

# European Network of Prosecutors for the Environment

Réseau des Procureurs Européens pour l'environnement



## ENPE newsletter - Issue 9

03 May 2019

### Message from ENPE President Anne Brosnan

Dear colleagues,



A warm welcome to the four new members of our network. These are the Public Prosecution Service of Portugal as a Full Member; The Crown Prosecution Service (CPS) of England and Wales as an Observer Member; Lorna Dempsey, formerly our Treasurer, as a Supporting Member from Ireland and Teodor Nita as a Supporting Member from Romania. Welcome to all.

This month will see a number of important events in the diary. I will be attending the 3<sup>rd</sup> Meeting of the DG Environment Environmental Compliance and Assurance Experts Forum and following on from that, attending and presenting at various events during a busy EU Green Week in Brussels. I hope to meet many colleagues and new contacts involved, like ourselves, in the important work of protecting the environment. In particular I am due to meet with the Chairs of EUFJE, IMPEL and EnviCrimeNet to discuss the common elements of the work we are doing and how we might align our agenda to hold another Four Networks Conference around environmental protection, possibly in late 2020.

We have recently held two brilliant workshops in Nicosia in Cyprus for our Air Quality and Waste Working Groups for more of which see below. We have put together a Short Animated Training film for the Waste Shipment Regulation. Sounds dull? Not at all. Give it just the three minutes of your life that it takes to watch and you'll be agreeably surprised. It's an introduction to the subject area which provides a framework for more detailed understanding. We are really delighted with it. Well done to Rob de Rijck and his waste working group.

One of our new members, the Crown Prosecution Service of England and Wales has sent us some excellent new cases. We've included these and we can put you in touch with a specialist who can help with further detail if needed.

Arrangements are progressing well for our forthcoming conference in October to be held in conjunction with Eurojust at their offices in the Hague. We hope to have an exciting and packed agenda with some good speakers and an excellent venue for our conference dinner on the 29 October. More to follow.

And finally we have included an interesting case or two "from across the pond". International collaboration allows us to learn some valuable lessons from cases handled by others as well as our own. Enjoy.

## **LIFE-ENPE waste crime and air pollution Working Groups workshops – Nicosia, Cyprus 28-29 March 2019**

Working Groups 2 and 3 (WG2 & WG3) are focused on **waste crime (WG2)** and **air pollution (WG3)** and together these groups organised and hosted 2 days of consecutive workshops to raise awareness and share best practice in



the prosecution of these types of environmental crimes. The workshops were held on the 28 and 29 March at the Ministry of Finance, Nicosia, Cyprus. Both days were well attended with 34 attendees registered, including both delegates and speakers from 13 different European countries.

The first day of this combination of workshops was dedicated to waste, in particular to the illegal disposal, storage and treatment of wastes. The second day focused on air pollution, particularly, events where air pollution was reported. This included group activities involving case studies and discussions around the correct steps to take if

and when a prosecution was appropriate.

Both workshops were considered a great success and we are indebted to our hosts, the Ministry of Finance in Cyprus, for providing first class facilities and catering. We would like to record our thanks to Mr Costas Clerides the Attorney General of the Republic of Cyprus, who gave a very inspiring opening speech to the workshop.

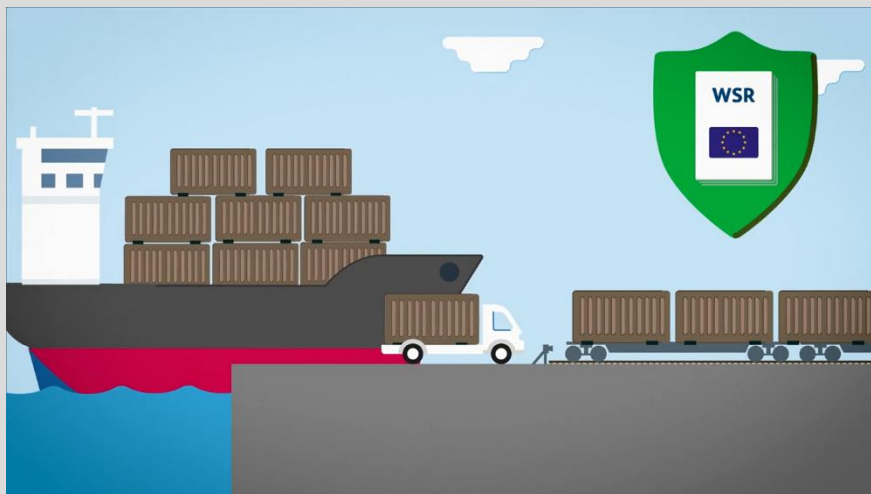


**The photos show the magnificent Ministry of Finance hall which hosted the workshops, including one of the breakout sessions where groups were given specific questions and case studies relating to air pollution cases.**

Filmed presentations from both workshops which we are able to share are now available to view from the ENPE Website: <https://environmentalprosecutors.eu/node/297>

## Waste Shipment Regulation: animated training video

Rob de Rijck, Chair of the LIFE-ENPE Waste Crime Working Group has worked closely with other members of the group to plan, script and develop a short animated training video on the new Waste Shipment Regulation for prosecutors and other specialists. The 3 minute animation took several weeks to develop, with ENPE working in consultation with



specialist animators. To access the training including an option with English subtitles, please see the following links:

with subtitles: <https://vimeo.com/333388717>

without: <https://vimeo.com/333388494>



## ENPE Conference 2019 at EUROJUST, The Hague

The ENPE annual will be held in conjunction with EUROJUST at the **EUROJUST** premises in **The Hague, Netherlands** from the **28-30 October 2019**. Following the issue of our 'Save the Date' notices, we are now preparing invitations so please



do keep an eye out for these in the coming few weeks. We are planning 28 October to be a "touch down" date for travel and arrival, with a cultural event and welcome drinks. The formal part of the conference itself will commence at 9.00 am on 29 October for two days.

We were very pleased to visit Eurojust's new head office recently and can report that the facilities are exceptional. Two of the many attractive conference rooms are shown here.



The Hague (Den Haag), is a very interesting and attractive town, situated very near to the coast, with some lovely



historic areas and a seaside coast making it an ideal location for a conference of this type. We will keep you updated with regular bulletins and notices of how things are progressing and hope to see you in October 2019.

These photographs show Shaun checking out the venue.



## ENPE membership news

At the recent ENPE Board Meeting on 04 April 2019, held at the EUROJUST Headquarters, The Hague, we were pleased to formally approve applications from, and welcome 4 new ENPE members: The Public Prosecution Service of Portugal/ Ministério Público / Procuradoria-Geral da República as a Full Member; The Crown Prosecution Service (CPS) of England and Wales (UK) as Observer Members; Lorna Dempsey as a Supporting Member and Teodor Nita as a Supporting Member.

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); Drvazno Dovsetnisvo 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;

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; 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 networking and forthcoming events

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

On behalf of EJTN's Secretary General and the Director of the Romanian National Institute of Magistracy, ENPE has been invited to attend the 22<sup>nd</sup> General Assembly of the European Judicial Training Network to be 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 will be attending on our behalf.

### ENPE representation at DG Environments Environmental Compliance Assurance (ECA) Compliance & Governance forum meeting 14 May 2019

ENPE has been well represented at the Environmental Compliance Assurance (ECA) workshops and meetings held during 2018 and early 2019 hosted by the Directorate General for Environment at the EU in Brussels. Anne Brosnan will be attending the next forum meeting on 14 May 2019 which will include a presentation of recent and forthcoming ENPE activities. We remain strongly committed to supporting this initiative and, as always, would urge our members to find out more, including ways of participating, through the following link :

[http://ec.europa.eu/environment/legal/compliance\\_en.htm](http://ec.europa.eu/environment/legal/compliance_en.htm)

## FORTHCOMING EVENTS

### Green Week, Brussels, 13-17 May 2019

Anne Brosnan will be representing ENPE during Green Week in Brussels. She will be participating in a LIFE programme workshop, including presenting and leading discussion on the LIFE-ENPE project in the company of other LIFE funded project representatives on finding better solutions to the implementation of environmental policies. The idea is that discussing ongoing LIFE projects will inspire an interactive debate creating innovative insights on how to achieve environmental objectives. Anne will also be joining in on a panel session entitled: "***Environmental Implementation and the Judiciary***" to give the prosecutors view on environmental regulation.

### ENPE contributing to IMPEL SPIDERWEB Project

ENPE has been invited to participate in IMPEL's SPIDERWEB project which seeks to improve detection and disruption of environmental crime in the Balkan region of Europe. Shaun Robinson, ENPE Project Manager will sit on the Consultation Group who are due to meet twice a year to assist in the steering and direction of the project. The first meeting was held in Lubljana from the 15-17 April 2019 <https://www.impel.eu/support-for-the-spider-web-project-expressed-during-consultation-group-meeting-in-ljubljana/>

For more information on this project please see: <https://www.impel.eu/projects/spiderweb/>

## Recent prosecution cases

### A UK development company has been fined more than £18,000 for illegally destroying a building where protected Pipistrelle bats were known to roost.



Landrose Developments Ltd was fined £18,820 at Brent Magistrates' Court on 5 April after pleading guilty to destroying the breeding site / resting place of a European Protected Species (EPS), namely Pipistrelle Bat. The court heard how the company was involved in the demolition / re-development of a detached bungalow in Dennis Lane, Stanmore in October 2016. In 2011, plans were submitted to demolish and redevelop the property. A subsequent ecological survey of the premises revealed the presence of Pipistrelle bats within the property. The presence of the bats meant that the building could not be demolished without a European

Protected Species License and appropriate mitigation in place. The Council imposed a condition stipulating that ecological features should be maintained within the premises. It was raised to the owner of the property that demolition without an EPSL or appropriate mitigation would destroy a roost and constitute an offence under the Conservation of Species and Habitat Regulations. Yet despite being aware of the existence of two bats at the location, the property was demolished, under the authority of Landrose Developments, in October 2016 without any measures in place to protect the bats. Police were alerted to the demolition of the property in July 2017 and an investigation commenced by the Met's Wildlife Crime Unit and Harrow's designated Wildlife Crime Officer. The development company was charged with destroying a bat roost on 12 September 2018 after attending a voluntary interview at Colindale Police Station.

**DC Garry Redshaw, who led the investigation, said:** "All 18 UK species of bats are European Protected Species (EPS) and are protected under the Conservation of Species and Habitats Regulations. This makes it an offence to capture, injure, kill or disturb an EPS or destroy their breeding site or resting place.

"The development company was clearly aware of the bats existence but proceeded to destroy their resting place anyway."

**DC Sarah Bailey from the Met's Wildlife Crime Unit added:**

"Although this is only the second ever Met case of its kind, sadly bat roosts are destroyed every year and go unreported to police. I would urge anyone who is aware of this criminality taking place, to report it to police."

Prior to this case the highest fine ever imposed for a single charge of destroying a bat roost was £5000. A fine of this size has been made possible by legislation that removed the statutory maximum of £5000 and allowed for unlimited fines to be imposed. [Article from the Bat Conservation Trust bulletin, 08 April 2019]

## Cases from the England and Wales (UK) Crown Prosecution Service (CPS)

Prosecutors and coordinators are working hard across the country to prosecute wildlife, rural and heritage crimes. Here we celebrate some of their recent successes:

### Jeffrey Lendrum

A prolific bird egg smuggler has been jailed for three years and one month after he was caught trying to bring protected eggs into the UK.

Jeffrey Lendrum, 56, pleaded guilty to four offences on the second day of his trial at Snaresbrook Crown Court on January 8. He was imprisoned on 10 January.



Lendrum had been caught with the eggs strapped to his body by a sling hidden underneath a heavy coat at Heathrow airport on 26 June 2018.

The prosecution was able to prove that Lendrum knowingly smuggled the eggs in to the country for commercial gain by trying to evade customs.

Remi Ogunfowora, of the CPS, said: "We worked with our partners in the National Crime Agency to ensure this prolific bird egg smuggler faced appropriate charges.

"We hope the sentence passed deters others from becoming involved in the damaging trade around rare and endangered wildlife."



### Badger baiting case

In January 2019, in Yorkshire, England, five men were sentenced to six months in prison for offences relating to badger baiting. Additionally the magistrates ordered that all the dogs be forfeited, along with equipment seized at the time. All five defendants were banned from owning any animals for ten years. Additionally a criminal behaviour order was imposed on all of them for three years.

On 30 December 2017 a member of the public reported to the police that he had seen the five men, who had dogs with them, digging out a badger sett. Officers discovered one of the men standing in a large hole and digging. Spades, a crowbar and a pick axe handle were lying nearby. Two terrier-type dogs were with the men. Other freshly dug holes were found nearby, and some of these holes were covered by wide mesh netting.

The men claimed they had been 'ratting' (hunting for rats using dogs) and had lost two dogs down the holes, but the management of nearby industrial premises confirmed that no authority had been given to anyone to undertake pest control in the area.

Two dogs were seized at the scene, and two more emerged from the sett the following day. The dogs had been fitted with tracking collars.

Sally Robinson, CPS Wildlife, Rural and Heritage Crime coordinator for CPS Yorkshire and Humberside said:

"It's clear from the evidence presented to us by the police that these men were openly engaged in a well-planned badger baiting exercise. One defendant was caught red-handed in the act of digging as the police arrived.

"An independent wildlife expert has confirmed that the area was an active badger sett. The netting was placed over alternative exits to prevent the badgers from escaping, digging equipment was found at the scene, and the dogs were found to have facial injuries consistent with having had a fight with a badger. They were all treated by a vet.

"Badger-baiting is an unspeakably cruel and barbaric activity. As with all our cases, we will prosecute if we have sufficient evidence for a realistic prospect of conviction. This case met that test and these men have today been found guilty and sentenced to six months in prison for their crimes."

## **Python skin case**

In January 2019, an offender was sentenced to 160 hour community order after illegally importing and selling python skin baseball caps and bags. The baseball caps were advertised on the offender's website for approximately £350 each and the bags in the region of £2,800.

All species of pythons are listed on the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). An expert identified the hats and bags as likely to be from the Reticulated Python (*Python reticulatus*) which has been listed on Appendix II since 4th February 1977 and on Annex B of the EC Wildlife Trade Regulations since 1995. As such, any trade to the EU of specimens of this species, including parts and derivatives, would require an export permit to be issued by the country of origin and an import permit issued by the management authority of the Member State of destination. The offender had no such permit.

CITES is an international agreement between 180+ governments, which aims to ensure that the international trade in specimens of wild animals and plants does not threaten their survival. Appendix I species are threatened with extinction and therefore the trade is strictly controlled, with trade in specimens of these species only permitted in exceptional circumstances.

## **Daniel Lingham**

In November 2018, Daniel Lingham was jailed for taking eggs from the nests of wild birds. Lingham was seen in the process of taking nine Linnet eggs from a heath in Norfolk, England. A subsequent search of his home revealed 4145 further eggs which had also been unlawfully taken from the wild in Norfolk.



1290 of those eggs came from 31 species listed in the red and amber categories of conservation concern. 75 eggs came from barn owls, kingfishers, little ringed plovers, marsh harriers and woodlarks, all of which are protected species.

Lingham pleaded guilty to taking the eggs, possessing the eggs and having items he could use for during carrying out the offences at Norwich Magistrates' Court on 12 October 2018.

He was sentenced to 18 weeks in prison and given a Criminal Behaviour Order for 10 years.

Sylvia Cundell, CPS Wildlife, Rural and Heritage Crime coordinator for the East of England said: "Daniel Lingham was a persistent taker of eggs from birds in the wild over a period of several years, on occasion repeatedly targeting the same nesting sites.

"The laws against the taking of wild birds' eggs are there for a reason - to protect species from decline. The CPS is committed to the robust prosecution of those who commit offences against protected wildlife."

In February 2019, Austin Hawke was convicted of failing to check a snare at least once every 24 hours contrary to section 11B of the Wildlife and Countryside Act 1981.

Hawke had set eight wire snares around a stink pit where dead and decaying animals were placed to lure foxes. The pit had four entrance holes cut into the fencing mesh with snares placed nearby. Hawke claimed he had deactivated the snares and that he had made the loops of the snares so small as to prevent hares and badgers getting caught in them. A badger had however been caught in a snare and was found dead by a walker who called police to the site. It was clear the badger had been dead for several days.

Hawke was found guilty and received a conditional discharge and ordered to pay £645 in costs.

## **A Belgian Waste Case**

### **Three Belgian defendants sentenced to imprisonment up to 5 years and 600.000 euro fines in unprecedented illegal waste case**

On 5 February 2019, the Court of First Instance of East-Flanders, Ghent department, Belgium, ruled in the case of the Public Prosecutor against 3 Belgian managers of a waste processing company.

The defendants operated a plant for the storage and processing of shredder materials, light organic waste, sieve sands and the production of solid recovered fuel ("SRF") in Ghent and surroundings.

The defendants were charged with storing 158767 tons of waste (light shredder fluff from car wrecks, "Fe-fines" or the fine iron fraction and sieve sands) without an environmental permit or exceeding the permitted quantities, of not

respecting operating conditions regarding fire safety and of the storage of this waste in violation of the Flemish Waste Decree. 14.329 tons of fluff had been dumped in a tug pushed dumb barges in the Ghent port.

The defendants were managers of a company called "PTB Ltd." that went bankrupt in December 2014. The company's purpose was to process light shredder fluff from wrecked cars and compress it into bales of secondary solid fuel, which in turn could be used e.g. in the cement industry.

The court dismissed the argument that the "reasonable time" for the trial had been exceeded, because the investigation had been conducted without periods of standstill and the defendants had been offered several possibilities to regularise the offences.

Huge amounts of waste had been collected on payment of a price of 1 EUR below the market price, without a real and legal market for the processed waste, according to the court.

The quantities were proven on the basis of the reports of the environmental inspection, which in Flanders constitute evidence to the contrary.

The legal person, PTB Ltd., could not be prosecuted because it had become bankrupt. The court deemed the 3 managers liable because they had power of decision regarding the offences and because they acted knowingly.

The court stressed the defendants started operating the plant without prior environmental permits. Once the permits were granted, the quantities were systematically exceeded. The activities continued even after the environmental inspection reported the offences. Compliance with environmental regulations was not a priority and was subordinated to financial interests, according to the court.

The offences continued even after orders by the environmental inspection, and were not sufficiently remedied.

All three managers were equally held responsible. The court stated the storage of huge amounts of waste in violation of environmental regulations, had been typical for the business from the start.

The criminal liability of the managers did not end with the company going bankrupt. According to the court, the managers were responsible for dumping the waste and each of them had (and still has) the power to have the waste removed (in which case the offence of abandoning of waste would end).

Under Flemish legislation, the penalty for the offences is a minimum of 1 month and a maximum 5 years of imprisonment and / or a fine of a minimum of 100 and a maximum 500.000 euro. The punishment for a company is a fine of a minimum of 500 euro and a maximum of 1.000.000 euro.

The defendants asked the court to suspend the sentence, but this was turned down.

The court referred to article 5 of Directive 2008/99 on the protection of the environment through criminal law: offences should be punishable by effective, proportionate and dissuasive criminal penalties.

The court gave the following motives for the sentence:

- the illegal storage of the waste and frequent company fires caused real environmental damage;
- the defendants acted as professionals, driven by the love of gain;

- businesses have to comply with environmental regulations before starting up and not vice versa;
- the defendants gave priority to personal financial interests over the general interests of public safety and a sound environment;
- environmental regulations have to be taken seriously;
- businesses have to bear the costs of the activities;
- the social costs of deploying means and capacity for the enforcement at the inspection, police and judiciary levels;
- the defendants paid no attention to environmental regulations even after warnings by the environmental inspection;
- they burdened society and the owners of the premises with a huge waste problem and cost;
- they distorted competition with companies who do make efforts to comply with environmental regulations;
- the magnitude of the waste fraud is unprecedented in Belgium;
- the company accepted (and kept accepting) huge amounts of waste while there was no real or legal market for the recycled waste fractions;
- after the legal person went bankrupt, the head defendant took over the assets and continued the same activities with a new company.

The first defendant was sentenced to 5 years imprisonment (23 months on probation, so 37 months effective) and a fine of 600.000 euro. He had already been convicted for waste crimes in 2016. The court called him the leading man, a real environmental criminal who even made attempts to transfer excess waste to the Walloon region making use of "connections", who according to statements of employees ordered them not to warn the fire brigade and to mix fine fraction with the fluff to get rid of it.

The other two managers were sentenced to 3 years imprisonment (suspended) and a fine of 600.000 euro and 2 years imprisonment (suspended) and a fine of 300.000 euro.

The prosecutor asked for the seizure of over 15 million euros, the price of the removal of 158.767 tons of waste. This was dismissed because the court ordered the removal of the waste within 10 months after the judgment becomes final under a penalty of 1.000 euro per day for each of the condemned. The condemned may be ordered to pay back the removal costs to the Flemish region.

The owner and former owner of a plot of the premises where tons of waste remain to date received a provisional indemnity of 100.000 euro for preventive measures against fire and breaking down of the hangar, a provision of 1 euro for the removal cost and a provision of 1 euro for commercial and financial damage. [Note: this judgment is currently under appeal.]

## US Department of Justice cases

### Largest e-recycling fraud in U.S. history sends owners of Kent firm to prison

Photo courtesy of Seattle Times, US

Residents across the United States Pacific Northwest have dutifully dropped off their broken LCD TVs and computer screens at special e-recycling centers for proper handling and disposal. For good reason: Tubes inside the flat-screen monitors contain mercury, a chemical that can cause organ damage and mental impairment if the fragile tubes shatter.



The Northwest's largest recycler of the screens, however, was not disposing of them safely at all — it was secretly sending them to Hong Kong where workers, reportedly oblivious to the dangers and not wearing masks, were smashing them, releasing the toxins into the ecosystem. For more details on this case please see:

<https://www.seattletimes.com/business/largest-e-recycling-fraud-in-u-s-history-sends-owners-of-kent-firm-to-prison/>

## A case from Spain – illegal trade of ozone-depleting substances

### How a company earned up to €1 million illegally trading ten tons of ozone-depleting substances

Spanish authorities have uncovered an organised crime group involved in the illegal trade of ozone-depleting substances. The specialised Environment and Urban Planning Unit of the Spanish Public Prosecutor's Office coordinated the Nature Protection Service of the Spanish Civil Guard to carry out the investigation, which was supported by Europol and the French National Gendarmerie (Gendarmerie Nationale).

- The Spanish Civil Guard (Guardia Civil) discovered a company and an organised crime group involved in the illegal export of ozone-depleting substances
- Ten tons of the banned R-22 gas smuggled from the EU
- Ten people were involved in illegal earth-destroying activities

The investigation revealed that a company in Valencia, Spain, was involved in smuggling ten tons of R-22 refrigerant gas without a legal licence, bringing in €500 000 to €1 million in profit for the criminal gang. For more detail on this case, please see the link from the EUROPOL website below:

<https://www.europol.europa.eu/newsroom/news/how-company-earned-to-E2%82%AC1-million-illegally-trading-ten-tons-of-ozone-depleting-substances>

## 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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