

# European Network of Prosecutors for the Environment

Réseau des Procureurs Européens pour l'environnement



## ENPE newsletter - Issue 10

30 September 2019

### Message from ENPE President Anne Brosnan

Dear colleagues,

Preparations for our 2019 annual conference, to be held in conjunction with EUROJUST at their headquarters in The Hague, Netherlands are gathering pace. The conference title is: *“International collaboration & co-operation in the fight against environmental crime”* and as an update:

- over 100 delegates will be in attendance;
- the programme includes speakers in plenary from four continents, including a delegation from China;
- we will also have a facilitated workshop over 2 sessions; a conference dinner at the seafront, Scheveningen; and for networking, a cultural and social event in advance of the conference which will involve a visit to the Panorama Mesdag museum of The Hague.



I am delighted to announce that the Dutch Secretary of State, Stientje van Veldhoven, will open the conference hopefully in person but if not by video (it's all possible now) and Olivia Swark-Goldman CE of the Wildlife Justice Commission will close with what we hope will be an inspirational speech. We are also delighted to welcome speakers from Australia, USA, Canada and Brazil. Shaun is very busy with the last few arrangements but we are very excited about the programme of activities and presentations and we have acted on your feedback to ensure that networking opportunities are increased. We have an intriguing “open mic(rophone)” session on the second day of our deliberations where you can raise thoughts and issues for ENPE colleagues to consider.

Welcome to our new Full Members: the Austrian Federal Ministry of Constitutional affairs, Reforms, Deregulation and Justice; the Prosecutor's Office II of the Canton of Zurich, Switzerland; and to our new Supporting members: Piotr Nowak from Poland and Aisling Kelly, from Ireland.

And Brexit, dare I mention it? Your Board has met to discuss the ramifications and implications of Brexit. We have held some follow up discussions by phone. We will have an update and a discussion at our AGM on 29 October. We hope that by then the position is clearer but we are holding a steady course to complete our first LIFE project programme of works in early 2020.



Shaun and I were recently involved in a team building event eating Chinese food on a Dutch barge in England. We hope soon to be English delegates eating Dutch food with Chinese colleagues in the Hague! Cross cultural exchange is one way that we can enhance our international contacts and share the important issues of the day. It's a great opportunity to discuss our ideas, to share best practice and to learn from each other.



## ENPE Conference 2019 at EUROJUST, The Hague

As mentioned in the message from the President above, the ENPE annual conference will be held in conjunction with EUROJUST at the **EUROJUST** premises in **The Hague, Netherlands** from the **28-30 October 2019**. We are



pleased to report that preparations are going well with almost all delegate and speaker places now confirmed.

Conference events will start at 17.00hrs on the 28 October for an informal reception at the Panorama Mesdag museum <https://www.panorama-mesdag.nl/english/> and the conference proceedings commencing at 9.00 am on 29 October.

The conference will be opened by Stientje van Veldhoven, the Dutch Secretary of State for the environment, and closed with an inspirational speech from Olivia Swark-Goldman, chief Executive of the Wildlife Justice Commission. The closing of the conference will be followed by a visit to a local brewery to take much needed refreshment with all delegates welcome.

## ENPE membership news

At the last ENPE Board Meeting on 29 July 2019, held at our registered office at Scotland House, Brussels, we were pleased to formally approve applications from, and welcome 4 new ENPE members: the Federal Ministry of Constitutional affairs, Reforms, Deregulation and Justice, Austria; the Prosecutor's Office II of the Canton of Zurich, Switzerland as Full Members and Mr Piotr Nowak and Ms Aisling Kelly as Supporting Members.

Our list of ENPE Membership organisations, including members and observers is currently - **FULL MEMBERS:** Environment Agency (England, UK); Ministère de la Justice (France); Environmental Protection Agency (Republic of Ireland); Riksenheten för Miljö- och arbetsmiljömål (Sweden); Openbaar Ministerie, Functioneel Parket (Netherlands); Vrchní státní zástupitelství v Praze (Czech Republic); Ökokrim (Norway); Rigsadvokaten (Denmark); Fiscalía General del Estado Medio Ambiente y Urbanismo (Spain); Državno odvjetništvo Republike Hrvatske (Croatia); Finnish Prosecution Service (Finland); Specialised Multi-field Prosecution Office (Latvia); The Greek Public Prosecution Service (Greece); The Association of Public Prosecutors (Former Yugoslav Republic of Macedonia); Italian Environmental Prosecutors General; Law Office of Cyprus; Romanian Public Ministry Prosecutor's Office attached to

the High Court of Cassation; Public Prosecution Service of Portugal/ Ministério Público / Procuradoria-Geral da República; Austrian Federal Ministry of Constitutional affairs, Reforms, Deregulation and Justice, Austria; Prosecutor's Office II of the Canton of Zurich, Switzerland.

SUPPORTING MEMBERS: Sara Boogers of the Public Prosecutor's Office, Antwerp, (Belgium); Carla Campanaro, Head of LAV legal office, Italy & Project Lawyer to the Life Reason for Hope project; Teodor Nita, Prosecutor to the Court of Cassation, Constanta, Romania; Lorna Dempsey, Milieu consultants; Aisling Kelly, Ireland; Piotr Nowak, Poland.

OBSERVERS: European Union Forum of Judges for the Environment (EUFJE), Brussels (Belgium); International Association of Prosecutors (IAP); Sofia Regional Prosecutors office (Bulgaria); Dublin City Council (Republic of Ireland); Eurojust (Netherlands); The State Environmental Inspectorate (SEI) (Former Yugoslav Republic of Macedonia); Brazilian Federal Prosecution Service (Brazil); TRAFFIC (Belgium); Croatian Ministry of Environment & Energy; Crown Prosecution Service of England and Wales.

We continue to welcome new Members - for more information about joining ENPE please contact [shaun.robinson@environment-agency.gov.uk](mailto:shaun.robinson@environment-agency.gov.uk)

## ENPE activity at recent and forthcoming events

### Chinese delegation of Judges, 27 August 2019, London

ENPE President Anne Brosnan was very pleased to once again host, on behalf of the Environment Agency, England, a delegation of 12 senior Chinese judges in London. We were able to facilitate peer-to-peer exchanges between senior judges involved in Environmental law issues in the People's Republic of China and the English Environment Agency and discuss in particular environmental law implementation and the Environmental Liability Directive.

The study visit which was organised by Client Earth China, included a very full day with the Environment Agency legal team and was a chance for colleagues closely involved in environmental law issues to discuss practical issues and possible solutions. In particular, the focus was be on the thematic areas of environmental liability and restoration of damage as well as air pollution and environmental torts. There were presentations from Environment Agency legal specialists on contaminated land legislation, the Environmental Liability Directive, and case studies relating to judicial review.

The Chinese judges also had the opportunity to share their experiences and expertise on subjects including typical environmental cases in China, the country's system of civil and administrative appeals and the progress of public interest litigation. This visit was a resounding success and will we hope support both the EU and China in the process of achieving their environmental protection ambitions.

### ENPE at the DG Environment Environmental Compliance Assurance (ECA) Compliance & Governance forum meeting and Green Week, Brussels 14-17 May 2019

ENPE President Anne Brosnan presented at the Environmental Compliance Assurance (ECA) forum meeting on 14 May 2019 hosted by the Directorate General for Environment at the EU in Brussels. Outlining our recent and forthcoming ENPE activities, Anne confirmed our ongoing commitment to this hugely important initiative. More details are available via the following link [http://ec.europa.eu/environment/legal/compliance\\_en.htm](http://ec.europa.eu/environment/legal/compliance_en.htm)

Anne continued her busy schedule in Brussels by leading a discussion on getting policy ideas into actions in a LIFE programme workshop during Green Week on 16 May. We were pleased to hear that the LIFE-ENPE project had been used as an exemplar project on finding solutions to the implementation of environmental policies. Anne also joined in on a panel session entitled: "**Environmental Implementation and the Judiciary**" giving the prosecutor's view on environmental regulation.

### ENPE contributing to the Joint Bern Convention - CMS MIKT Meeting on Illegal Killing of Birds Rome 08-10 May 2019

Angus Innes (Environment Agency Senior Lawyer, England, UK) represented ENPE at the recent CMS MIKT Meeting in Rome where the focus was on the strategy for addressing Illegal Killing, Taking and Trade of Wild Birds (IKB) Beyond 2020 in Europe and the Mediterranean region, including discussions around streamlining and

coordinating the processes under the Bern Convention and CMS MIKT, with the possibility of a joint strategy. The overall vision, scope and overarching goal(s) were discussed in plenary. Breakout group sessions looked at:

- Ensuring that the law is implemented and enforced
- Ensuring efficient justice for IKB-related offences

The challenges in aligning and co-ordinating the many different administrative and legal approaches that are adopted by countries across Europe were acknowledged with suggestions for improving methods of reporting.

## LIFE-ENPE Wildlife Working Group (WG1)

### Training package on Illegal Taking and Killing of Birds

After many months of hard work, the LIFE-ENPE Wildlife Working Group (WG1) has, in conjunction with the United Nations Environment Programme's Convention on Migratory Species (CMS), finalised its training package on prosecuting offences concerning the illegal taking and killing of wild birds, based on the training seminar organised in Segovia, Spain in May 2018. The package is divided into four sections and comprises annotated and illustrated Powerpoint slide packs for trainers to deliver their training. For more details on this training package please contact [shaun.robinson@environment-agency.gov.uk](mailto:shaun.robinson@environment-agency.gov.uk)

## ENPE at the EJTN general assembly, Bucharest, Romania 27-28 June 2019

ENPE was represented at the 22<sup>nd</sup> General Assembly of the European Judicial Training Network held in Bucharest, Romania on 27<sup>th</sup> and 28<sup>th</sup> June 2019. Teodor Nita, an ENPE Supporting Member, based in Constanta Romania attended on behalf of ENPE and enjoyed a fascinating 2 day meeting.

The well attended event included presentations and discussions on EJTN activities from representatives from across Europe.

As announced by the Director of the Croatian Judicial Academy, Mrs. Andrea Posavec Franić, at the meeting, the **next General Assembly** is planned to take place in Zagreb on 18 – 19 June 2020 under the auspices of the future Croatian Presidency of the Council of the European Union. Further information will be communicated in due course.



[photo courtesy of EJTN secretariat]

## Forthcoming events and activities involving ENPE

### The European Forum of Judges for the Environment (EUFJE) Annual Conference 12 – 14 September 2019, Finland



Our colleagues at EUFJE recently held their 2019 Annual Conference on 12–14 September 2019 in Helsinki, Finland. Hosted by the Supreme Administrative Court, the main theme of the conference is the role of science in environmental adjudication. The conference programme include benchmarking sessions, exchange of experiences and presentations of recent EU case-law of the European court of Justice. For more details please see:

<https://www.eufje.org>

### LIFE SMART-WASTE Project & INTERPOL PCWG conference; 12-14 November 2019

LIFE SMART Waste is joining together with INTERPOL's Pollution Crime Working Group to deliver its final conference entitled, '*Smarter waste regulation and pollution crime enforcement*'. The joint conference will bring

**SMARTER WASTE REGULATION  
AND  
POLLUTION CRIME ENFORCEMENT**

**12 - 14\* NOVEMBER 2019**

SMART Waste  
Brussels, Belgium  
INTERPOL

\* Day 3 (14 November) is for INTERPOL PCWG delegates only

together environmental regulators, law enforcement agencies, policymakers, legislators, waste management industry representatives and other key stakeholders, creating opportunities for knowledge exchange and collaboration on a truly global basis. Registration is open until 12 October 2019 and further information is available on the [event web page](#).

### The European Union Network for the Implementation and Enforcement of Environment Law (IMPEL) will hold their General Assembly on the 19 – 20 November 2019, Finland



This 18th IMPEL General Assembly meeting will take place in the Finlandia Hall, Helsinki, Finland. The National Coordinators meeting will be held on 18 November, in the afternoon. Please note this meeting will take place in the Finnish Ministry of the Environment. For more details please see: <https://www.impel.eu/events/impel-general-assembly-meeting-19-20-november-2019-helsinki/>

### IMPEL Wasteforce project first training session; Lisbon 27-29 November 2019

ENPE Board Member Antonio Vercher Noguerra and Howard McCann will be representing ENPE in a forthcoming training event around tackling illegal waste activities. The session has been organised by IMPEL's Wasteforce Project Team. The project is focused on improving the effectiveness of investigating and prosecuting illegal waste

activities including waste trafficking. Our ENPE representatives will be involved in the preparation and delivery of specialist training for prosecutors at the first training event, to be held in Lisbon from the 27-19 November 2019.

This training event:

- Is dedicated to public prosecutors and judges as well as inspectors, customs and police authorities;
- Will be organisation by the Portuguese Environmental Inspectorate in close co-operation with the Portuguese Public Prosecutors Office and the National Centre for Judiciary Training;
- Will be include training sessions delivered by ENPE representatives and those of the European Union forum of Judges for the Environment (EUFJE).

## Recent prosecution cases

### CZECH REPUBLIC



Two Malaysian citizens were sentenced to 30 and 24 months in prison respectively and a fine amounting to 20.000 EUR for smuggling of 18 kg (approximately 70.000 specimen) of glass eels. The two were arrested at Prague airport on their way from France to Vietnam in January 2019 having this contraband in their luggage.

However, further investigation showed that one of them played the role of driver and coordinator of couriers within an organised group of perpetrators, and was dispatching them in at least six cases to fly with the contraband from various airports in Europe. He also was in direct contact with the head of the criminal organization.

Part of the organised group was prosecuted in other EU states. For this reason, mutual legal assistance was needed in the case and the prosecution team offer their thanks to our colleagues in Frankfurt am Main, Germany, and Switzerland. Czech prosecutors were able to prove the aggravating circumstance of committing the crime by organised groups operating in more states. The judgement is not final yet because of the accused's appeal; but the accused remain in custody.



[Photos courtesy of Česká inspekce životního prostředí, consent for publication provided to ENPE member K. Weissova]

A taxidermist was sentenced to conditional sentence of 2 years of imprisonment for possession of the highly dangerous poison carbofurane. Despite a ban on the sale of this substance in the Czech Republic (as well as in the EU) which came into force as long ago as 2008, there is still a lot of this poison in the possession of Czech citizens. This is unfortunately borne out by some 15 to 20 registered cases of wildlife animals being poisoned across the territory of the Czech Republic each year, including protected species. In this case the act of setting the poisoned baits was not proven, even though the perpetrator had a clear reason, as a taxidermist, to set these baits in the vicinity of his dwelling. Poisoning cases are a challenge for those involved in law enforcement who face the difficult task of linking up the poisoned bait to the persons who set or planted them, as was the case here, and a general lack of prioritization of these cases. A good conviction with an effective, dissuasive penalty.

For more information please contact Katerina Weissova c/o Shaun.



## **ENGLAND, UK.**

**PORTSMOUTH MAGISTRATES COURT – 12 AUGUST 2019**

**ENVIRONMENT AGENCY v JASON NEWMAN, SIDNEY SIMPSON, DANIEL WORBOYS**

**Section 33 Environmental Protection Act 1990 – Illegal deposit of waste**

**Section 34 Environmental Protection Act 1990 – Duty of Care offences**

**Sentence:**

- **Jason Newman - 12 weeks imprisonment suspended for 12 months and £1,000 compensation to be paid to the land owner. No costs order or victim surcharge imposed.**
- **Sidney Simpson – 12 weeks imprisonment suspended for 12 months and £1,000 compensation to be paid to the land owner. No costs order or victim surcharge imposed.**
- **Daniel Worboys - 12 weeks imprisonment suspended for 12 months and £1,500 compensation to be paid to the land owner. No costs order or victim surcharge imposed.**

### **Background and brief facts.**

This case concerned deliberate and repeated fly-tipping on private land between the west of the A3 and the east of Hulbert Road in Havant, which was discovered on 13 September 2018. The piece of land is approximately 40m<sup>2</sup> and it is estimated that around 40 separate deposits of waste had been distributed across the field, including electrical items which had entered the nearby watercourse. Clearance costs of the site which contained 100 tonnes of waste were just under £100,000.

The case concerned four defendants who work in the waste clearance business around Portsmouth. Waste found at the Havant site was linked to numerous individuals and businesses, who identified the defendants as responsible for disposing of their waste.

In interviews under caution, Newman, Simpson and Worboys made admissions to depositing waste at the Havant site and to the associated duty of care offences. Newman and Simpson stated they had been responsible for depositing one truck load and Worboys stated he visited the site twice and deposited two truck-loads. These three defendants entered timely guilty pleas to all offences they faced.

In sentencing, the Court agreed that the offending was deliberate, category 3 harm and that the defendants were motivated by financial gain.

**COURT OF APPEAL : THAMES WATER UTILITIES LIMITED**

**APPEAL AGAINST SENTENCE - JUDGMENT 26 JULY 2019**

**HEARING AT THE COURT OF APPEAL, CRIMINAL DIVISION 23 JULY 2019**

**Before Lord Justice Gross, Mr Justice William Davis and Mr Justice Garnham**

**ON APPEAL FROM THE CROWN COURT SITTING AT OXFORD (HHJ ROSS 21 DECEMBER 2018) – Thames Water was ordered to pay £2,000,000 fine, costs of £79,991.57 and a victim surcharge of £120.**

**ORDER ON THE APPEAL:**

- 1. Dismissed the appeal;**
- 2. Directed that the Appellant pay costs in the sum of £6,000.**

**OFFENCE : causing a water discharge activity on or before 9 August 2015 contrary to Regulation 38(1) of the Environmental Permitting (England and Wales) Regulations 2016 resulting in pollution at Milton under Wychwood, Oxfordshire arising from unauthorised discharge of untreated sewage from Bruern Road Sewage Pumping Station**

Appeal against Sentence

Thames Water appealed on the grounds that the sentence was manifestly excessive and wrong in principle. There were three inter-related grounds/submissions:

1. The Crown Court Judge did not comply with his duty to state his reasons for deciding on the sentence imposed. He did not as a matter of fact explain how he arrived at the final figure of £2,000,000 and did not engage in a step by step exercise as required by the Environmental Offences Definitive Guideline;
2. That a pre-credit fine of what must have been at least £3,000,000 was manifestly excessive;
3. The sentence was manifestly excessive when compared to other sentences, one of which the learned judge expressly referenced (The “Broadlayings” case in Reading Crown Court where the fine was £250,000)

Court of Appeal Judgment

The grounds of appeal:

1. The Court agreed that the judge did not engage fully in a step by step approach as required by the Sentencing Council Definitive Guideline and that his sentencing remarks failed to set out clearly how he reached a figure of £2 million as representing the appropriate fine. However, of itself this does not take Thames Water very far and such a failure does not invalidate the sentence;
2. The Court applied the Sentencing Council Definitive Guideline and made the following findings: The judge dealt with steps 3 and 4 and the court adopted his findings on culpability and harm. There was no explicit stepping back by the judge. If he had set out the relevance of the size of the organisation to the level of fine required to effect adequate punishment or deterrence then the judge inevitably would have increased the level of fine very substantially beyond that appropriate for a large company. The judge did state that full credit would be given. Earlier in the judgment the court considered that as the substantial area of dispute between the parties was the level of culpability and the judge found against Thames Water on that issue no complaint could have been made had the judge reduced the credit for plea to around 20%. He did not do so. However, the Court abided by his conclusion in considering the sentence imposed.

3. The court considered that the third ground of appeal failed to take account of the principles in the Court of Appeal case of R –v- Thames Water Utilities Limited [2015] EWCA Crim 960. The court set these out in full as they considered them to be wholly apposite to the facts in this case. The Court of Appeal in the Broadlayings case was not in a position to increase the fine imposed by the judge sitting in Reading. Had it been, it would have done so. In those circumstances the fact that the judge who imposed the sentence with which we are concerned saw similarities with the facts of the Broadlayings case is of no account. The sentence imposed by the judge sitting in Reading can be of no persuasive effect.

### Conclusion

Applying the principles set out by the Court of Appeal in 2015, the court was quite satisfied that, had the judge engaged in the step by step approach as required by the Sentencing Guideline, he would have reached the same conclusion as he did when applying a less structured approach. This was a breach of environmental regulations committed by a very large organisation as a result of corporate recklessness. The size of the organisation meant that the figures provided within the table applicable to a large company were of little relevance. The previous history of the organisation was little short of lamentable. To bring home to the directors and shareholders the need to protect the environment required a very substantial fine. In those circumstances a fine measured in millions of pounds was entirely appropriate. A fine after trial of £3 million was appropriate. The credit given by the judge may have been generous. Certainly the resulting fine of £2 million was not manifestly excessive or wrong in principle.

Interestingly in this case, His Honour Judge Peter Ross at first instance fined Thames Water Utilities Limited (TWUL) the sum of £2 million and also ordered them to pay costs of £79,991.57 and a victim surcharge, all within 56 days. However the Judge recognised that there were local environmental charities that should benefit. He therefore stated that if TWUL was to donate funds to each of three environmental charities and provided confirmation of payments within 56 days he would reduce the fine by £200,000 (under his powers to vary a sentence within 56 days).

### **DEFENDERS UK**

A BBC programme, *Defenders UK* with information on the 2018 conviction of Thames Water for sewage offences can be viewed on BBC iplayer (an online on demand service) here :

<https://www.bbc.co.uk/iplayer/episode/m0008cm6/defenders-uk-series-2-episode-8>

It is a very interesting and informative programme featuring some very useful discussion with investigators and issues around environmental protection.

### **BIFFA WASTE SERVICES LIMITED WOOD GREEN CROWN COURT 24<sup>th</sup> JUNE 2019.**

**On the 19<sup>th</sup> June 2019, Biffa was convicted of 2 counts of exporting waste collected from households to China in May and June 2015, contrary to Regulation 23 of the TFS Regulations 2007, and Article 36 of the EU Waste Shipments Regulation 2006 (WSR).**

In May and June 2015, The Environment Agency, England, UK, (EA) intercepted 7 containers of waste (approximately 175 tonnes) destined for China at Felixstowe. The containers were loaded at Biffa's site in Edmonton, London. The transport documents described the waste as 'mixed waste paper.' We alleged that the waste was 'waste collected from households.'

A 3 week trial began on the 3<sup>rd</sup> June 2019 at Wood Green Crown Court. On the 19<sup>th</sup> June, a jury convicted the defendant company. Biffa's case was that the waste was waste paper, which can be lawfully exported to China for recycling. The company stated that what it had exported was homogenous waste throughout 2015; its MRF facility in Edmonton was operating properly at the time, there were no breakdowns, maintenance issues or staff shortages. In short the plant was operating at its optimal level and producing waste to a required standard. The defence expert claimed that on the basis of the prosecution evidence, he had seen nothing that had changed his mind about the plant working at optimal efficiency to produce the waste it had consigned for export in these containers.

In contrast, EA officers testified to the nature and quantity of contaminants including soiled nappies / sanitary products, human hair, food, bags of excrement, hot water bottles, large items of clothing, underwear, children's toys, electrical cables and other contaminants significantly more than a minimal level. Officers inspecting the containers at Felixstowe in May, June and August 2015 recorded sickly smells, flies and condensation; on one occasion at least two officers had to leave the evidencing area due to the smell coming out of the bales. Further, on its own figures provided during the trial, Biffa exported more than 340,000 nappies to China in 2015 alone.

The jury concluded that the waste was waste collected from households (Y46). There is an absolute prohibition in Article 36 on Y46 waste being exported to China (and any other non-OECD country).

On the 27<sup>th</sup> September, the Court considered the fine for the seven containers, EA costs and the agreed POCA figure. Biffa Waste Services Ltd was fined £350k with costs of £240K and POCA of £9912, so a total to be paid of £599,912.



Photo from inside waste container courtesy of H McCann Environment Agency

For further information please contact Howard McCann, Environment Agency (England, UK).

## ENPE website crimes database

As a reminder, we welcome submissions for inclusion on the ENPE crimes database. The database is part of the ENPE website <https://www.environmentalprosecutors.eu/> and is building a collection of case law for all three ENPE working group subject areas (wildlife crime, waste crime & air pollution). The database is of a non-operational character and concerned with legal aspects only. Names of defendants and other identifying information are left out. Because the main function of the database is supporting the ENPE network of prosecutors, access to it is not public, but is subject to authorisation by ENPE. Environmental prosecutors in Europe are invited to request an authorisation - please contact Rob de Rijck or Lars Magnusson on [r.de.rijck@om.nl](mailto:r.de.rijck@om.nl) or [Lars.Magnusson@aklagare.se](mailto:Lars.Magnusson@aklagare.se). Case law, with identifying details omitted and together with the relevant database keywords and a summary in English, can be submitted via the national ENPE contact points.

## Contact

For all queries, please contact Shaun Robinson, ENPE aisi secretariat and LIFE-ENPE project manager at: [shaun.robinson@environment-agency.gov.uk](mailto:shaun.robinson@environment-agency.gov.uk) Mob:+44 (0)7771 940690 Tel:+44 (0)203 025 2880; or visit our website: [www.environmentalprosecutors.eu](http://www.environmentalprosecutors.eu)



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