities responsible for issuing permits
Coordination & corporation. National/cross border	Develop clear criteria for referral of cases for criminal investigation	Involve stakeholders at early stages of legislation
Raising awareness	Legislator	Whistle blowers and other persons reporting crime.



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3.3 A national strategy, 'How' : support mechanisms

Themes identified

1. Estimate necessary resources (budgets, number of staff, available skills, equipment, training opportunities etc.) and evaluate in what measure they are currently available.
2. In case of a serious gap between what is needed and what is available, explore how this problem can be solved.
3. Political commitment and will are essential, also allocation of budgets is crucial.
4. Explore the possibility of financing through results of enforcement (fines and confiscation of criminal assets), which is effectively a method to bring the 'polluter-pays' principle into effect.
5. Monitoring and reporting, also to the EU Commission, are strong drivers for the implementation of the Directive. Consider the institution of a special body or committee to monitor and report on the implementation of the Environmental Crime Directive. This body or committee may be the coordinating mechanism meant in Article 19 of the Directive.
6. Build a 24/7 infrastructure for information sharing across different agencies.
7. Engage science & research to report on effectiveness of enforcement and steps taken to bring enforcement forward.

From the flipchart regarding 'How.'

Create a national environmental fund to be financed by fines imposed for environmental offences	Connect proceeds of environmental fines with funding of enforcement agencies	DG ENV, Ministries: Justice, Interior, Environment, Agriculture, Fisheries, Finance, Directorate for enforcement
Monitoring body for the implementation of EU and national level	Regular reports from operation on high level or monitoring body	Publication of annual implementation report
Warning system for non-implementation	24/7 central environmental call centre	Infrastructure for exchange of Information
Support in: technical, legal, financial, administrative	Estimation of resources (Financial & staff)	Specialisation
Coordination institution on a formal basis		



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PART 4: A MODEL FOR A NATIONAL STRATEGY

Template of the ECD national strategy

Introduction

This section should provide a **concise overview of the rationale** for adopting the national strategy and its overall purpose. It should explain the role of the strategy in strengthening the prevention, detection, investigation, and prosecution of environmental crime, as well as its contribution to effective environmental protection, the rule of law, and the implementation and enforcement of EU Directive 2024/ 1203, the 'Environmental Crime Directive'.

This section should also outline the need for a **comprehensive and coordinated approach** to environmental protection, emphasizing the importance of cooperation among relevant national authorities and the integration of environmental, regulatory and criminal enforcement measures.

Finally, this section should indicate the **period of implementation** of the strategy, specifying its duration and the timeframe within which the envisaged measures are to be implemented.

Analysis of Situation / Problem Analysis / Ex-ante analysis

This section should provide an overview of the current situation in the field of environmental protection and enforcement, serving as the analytical basis for the preparation of the national strategy. National authorities drafting the strategy should conduct an ex-ante analysis examining the existing policy, institutional and legal framework, and identifying the main factors affecting the effective prevention, detection, investigation and prosecution of environmental crime.

In particular, the analysis should review the current:

- **policy framework**, including national strategies and other policy documents relevant to environmental protection,
- **institutional framework**, identifying the competent authorities responsible for environmental protection, monitoring and law enforcement, and
- **legal framework**, including the main laws and secondary legislation governing environmental protection and environmental criminal enforcement.

The section should also identify **key challenges** that may affect the effective implementation of environmental criminal law. In this context, national authorities should consider, where relevant:

- the need for alignment of national criminal legislation with the Environmental Crime Directive and other relevant EU requirements,
- the current capacities of competent institutions, including staffing level, availability of specialized expertise and financial resources,



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- the degree of specialization among national authorities involved in environmental crime cases, including police/investigators, prosecutors, and judges,
- the quality of inter-institutional cooperation, including coordination mechanisms and the existence of systems for (automatic) data exchange between relevant authorities,
- the availability and quality of statistical data on environmental crime, including the types of data collected and any challenges in data collection or reporting,
- the existing framework for cross-border cooperation, particularly in cases involving transnational environmental crime.

The purpose of this section is to provide a clear and structured overview of the national context and the main challenges in combating environmental crime, thereby informing the strategic priorities and measures to be set in the subsequent parts of the strategy.

General Objective

This section should define the **overarching objective of the national strategy** in combating environmental crime, ensuring its alignment with the objectives and requirements of the Environmental Crime Directive. The general objective should reflect the commitment of national authorities to strengthen the prevention, detection, investigation and prosecution of environmental offences, and to ensure effective protection of the environment through the application of criminal law.

When drafting the general objective, national authorities should formulate **a clear and concise statement** that reflects the strategic direction of the document. The objective should emphasise the need to improve the effectiveness of environmental criminal enforcement, enhance institutional capacities, strengthen cooperation among competent authorities, and ensure the effective implementation of national legislation transposing the Environmental Crime Directive.

The general objective should also reflect a comprehensive approach to combating environmental crime, integrating preventive, regulatory and criminal justice measures. Where appropriate, it may also refer to strengthening cross-border cooperation, improving data collection and analysis, and promoting coordinated action among environmental authorities, law enforcement bodies, prosecution services and the judiciary.

The general objective should serve as the **guiding framework for the specific objectives and measures** set out in the subsequent sections of the strategy.

Example of the General Objective:

The general objective of the strategy is to ensure a comprehensive and coordinated national response to environmental crime, in line with the Environmental Crime Directive and relevant EU environmental acquis. The strategy seeks to strengthen the capacity of national authorities to prevent and address environmental offences, enhance cooperation among environmental and criminal justice institutions, and improve the effectiveness of enforcement mechanisms in order to ensure a high level of environmental protection.



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Specific objectives

This section should define the **specific objectives** through which the general objective of the strategy will be achieved. Specific objectives should translate the overarching strategic goal into a limited number of clearly defined priority areas for action.

When drafting this section, national authorities should formulate objectives that are **clear, operational and aligned with the requirements of the Environmental Crime Directive**. The objectives should reflect the main areas where action is needed to strengthen the prevention, detection, investigation and prosecution of environmental crime.

Each **specific objective and corresponding measures** should be accompanied by clearly defined **indicators for monitoring implementation**, including the **baseline value and the target value**. Indicators should be structured across different levels of the strategy:

- **Indicators for the general objective** should measure the **overall impact** of the strategy.
- **Indicators at the level of specific objectives** should reflect **outcomes**, capturing broader improvements in the effectiveness of environmental crime enforcement.
- **Indicators at the level of measures** should be **output-oriented**, reflecting the direct results of implemented actions (for example, the number of newly recruited staff, number of specialised training sessions organised, or establishment of coordination mechanisms).

Specific objectives should therefore be formulated in a way that allows their implementation to be supported by **concrete measures, actions and measurable indicators**, which should be presented in the subsequent sections of the strategy.

Example of indicators at the 'specific objective' level:

Specific objective		
Strengthened institutional capacities		
Indicator	Baseline in 2025	Target in 2029
Value of seize asset	Xxx million	20% increase
Number of environmental crime cases prosecuted (indictment submitted/approved by the court)	xxx	30% increase

All discussed, priorities and objectives could be clustered around four specific goals.

Based on discussions at the workshop, the strategy may be structured around several **specific objectives** addressing the key dimensions of combating environmental crime. While national authorities may adapt this structure to their national context, the following clustering of priorities may serve as a **reference model** when defining specific objectives and related measures.



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Specific Objective 1 – Improving the legislative framework

This specific objective should focus on strengthening the legal framework for preventing and combating environmental crime and ensuring alignment with the Environmental Crime Directive and other relevant EU legislation.

When developing measures under this objective, national authorities may consider actions aimed at:

- Aligning national criminal law with EU Environmental Crime Directive, including provisions on environmental offences, sanctions, and the protection of whistleblowers and environmental defenders;
- Assessing whether environmental offences should be treated as serious crime, including implications for criminal procedure law and the use of special investigative techniques;
- Strengthening the criminal liability of legal entities, including the effectiveness, proportionality and dissuasiveness of sanctions;
- Reviewing relevant provisions of the criminal procedure framework to ensure effective investigation and prosecution of environmental crime;
- Improving the interaction between administrative and criminal environmental law, including relevant provisions of administrative law;
- Clarifying the procedural role of civil society organizations/ Non-Governmental Organisations (NGOs), including safeguards and participation mechanisms where appropriate.

Specific Objective 2 - Strengthening institutional capacities

This objective should focus on strengthening the institutional capacities of authorities responsible for preventing, detecting, investigating and prosecuting environmental crime.

Measures under this specific objective may address:

- Promoting specialization among authorities involved in environmental crime cases, including judges, prosecutors, police, custom authorities, and inspections;
- Ensuring adequate financial resources for institutions responsible for environmental crime enforcement;
- Improving human resource management, including the recruitment and retention of specialized staff such as environmental experts and forensic specialists;
- Developing and providing training programs for relevant actors across the environmental and criminal justice sectors;
- Strengthening technical and investigative capacities, including access to specialized equipment and forensic tools;
- Supporting the development of capacities within civil society organizations/ NGOs active in environmental protection, including monitoring and reporting environmental harm.



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Specific Objective 3 - Enhancing internal and cross-border cooperation

This objective should aim to strengthen coordination and cooperation among national authorities and promote effective cross-border collaboration in addressing environmental crime.

Measures under this objective may include:

- Improving coordination and cooperation between administrative (such as inspections) and criminal justice authorities;
- Strengthening links between crime enforcement and the fight against corruption and organized crime, including mechanisms for information exchange;
- Promoting participation in relevant European and international networks, such as ENPE, IMPEL, DG JUST, DG ENV and other relevant frameworks;
- Improving access to specialized laboratories and scientific expertise required for environmental investigations.

Specific Objective 4 - Increasing transparency (Awareness and reporting)

This specific objective should aim to improve transparency, public awareness and the availability of reliable information on environmental crime.

Measures under this objective may include:

- Strengthening data collection systems and statistical reporting on environmental crime;
- Promoting statistical analysis and impact assessment to support evidence-based policy making;
- Encouraging cooperation with academic and research institutions in analyzing environmental crime trends and enforcement effectiveness;
- Supporting the role of civil society organization in raising awareness;
- Implementing public awareness initiatives targeting different stakeholders, including schools, business, industry association and chambers of commerce.

Monitoring mechanism and body

This section should set out the institutional arrangements for monitoring the implementation of the national strategy and ensuring the effective delivery of its objectives and measures.

National authorities should establish a **formal monitoring body** responsible for overseeing the implementation of the strategy. This body should include representatives of the key national institutions responsible for implementing the activities defined in the strategy. The monitoring body should ensure coordination among the relevant authorities, track progress in the implementation of planned measures, and address potential challenges affecting implementation.

Authorities responsible for the implementation of activities under the strategy should submit **regular progress reports** to the monitoring body. As a rule, implementing institutions should provide **quarterly reports** describing the status of implementation of the activities within their



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competence. Based on these reports, the monitoring body should assess progress in the implementation of the strategy and prepare **annual reports** summarising the overall implementation, identifying achievements, challenges and areas requiring further action.

The monitoring framework should also include **warning and mitigation mechanisms**. Where delays or obstacles in the implementation of planned activities are identified through quarterly reporting, the monitoring body should initiate appropriate procedures to address the situation. This may include issuing warnings, recommending corrective measures, or proposing adjustments to ensure that the implementation of activities remains aligned with the agreed timeframe and objectives of the strategy.

The strategy should be accompanied by a **detailed action plan**, which operationalises the strategic objectives. The action plan should define the specific activities to be implemented, identify the responsible institutions, specify the timeframe for implementation, and indicate the required financial resources. The action plan should serve as the main operational tool for implementing and monitoring the strategy.

Financial resources

This section should provide an **estimation of the financial resources** required for the implementation of the national strategy. The assessment should identify the indicative budgetary needs for the implementation of the activities envisaged under the strategy, broken down by year of implementation.

The estimation of financial resources should be prepared **on the basis of the action plan**, which defines the specific activities, responsible institutions, implementation timelines and expected outputs. Financial estimates should therefore reflect the concrete measures included in the action plan and the resources required for their implementation.

The assessment should take into account, where relevant, the costs related to activities such as the recruitment of additional staff (including the number and profile of new employees), organisation of training programmes, acquisition of equipment, development of technical or IT systems, and other operational measures foreseen in the strategy.

Given the technical nature of budget estimation, the financial assessment should be **prepared by a public financial management (PFM) expert**, in cooperation with the institutions responsible for implementing the activities set out in the action plan. The purpose of this section is to ensure that the strategy is supported by realistic and sustainable financial planning and that the required resources for its implementation are clearly identified.



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PART 5: SIGN-POSTING TO NATIONAL DOCUMENTS⁴

The documents listed below have been assembled as reference material for this guide. They include different approaches to combating environmental crime. Each example illustrates one or more of the requirements that a national strategy will need to fulfill. The “Covers Art. 21” row in each entry shows for which mandatory elements of Article 21(1) the document can serve as guidance.

1 National Enforcement Strategy for Environmental Law (LHSO)

Netherlands, 2022

Document type: National enforcement strategy (legally binding on participating authorities)

Language: Dutch

Covers Art. 21: Art. 21(1)(b) Roles, responsibilities and coordination of competent authorities

Content	Governs enforcement of all areas of environmental law under the Dutch Environment and Planning Act (<i>Omgevingswet</i>). Establishes principles for all enforcement authorities (administrative bodies, police, and public prosecutors). Provides a ‘grid’ for choosing between administrative remedies, administrative penalties, and criminal prosecution, based on the seriousness of the violation and the behaviour of the offender.
Useful for	Step-by-step guides for choosing an appropriate enforcement response; Structuring cooperation between administrative and criminal enforcement authorities.
Access	Informatiepunt Leefomgeving (IPLO)

2 National Action Plan against Wildlife Crime

Czech Republic, 2024

Document type: Thematic action plan (Wildlife Crime)

Language: Czech (English translation available)

Covers Art. 21: Art. 21(1)(a) Objectives and priorities; Art. 21(1)(b) Inter-agency coordination; Art. 21(1)(c) Specialisation and resources

Content	Includes a SWOT analysis and a vision with 8 objectives, each corresponding to an EU priority in combatting wildlife crime. For each objective, the plan lists concrete measures with performance indicators, timeline and information on the responsible entity and method of financing.
Useful for	Drafting a strategy from problem identification to concrete measures. Creating a tabular overview of the strategy.
Access	Czech version English version

⁴ ENPE is very grateful to A. Hatzis Sarraamona as the author of this part of the package.



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3 Strategy to Prevent and Combat Waste-Related Crime 2021–2023

Czech Republic, 2022

Document type: Thematic national strategy

Language: English

Covers Art. 21: Art. 21(1)(a) Objectives and priorities; Art. 21(1)(b) Coordination; Art. 21(1)(c) Specialisation and resource evaluation

Content	Identifies four issues related to waste crime (inter-agency cooperation, specialisation and training, the balance between administrative and criminal sanctions, and public awareness) and sets out measures for each issue. For every measure, the document names the responsible authority, the cooperating bodies, a performance indicator, the source of financing, and a deadline.
Useful for	Drawing up measures with a timeframe and clearly allocated responsibilities for identified problem areas.
Access	Czech Ministry of the Interior

4 Analysis of Institutional Limitations of the Prosecution Office in Prosecuting Environmental Criminal Offences in Serbia (Analiza GAP)

Serbia, 2025

Document type: Diagnostic analysis (preparatory to a strategy)

Language: Serbian

Covers Art. 21: Art. 21(1)(a) Evidence base for setting priorities; Art. 21(1)(c) Resource and specialisation gaps

Content	Identifies key deficiencies in the Public Prosecution Service's capacity to investigate, prosecute, and adjudicate environmental crime cases, using interviews with prosecutors and statistical data on complaints, prosecutions, and convictions across 18 categories of offence. Identifies gaps in specialisation, inter-agency cooperation, and cross-border collaboration.
Useful for	Conducting an analysis that can serve as evidence for the strategy.
Access	Serbian version English version

5 Council of Europe Strategy on the Environment (2025–2030)

Council of Europe (CoE), 2025

Document type: International organisation strategy

Language: English / French

Covers Art. 21: Human rights rationale underpinning all art. 21(1) elements

Content	Sets out the approach of the Council of Europe strategy for protecting the environment. Includes the formulation of strategic objectives, one of them the
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prevention and prosecution of environmental crime, and the Council of Europe values that underpin them.

Useful for Drafting the rationale and objectives section of a national strategy. The human rights and rule-of-law framework can support the argument for why a strategy is needed.

Access [English version: Council of Europe](#)
[French version: Council of Europe](#)

6 Investigation of Environmental Crime: Focus on Illegal Waste Crime

France, 2025

Document type: Presentation for EJTN Criminal Justice Seminar, including case studies

Language: English

Covers Art. 21: Art. 21(1)(b) Inter-agency cooperation and cross-border cases; Art. 21(1)(c) Specialisation, resources and investigative tools

Content Practical account of investigations into illegal waste crime: multi-agency task forces, financial investigation, asset seizure, and cross-border cooperation. Describes how investigators are organised and trained, from local units to a central specialised directorate. Includes case studies in illegal waste trafficking.

Useful for Organisation of investigative authorities; Designing the investigative part of a strategy.

Access [Investigation of environmental crime](#)

7 Environmental Crimes: Special overview of the Spanish Prosecutors for the Environment's experience and practice

Spain, 2024

Document type: Presentation for EJTN Seminar on Environmental Crimes

Language: English

Covers Art. 21: Art. 21(1)(b) Roles and responsibilities of competent authorities; Art. 21(1)(c) Specialisation and resources

Content Explains the structure of Spain's national network of environmental prosecutors: a central coordinating unit with support team, and a nationwide network of prosecutors. Identifies gaps in staffing, technical expertise, and judicial specialisation. Sets out strategic goals.

Useful for Designing the prosecutorial component of the strategy; Building specialisation within an existing prosecution service; Differentiating roles and responsibilities;

Access [Environmental Crimes: Special overview](#)



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