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GUIDANCE

FOR EFFECTIVE ENVIRONMENTAL CRIME NATIONAL STRATEGIES

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INTRODUCTION

Environmental crime, such as wildlife crime, is one of the most lucrative crime categories globally. The World Bank estimates that the value of illegal logging, illegal fishing, and illegal wildlife trade alone is over USD 1 trillion per year¹.

Environmental crime encompasses any breaches of legislation aimed at protecting the environment, but these crimes do not only destroy the environment but also threaten human health, security and governance, and hamper efforts to curb the climate and biodiversity crises.

In 2024, the European Union adopted [Directive \(EU\) 2024/1203 on the protection of the environment through criminal law](#) with the aim of addressing the gaps in the criminal law response of EU Member States to the most serious forms of environmental crime. It builds on the first Environmental Crime Directive adopted in 2008, which required updating to address implementation gaps and respond to evolving challenges. Among the many provisions covered by the revised Directive is an **obligation for all EU Member States to establish and publish a national strategy to combat environmental crime by 21 May 2027** (Article 21 – see page 3).

The effective implementation and enforcement of the Directive have been persistent areas of weakness in the EU. Member States, with the support of the European Commission, will now **need to allocate sufficient human, technical, and financial resources to the fight against environmental crime if they want this revised Directive to achieve its goals**. In this respect, **national strategies will play a critical role in identifying clear priorities, responsibilities, and actions to tackle these crimes**. To do so, they must be elaborated, implemented, and monitored in an ambitious and rigorous way.

The Directive establishes the minimum rules that must be put in place across the European Union and does not preclude Member States from adopting more stringent measures where appropriate. It is particularly relevant for Article 21, which only provides broad instructions for the development of the national strategies.

¹ World Bank Group. 2019. [Illegal Logging, Fishing, and Wildlife Trade: The Costs and How to Combat it](#). World Bank Group.

This short guidance document provides **key recommendations to support Member States' efforts in developing sound and strong strategies** in line with the purpose and provisions of the Environmental Crime Directive. The recommendations outline how Member States should develop their strategies, which elements should be covered, and mechanisms to monitor their implementation and review.

Member States obligations as per Article 21 of the Environmental Crime Directive

Article 21

National strategy

1. 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 specialisation 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.
2. Member States shall ensure that their national strategy is reviewed and updated at regular intervals which are 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.

ELABORATION PROCESS

The development of the national strategies offers a unique opportunity for Member States to reflect on their priorities, objectives, needs, and shortcomings in order to identify key actions to tackle environmental crime.

As such, they **must be elaborated in a rigorous manner, following a science-based, transparent, and inclusive approach.**

1) Science-based approach

To be effective, national strategies must be rooted in science. Member States should **conduct a situational analysis** prior to developing their national strategies to:

- Identify **which policies the strategy will support and build upon** (at all levels: local, national, European, international).
- Identify **how environmental offences will be addressed and actions prioritized** based on prevalence and impact for the environment, human health, security, and governance. These should include considerations about organized crime, crime convergence (e.g. corruption, financial crime, etc.) as well as how new technologies and innovations can facilitate some crimes (e.g. illegal online wildlife trade).
- Identify **actions** that have been implemented to tackle these crimes to assess their effectiveness and determine the needs and gaps in current efforts.
- **Map out key stakeholders** that will support the implementation of the strategy at the local, national and regional levels (e.g. Ministries, enforcement and judicial authorities, non-governmental organizations, etc.).

This exercise should **rely on existing institutional data**, in particular seizures and environmental crime cases reported, investigated, prosecuted, and adjudicated. Institutional data alone won't provide an exhaustive picture of environmental crime since these crimes are, by nature, hidden and often go unreported. As such, additional **data should be compiled from other sources** (e.g. Europol, Eurojust, World Customs Organization, EU-TWIX, etc.) as well as from existing **scientific papers, reports and articles** (e.g. EU Action Plan against Wildlife Trafficking progress reports², CITES Annual Illegal Trade Reports³, etc.).

² European Commission. 2026. [EU Action Plan against Wildlife Trafficking – Progress report for 2024](#).

³ TRAFFIC. 2025. [An overview of seizures of CITES-listed wildlife in the European Union](#).

Finally, **independent expert knowledge** will also be critical to gathering the necessary information and inputs.

The situational analysis will **inform both the development of the strategies and provide Member States with the baseline data needed to monitor and evaluate their progress.**

2) Transparent and inclusive approach

The strategies must be elaborated in an open, transparent, and inclusive manner. It is essential that **key stakeholders are consulted and have opportunities to contribute to the development process**. This will ensure that relevant information and input are collected to support a robust and science-based approach and will **foster strong buy-in and sense of ownership**. This is important since these stakeholders **possess valuable knowledge** that must be considered when developing the strategies, especially considering that many of them will directly and indirectly support the implementation of the strategies.

The **timeline and process for the development of the national strategies should be made publicly available** to allow relevant stakeholders to support and participate in their elaboration. To facilitate this engagement, Member States should:

- Organize expert and targeted stakeholder interviews and/or a national workshop to collect information for the situational analysis and to inform the content of the strategy.
- Organize a public consultation to gather feedback on the first draft of the national strategy.

Member States should make sure to engage with the following stakeholders:

- **Ministries and associated agencies** (e.g. Ministry of Justice, Ministry of Environment, Ministry of Interior, etc.).
- **Competent national authorities** (e.g. environmental inspectorate, police, customs, prosecutors, judges, specialized bodies, courts, etc.). This could also include authorities operating at local or sub-regional levels.
- **European agencies** (e.g. Europol, Eurojust, OLAF, EPPO) and **environmental networks** (e.g. IMPEL, EnviCrimeNet, ENPE, EUFJE).
- **Civil society**, in particular non-governmental organizations with expertise in environmental crime.
- Other relevant experts and interest parties such as researchers, lawyers, private sector representatives, territorial administration, etc.

CONTENT AND FORMAT

1) Format

All national strategies should include Member States' **priorities and objectives** to tackle environmental crime, as well as clear **actions that will be carried out** to support these priorities and objectives. They should specify which **environmental offences are targeted**, as well as which **stakeholder(s) will be responsible for the execution of each action and under which timeline**. **Indicators should be developed to help track progress** (see Monitoring section).

Recital 65 indicates that Member States are free to either develop separate sectoral strategies targeting specific environmental offences, or one strategic document covering multiple offences. Regardless of the option chosen, Member States should **ensure that each environmental crime category (e.g. wildlife crime, forestry crime, pollution crime, etc.) is adequately covered, while also addressing cross-cutting issues**, such as crime convergence, to avoid creating silos.

2) Content

Each Member State will have to adapt the content of its strategy to its national context (issues, priorities, laws and policies, authorities, etc.). Nonetheless, **all strategies must cover the same elements to provide a clear and effective framework for the implementation of the Environmental Crime Directive across the entire criminal justice chain**.

The content of the strategies **must be aligned with the obligations listed under Article 21, as well as contribute to other objectives of the Directive**, for example with regards to prevention, training, coordination, or data collection. Member States should include the following elements in their national strategies:

Objectives and priorities

Using the results of the situational analysis and input from relevant stakeholders and independent experts, Member States should determine what their **priorities and objectives** (timebound and measurables) will be in the fight against environmental crime. **Specific actions and indicators (see Monitoring section) should be identified**

under each objective, and Member States should specify, where relevant, the offences, species, habitats/sites, or products to which they relate.

Member States should also consider **synergies with other strategies and/or policies**. For instance, the [EU Action Plan against Wildlife Trafficking](#) encourages Member States to develop their own national plans in this area. The strategies could therefore build on this existing framework to address illegal wildlife trade. If Member States opt for the development of sectoral strategies, they should appropriately cross-reference and align them to maintain a coherent approach across all sectors covered by the Directive.

Roles and responsibilities

It is important to define the **roles and responsibilities of competent authorities**, in particular law enforcement and judicial authorities, in charge of supporting the implementation of the Directive and the national strategy.

The strategy should address authorities' **training and specialization needs**, including adapting existing training curricula, developing guidance documents, etc. In addition, the strategy should clarify how authorities will **cooperate and coordinate their actions**. This should also include the collaboration between Member States, with European agencies and environmental networks, as well as with third countries.

Finally, where relevant, the roles and responsibilities of other stakeholders that will contribute to the implementation of the strategy should be delineated (e.g. for preventive actions, research and innovation, access to justice, etc.).

Resource allocation

Lack of adequate resources will hinder Member States' ability to effectively tackle environmental crime and comply with their obligations. As such, the strategy should indicate the **financial, human, and technical resources that will be allocated to its implementation**. Member States could also identify opportunities for **partnerships and cooperation with relevant stakeholders to leverage existing expertise** (including tools) to support the prevention, detection, and investigation of environmental crime.

Prevention and complementary approaches

The Directive requires Member States to take appropriate measures, in collaboration with relevant stakeholders, to prevent and reduce environmental crime as enforcement alone will not be sufficient to stop these crimes. The strategy should **include specific preventive actions that will aim at addressing the drivers and root causes behind environmental crime** (e.g. science-based behavioral change approaches, legal and sustainable alternatives, due diligence mechanisms along the supply chain, etc.).

Besides, the strategy should also ensure the **complementarity of criminal and non-criminal responses** to environmental offences to avoid creating a climate of impunity that would signal tolerance for and enable further these crimes.

Knowledge development

There are still significant data gaps when it comes to environmental crime, which directly hampers the ability of Member States to tackle them effectively. The strategy should **provide a framework to gather further data and build the existing knowledge base** about environmental crime, including by fostering the development of innovative tools to support enforcement efforts. It should also **incorporate the obligations under Article 22**, to make sure that activities pertaining to data collection and reporting directly support the strategy's implementation.

IMPLEMENTATION, MONITORING & REVIEW

1) Endorsement

Once the national strategies are finalized and formally adopted, they should be **made publicly available** to ensure **transparency and accountability**, as well as **foster trust and engagement from all stakeholders**.

2) Monitoring

Member States will need to make sure that the strategies are implemented and successfully meet their objectives. To do so, they should **establish a task force or committee that will be responsible for monitoring the implementation of the strategy**. This group should bring together **representatives of the different stakeholders directly supporting the strategy**, including civil society organizations. At the very least, there should be opportunities for relevant experts to provide feedback on a regular basis.

Clear indicators must be defined during the strategy development process to assess progress made in executing the strategy's actions and achieving its overall objectives, and ultimately to **determine their effectiveness**. **Annual reports should be prepared**, providing an overview of actions undertaken and resources allocated to the strategy during the reporting period. These could be developed by the above-mentioned task force/committee. The annual reports will facilitate adaptive management actions, support Member States in reporting to the European Commission, and help with the mandatory review of the strategy after five years.

3) Review

According to Article 21, Member States must ensure that their strategies are regularly updated and reviewed, at least every five years.

The review process should include a **thorough evaluation of the strategies**, identifying **successes, shortcomings, best practices and lessons learned, building on the initial baseline data from the situational analysis, the progress reports, data collected** as per Article 22, and any other information deemed relevant.

The review process should be carried out in a transparent and inclusive manner, **allowing relevant stakeholders to be consulted**. By using all these sources, Member States will ensure that the review is evidenced-based and that the **revised strategy addresses ongoing gaps and issues, as well as any new and emerging trends**.

Finally, identified best practices and lessons learned could be shared with other Member States to improve the overall implementation of the Directive.

CONCLUSION

This guidance document aimed to provide Member States with key recommendations to develop robust strategies that will support their implementation of the Environmental Crime Directive and enhance their efforts in tackling these crimes.

We therefore urge Member States to follow the below recommendations:

- **Adopt a rigorous, evidence-based approach**

The elaboration, implementation, monitoring, and review of the strategies should be grounded in science, using data, empirical evidence, and expert input.

- **Ensure transparency and inclusive stakeholder engagement**

Open and participatory processes are essential to support the development and implementation of the strategies and strengthen ownership and effectiveness.

- **Draft comprehensive strategies**

All environmental crime categories should be addressed by the strategies. Targeted priorities and actions with clear timelines, indicators, and responsible entities should be defined. They should be aligned with the obligations under Article 21, but also support the implementation of other provisions of the Directive (e.g. prevention, training, cooperation, etc.) as well as other existing policies.

- **Allocate adequate resources**

Sufficient financial, human, and technical resources should be allocated to ensure effective implementation of the strategies.

- **Provide effective monitoring and accountability**

Once adopted, the strategies should be made publicly available with regular reporting, and dedicated oversight mechanisms to track progress.

- **Allow for regular updates and reviews**

The strategies should undergo regular evaluations and updates to remain fit for purpose, using existing knowledge and stakeholders' inputs to adapt to evolving risks and trends.

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