



European Union Network for the Implementation and Enforcement of Environmental Law

# SPIDER WEB

Strategic Project to Increase the Detection and Disruption of Environmental Crime in the Western Balkans

## TRAINING NEEDS ASSESSMENT REPORT



July 2019  
Deliverable 1.2



# Countering Serious Crime in the Western Balkans: Training Needs Assessment Report targeting waste and nature crime in Albania, Bosnia and Herzegovina, Kosovo\*<sup>1</sup>, The Republic of North Macedonia, Montenegro and Serbia

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<sup>1</sup> \**"This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence"*

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## Executive Summary

In order to get a better understanding of the needs and challenges to successfully prevent and address environmental crime and fight serious and organised crime (SOC) involved in waste and nature-related offenses in the Western Balkans, IMPEL issued this Training Needs Assessment (TNA).

This was done by (i) assessing the level of awareness and knowledge of waste and nature crime, both at the national and regional level; (ii) assessing the types of training already received on the subject; and (iii) assessing the training needs and training wishes.

An online tailored questionnaire was filled in by 56 respondents from 33 different institutions from Albania, Bosnia and Herzegovina, Kosovo\*, The Republic of North Macedonia, Montenegro and Serbia.

The outcomes showed that beneficiaries have received training, but the current level of awareness and priority for addressing environmental crime remains overall low. A quick scan showed that the level of knowledge is still basic. Prosecutors and judges clearly expressed their appreciation for case studies and lessons learnt from other countries in the region and at international level. There is clear added value to target all actors and stakeholders in the compliance and enforcement chain.

### **To address these challenges, the TNA identified the following ways forward:**

- Further training is required; both theoretical as at practical level.
- Beneficiaries themselves should develop and implement longer-term capacity building and training strategies and programmes for all staff members.
- Specific training sessions for practitioners and law enforcement officers should include in details how-to's regarding: inspections, detection, criminal and administrative investigation, dealing with intelligence, evidence collection, how to perform analysis with respect to wildlife, timber and waste crime and how to effectively present a case of prosecution in court.
- Tools like guidelines, toolkits or operational manuals support the capacity building efforts; mainly after the training took place.
- Joint training sessions are recommended as they facilitate inter-agency cooperation and create mutual understanding.
- Training impact should always be measured.
- Facilitate specialisation of public prosecutors in the area of environmental crimes.
- Offer distance learning and electronic training to allow for larger participation.

## Acknowledgements

This report, commissioned by IMPEL, was prepared by a research team from SOFIES that includes: Vittoria Luda di Cortemiglia, Gordana Petkovic and Ruweyda Stillhart with support from Federico Magalini and David Rochat.

The research team would also like to express its appreciation to all 56 experts and representatives of the 33 institutions and entities who contributed information and participated to the online questionnaire.

SOFIES research team also wishes to gratefully acknowledge the financial support from IMPEL within the context of the SPIDERWEB Project, funded by the German Cooperation (GIZ).

## 1. Introduction

This Training Needs Assessment Report is an outcome of a research project commissioned by the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL), implemented by Sofies,<sup>2</sup> with the goal of collecting adequate and reliable information on the capacity and ability of the four EU accession candidates (Albania, The Republic of North Macedonia, Montenegro and Serbia) and two potential candidates (Bosnia and Herzegovina, and Kosovo\*) in the Western Balkans to prevent and address environmental crime and fight serious and organised crime (SOC) involved in waste and nature-related offenses. The current research project is a component of a wider set of activities being carried out by IMPEL in the region, within the project “SPIDERWEB - Strategic Project to Increase the Detection and Disruption of Environmental Crime in the Western Balkans”.<sup>3</sup>

The SPIDERWEB project focuses on:

1. Nature Protection, including trade in wildlife covered by the EU Wildlife Trade Regulations (EU WTR) and Habitats & Birds Directives, Timber and timber products trade as regulated by the EU Timber Regulation (EU TR); and
2. Waste Management; covering all aspects in the chain, from point of generation to transport and treatment covered by the EU Waste Framework Directives and Regulations.

SOFIES Research Team undertook a situation analysis and a training needs assessment of actors across the compliance and enforcement chain in each target economy. This was aimed at providing some information and context with the national trainings that will be organised by IMPEL in each target beneficiary of the TNA, starting from May 2019 onwards.

The objectives of this Training Needs Assessment are to assess:

1. The level of awareness and knowledge of on waste and nature crime at the national and regional level;
2. the type of training received on the subject;
3. the training needs and training wishes.

The data was collected through an online questionnaire and later aggregated by the research team; the individual information was not disclosed. While the main goal of this report is to emphasise common trends across the regions, some project beneficiary specific information is also provided.

The results of the questionnaire are presented in this report along with some specific recommendations: this will assist in making the decision on what major topics to include in each of the trainings and in future trainings on environmental crimes in the Western Balkans region and in the individual beneficiaries.

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<sup>2</sup> For more information on Sofies please visit <https://sofiesgroup.com/en/>

<sup>3</sup> For more information please see “Strategic Project to Increase the Detection and Disruption of Environmental Crime in the Western Balkans” (SPIDER WEB) Project: <https://www.impel.eu/projects/spiderweb/> and <https://cscwb.info/it/giz-sponsors-impels-spider-web-project-to-combat-environmental-crime/>



## 2. Scope and methodology

This Report comprises the analysis of the data from a Training Needs Assessment (TNA) exercise carried out by SOFIES Research Team in the month of April 2019. A tailored online questionnaire was developed by SOFIES using Google Forms. A first draft of the questionnaire was initially shared with the IMPEL SPIDERWEB Team to collect inputs and additions, and revised accordingly. The questionnaire comprised a set of 50 questions divided in three main sections: general background of the respondent; questions related to wildlife and timber; and questions related to waste. The questions can be found in Annex II.

The questions aimed at assessing the current knowledge level of individual respondents with regards to the issues covered; the training received on such topics and the training desired.

The online questionnaire was widely disseminated through previously contacted persons that were interviewed for the preparation of the Baseline Report, and via main related institutions. The questionnaire was addressed to experts from relevant Ministries and Competent Authorities, Environmental Inspectorates, Police, Customs, Prosecution Offices, Judiciary, non-governmental organisations and International/Regional Organizations.

This Report is structured into two parts: the first part presenting general findings for all project beneficiaries in the Western Balkans region, while the second part features specific findings based on the information collected through desk review and experts' interviews and complemented by the data collected at the project beneficiary level with the online questionnaire.

The Training Needs Assessment Report therefore integrates the results obtained from the questionnaire along with the relevant information gathered in the Baseline Report, in order to provide an overview of the requirements for the improvement of capacities to tackle wildlife, timber and waste crimes.

It should be noted that data from the Training Needs Assessment present some limitations due to the small number of respondents and the short time available (1 month, April 2019). The Tender requirements stated that a minimum of 36 responses from all six project beneficiaries and at least 18 different organisations was needed for this task. Overall, the online questionnaire was filled in by 56 respondents from 33 different institutions from Albania, Bosnia and Herzegovina, Kosovo\*, The Republic of North Macedonia, Montenegro and Serbia.

It is important to underline that given the limited number of respondents, replies are to be considered as an indication of the individual opinion or knowledge of the respondent participating in the questionnaire, and should not be considered as a representation of the entire general situation/opinion of this particular relevant stakeholder group. Also, as respondents belonged to different stakeholders' group, not necessarily all questions are fully relevant to their professional experience and therefore some replies may be biased.



### 3. Results

The present section summarises the overall results of the online questionnaire, presented in three areas: profile of those who filled in the questionnaire; main training needs identified; and preferred training methods and formats to be used.

#### 3.1 Respondent profile

The questionnaire was completed by a total of fifty-six (56) respondents from thirty-three (33) different of institutions representing the main target groups (Ministries/Government Agencies, Environmental Inspectorates, Customs, Police, Prosecution Offices, Judiciary, NGOs and IGOs and experts). 54% of the respondents were male, 46% women. The average number of answers per project beneficiary has been 9, but results differed. For instance, while Serbia and Kosovo\* account for 25% and 21.4% respectively, Bosnia and Herzegovina accounts for just 10.7%. Nevertheless, considering that the answers cover such a wide array of institutions, the data set can be considered useful for the purpose assessing overall training needs.

The number of questionnaire’s participants by project beneficiary is the following: Serbia (14); Kosovo\* (12); Republic of North Macedonia (9); Montenegro (8); Albania (7); and Bosnia and Herzegovina (6).

#### Beneficiaries of this TNA

56 responses

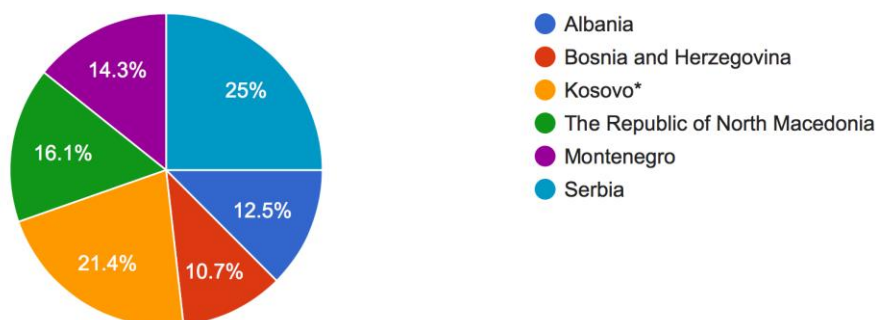


Figure 1 - Beneficiaries of this TNA

Respondents belonged to different types of institutions: almost half (27 persons, 48.2%) work in Ministries or Government Agencies; ten (17%) in Environmental Inspectorates; six (10.7%) in public prosecution offices; 3 in the judiciary; 3 in scientific institutions; 2 in customs and 2 for criminal police. In addition, two more work for International Organisations and EC funded projects.

### Type of Entity

56 responses

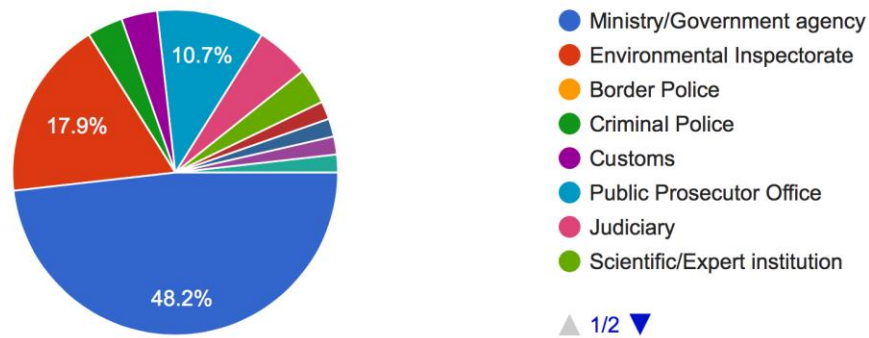


Figure 2 - Type of Entity

### WILDLIFE AND TIMBER

Forty (40) questionnaire participants (71.4% of the overall number of respondents) affirmed to be familiar to the sector of wildlife and timber and therefore were introduced to the relevant sections, whereas the remaining sixteen (16) participants did not provide inputs in this section.

#### Knowledge, experience and involvement

Fifteen (15) respondents to the section on wildlife and timber (37.5%) indicated they have low of level of involvement and experience with regards to wildlife crime, whereas fourteen (14, equivalent to 35%) declared no involvement or practical experience at all. Nine (9) questionnaire participants (22.5%) indicated that they have occasional involvement in wildlife issues, and just two (2) participants (5%) declared that they have vast experience in this sector.

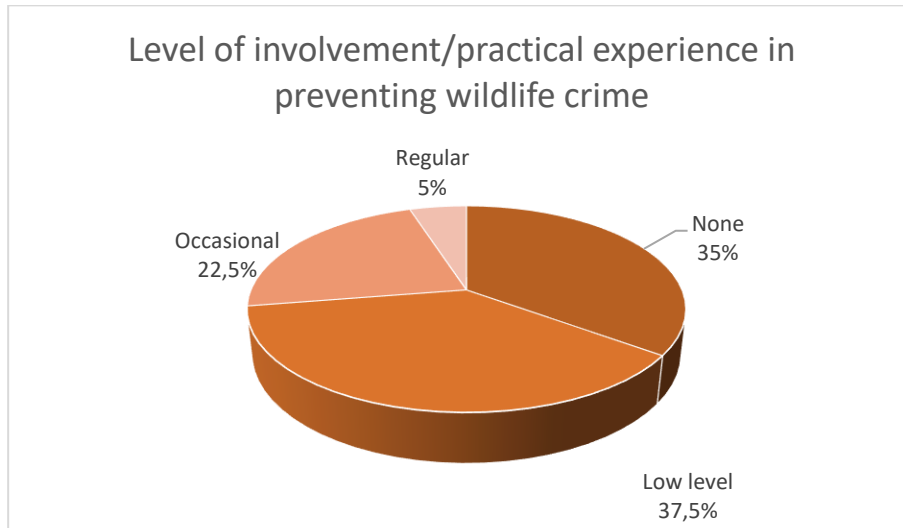


Figure 3 - Experience in preventing Wildlife Crime

With respect to the perception of respondents on how often wildlife smuggling takes place on and near the checkpoints, the majority indicated that they did not know (57.5% - 23 respondents), followed by those whose opinion was that it occurred rarely (20% - 8 respondents), on a monthly basis (12.5% - 5 respondents), weekly (7.5% - 3 respondents) and daily (2.5% - 1 respondent).

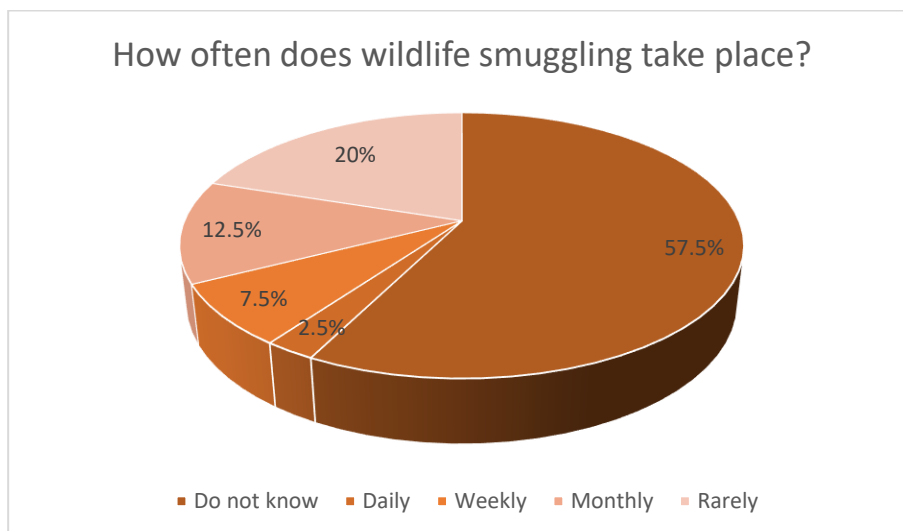


Figure 4 - Knowledge on number of times wildlife smuggling takes place

Another question explored the level of knowledge and experience of wildlife crime of questionnaire participants: 32.5% (13 participants) declared to have a basic knowledge and basic experience; 30% (12 participants) stated that they have basic knowledge but no experience; 15% (6 participants) indicated detailed knowledge and basic experience; 10% (4 participants) indicated detailed knowledge and no experience; 10% (4 participants) indicated no knowledge and no experience whatsoever and, finally, only 2.5% indicated detailed knowledge and extensive experience in this field.

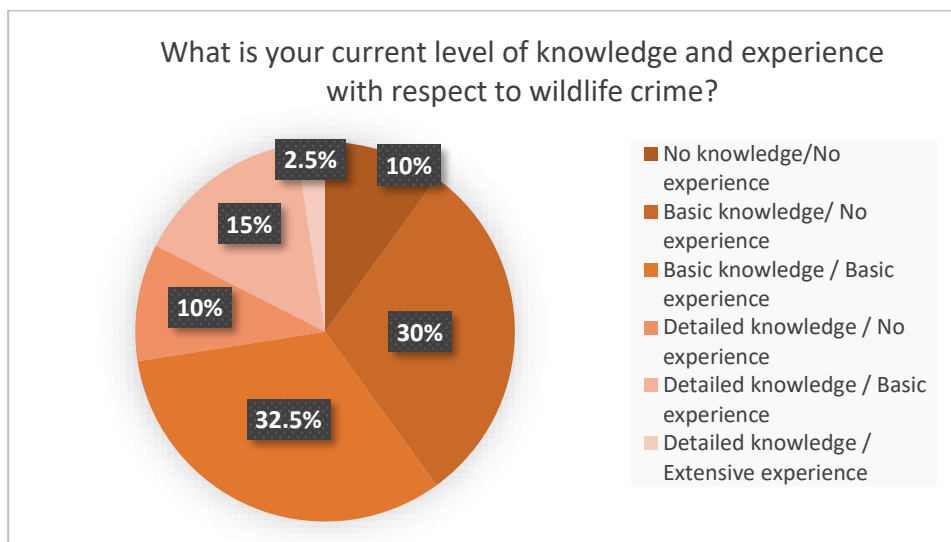


Figure 5 - Level of knowledge and experience in relation to wildlife crime

In terms of assessing the individual professional capacity with regards to wildlife crime, the questionnaire participants indicated that they are not sufficiently trained on CITES and wildlife crime and that frequent assistance from other colleagues is required (55%). It would be interesting to further investigate which is the level of expertise of colleagues asked for assistance, but unfortunately the questionnaire did not pose a follow-up question on this regard. Other respondents (8 out of 40 - 20%) stated that the assistance from other agencies/bodies is sometimes required and a small portion indicated that they did not consider wildlife crime issues to be a part of their responsibility (3 out of 40 - 7.5%). A number of respondents did not reply to this question (7 out of 40 - 17.5%).

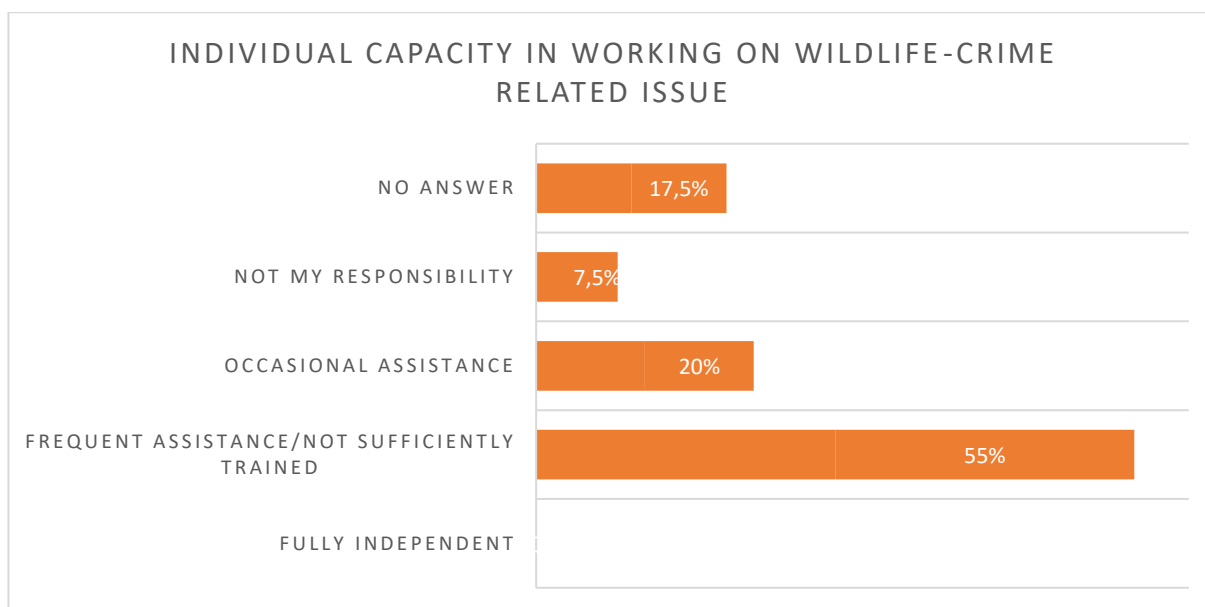


Figure 6 - Individual capacity with regards to wildlife crime

Almost half of the respondents (47.5%) were unable to provide an estimate of the number of wildlife crime-related cases dealt by their respective authorities on an annual basis. The majority of those that did provide an estimate (35%) indicated a relatively low number of cases per year (between 0 and 10), with only a small number indicating significant number of cases, namely 10% indicating between 10 and 20 cases per year, 5% indicating between 20 and 50 cases per year and only 2.5% indicating more than 50 cases per year.

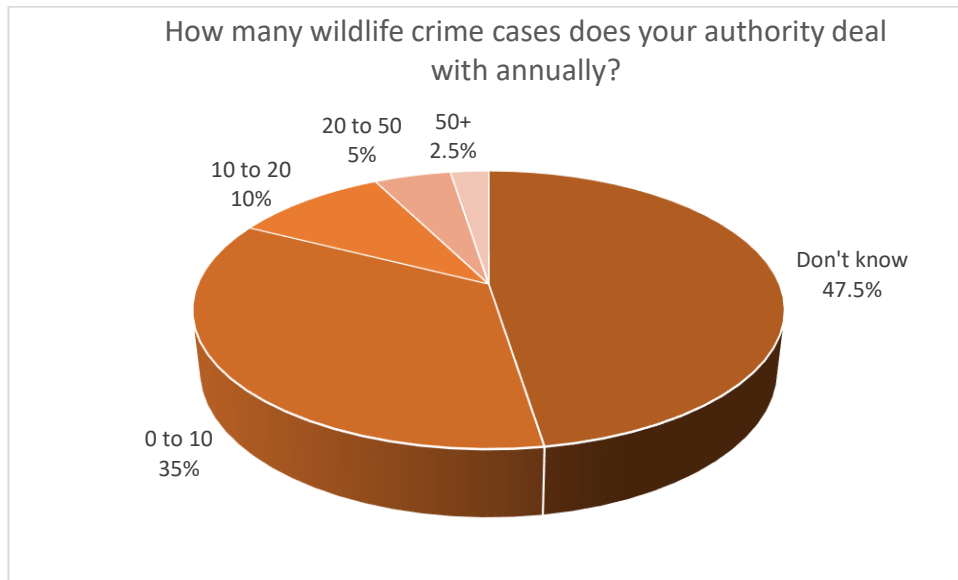


Figure 7 - Number of wildlife crime dealt with annually

The questionnaire also inquired which tools respondents use on a regular basis when dealing with wildlife-related offences. National wildlife-related legislation is most utilized (23 out of 40 - 57.5%), followed by: CITES website (20 out of 40 - 50%); publications and guidebooks on wildlife protection (15 out of 40 - 37.5%); CITES trade database (11 out of 40 - 27.5%); Species+ database (10 out of 40 - 25%); species identification materials (8 out of 40 - 20%); and the EUTWIX database/mailling list (5 out of 40 - 12.5%). A smaller portion of questionnaire participants did not provide an answer (7 out of 40 - 17.5%).

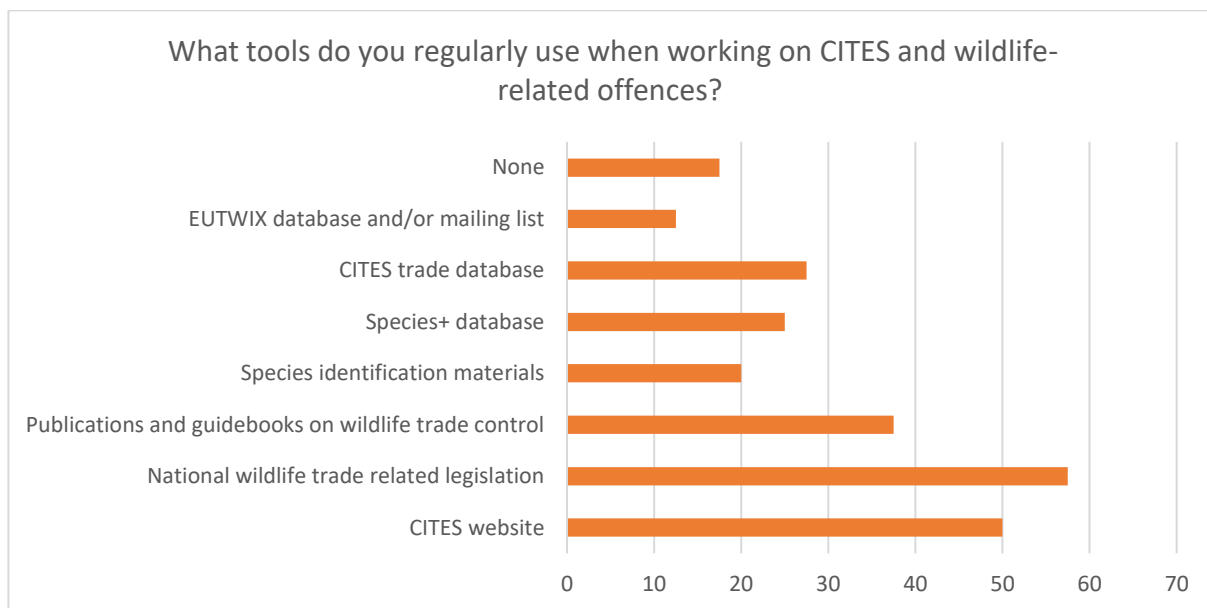


Figure 8 - Tools used when working on CITES and wildlife-related offences

### Priorities and challenges

Questionnaire participants were also asked to select which they considered to be the priorities in combatting wildlife crime. The following priorities were indicated, listed in order from highest to lowest: Training enforcement authorities, prosecutors and judges on wildlife crime (31 out of 40 - 77.5%); Structural reorganisation of enforcement bodies (establishment of a wildlife crime police units) to effectively combat wildlife crime (25 out of 40 - 62.5%); Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (e.g. equipment and facilities to house and care for confiscated wildlife) (23 out of 40 - 57.5%); and Improvement of national legislation to ensure more effective enforcement (22 out of 40 - 55%).

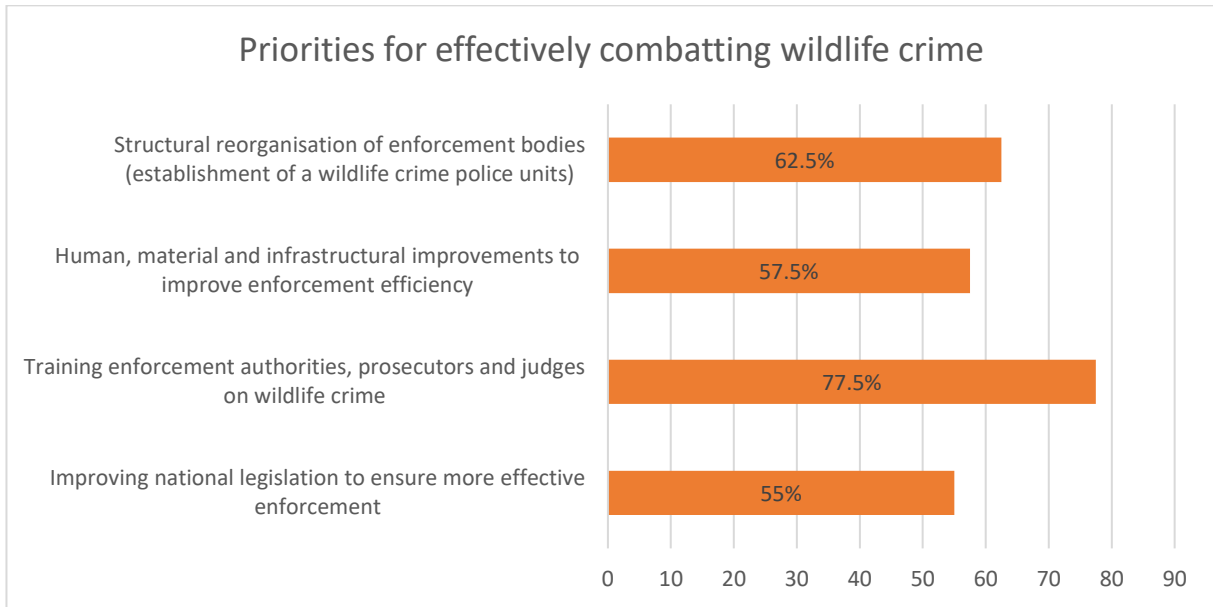


Figure 9 - Priorities for effectively combatting wildlife crime

One of the main challenges in dealing with wildlife crime highlighted by the questionnaire respondents was the inadequate level of cooperation among national authorities. More than half considered the quality of cooperation between national authorities as insufficient (47.5%) and more than a quarter defined it as very poor (25%). Only a small percentage (17.5%) considered the cooperation to be good, whereas nobody defined it as excellent.

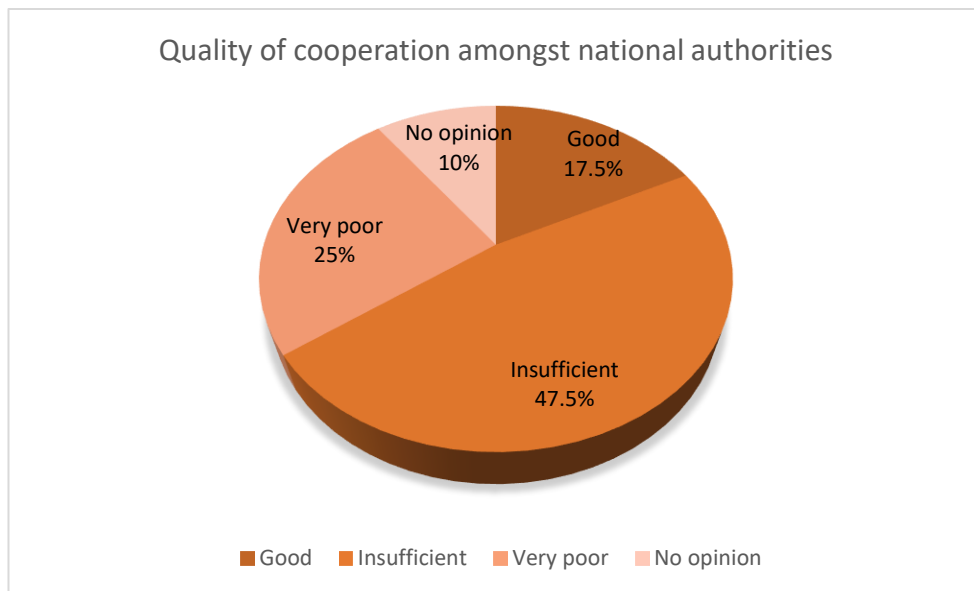


Figure 10 - Cooperation amongst national authorities for wildlife crime



**WASTE CRIME ISSUES**

With regards to waste crime issues, just eighteen respondents (18 out of 40 - 45%), declared to be familiar with the this sector and were thus invited to reply to the relevant section.

Most of the respondents who were familiar with waste crime issues were from Ministries, the state Inspectoriate and the Environmental Protection Agencies. Those who were not familiar were from either law agencies, the police and the customs administration.

With regards to waste crime issues, illegal landfilling and illegal disposal (82.1. % and 71.4% respectively) are the most frequent crimes faced by authorities in their work, closely followed by illegal burning (64.2%) and tax avoidance (35.7%); illegal export (28.5%); mis-description of waste (21.4%); illegal recovery (17.8%); fly tipping (14.2%).

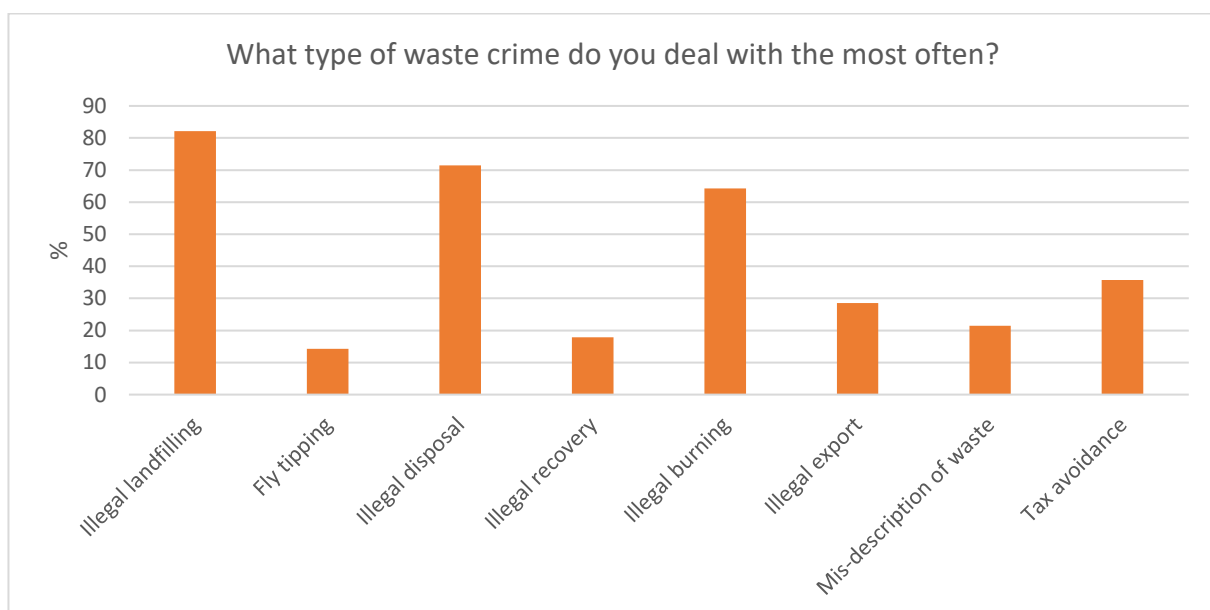


Figure 11 - Type of waste crime dealt with

The respondents were also asked how the information of a waste crime brought to their attention. The role of the public on this regard seems to be relevant (27 respondents out of 30 - 90%), along with information received from other agencies (18 out of 30 - 60%). Information on waste crime is also acquired through intelligence work (9 out of 30 - 30%) and information by other countries (8 out of 30 - 26.6%).



Figure 12 - Information on when waste crime is happening

With regard to the question on detection of illegal traffic: Twelve respondents (12) answered that they deal with this issued based on information received from other countries (38,7%); ten (10) based on intelligence received (32.2%); three (3) based on inspection supervision and information from other administrative bodies (9.6%); 1 respondent that is not competent (3.2%). It is worth underlying that 35.4% (eleven) respondents replied that they do not know how illegal traffic is detected.



Figure 13 – Methods of detecting illegal traffic of waste

As a follow up question, respondents were asked on which basis a prioritisation on serious waste crime incidents is taken. Ten (10) respondents mention that they usually deal with waste crime cases on the basis of a “first come first served” approach (40%), as they do not know what should be regarded as serious (9 respondents, equally to 36%). The decision is usually responsibility of the manager (9 respondents, equally to 36%); six (6) respondents in fact mentioned that they do not have a guideline to determine which case should be considered most serious (24%) and three respondents answered “other” (3%).



Figure 14 - Prioritisation of waste crime

The main issues related to waste crime indicated by respondents, are: land, water and air pollution (86.6%, 80% and 76.6% respectively), followed by corruption (40%), odour (36.7%), and tax avoidance (30%).

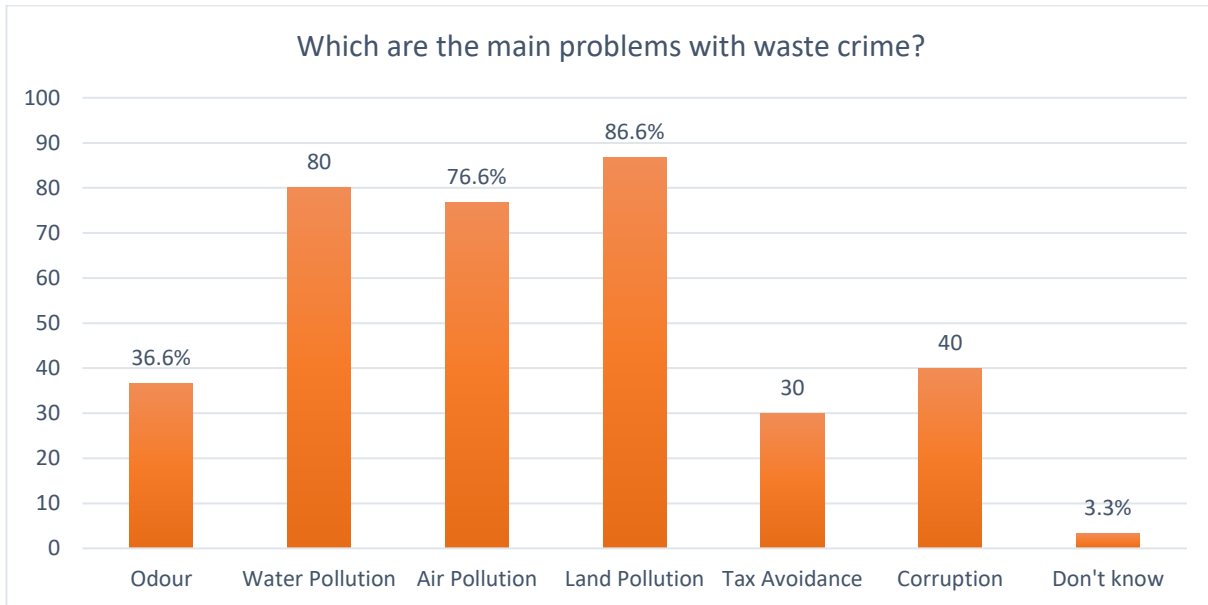


Figure 15 - Main problems with waste crime

One question also aimed at exploring the knowledge of the actors involved in waste crime, and possible level of recidivism. Although 33% of the respondents affirmed not to know who are the actors behind such environmental crime, a number of experts interviewed are of the opinion that the same companies (27%) and the same people are involved (24%), and with answer “No, it is random” (16%).

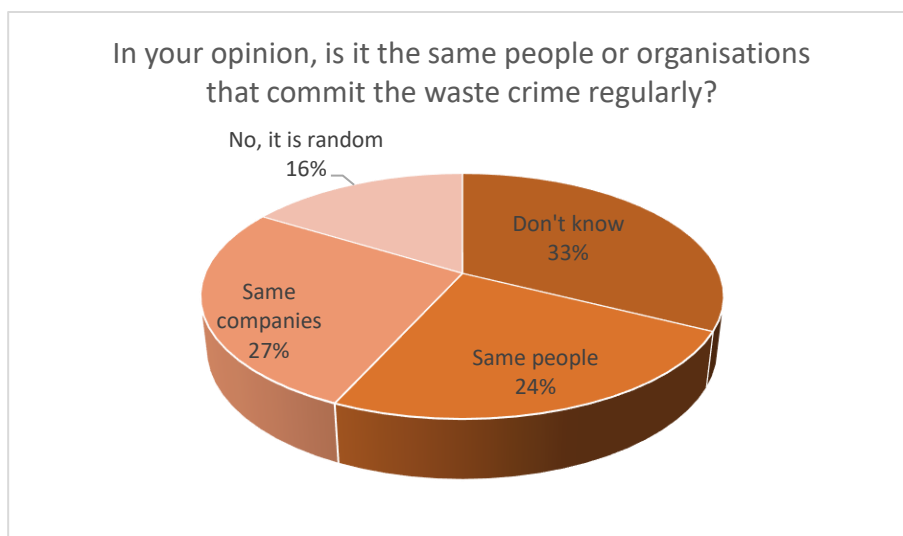


Figure 16 - Committing the waste crime regularly

As a follow up question, experts participating in this training needs assessment were consulted on the penalties provided by the respective legal system for waste crime. The level of punishment is linked to the seriousness of the crime by the respondents (37%); not held adequate nor proportionate (36%); or there is punishment not satisfactory (27%).

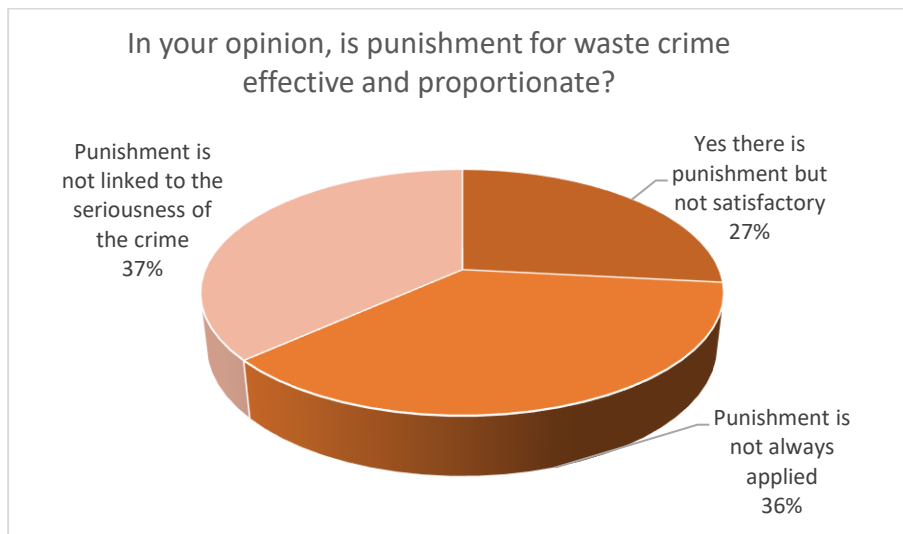


Figure 17 - Appropriateness and effectiveness of waste crime punishment

Information sharing with other agencies and other countries regarding waste was also topic of a specific question. Fifty-two per cent of responses (52%) indicated that information is not shared with other countries nor agencies, while 31% replied instead positively.

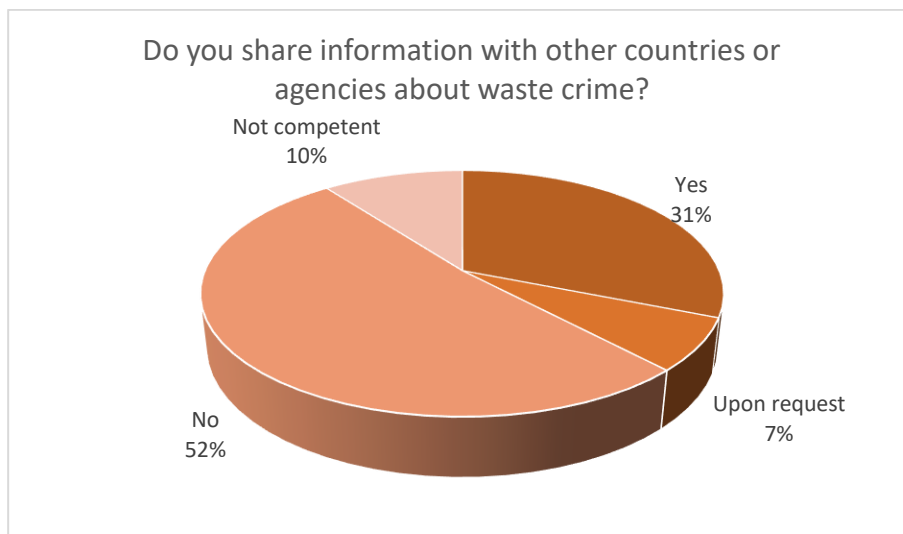


Figure 18 - Sharing waste crime information

### 3.2 Training needs

Respondents were asked a few questions regarding past trainings received on topics relevant for wildlife, timber and waste crime issues. This section presents the data collected into two sub- paragraphs, the first dedicated to wildlife and timber crime, and the second focusing on waste crime.

WILDLIFE AND TIMBER

Past trainings

With regards to wildlife and timber crime, seventeen (17) participants had no training whatsoever (42.5%); fifteen (15) participants received training on CITES implementation (37.5 %); 10 participants received training on case studies on enforcement and prosecuting wildlife crime (25%); nine participants received training on wildlife and timber identification (22.5%); four participants received training on physical control of wildlife and timber shipments (10%); five participants received training on wildlife smuggling methods (12.5%); two participants received training on handling wild animals (5%) and two on sanctioning wildlife offences (5%) respectively.

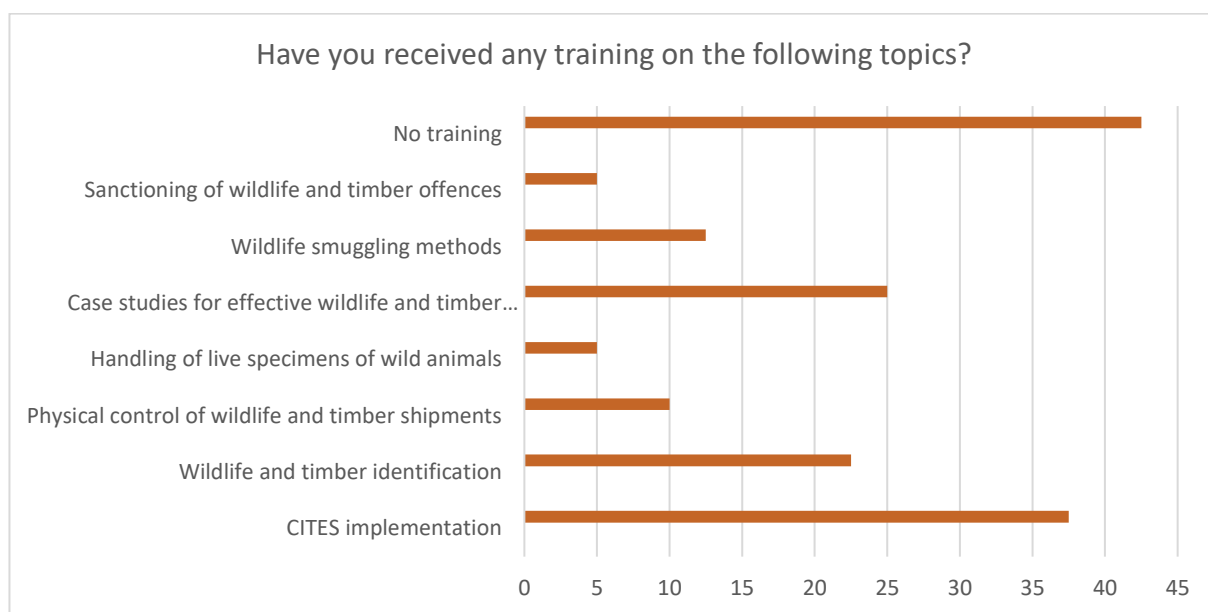


Figure 19 - Training already received

Training needs

Respondents were also asked to indicate which topics would be useful for carrying out their professional role with respect to illegal wildlife trade and illegal timber logging. The following training topic selections were made by the questionnaire participants: CITES implementation (62.5%); prosecuting and sanctioning (60%); investigations (50%); wildlife smuggling methods (47.5%); physical control of shipments (42.5%); and wildlife identification (37.5%).

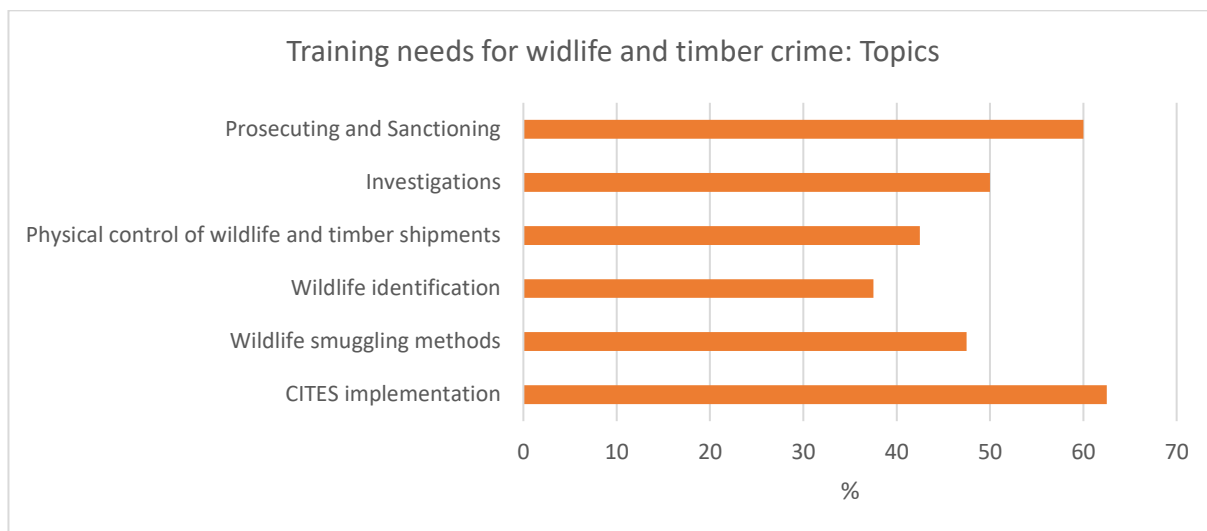


Figure 20 - Training needs for wildlife and timber crime

### WASTE CRIME ISSUES

As of waste crime, various aspects have been indicated by participants as priority training needs. Waste crime indicators (25 respondents out of 32 - 78.1%); international waste management regulations (22 respondents out of 32 - 68.7%); and waste crime detection and disruption methods (21 respondents out of 32 - 65.6%) were the most cited topics. In addition, other topics have been highlighted such as: the EU Framework Directive on Waste (59.3%); understanding the types and definition of waste (59.4%); waste crime risk assessment (59.4%); Understanding the causes of waste crime (53.1%); Identifying high risk waste crime (46.8%), waste producer responsibility (43.7%); environmental and Health impacts of waste management and waste crime (43.7%), waste duty to care responsibility (34.3%); waste processors responsibility (40.6%); and the definition of waste disposal and recovery (25%).



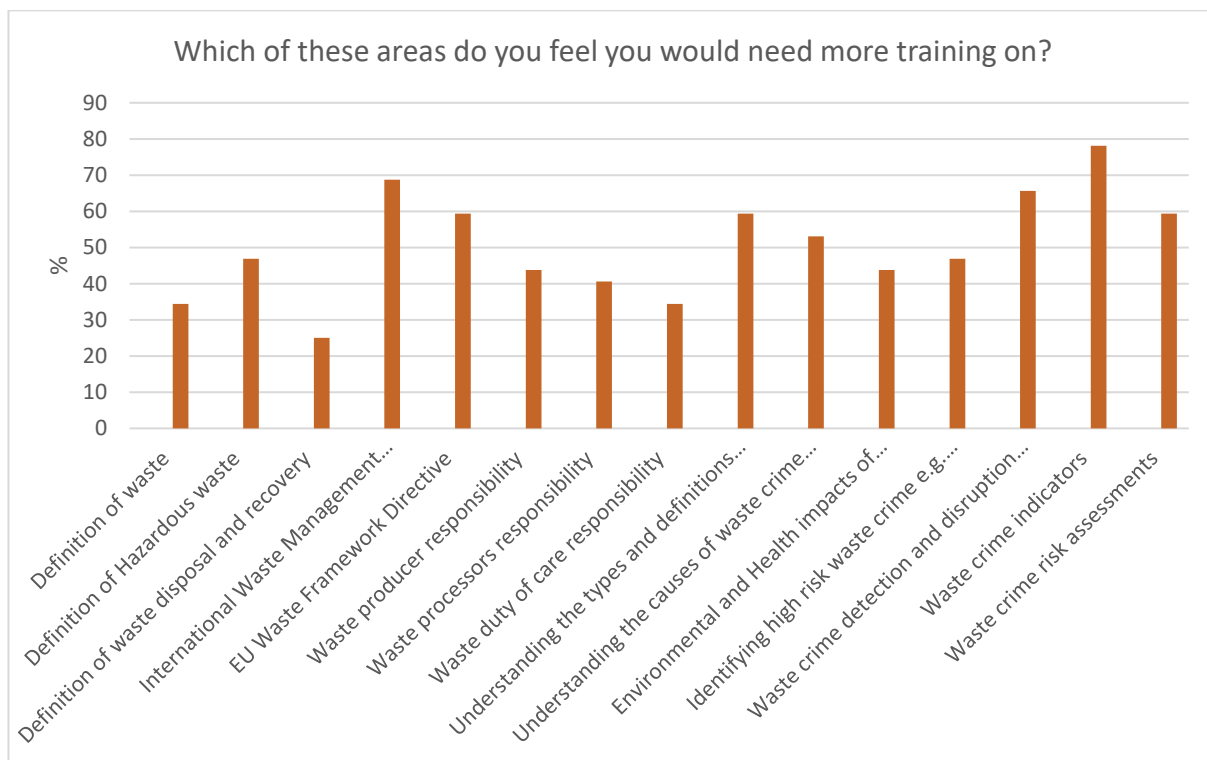


Figure 21 - Areas where more training would be needed

No regular training is provided on waste issues, according to the majority of experts responding to the questionnaire, and 8 respondents (25%) did not receive any specific waste training at all.

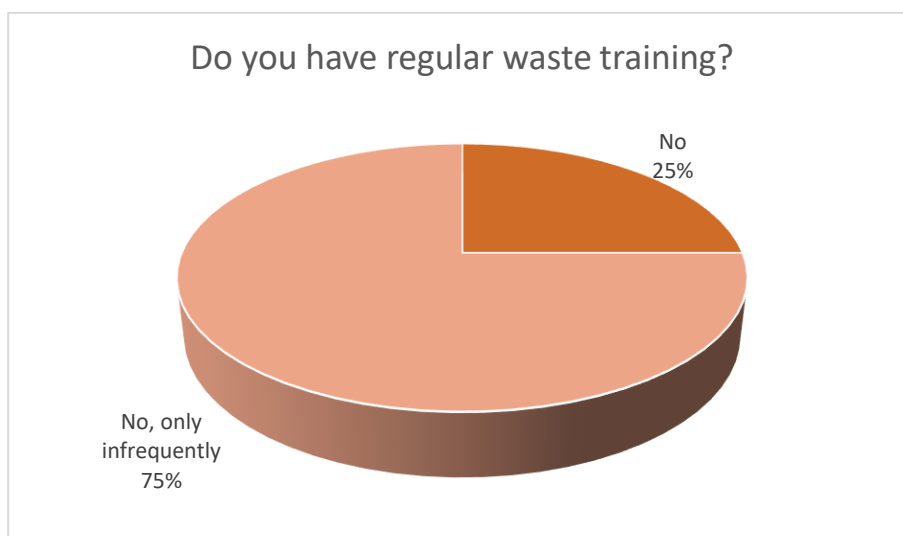


Figure 22 - Reception of regular training on waste

As already underlined in the Baseline Report, specialised training on how to investigate and gather evidence of waste crime is needed, as more than half of the respondent did not receive any such training (58%), while 42% received at least some training on this topic.



Figure 23 - Reception on investigating waste crime and evidence gathering?

Only six (6) respondents found the training received adequate for detecting waste crime and regulating waste management, but this reply is possibly linked to the specific profile of the respondents (not necessarily involved in detection of waste crime).

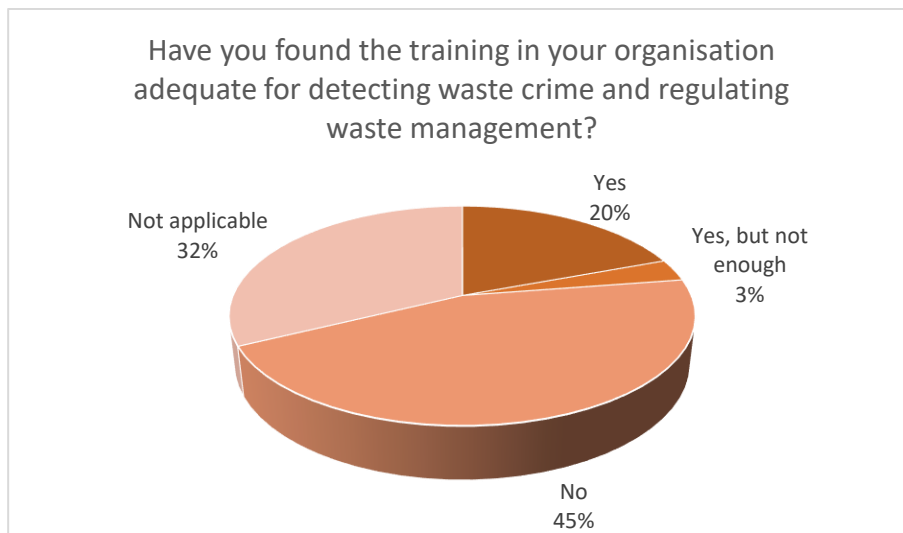


Figure 24 - Quality of training received on waste

Respondents were also asked how the training provided on waste crime issues can be improved: better focus on problem areas (64.7%); better use of technology (38.2%); more operational (35.2%); and better trainers (29.4%). About twenty-six per cent (26.4%) of the respondents mentioned that they did not receive any waste crime training.



Figure 25 - Improving waste crime training

### 3.3 Training methods

Questionnaire participants were also asked to choose what further training topic they would benefit most in order to fully implement their duties in the prohibition of transnational crime. Most participants chose transnational crime investigation (29%); followed by transnational crime intelligence collection and analysis (20%); police control investigation (20%); transnational crime awareness (16%) and checkpoint anti-smuggling (14%), with only 1% of the surveyed participants chose the option of law enforcement.

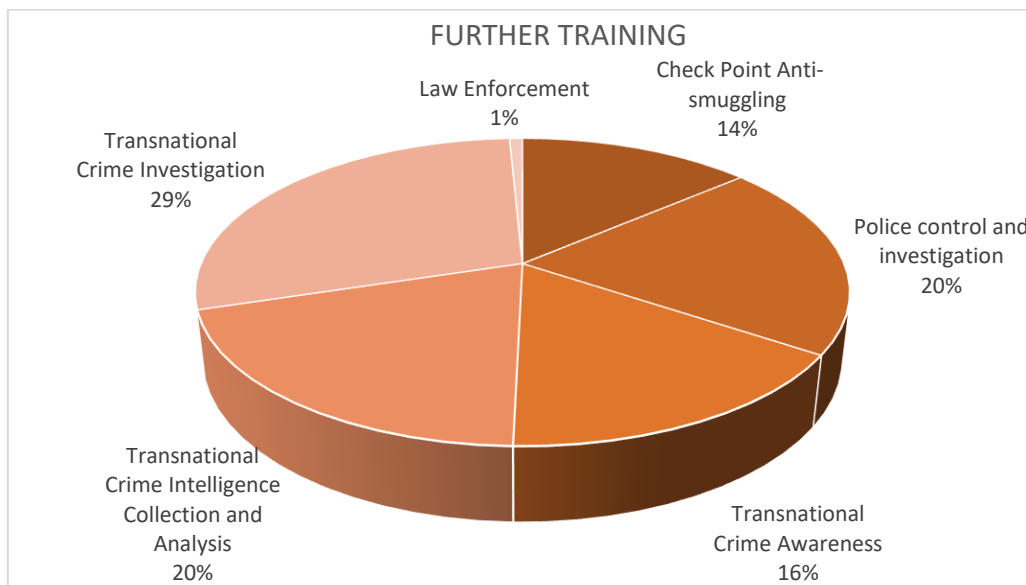


Figure 26 - Further training wishes

The questionnaire participants' responses related to the training format indicate that they would be most likely to participate in workshop-style events (80%) and classroom trainings (27%), but interest was also shown toward a combination between classroom training and distance education.

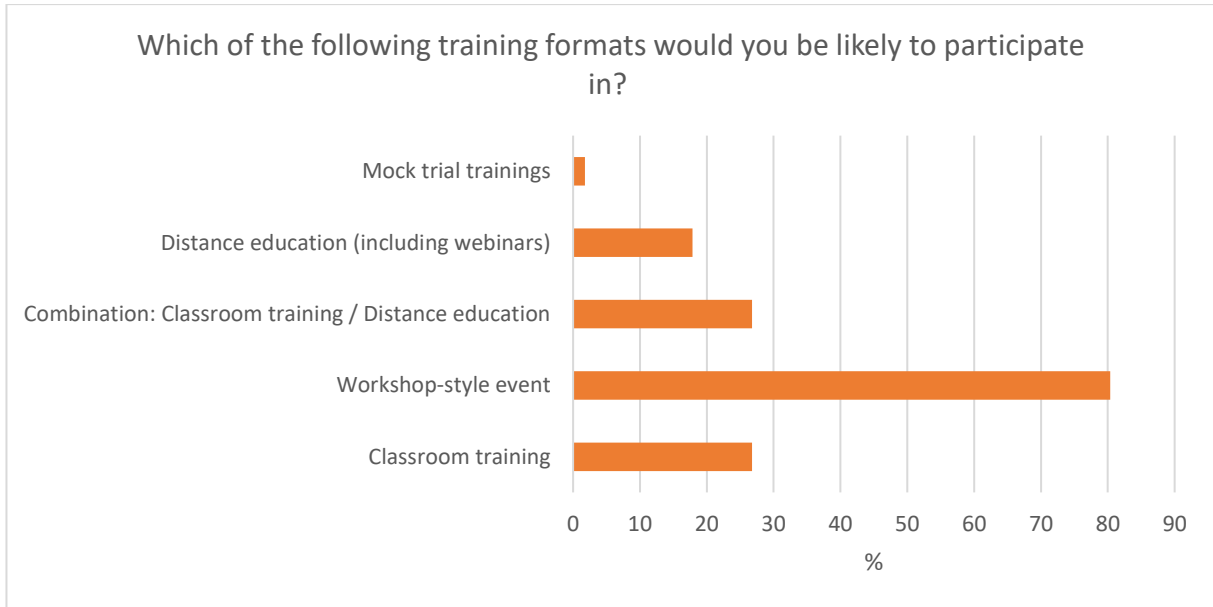


Figure 27 - Training formats

With respect to the question regarding which training method is considered most effective, respondents indicated that case studies (84%) would be the most beneficial training methods, followed by practical toolkits (57.1%); on-the-job trainings (51.7%); and group discussions (46.4%).

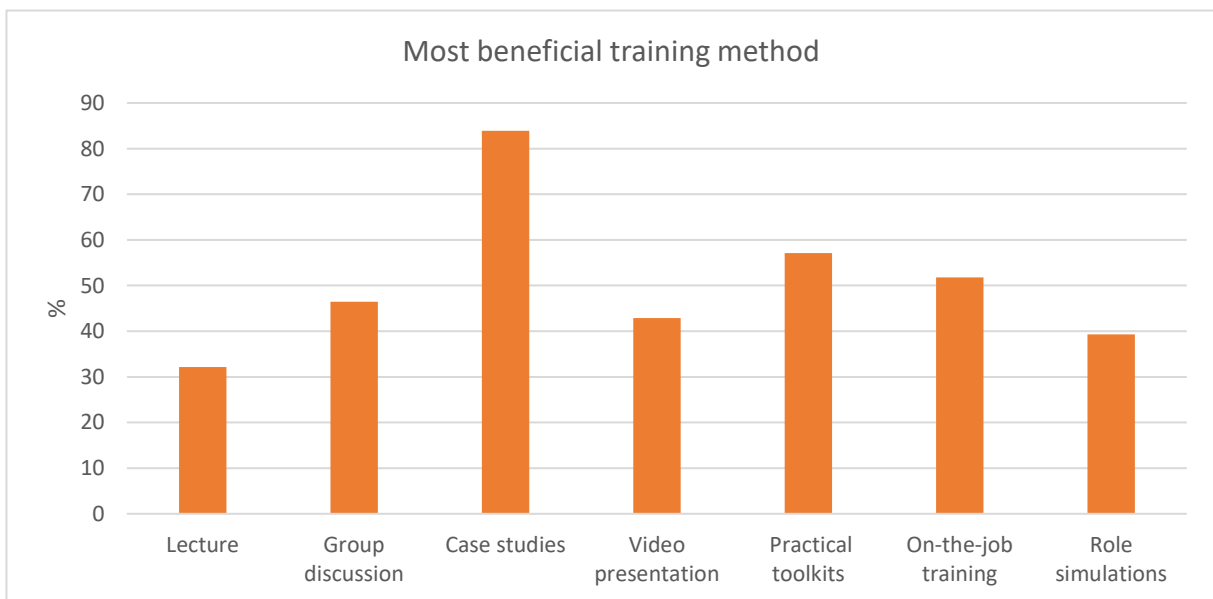


Figure 28 - Beneficial training methods

Respondents to the questionnaire indicated that the three most beneficial informal learning methods were working alongside experienced colleagues (17%); followed by networking with others doing similar work (17%); and on-the-job trainings (13%).

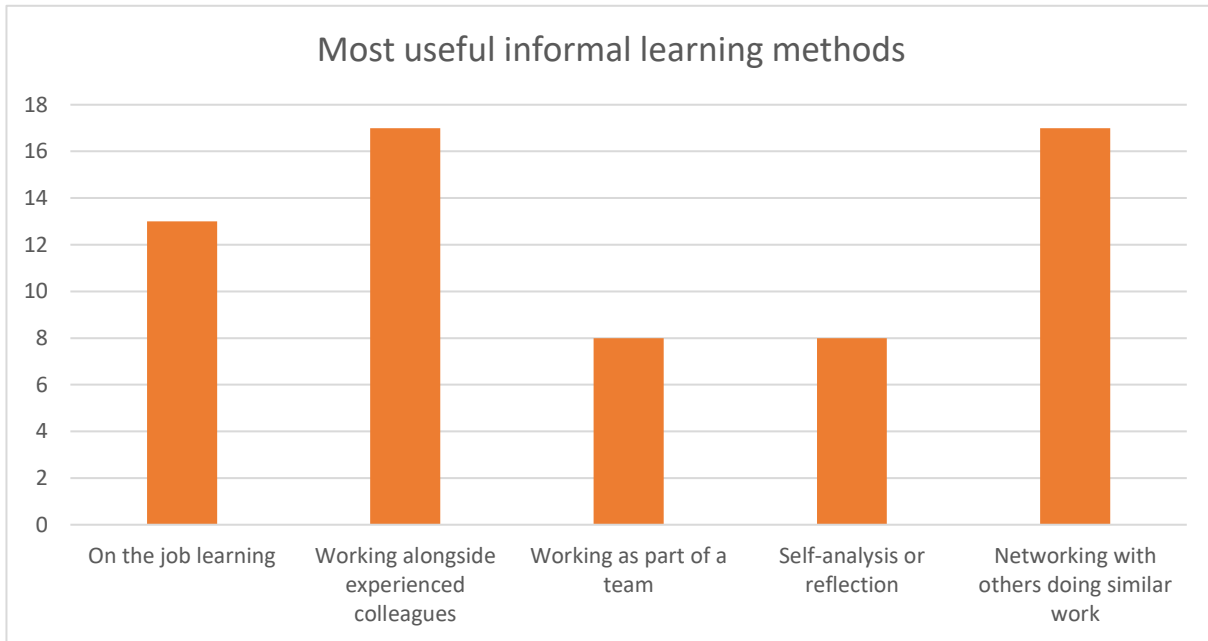


Figure 29 - Most useful learning methods

## 4. State of play of national priorities

This part of the report focuses on the priorities in each project beneficiary as expressed in the replies to the questionnaire as well as in the interviews with experts carried out in February- March 2019 in preparation of the Baseline Report. The questions were intended to get a feeling of the priorities of the different beneficiaries regarding transposition, implementation, enforcement of environmental law, as well as the perceived main challenges.

### 4.1 Albania

A few general findings on the knowledge gaps and capacity building needs emerged with the desk review and interviews with key stakeholders, and the replies to the Training Needs Assessment questionnaire. In total, seven (7) respondents from six (6) different institutions filled in the questionnaire.

Even though a number of projects and initiatives have already taken place, in consideration of the low priority granted to environmental crime in general, and the persistent lack of awareness of authorities as well as the general public, further training and repeated training for all actors in the compliance and enforcement chain should raise awareness on the nature of environmental crime, relevant causes, impact, and dynamics. It should also be noted that no system of training and in-service training on environmental issues of staff in sectoral ministries exists (UNECE, 2018, p.16).<sup>4</sup> UNECE report in fact recommends that: *“The Ministry of Tourism and Environment should establish a training system, including for in-service training, for staff in the Ministry and subordinated institutions to ensure regular and comprehensive coverage of environmental and sustainable development issues”* (UNECE, 2018, p.16). The majority of Albanian respondents to the questionnaire (5 out of 7) also indicated that they do not receive regular training on waste issues and four (4) did not find the training received adequate to effectively detect and regulate waste crime.

With regards to environmental inspectors, following the introduction of a risk-analysis-based approach to inspection planning, guidance materials and training is needed (UNECE, 2018, p. 4). In particular, the sessions should cover the operational steps needed for inspection planning, effective cooperation between environmental inspectors and other supervisory authorities, and on how to improve reporting procedures and the evaluation mechanism of work of the State Environmental Inspectorate (SIEF) (EC, 2014, p.57).<sup>5</sup> Furthermore, a specific session should be devoted to security measures and soft procedures to be adopted during inspections (Interview 3).

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<sup>4</sup> UNECE (2018), “Environmental Performance Reviews Albania. Third Review Synopsis”, [https://www.unece.org/fileadmin/DAM/env/epr/epr\\_studies/Synopsis/Albania\\_ECE.CEP.183\\_Synopsis.pdf](https://www.unece.org/fileadmin/DAM/env/epr/epr_studies/Synopsis/Albania_ECE.CEP.183_Synopsis.pdf)

<sup>5</sup> EC (2014), “2014 Progress Report on Albania”, October, [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/key\\_documents/2014/20141008-albania-progress-report\\_en.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/key_documents/2014/20141008-albania-progress-report_en.pdf)

Another topic, which was highlighted during the interviews and the desk review, has been the importance of coordination and cooperation among different ministries, and state agencies on biodiversity and environmental protection issues (GIZ, 2017, p.27,<sup>6</sup> and Interviews 1 and 3).

Currently, police officers are not specifically trained to deal with the investigation of environmental crime (Interview 2 and TNA questionnaire), especially in the Prosecution Offices of the districts, while prosecutors and judges have limited knowledge on environmental law and experience on environmental related cases (Interview 2). Training for police and prosecutors should thus focus on how to conduct investigations on environmental crime, with concrete steps to be followed to collect proper evidence to be presented to the prosecutor and the judge (Interview 2, 3 and TNA questionnaire). Case studies on prosecution of nature and waste crime carried out in Europe would also be very helpful for capacity building of prosecutors and judges (Interviews 2 and 3).

Prosecutors and law enforcement officers would also require training on how to prove the causal connection between the crime such as pollution of air, pollution of water or destroying the woods, and the severe consequences caused to the health or life of people (paragraph 2 of Articles 201 and 203, and paragraph 3 of Article 206/a). Another topic for prosecutors how to quantify the economic damage caused by the pollution to the environment, such as air and water, in order to implement the polluter-pay principle and request payment of damages (Interview 2).

On waste crime in particular, as Albania is at an early stage of alignment with the *acquis* waste, further development of capacities at both central and local level government on the waste international and national legislation and policies is required (EC IPAll, 2018, p. 33).<sup>7</sup> Also, further training would be required on the Basel Convention from an operational point of view, i.e. how to conduct investigations for law enforcement and inspectors and prosecutors (Interview 3). Just three out seven respondents to the questionnaire affirmed to be familiar to the waste crime sector. According to five respondents to the questionnaire, most common waste crime types they are confronted with in their daily work are Illegal landfilling, fly tipping, illegal disposal, illegal burning, tax avoidance.

In this sector, respondents to the questionnaire highlighted that they would need further training on:

- International Waste Management Regulation and Legislation (e.g. Basel Convention, EU Waste Framework Directive);
- Understanding the types and definitions of waste, root causes and environmental and health impacts of waste management and waste crime;
- Understanding waste producer responsibility, waste processors responsibility, waste duty of care responsibility;
- Understanding the different types of waste crime (e.g. mis-description of waste, illegal export, etc.);
- Waste crime indicators;

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<sup>6</sup> GIZ (2017), "National Assessment of Biodiversity Information Management and Reporting Baseline For Albania", May, [https://balkangreenenergynews.com/wp-content/uploads/2017/08/Albania-Assessment\\_ENG.pdf](https://balkangreenenergynews.com/wp-content/uploads/2017/08/Albania-Assessment_ENG.pdf)

<sup>7</sup> EC IPA II (2018), "Revised Indicative Strategy Paper For Albania (2014-2020) Adopted On 3 August 2018", <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20180817-revised-indicative-strategy-paper-2014-2020-for-albania.pdf>



- Methods and procedures to identify and disrupt waste crime;
- Intelligence gathering and sharing in waste crime matters;
- Waste crime risk assessments;
- Serious and organised waste crime.

Respondents indicated that the current training provided could be improved by better focussing on problem areas and be more operational; better use of technology. Case studies, role simulations, practical toolkits, use of practical toolkits/applications are among the most preferred cited methods of training.

With regards to nature crime, continuing building capacities of CITES authorities on EU Regulations and priorities relating to legal and sustainable trade in wild fauna and flora is needed. Training for staff of Ministry of Tourism and Environment (MoTE) is necessary, including management authorities of protected areas, in biodiversity data analysis and processing (GIZ, 2017, p.29). But also training on how to conduct investigations for law enforcement and inspectors and prosecutors on CITES (Interview 3). Five out of seven respondents to the questionnaire affirmed to be quite knowledgeable in nature issues, but with a low level of direct involvement or practical experience in preventing or sanctioning wildlife crime. The majority was not aware of the frequency of the occurrence of smuggling of wildlife across or between check points, or how many wildlife crime cases their institution deals on an annual basis (5 out of 7).

A number of priorities have been highlighted by the TNA questionnaire respondents to improve enforcement for improving national legislation to ensure more effective enforcement:

- Training enforcement authorities, prosecutors and judges on wildlife crime;
- Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (e.g. equipment and facilities to house and care for confiscated wildlife);
- Structural reorganisation of enforcement bodies (e.g. establishment of a wildlife crime police units) to effectively combat wildlife crime.

With respect to nature crime, the following have been the areas suggested by questionnaire respondents:

- CITES implementation;
- Bird and Habitat implementation;
- Wildlife identification;
- Wildlife smuggling methods;
- How to conduct physical controls of wildlife and timber shipments;
- Investigations on wildlife and timber crimes;
- Prosecuting and sanctioning wildlife and timber crimes.

## 4.2 Bosnia and Herzegovina

Some findings on the knowledge gaps and capacity building needs Bosnia and Herzegovina have emerged during the desk review and the interviews undertaken for the preparation of the Baseline Study. These findings have been

complemented by the data collected with the Training Needs Assessment Questionnaire. Six (6) respondents from four (4) different institutions filled in the questionnaire.

In general terms, awareness and prioritisation of the issue requires additional training on environmental crime in general, its dynamics, root causes and damages and the risks of such crimes, and most frequent modalities (Interview 10 and TNA questionnaire). Also, specialised training is required on the procedures to be followed to collect proper evidence and to preserve the chain of control of the evidence. Customs authorities would also benefit from further capacity building on how to detect wildlife and nature crime (Interview 10). Prosecutors are also currently not receiving specialised training on these topics (Interview 7).

On waste issues, according to the information gathered during the desk review and the interviews there is a need to build capacity in most areas affecting waste management in each of the entities and in the Brčko District. In particular, training management of hazardous wastes is problematic. Neither FB&H nor Republika Srpska have suitable plans in place for managing hazardous materials. Training on the Waste Framework Directive and Waste Shipment Regulation would also enhance the implementation on transboundary control of shipments. None of the respondents from Bosnia and Herzegovina to the questionnaire declared to be familiar with waste crime issues. Training on waste crime issues is not regularly provided.

The following areas have been highlighted for further training:

- Understanding the causes of waste crime (e.g. mis-description of waste, illegal export);
- Definition of Hazardous waste and of waste disposal and recovery;
- International Waste Management Regulation and Legislation (e.g. Basel Convention, EU Waste Framework Directive);
- Environmental and Health impacts of waste management and waste crime;
- Waste crime detection and disruption methods;
- Waste crime indicators;
- Intelligence gathering and sharing;
- Serious and Organised Waste Crime;
- Waste crime risk assessments.

In addition, awareness on transnational crime should also be increased among enforcement chain actors, along with training on investigations on transnational crime (intelligence collection and analysis).

To improve effectiveness of capacity building activities, it was highlighted that the training should be better focussed on problem areas and be more operational, with a better use of technology. The following training methods were indicated as most appropriate: lecture; group discussion; case studies; video presentation; role simulations.

Regards nature crime issues, Bosnia and Herzegovina still has a number of obstacles to overcome in order to enable enforcement of wildlife conservation related conventions, namely CITES and Bern Convention. The first national act in Bosnia and Herzegovina intended for CITES implementation was adopted in May of 2018, entering into force six months after the adoption date. Being of recent date, there are no indicators available in order to

evaluate the level of enforcement of its provisions, but it can be concluded that it is in the initial phase.<sup>8</sup> Furthermore, Bosnia and Herzegovina has to make sure that the provisions of the relevant EU nature protection and timber related acts are transpose in its national legislation aligned, namely the Environmental Crime, Birds and Habitat Directives, and to ensure harmonization with the EU WTR and EU TR.

Four out of six respondents to the questionnaire declared to be familiar with (but with limited knowledge on) the topic of nature crime, and with little or no direct involvement or practical experience in preventing and detecting wildlife crime. Cooperation among different authorities on nature crime issues is rated as poor by all (6) respondents.

Despite the current lack of all the necessary legal instruments necessary for full functional enforcement, certain activities have already taken place in terms of raising the capacities relevant for combatting wildlife crime. An EU funded project “Contribution to implementation of CITES Convention in Bosnia and Herzegovina” EuropeAid/137-042/DD/ACT/BA, conducted from August of 2016 until September of 2018, involved a number of relevant government agencies. The project activities focused on raising the capacities for CITES implementation and preventing illegal wildlife trade, through legislative gap analysis for CITES, development of a guidebook for regulating wildlife trade and most importantly the delivery of trainings to enforcement officers, prosecutors and judges, and other stakeholders. More than 70 customs and state border police officers, veterinary inspectors, judges and prosecutors received basic training on CITES and wildlife crime related issues through this project.<sup>9</sup> The continuation of operational training activities on wildlife crime is for police, customs, prosecutors and judges is recommended. Training sessions should also be dedicated to issues related to monitoring of the status of NATURA network and the implementation of mechanisms of protection and preservation of integrity of ecological network (e.g. appropriate assessment). Training on the EUTR Regulation and on the prevention of illegal cross-border activities in the field of forestry, and cooperation with customs and border service would be necessary too. Training at improving technical capacities in biodiversity data management is also among priorities to be addressed (GIZ, 2017, p.17).

Finally, training for all actors in the compliance and enforcement chain should also cover the importance of collaboration among different actors involved in the inspection, detection and investigation on crimes against the environment, as actors seem to act in isolation and not be used to share information.

A number of priorities were highlighted by TNA respondents for a more effective action against nature crime, including:

- Improving national legislation to ensure more effective enforcement;
- Training enforcement authorities, prosecutors and judges on wildlife crime;
- Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (e.g. equipment and facilities to house and care for confiscated wildlife);

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<sup>8</sup> For further information see: <https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-69-04.pdf> and <http://www.sluzbenilist.ba/page/akt/nQBBfp1J1ow=>

<sup>9</sup> See Final report draft: “Contribution to implementation of CITES Convention in Bosnia and Herzegovina”, EuropeAid/137-042/DD/ACT/BA

- Structural reorganisation of enforcement bodies (establishment of a wildlife crime police units) to effectively combat wildlife crime.

### 4.3 Kosovo\*

Few findings on the knowledge gaps and capacity building needs emerged from the desk review and interviews with key stakeholders. These findings have been complemented by answers provided to the TNA questionnaire by twelve (12) respondents from four (4) different institutions from Kosovo\*.

Special training on environmental issues has been facilitated through EU programmes that have financed networks that temporarily have benefitted human resources. However, this aid has had a limited impact over time (EFFACE, 2015, p.2).<sup>10</sup> Training on the implementation of EU Regulations and laws related to nature crimes in general was raised by different respondents (Interview 9, 11, 12 and TNA questionnaire).

According to the interviews carried out, little training was provided to Environmental Inspectors on waste crime issues (Interview 10), or to any other actors in the compliance and enforcement chain. More information should be provided on illegal transboundary waste shipments, particularly to customs officials, enabling them to identify illegal waste.

Some training was provided on wildlife crime and on the CITES convention (Interview 13 and TNA questionnaire), but law enforcement authorities need for more information on CITES. Further capacity building for all stakeholders is required (ECRAN 2015, p. 12<sup>11</sup> and Interview 10). In particular, capacities of CITES units and that of enforcement agencies should be enhanced on illegal wildlife trade (Interview 13 and TNA questionnaire).

However, because Kosovo\* is not a UN member, the implementation of MEAs (CITES, as well as Basel) and enforcement of provisions with respect to international wildlife trade is not possible, presenting a serious obstacle for combating environmental crime.

Operational training on how to detect and investigate waste and nature crime would be extremely important. The Kosovo Police would benefit from specific capacity building on how to start criminal investigations regarding environmental crimes (Interview 13). As for prosecutors and judiciary, awareness should be raised on how to distinguish minor environmental offences from more serious environmental crimes (Interview 10).

Finally, training should also include how to enhance cooperation and coordination between relevant environmental authorities and institutions in the implementation of EU legislation in cases of criminal offences against environment (inspection services, customs, police, etc.).

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<sup>10</sup> EFFACE (2015), "The EU's Promotion of Environmental Protection In Kosovo: A Case Study On The Protection Of The Environment Through Criminal Law In Kosovo Policy Brief 6: Policy implications for the EU", ed. Fajardo del Castillo T., <https://efface.eu/sites/default/files/publications/PB%206%20Case%20Study%20Policy%20Brief%20-%20Kosovo%20-%20UniGr.pdf>

<sup>11</sup> ECRAN (2015), "Report on Regional Workshop on Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)", 2-4 June 2015, Podgorica, [http://www.ecranetwork.org/Files/Report\\_CITES\\_Workshop\\_June\\_2015\\_Podgorica.pdf](http://www.ecranetwork.org/Files/Report_CITES_Workshop_June_2015_Podgorica.pdf)

These general findings have been confirmed by the information collected through the TNA questionnaire. With regards to nature crime, all respondents from Kosovo\* to the TNA questionnaire (12) affirmed to be familiar with wildlife and timber issues: one person declared to have a detail knowledge of this sector (the rest just basic knowledge). Just two respondents were able to provide an answer on the frequency of wildlife trade across or between check points. Just one respondent work has practical experience and is regularly involved in preventing and sanctioning smuggling of wildlife or timber, while five (5) have occasional or low level of direct involvement.

Some training has been provided in Kosovo\* on nature crime, but respondents to the TNA questionnaire highlighted the following areas as for further capacity building:

- CITES implementation;
- Physical control of wildlife and timber shipments;
- Wildlife smuggling methods;
- Wildlife smuggling, Investigations.

Among the priorities indicated regarding nature crime in Kosovo\*, respondents to the questionnaire have highlighted the following:

- Improving national legislation to ensure more effective enforcement;
- Training enforcement authorities, prosecutors and judges on wildlife crime;
- Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (ex. equipment and facilities to house and care for confiscated wildlife);
- Structural reorganisation of enforcement bodies (establishment of a wildlife crime police units) to effectively combat wildlife crime.

With regards to waste crime, half (6 out of 12) of the respondents from Kosovo\* indicated that they are familiar with this sector. The type of waste crime they are most involved in are: illegal landfilling; illegal disposal; illegal recovery (e.g. waste recycling); illegal burning; illegal export of waste; and tax avoidance. Just one person has received a specific training on investigating waste crime and evidence gathering.

A number of areas were suggested for further training:

- International Waste Management Regulation and Legislation (e.g. Basel Convention, EU Waste Framework Directive);
- Waste producer responsibility, Waste processors responsibility, Waste duty of care responsibility;
- Understanding the types and definitions of waste crime;
- Understanding the causes of waste crime (e.g. mis-description of waste, illegal export);
- Environmental and health impacts of waste management and waste crime;
- Identifying high risk waste crime e.g. high financial rewards, high environmental impact;
- Waste crime detection and disruption methods;
- Waste crime indicators;
- Waste crime risk assessments.

In addition, respondents indicated that the training should: be better focussed on problem areas; make a better use of technology; have better trainers; and be more operational. Or that they did not receive any training on waste crime.

#### 4.4 The Republic of North Macedonia

Findings are based on the desk research, interviews and replies to the TNA questionnaire. In total, nine (9) respondents from five (5) different institutions have completed the online questionnaire.

Current identified gaps in the implementation of Criminal Code were addressed during the interviews, as for instance as: inadequate institutional setup for suppression; low awareness among certain competent entities; inadequate system of statistical data processing; and limited social action. The research found that such challenges in implementation of Criminal Code are mainly related to several issues: quality of criminal charges, individuality of cases, complex detection procedures, necessary situational expertise and engaging expert witnesses, capacity building of customs, police, prosecutors, judges (Interview 17).

Substantial institutional re-organisation, additional human resources and relevant capacity building is required in order to implement the National Waste Management Strategy. The institutional capacities for the approximation of environmental legislation are rather low to be able to implement the legislative, institutional and organisational measures, as well as financial resources and public awareness as required. Also, there is the need to develop and implement monitoring, supervision and enforcement mechanisms regarding waste generators and waste management infrastructures at national and local level (municipal waste management in disposal facilities, industry, other waste generators).

The Ministry's tasks of monitoring/inspecting/enforcement the waste management operations and nature protection require the strengthening of the human and technical capacities of the inspectorate (Strategy on Waste Management, pp. 62-64).

Major impediments for the implementation of legislation on nature protection have also been highlighted, namely: lack of financial resources; low prioritisation of biodiversity conservation; lack of capacity in the Ministry of Environment and Physical Planning; insufficient co-ordination and cooperation between the departments in the Ministry, as well as with other relevant ministries; non-compliance with the legislation (illegal fishing, illegal logging, etc.); and slow procedures for proclamation of new protected areas (National Biodiversity Strategy, p.85).<sup>12</sup>

General trainings are not frequent. For example, the staff of the Ministry of Environment and Physical Planning participated to only two general trainings in 2018. The Ministry's staff is encouraged to use distance learning and electronic training, but no information is available on the numbers of staff who have undertaken such trainings. The system for regular training of staff of the Ministry of Environment and Physical Planning is in place, but it does not function properly (Draft UNECE EPR, pp. 40-41).

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<sup>12</sup> Ministry of Environment and Physical Planning of Macedonia (2018), "National Biodiversity Strategy (NBS) and Action Plan for the period 2018–2023," <https://www.cbd.int/doc/world/mk/mk-nbsap-v2-en.pdf>

With regards to the reasons for gaps in the implementation of transboundary waste movement regulations, one main problem is the lack of experience of customs officials on the border controls in these fields (operating procedures, detection and investigations). In addition, lack of capacities in the Ministry and the lack of laboratory for waste testing amplify the problem (Interview 15).

Based on TNA responds the following areas have been highlighted for further training:

- International Waste Management Regulation and Legislation (e.g. Basel Convention, EU Waste Framework Directive);
- Types and definitions of waste crimes;
- Understanding the causes of waste crime (e.g. mis-description of waste, illegal export);
- Definition of Hazardous waste and of waste disposal and recovery;
- Waste producer responsibility, Waste processors responsibility, Waste duty of care responsibility;
- Waste crime detection and disruption methods;
- Waste crime indicators;
- Intelligence gathering and sharing;
- Serious and organised waste crime;
- Waste crime risk assessments;
- Environmental and Health impacts of waste management and waste crime;
- International waste management vulnerability.

The implementation of CITES is also faced by a number of challenges, such as: the lack of technical specialized organizational units for different aspects of nature protection on the national level is a problem, as well as the general lack of administrative, technical and institutional capacities (Interview 16).

A number of priorities have been highlighted by the TNA questionnaire respondents to improve enforcement for improving national legislation to ensure more effective enforcement:

- Improving national legislation to ensure more effective enforcement;
- Training enforcement authorities, prosecutors and judges on wildlife crime;
- Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (e.g. equipment and facilities to house and care for confiscated wildlife);
- Structural reorganisation of enforcement bodies (e.g. establishment of a wildlife crime police units) to effectively combat wildlife crime.

With respect to nature crime, the following have been the areas suggested by questionnaire respondents:

- CITES implementation;
- Wildlife identification;
- Physical control of wildlife and timber shipments;
- Wildlife smuggling methods;
- Wildlife smuggling methods;
- Investigations on wildlife and timber crimes;
- Prosecuting and sanctioning wildlife and timber crimes.



Training needs with regard to transnational crime are related to:

- Check point anti-smuggling;
- Police control and investigation;
- Transnational Crime Awareness.

Case studies, role simulations, practical toolkits, on-the job training etc. are among the most preferred cited methods of training by TN questionnaire participants.

An annual training programme outlines the needs for general and specialised trainings in the MEP, which is unfortunately poorly financed and has no resources for specialised training. Specialised training courses on environmental issues are entirely project-based. There is no system of training and professional development on environmental issues for staff in sectorial ministries, nor for prosecutors and judges (Interview 14).

Cooperation with customs is generally good, but there is need for establishing National Environmental Security Task Force comprising the representatives of environmental inspection, police, customs, prosecutors, judges, and Misdemeanour Commission. Customs regularly cooperate with the Southeast European Law Enforcement Centre and with Interpol, Europol, by taking part in operations related to crimes against the environment, including illegal cross-border movements of hazardous waste and chemicals (Interview 14). Improvement of the knowledge and skills of the customs officers with regards to conducting customs investigations, and selective controls based on risk analysis and risk assessment efficiency of the special customs units, at the borders, but also the inland territory is high priority (Strategic Plan of the Customs Administration of the Republic of Macedonia 2018-2020, pp.6-8).

Specifically, the following areas are very important:

- Enhancing full alignment with Environmental Crime Directive through the implementation of the Criminal Code;
- Establishment of National Environmental Security Task Force for effective cooperation and coordination between environmental inspection, police, customs, prosecutors, judges, Misdemeanour Commission (preparation of Strategy for dealing with environmental crime), adopting an operational Action plan; adopting Sectorial Operational Manuals including procedures and institutions involved);
- Full alignment with the Waste Framework Directive and Shipment Regulation through strengthening capacities for its implementation (establishment of laboratories for waste testing), development of EPR schemes and technical capacities for environmental sound management on the territory of NMK (especially landfills and hot spots);
- Strengthening the capacities of CITES implementation and enforcement (administrative, technical and institutional) on illegal wildlife trade, especially birds;
- Full alignment with Habitat and Bird Directive (designating and managing future Natura 2000 sites, monitoring the status of habitat types and species, establishment of ecological network and appropriate assessment etc.);
- Initiate transposition and implementation of EUTR Regulation and development an institutional framework for combating with illegal trade.

In order to improve implementation of Environmental Crime Directive and relevant EU *acquis* in the field of waste and nature the following activities should be taken (Interview 14, 15, 16, 17. and 18):

- Need to develop guidance on the control of illegal traffic of hazardous waste and chemicals, as well as guidance on illegal traffic of endangered species;
- Enhancing the cooperation between inspection, customs, police, prosecutors and judges (development of memorandum on cooperation and coordination of enforcement activities, joint operations, joint trainings);
- Exchange of experiences and good practices in the region on environmental crime cases and establish training programmes (CITES, waste), for inspectors, police, prosecutors and judges;
- Need to develop Manual in the field of waste and wildlife prosecution and organisation of trainings for prosecutors;
- Need to develop Manual in the field of waste and wildlife criminal crime and organising trainings for judges for raising awareness and proper recognition of the environmental crime and the manner of categorization of different cases;
- Training in the field of forensic science in the environment;
- Standard operation procedures/manuals in the field of environmental crime.

#### 4.5 Montenegro

Some specific findings on the knowledge gaps and capacity building needs in Montenegro emerged from the desk review and interviews with key stakeholders. These findings have been complemented by answers provided to the TNA. In total, eight (8) respondents from six (6) different institutions in Montenegro have completed the online questionnaire.

The EC 2018 Progress Report underlined that Montenegro should focus in particular on environment and climate change. Strengthening the administrative capacity for ensuring the application of the *acquis* remains a substantial challenge for Montenegro (EC 2018f, p. 75).<sup>13</sup> In accordance with the Plan of Institutional Adjustment and Strengthening of Administrative Capacities for Environment and Climate Change Sectors in Montenegro for the period 2017-2020 (PIAC)<sup>14</sup> necessary steps should be taken in order to prepare for the effective implementation and enforcement of EU *acquis*, especially horizontal legislation, notably with respect to environmental crime, waste management and nature protection.

Generally, in Montenegro there is insufficient administrative capacity for management of all environmental aspects (number of employees in the ministry competent for environmental protection, as well as in other competent authorities at regional and local level). In addition, there is insufficient organisation, poor coordination and poor communication between institutions. In this regard there is need for further strengthening its capacity building and training of human resources at all levels of implementation and enforcement of legislation in line with National

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<sup>13</sup> EC (2018f), "Montenegro 2018 Report," <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20180417-montenegro-report.pdf>

<sup>14</sup> Plan of Institutional Adjustment and Strengthening of Administrative Capacities for Environment and Climate Change Sectors in Montenegro for the Period 2017-2020 has been adopted in June 2017. <http://www.mrt.gov.me/en/library/document>

Strategy and its related Action Plan for the transposition and implementation and enforcement of the EU *acquis* on environment and climate change.

Three mechanisms of capacity building have been identified: professional advanced training in accordance with the Programme of professional advanced training of state officials and employees (hereinafter: Program); TAIEX - technical assistance and IPA II. This Program particularly is based on the strengthening of administrative capacities of state administration focused on EU integration, improvement of practical knowledge and understanding of EU legal system through courses and trainings established in Program modules of Human Resources Administration. TAIEX is a key instrument of technical assistance and information exchange, especially in the field of practical implementation and enforcement of EU related legislation, which should be used in Montenegro in accordance with the obligations established in the Program of Accession of Montenegro (2017-2018) and in the Strategy with AP. With relevance to wildlife crime, a four day TAIEX expert mission on capacity building of CITES Management Authority was conducted in December of 2017, with the expert from the Portuguese CITES Management Authority assessing and assisting the Montenegro Environmental Protection Agency in enforcing CITES provisions and providing guidance on the required capacity, procedures and practice in order to regulate international and internal trade, as well as the possession of protected species and other wildlife.<sup>15</sup> Future TAIEX training activities should focus on additional training of administration for inspection affairs, predominantly on Environmental Inspection, which the weakest link in the overall system. Another relevant capacity building activity for combatting wildlife crime was conducted in February of 2019 for 20 police officers, with emphasis on illegal killing of birds, organized by an environmental NGO in cooperation with competent wildlife enforcement from Croatia.<sup>16</sup>

It is also envisaged to plan courses, trainings, study visits and mentorship financed from IPA II. Annual Training Program will be adopted for each of three mechanisms of capacity building (PIAC, pp. 63-64).

Training of police should be more frequent and planned, especially border police. A guide is needed for the identification, control and undertaking of investigative actions containing information on the type of goods being controlled (waste, affected wild flora and fauna), practical experience of detection, determining what is a counterfeit, in particular identification of waste and wild species protected by international and national regulations. In pre-criminal proceedings, it is very important to obtain evidence in a lawful manner. Good fieldwork is needed (Interview 21).

Based on TNA respondents, the following areas have been highlighted for further training:

- Definition of waste;
- International Waste Management Regulation and Legislation (e.g. Basel Convention, EU Waste Framework Directive);
- Types and definitions of waste crimes;
- Understanding the causes of waste crime (e.g. mis-description of waste, illegal export);
- Definition of Hazardous waste and of waste disposal and recovery;

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<sup>15</sup> Expert report: TAIEX expert mission on capacity building of CITES Management Authority - ID: 64976.

<sup>16</sup> <https://www.bokanews.me/featured/radionica-zajedno-protiv-krivolova/>  
<http://www.czip.me/aktuelno/652-odrzana-radionica-zajedno-protiv-krivolova-u-budvi-i-podgorici>

- Waste producer responsibility, Waste processors responsibility, Waste duty of care responsibility;
- Serious and Organised Waste Crime;
- Waste crime detection and disruption methods;
- Waste crime indicators;
- Processes to help identify and disrupt waste crime;
- Identifying high risk crime.

Respondents to the TNA questionnaire also highlighted the following areas as for further capacity building:

- CITES implementation;
- Physical control of wildlife and timber shipments;
- Wildlife smuggling methods;
- Wildlife investigations;
- Wildlife prosecuting;
- Wildlife sanctioning.

Among the priorities indicated regarding nature crime in Montenegro, respondents to the questionnaire have indicated the following areas:

- Improving national legislation to ensure more effective enforcement;
- Training enforcement authorities, prosecutors and judges on wildlife crime;
- Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (ex. equipment and facilities to house and care for confiscated wildlife);
- Structural reorganisation of enforcement bodies (establishment of a wildlife crime police units) to effectively combat wildlife crime.

Training needs with regard to transnational crime are related to:

- Transnational investigation;
- Check Point Anti-smuggling;
- Transnational Crime Intelligence Collection and Analyses;
- Police control and investigation;

Preferable training formats are workshop-style and web-based courses. Lectures, case studies, role simulations, practical toolkits, on-the job training etc. are among the most preferred cited methods of training.

In the field of *environmental crime*, it is of high importance to build capacity of the authorities in justice sector. According to PIAC in the criminal law protection of the environment special attention should be paid to raise the level of knowledge (awareness) of all stakeholders. Judges should be trained in order to strengthen capacity of administrative judiciary through training and workshops of the representatives of all institutions responsible for these issues (justice, environmental protection, prosecution, courts (NPAA, pp.16-17). Judges and prosecutors are not specialized in environmental disputes. Proof of the court is very difficult problem, and in particular the dimensioning of the being of the crime. It all comes down to the opinion of the expert. A specialised department with specific knowledge is needed (Interview 23).

Generally, the following areas are considered very important:

- Strengthening the implementation of Environmental Crime Directive through capacity building programmes as well as building mechanisms for coordination and communication between relevant institutions (Ministry, NEPA, inspection, prosecution and judges);
- Full Alignment with Waste Framework Directive and Shipment Regulation through capacity building programs for implementation on transboundary control of shipments and environmental sound management on the territory of Montenegro;
- Full alignment with Habitat, Birds and CITES units in NEPA in: establishment of Natura 2000 network (using planned technical assistance within IPA), in the monitoring of the status of NATURA network and the implementation of mechanisms of protection and preservation of integrity of ecological network (e.g. appropriate assessment); upgrade of capacities in the fight against the illegal trade of wild species; Full alignment with EUTR Regulation and development of institutional framework, especially for the prevention of illegal cross-border activities in the field of forestry and coordination of border services.

In the course of preparation of the Strategy with the AP in terms of institutional organization, competences and available capacities for an efficient transposition and implementation of the EU *acquis* in the area of horizontal legislation, waste management and nature protection the following priority training areas have been identified and will cover all relevant institutions on national and local level (PIAC, pp. 64-68).

In order to improve enforcement of *Environmental Crime Directive, Habitat and Bird Directive and EUTR Regulation* the following key activities have been planned for the period 2017-2020:

#### **Horizontal Legislation**

- Development of Manual on the implementation of Criminal Code;
- Training of judges with the aim of capacity building of administrative justice in conducting environmental crime cases (the creation of a specific questionnaire on environmental crime to be addressed to judges was suggested– Interview 27);
- Building of capacities of competent inspection services in the field of environmental crime;
- Building of capacities of Ecological Inspection and other competent state bodies, as well as police, customs and prosecutors in prevention, identification, investigation and processing in cases of environmental crime through organizing separate and joint trainings, especially on border control (Interview 23).

#### **Waste Management**

- Development of Manual for implementation of EU Shipment Regulation, as well as the guidance on distinction between what is waste and non-waste and guidelines how to determine and calculate financial guaranties, insurance and bonds for transboundary movement of hazardous wastes (Interview 28);
- Building of capacities of the Ministry, NEPA and Environmental inspection through training programs for the implementation of transboundary movement of hazardous waste and their disposal, as well as prevention and supervision of illegal acts in the field of waste management;

- Building of capacities of Ecological Inspection for the supervision of waste management on the territory of Montenegro.

### **Nature Protection**

- Development of Handbook on CITES for inspection, customs, police, prosecutors and judges; Strengthening the capacity of all bodies to implement the CITES Convention, transferring the practical experience of EU countries in the implementation of CITES, examples of the EU countries on the adoption of national relevant legislation, issuing permits, introducing with the work of the centres in the region for the accommodation and rehabilitation of confiscated endangered species of animals;
- Building of capacities of Ecological Inspection in implementation of inspection supervision in the area of protected natural resources, and areas of NATURA 2000;
- Building of capacities of Ecological Inspection in execution of inspection supervision of trade in protected and unprotected wild plant and animal species and fungi;
- Development of handbook on protected species is needed, especially on wood trade (pay attention to the country from which it comes), which would be intended for all customs authorities, inspections, police and prosecutors (Interview 24);
- Building of capacities of Inspection for Forestry, Hunting and Plant Protection in execution of supervision of use and trade in protected wild hunting game specie PAC.

Finally, full alignment of EU legislation depends on continuously building of administrative capacities of employees in all relevant institutions and levels i.e. in good quality transposition of EU requirements and in implementation of legislation related to Ecological crime, waste and nature protection.

## **4.6 Serbia**

This section summarises the specific findings on the knowledge gaps and capacity building needs in Serbia emerged from the desk review and interviews with key stakeholders. These findings have been complemented by answers provided to the TNA questionnaire. In total, fourteen (14) respondents from eight (8) different institutions in Serbia completed the online questionnaire.

Serbia has been implementing the relevant multilateral environmental agreements for a number of years, and despite this experience, a number of issues still impede the effective suppression of wildlife and waste crime in Serbia. Some of these obstacles range from the general low priority level given to environmental crime in some crucial government agencies and institutions, to legal gaps as there is partial transposition or absence of some elements of certain environmental criminal offences in the Criminal Code. There are even cases where operational and technical difficulties related to wildlife and waste crime cases can pose problems for enforcement (ex. lack of infrastructure, human and material resources to properly dispose of hazardous waste or confiscated live specimens of wildlife).

A detailed assessment of the institutional and administrative capacities needed for implementation, monitoring of compliance and enforcement of transposed legal acts relevant for wildlife and waste crime has not been established yet. What is critical is the establishment of the implementation capacity. For that purpose, the Action

Plan for Administrative Capacities Development is under development within IPA 2014 project on Further Implementation of Environmental Approximation Strategy.<sup>17</sup>

In terms of effective suppression and sanctioning of environmental crime, Serbia has problems that relate to the lack of capacities within environmental inspectorates, police, customs and the judicial authorities. Even though cooperation between authorities exists, it is often not supported by simplified protocols, but on the contrary, it is often burdened by bureaucratic formal procedures which adversely affect the response time to wildlife and waste crime. Another challenge is the judges' lack of knowledge of environmental law and experience on when dealing with environmental crime cases, resulting in sentences not proportionate to the seriousness of the crime, or even in absolution, in some instances. In both wildlife and waste crime cases, both prosecutors and judges sometimes have problems in defining whether a particular offence falls under the circumstances of the criminal sanction or an administrative offence, as for some illegal activities an offence can be classified as either of the two. In specific cases, judges find it challenging to identify the link between the offence and the severity of its consequences. At the same time, environmental inspectors do not have the competence to conducting investigations and thus face difficulties in gathering evidence and providing information to support prosecution. On the other hand, criminal investigation police do not have the necessary knowledge and/or experience of the specific subject that they are tasked with investigating, both in the case of wildlife and waste crime. Sometimes, actions carried out by environmental inspectors are not accepted as legally valid proof in court cases. The requirement to use certified organisations for this purpose has its limits, since there are no accredited laboratories for certain analytic areas.

With relation to prosecuting waste crime, the following problems were identified: difficult arrival to the site; determining the characteristics of the crime scene; contacting the owner of the property or the responsible person in order to determine their knowledge of hazardous materials; the content of the evidence collection plan; taking and storing samples and laboratory analysis of these samples; complex determination of a person who would be responsible for gathering on-the-spot evidence in the event of an incident; the lack of experts of the relevant profession; determination or proving evidence of damage as a consequence of any of the criminal acts that are damaged, destroyed or polluted the environment; difficulties in interpreting such evidence (Interview 34).

Based on TNA responds the following areas have been highlighted for further training:

- International Waste Management Regulation and Legislation (e.g. Basel Convention, EU Waste Framework Directive);
- Types and definitions of waste crimes;
- Recognizing the different types of waste crime (e.g. mis-description of waste, illegal export);
- Definition of Hazardous waste and of waste disposal and recovery;
- Waste crime detection and disruption methods;
- Waste crime indicators;
- Intelligence gathering and sharing;
- Serious and organised waste crime;

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<sup>17</sup> The purpose of the project is support for transposition, implementation and enforcement of *acquis* through further implementation of principles from Environmental Approximation Strategy. [http://eptisasee.com/wp-content/uploads/short\\_booklets/ehe-short-brochure-environment.pdf](http://eptisasee.com/wp-content/uploads/short_booklets/ehe-short-brochure-environment.pdf)



- Waste crime risk assessments;
- Environmental and Health impacts of waste management and waste crime.

There have been extensive trainings for enforcement authorities and other stakeholders in 2014 as a part of the Twinning Light Project SR/2012/IB/EN/01TWL “Strengthening the capacities of authorities responsible for cites and wildlife trade regulations enforcement in Serbia”, where more than 450 enforcement officers (customs, police, environmental inspectors), judges and prosecutors received specialized training on CITES and wildlife trafficking<sup>18</sup>. Furthermore, more than 700 customs and border police officers on wildlife smuggling prevention in 2018 as a part of the Program on Integrated Border Management, conducted jointly by customs, border police and the CITES Management Authority.<sup>19</sup> The CITES Management Authority and the Judicial Academy have initiated the capacity building of public prosecutors on wildlife crime issues in 2019, and at the time of writing of this report, four trainings have already been conducted for a total of 50 public prosecutors, with more training workshops planned in the oncoming period.<sup>20</sup> It should be noted that in 2019, on the request of the CITES Management Authority, 58 Public Prosecutor’s Offices in Serbia have designated on average two public prosecutors as contacts for wildlife crime related issues.

TNA responds indicated that trainings were organised on CITES implementation, wildlife and timber identification, physical control of wildlife and timber shipments and wildlife smuggling methods.

Trainings on wildlife crime, as well as other forms of capacity-building activities for enforcement authorities, prosecutors and judges are essential, and they need to be a part of a regular and continuous long term strategic process. This is one of the actions defined in the Biodiversity Strategy of the Republic of Serbia for the period of 2011-2018 in Section 4.7.1. Technical Capacity Building.<sup>21</sup>

Respondents to the TNA questionnaire highlighted the following areas for further capacity building:

- Physical control of wildlife and timber shipments;
- Wildlife smuggling methods;
- Wildlife investigations;
- Wildlife prosecuting;
- Wildlife sanctioning.

Among the priorities indicated regarding nature crime in Serbia, respondents to the questionnaire have highlighted the following:

- Training enforcement authorities, prosecutors and judges on wildlife crime;
- Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (ex. equipment and facilities to house and care for confiscated wildlife);

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<sup>18</sup> Twinning interim and final quarterly reports 1 and 2: Strengthening the capacities of authorities responsible for CITES and wildlife trade regulations enforcement in Serbia SR/2012/IB/EN/01TWL

<sup>19</sup> See <http://www.upravacarina.rs/lat/Stranice/Vest.aspx?ListItemID=2331>

<http://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/vlada/zakljucak/2017/39/1/reg>

<sup>20</sup> See <https://www.pars.rs/sr/tags/cites>

<sup>21</sup> See [http://www.rs.undp.org/content/serbia/en/home/library/environment\\_energy/biodiversity-strategy-of-the-re-public-of-serbia-for-the-period.html](http://www.rs.undp.org/content/serbia/en/home/library/environment_energy/biodiversity-strategy-of-the-re-public-of-serbia-for-the-period.html)



- Structural reorganisation of enforcement bodies (establishment of a wildlife crime police units) to effectively combat wildlife crime.

Training needs with regard to transnational crime are related to:

- Transnational investigation;
- Check Point Anti-smuggling;
- Transnational Crime Intelligence Collection and Analyses;
- Police control and investigation.

Preferable training formats are classroom training, workshop-style event which includes practical training where applicable. Case studies, role simulations, practical toolkits, on-the job training etc are among the most preferred cited methods of training.

There is a relatively large percentage of court decisions to suspend actions, which may point to the insufficient capacity of the courts to treat environmental cases and/or to courts overload. Some challenges remain: in gathering evidence and building cases for prosecution, unclear and lengthy procedures, a lack of effective communication, and limited individual capacity.

There is need to: (a) continuously provide joint training and other forms of capacity-building for enforcement and judicial authorities; (b) strengthen communication mechanisms between the enforcement and the judicial authorities; (c) receive feedback from the judiciary by the relevant authorities on all environmental crime cases brought before the courts, including those deemed inadmissible at a preliminary stage; and (d) to establish standard operating procedures and manuals on the enforcement of environmental laws (UNECE 2015b, pp. 56 - 58).<sup>22</sup>

Specifically, the following areas are very important:

- Full alignment with Environmental Crime Directive through the transposition and implementation of the Criminal Code of RS;
- Effective cooperation and coordination between relevant environmental authorities and institutions on implementation of EU legislation in cases of criminal offences against environment (inspection services, customs, police, NGOs etc.);
- Full alignment with the Waste Framework Directive and Shipment Regulation through strengthening capacities of customs, inspection and police focus to control transboundary shipment of hazardous waste and environmental sound management on the territory of Republic of Serbia;
- The capacities of CITES unit and that of enforcement agencies needs to be enhanced to keep up with the challenges of combatting illegal wildlife trade, especially birds;

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<sup>22</sup> UNECE (2015b), "Environmental Performance Reviews Serbia. Third Review. [http://www.unece.org/fileadmin/DAM/env/epr/epr\\_studies/ECE\\_CEP\\_174.pdf](http://www.unece.org/fileadmin/DAM/env/epr/epr_studies/ECE_CEP_174.pdf)

- The institutional framework for designating and managing future Natura 2000 sites needs to be upgraded and adequately resourced, adoption of new Nature Protection Strategy and Plan for implementation of EU Habitat and Birds Directive, finalization of the List for Annex I of Bird Directive and migratory species of birds.
- Full alignment with the EU WTR EUTR Regulation and development an institutional framework with clearly defined responsibilities for the implementation of the EUTR.

In order to improve implementation of Environmental Crime Directive and relevant EU *acquis* in the field of waste and nature the following activities have been planned for the period late 2018 - late 2020<sup>23</sup>:

- Capacity building for judicial authorities responsible for the implementation of environmental legislation (training programmes for representatives of the judicial system responsible for implementation of criminal law);
- Workshops on the experiences of member states regarding the establishment of special departments of courts dealing with environmental issues;
- Joint capacity building programmes and training for environmental and judicial authorities and institutions (preparation of draft procedure for cooperation between environmental protection inspectors and other relevant stakeholders in cases of criminal offences against environment taking into consideration provisions of the Criminal Code, training programmes and workshops).

The activities will be carried out by the Ministry of Environmental Protection, supported by the Ministry of Justice, the OSCE and the Judicial Academy. It is envisaged that the capacity building of the representatives of the judicial system will continue also after the implementation date.

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<sup>23</sup> NPAA (2018), p. 1146 and 1182, Posts Screening document (2015), p. 43.

## 5. Conclusions and Recommendations

According to the Tender Specifications, the Training Needs Assessment questionnaire was targeted to a minimum 36 respondents from a minimum of 18 different institutions from the six project beneficiaries. In total, 56 respondents filled in the questionnaire from 33 different institutions. Respondents belonged to different types of institutions: almost half (27 persons, 48.2%) works in Ministries or Government Agencies; ten (17%) in Environmental Inspectorates; six (10.7%) in public prosecution offices; 3 in the judiciary; 3 in scientific institutions; 2 in customs and 2 for criminal police. In addition, two more work for International Organisations and EC-funded projects.

Even with this limited number of respondents, and in combination with the findings of the Baseline Study, some general conclusions have been drawn, along with a number of recommendations concerning training needs and training methodology.

In summary:

- Although in all project beneficiaries training initiatives on different environmental crime issues have taken place, it is clear from the findings of the study as well as from the responses to the Training Needs Assessment that further training is needed (e.g. on the nature of environmental crime, causes, impact, dynamics, and most frequent modalities) to increase awareness among actors in the compliance and enforcement chain, and raise the priority of waste and nature crime.
- Training should be provided to all actors in the compliance and enforcement chain, as specific training needs by all stakeholders regards both waste and nature crime have clearly emerged from the analysis.
- Training should be provided both to personnel entering on duty, as well as to seasoned officials, and tailored according to their specific role and competences.
- Training on environmental crime in general, and on waste and nature crime in particular, should be conceived as part of a regular and continuous long-term strategic process, repeated over time for all staff, by institutions and agencies at policy level, as well as by those working at the operational level.
- Specific training sessions for practitioners, in addition to the theoretical framework, should be practically oriented, aimed at providing concrete know-how and skills to improve the effectiveness of their daily work. In particular, training on operational steps to be taken by the relevant institution on how to inspect, detect, investigate and prosecute crimes against the environment should be provided, along with appropriate guidelines, toolkits or operational manuals.
- Joint training sessions should also be organised to improve awareness on the need of inter-agency cooperation and to support overcoming barriers to the exchange of information among different institutions.
- The trainings topics and structure should be tailored to the needs of the target audience, the extent of coverage of each topic varying with respect to the target group. For this reason, a training needs assessment should be carried for training participants prior to the training session.
- Evaluation of training activities by both participants and trainers (through tests, surveys, self-assessment questionnaires, etc.) should always be envisaged in order to better monitor evolving training needs and impact of the capacity building initiatives.

- Capacity building initiatives targeted to law enforcement actors should focus in particular on: how to conduct criminal investigations; intelligence collection and analysis with respect to wildlife, timber and waste crime; how to collect proper evidence to be presented in court.
- As prosecutors usually deal with all forms of criminal cases, it is recommended- if allowed by the national legislation - that beneficiaries establish a network or identify group of public prosecutors, which will be specifically trained in wildlife crime issues in order to ensure more effective prosecution of wildlife and nature crimes.
- Training to prosecutors and judges should include case studies and lessons learnt from other countries in the region and at international level.
- Materials such as the training module on Biodiversity and Wildlife Trafficking, developed by the Academy of European Law (ERA) addressed to judicial training institutes, and national judges and prosecutors, could be used and adapted by beneficiaries, as required.<sup>24</sup>
- Materials such as those available in CITES Virtual College<sup>25</sup>, as well as other training materials as those from the [Master's course on Management, Access and Conservation of Species in Trade: the International Framework](#)<sup>26</sup> and other wildlife enforcement training modules could be translated in national languages and widely disseminated in order to be used in all beneficiaries.
- The training methodology that would be best suited for raising capacities for wildlife, timber and waste crime may vary for the target audience, but in all cases, it must include case studies and practical tools. Furthermore, the applied methodology should be that of a workshop-like activity, with practical on-the-job training elements conducted by trainers with extensive practical experience if possible.
- Offer of distance learning and electronic training should also be made available to allow for larger participation.

In terms of content, the Table 1 below provides a summary of the main areas in which further training would be needed per beneficiary.

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<sup>24</sup> See [http://www.era-comm.eu/Cooperation\\_national\\_judges\\_environmental\\_law/module\\_5/trainers\\_manual.pdf](http://www.era-comm.eu/Cooperation_national_judges_environmental_law/module_5/trainers_manual.pdf)

<sup>25</sup> See <https://cites.unia.es/index.php>

<sup>26</sup> See <https://cites.org/sites/default/files/notif/E-Notif-2015-043.pdf>

Table 1 - Summary of main topics to be covered by training initiatives per beneficiary

Albania	Bosnia and Herzegovina	Kosovo*	Republic of North Macedonia	Montenegro	Serbia
<b>Environmental crime - general issues</b>					
Nature of environmental crime, relevant causes, impact, and dynamics, and most frequent modalities	Nature of environmental crime, relevant causes, impact, and dynamics and most frequent modalities	Nature of environmental crime, relevant causes, impact, and dynamics, and most frequent modalities	Nature of environmental crime, relevant causes, impact, and dynamics, and most frequent modalities	Nature of environmental crime, relevant causes, impact, and dynamics, and most frequent modalities	Nature of environmental crime, relevant causes, impact, and dynamics, and most frequent modalities
How to conduct risk-analysis inspection planning	How to conduct investigations on transnational environmental crime (intelligence collection and analysis)	How to conduct risk-analysis inspection planning			
Operational steps needed for inspection planning, effective cooperation between environmental inspectors		Operational steps needed for inspection planning, effective cooperation between environmental inspectors			
How to improve reporting procedures and the evaluation mechanism of environmental inspectorates' work	Customs training on how to detect wildlife and nature crime at the borders		How to improve monitoring, inspections and enforcement of nature protection and environmental regulations by environmental inspectors	How to improve monitoring, inspections and enforcement by environmental inspectors	

Security measures and soft procedures to be adopted during inspections					
How to conduct investigations on environmental crime, & steps to be followed to collect proper evidence for the prosecutor	Procedures to be followed to collect proper evidence and to preserve the chain of control of the evidence	How to conduct investigations on environmental crime, & steps to be followed to collect proper evidence for the prosecutor			How to conduct investigations on environmental crime, & steps to be followed to collect proper evidence for the prosecutor
How to prove the causal connection between the eco-crime, and the health consequences			How to conduct forensic analysis in the area of environmental crime		
How to quantify the economic damage caused by the pollution to the environment					
Best practices in prosecution of environmental crime and international case studies on successful prosecutions	Best practices in prosecution of environmental crime and international case studies on successful prosecutions	How to conduct successful prosecution of environmental crimes and how to distinguish minor environmental offences from more serious environmental crimes	Best practices in prosecution of environmental crime and regional or international case studies on successful prosecutions		Best practices in prosecution of environmental crime and regional or international case studies on successful prosecutions
How to improve inter-agency collaboration and information-sharing	How to improve inter-agency collaboration and information-sharing	How to enhance cooperation and coordination between relevant environmental authorities and	How to improve inter-agency collaboration and information-sharing (including joint operations etc.)	How to enhance cooperation and coordination between relevant environmental authorities and	

		institutions in the implementation of EU environmental <i>acquis</i>		institutions in the implementation of EU environmental <i>acquis</i>	
<b>Wildlife crime</b>					
Implementation of the International legal framework on wildlife and timber	Implementation of the Environmental Crime, Birds and Habitat Directives and EU TR	Training on the implementation of EU Regulations and laws related to nature crimes in general	Implementation of the Environmental Crime, Birds and Habitat Directives and EU TR		Implementation of the Environmental Crime, Birds and Habitat Directives and EU TR
How to conduct investigations for law enforcement and inspectors and prosecutors on CITES, Habitat and Bird Regulations	Operational training on how to identify, investigate and prosecute wildlife crime	Operational training on how to identify, investigate and prosecute wildlife crime	Operational training on how to identify, investigate and prosecute wildlife crime	Operational training on how to identify, investigate and prosecute wildlife crime	How to conduct investigations for law enforcement and inspectors and prosecutors on CITES, Habitat and Bird Regulations
How to investigate and prosecute illegal logging (including domestic illegal logging)	How to conduct monitoring of the status of NATURA network and ensure the implementation of mechanisms of protection and preservation of integrity of the ecological network	How to investigate and prosecute illegal logging (including domestic illegal logging)	How to investigate and prosecute illegal logging (including domestic illegal logging)	How to investigate and prosecute illegal logging (including domestic illegal logging)	How to investigate and prosecute illegal logging (including domestic illegal logging)
Wildlife identification			Wildlife identification	Wildlife identification	
How to manage, analyse and process biodiversity data	How to manage, analyse and process biodiversity data		How to manage, analyse and process biodiversity data	How to improve monitoring of the status of NATURA network and	

				the implementation of mechanisms of protection and preservation of integrity of ecological networks	
How to investigate on wildlife smuggling methods	How to conduct investigations on illegal cross-border activities in the field of forestry	How to investigate on wildlife smuggling methods		How to investigate on wildlife smuggling methods	How to investigate on wildlife smuggling methods
How to conduct physical controls of wildlife and timber shipments		How to conduct physical controls of wildlife and timber shipments	How to conduct physical controls of wildlife and timber shipments	How to conduct physical controls of wildlife and timber shipments	How to investigate on wildlife smuggling methods
How to effectively prosecute and sanction wildlife and timber crimes	How to effectively prosecute and sanction wildlife and timber crimes	How to successfully prosecute and sanction wildlife and timber crimes	How to effectively prosecute and sanction wildlife and timber crimes	How to effectively prosecute and sanction wildlife and timber crimes	How to effectively prosecute and sanction wildlife and timber crimes
Importance of coordination and cooperation among different ministries, and state agencies on biodiversity and environmental protection issues	Importance of coordination and cooperation among different ministries, and state agencies on nature crime and environmental protection issues		Importance of coordination and cooperation among different ministries, and state agencies on nature crime and environmental protection issues		Importance of coordination and cooperation among different ministries, and state agencies on nature crime and environmental protection issues
How to collect and analyse intelligence on transnational environmental crime			How to investigate serious and organized transnational environmental crime	How to collect and analyse intelligence on transnational environmental crime	How to collect and analyse intelligence on transnational environmental crime
<b>Waste Crime</b>					



International and European waste management regulation and legislation	Waste Framework Directive and Waste Shipment Regulation	Waste Framework Directive and Waste Shipment Regulation	International Waste Management Regulation and Legislation	International Waste Management Regulation and Legislation	International Waste Management Regulation and Legislation
Types and definitions of waste, root causes and environmental and health impacts of waste management and waste crime	Definition of hazardous waste and of waste disposal and recovery	Definition of hazardous waste and of waste disposal and recovery	Types and definitions of waste, root causes and environmental and health impacts of waste management and waste crime	Definition of hazardous waste and of waste disposal and recovery	Types and definitions of waste, root causes and environmental and health impacts of waste management and waste crime
Waste producer responsibility, waste processors responsibility, waste duty of care responsibility	Environmental and health impacts of illegal waste management and waste crime	Waste producer responsibility, waste processors responsibility, Waste duty of care responsibility	Waste producer responsibility, waste processors responsibility, Waste duty of care responsibility	Waste producer responsibility, waste processors responsibility, Waste duty of care responsibility	
Recognizing the different forms of waste crime (e.g. mis-description of waste, illegal export)	Recognizing the different forms of waste crime (e.g. mis-description of waste, illegal export)	Understanding the types and definitions of waste crime	Recognizing the different forms of waste crime (e.g. mis-description of waste, illegal export)	Understanding the types and definitions of waste crime	Recognizing the different forms of waste crime (e.g. mis-description of waste, illegal export)
Intelligence gathering and intelligence sharing on waste crime issues	Waste crime detection and disruption methods	How to detect illegal transboundary waste shipments and identify illegal wastes at the border	How to detect illegal transboundary waste shipments and identify illegal wastes at the border	How to detect illegal transboundary waste shipments and identify illegal wastes at the border	Waste crime detection and disruption methods
Waste crime risk assessments	Waste crime risk assessments and waste crime indicators	Environmental and health impacts of illegal waste management and waste crime	Waste crime detection and disruption methods	Waste crime detection and disruption methods	Waste crime risk assessments and waste crime indicators

Serious and organised waste crime	Serious and organised waste crime	Waste crime risk assessments and waste crime indicators	Serious and organised waste crime	Serious and organised waste crime	Serious and organised waste crime
	Intelligence gathering and intelligence sharing on waste crime issues	How to identify high risk waste crime (e.g. high financial rewards, high environmental impact)	Intelligence gathering and intelligence sharing on waste crime issues	Waste crime risk assessments and waste crime indicators	Intelligence gathering and intelligence sharing on waste crime issues
			Waste crime risk assessments and waste crime indicators		

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## Annex I – List of respondents

Institution	Project beneficiary
State Inspectorate of Environment, Forestry, Water and Tourism	Albania
The Resource Environmental Centre Albania (REC Albania)	Albania
Lawyer	Albania
OSCE Presence in Albania	Albania
National Environment Agency	Albania
Unknown respondent	Albania
National Environment Agency	Albania
Federal Bureau for Inspection Affairs	Bosnia and Herzegovina
The Republic Institute for the Protection of Cultural, Historical and Natural Heritage	Bosnia and Herzegovina
Ministry of Physical Planning, Civil Engineering and Ecology, Republic of Srpska, BiH	Bosnia and Herzegovina
Federal Administration for Inspection	Bosnia and Herzegovina
MESP - Kosovo Environmental Protection Agency	Kosovo*
Kosovo Academy for Public Safety	Kosovo*
MESP	Kosovo*
Department for Environment Protection and Waters	Kosovo*
Kosovo Police	Kosovo*
Kosovo Environmental Protection Agency/ Directorate for the State of the Environment	Kosovo*
Basic Prosecution of Peja	Kosovo*
MESP	Kosovo*
Komuna e Deçanit	Kosovo*
MESP/KEPA	Kosovo*
MESP	Kosovo*
MESP	Kosovo*
	Montenegro
Agency for Nature Protection and Environment	Montenegro
Environmental Protection Agency	Montenegro
Vrhovni sud Crne Gore	Montenegro
Ministry of Sustainable Development and Tourism	Montenegro
Customs administration of Montenegro	Montenegro
	Montenegro
Administration for Inspection Affairs	Montenegro
Ministry of Environmental Protection	Serbia
Judicial Academy	Serbia
First Public Prosecutors Office in Belgrade	Serbia
Ministry of Environmental Protection	Serbia
Ministry of Environmental Protection	Serbia



Ministry of Environmental Protection	Serbia
Customs Administration	Serbia
University of Criminal Investigation and Police Studies	Serbia
Ministry of Agriculture, Forestry and Water Management - Directorate of Forests	Serbia
Basic Prosecutor`s Office Pančevo	Serbia
Ministry of Environmental Protection	Serbia
Ministry of Interior, Criminal Police	Serbia
Ministry of Environmental Protection	Serbia
Ministry of Environmental Protection	Serbia
Faculty of security Skopje	The Republic of North Macedonia
Ministry of Environment and Physical Planning	The Republic of North Macedonia
Ministry of Environment and Physical Planning	The Republic of North Macedonia
STATE ENVIRONMENTAL INSPECTORATE	The Republic of North Macedonia
SEI	The Republic of North Macedonia
State Environmental Inspectorate	The Republic of North Macedonia
Customs Administration of Republic of North Macedonia	The Republic of North Macedonia
State Environmental Inspectorate	The Republic of North Macedonia
Ministry of interior	The Republic of North Macedonia



## Annex II – Online questionnaire

# Training Needs Assessment (TNA) - Environmental Crime in the Western Balkans Study

\* Required

### General Questions

1. Name and Surname

Optional, in case you want to receive updates on the project and forthcoming training activities

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2. E-mail address

Optional, in case you want to receive updates on the project and forthcoming training activities

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3. Name of Institution

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**4. Beneficiaries of this TNA \***

*Mark only one oval.*

- Albania
- Bosnia and Herzegovina
- Kosovo\*
- The Republic of North Macedonia
- Montenegro
- Serbia

5. Type of Entity \*

Mark only one oval.

- Ministry/Government agency
- Environmental Inspectorate Border
- Police
- Criminal Police
- Customs
- Public Prosecutor Office
- Judiciary
- Scientific/Expert institution
- Option 9
- Option 10
- Option 11
- Option 12
- Option 13
- Option 14
- Option 15
- Option 16
- Option 17
- Option 18 Other:
- \_\_\_\_\_

### Questions on Wildlife and Timber

6. Are you familiar with this sector? \*

If you are not, you will be redirected to the Management of Waste section  
Mark only one oval.

- Yes
- No      *Skip to question 35.*

### Questions on Wildlife and Timber

7. Which answer best defines wildlife trade?

Check all that apply.

- Trade in live wild animals only Trade in
-

live wild plants and animals

- Trade in wild animals and plants, living and dead, including their parts, derivatives and products thereof
- Do not know

8. CITES enforcement and prevention of wildlife trafficking is the task of the following authorities:

*Check all that apply.*

- Competent Ministry responsible for the environment
- Customs authority
- Environmental inspection
- Police
- All of the above Do
- not know

9. In which national law(s) is CITES implemented in?

\_\_\_\_\_

**10. In your opinion, how often does smuggling of wildlife occur at your check points or between check points (i.e protected species are illegally traded) ?**

*Check all that apply.*

- On a daily basis On a
- weekly basis On a
- monthly basis Rarely
- Do not know
- 

11. Who is authorised to control hunting regulations?

*Check all that apply.*

- Police
- Special Inspectorate
- Hunting wards of Hunting society We
- have no hunting laws
- Other: \_\_\_\_\_

12. Do you know which species can be hunted during the open hunting season?

*Mark only one oval.*

Yes  No

13. Does poaching of mammals (Internal Wildlife Crime) happen in your territory?

*Mark only one oval.*

Yes  No

Do not know

14. If you responded YES to the question above, how often does poaching of mammals take place?

*Mark only one oval.*

Rarely (once or twice a year)  Often

(up to once a month)

Very often (more than once a month)

Other: \_\_\_\_\_

15. If you responded to the question above, what is the purpose for poaching of mammals?

*Mark only one oval.*

Food

Damage to crops

Trophy Hunting

Other: \_\_\_\_\_

16. Are you aware of any illegal killing and catching of birds?

*Mark only one oval.*

Yes  No

17. If you responded YES to the question above, what is the purpose of the killing/catching of birds?

*Mark only one oval.*

Food

Sport hunting

Taxidermy

Breeding Cage

birds Other:

\_\_\_\_\_

18. Do you know which are the wild species that are protected on your territory?

*Mark only one oval.*

Yes, most/all Yes,

only a few No

19. If YES to the question above, please mention 1 or 2 wild protected species.

\_\_\_\_\_

**20. Is your authority authorised to:**

*Check all that apply.*

Conduct physical inspections of shipments?

Stop, question, inspect and conduct searches of goods, people and premises?

Gather information on people, places, means of transport, etc. with relation to wildlife offences?

Investigate wildlife offences? Seize

property?

Make arrests?

Carry firearms or other weapons?

Use covert techniques?

Other: \_\_\_\_\_

21. How many wildlife crime cases does your authority deal with annually (e.g. detection, prosecution, sanctioning, legal issues, etc.)?

*Mark only one oval.*

Between 0 and 10

Between 10 and 20

Between 20 and 50

More than 50 Do

not know

22. What is your involvement/practical experience in preventing wildlife smuggling, and/or sanctioning wildlife smugglers?

*Mark only one oval.*

No involvement/experience

Low level of involvement/experience

Occasional involvement/experience

Regular involvement/ Vast experience

23. Which institution(s) would you contact to help determine the legality of a shipment containing plants and animals?

---

24. Which institution is responsible for checking of building/construction works in protected areas ((Future) Natura 2000 areas)?

---

25. Which enforcement institution(s) is authorised to control illegal wildlife trade and wildlife-related offences?

---

26. What tools do you regularly use when working on CITES and wildlife-related offences?

*Check all that apply.*

- CITES website
- National wildlife trade related legislation
- Publications and guidebooks on wildlife trade control
- Species identification materials
- Species+ database CITES
- trade database
- EUTWIX database and/or mailing list Other:
- \_\_\_\_\_

27. Do you have access to copies of legislation regarding flora and fauna and the latest CITES Appendices at your workplace?

*Mark only one oval.*

- Yes No
- Do not know

28. What is your current level of knowledge and experience with respect to wildlife crime?

*Mark only one oval.*

- No experience/ No knowledge Basic
- knowledge/ No experience Basic
- knowledge / Basic experience Detailed
- knowledge / No experience
- Detailed knowledge / Basic experience Detailed
- knowledge / Extensive experience

29. Have you received any training on the following topics?

*Check all that apply.*

- CITES implementation
- Wildlife and timber identification
- Physical control of wildlife and timber shipments
- Handling of live specimens of wild animals Wildlife
- smuggling methods
- Sanctioning of wildlife and timber offences
- Case studies for effective wildlife and timber enforcement and prosecuting wildlife and timber crime
- Other: \_\_\_\_\_

30. Please rate the quality of cooperation among the national authorities with respect to combatting wildlife crime:

*Mark only one oval.*

- Very poor
- Insufficient Good
- Excellent
- 

31. Mark the appropriate answer:

*Check all that apply.*

- I am fully independent in conducting tasks with respect to CITES and wildlife trade control
- Sometimes, I need assistance from other bodies/agencies with respect to CITES and wildlife trade control issues
- I need frequent assistance in conducting wildlife related tasks I
- am not sufficiently trained on CITES and wildlife crime Other:
- \_\_\_\_\_

32. What kind of training do you think would be most useful for your professional role, in the area of CITES and wildlife trade, and illegal logging issues?

*Check all that apply.*

- CITES implementation
- Wildlife identification
- Physical control of wildlife and timber shipments Wildlife
- smuggling methods
- Investigations
- Prosecuting
- Sanctioning

33. In your opinion, which are the main priorities to effectively combat wildlife crime? Check all that applies

*Check all that apply.*

- Improving national legislation to ensure more effective enforcement Training
- enforcement authorities, prosecutors and judges on wildlife crime
- Human, material and infrastructural improvements to enable the enforcement authorities to work more efficiently (ex. equipment and facilities to house and care for confiscated wildlife)
- Structural reorganisation of enforcement bodies (establishment of a wildlife crime police units) to effectively combat wildlife crime
- Other: \_\_\_\_\_

## Management of waste

34. Are you familiar with this sector? If not you will be redirected to next section \*

*Mark only one oval.*

- Yes
- No *Skip to question 63.*

## Management of waste

35. Which of these areas do you feel you would need more training on? Check all that applies

*Check all that apply.*

- Definition of waste



- Definition of waste disposal and recovery
- International Waste Management Regulation and Legislation e.g. Basel Convention, EU Waste Framework Directive
- Waste producer responsibility Waste
- processors responsibility Waste duty
- of care responsibility
- Understanding the types and definitions of waste crime
- Understanding the causes of waste crime e.g. mis-description of waste, illegal export
- Environmental and Health impacts of waste management and waste crime
- Serious and Organised Waste Crime
- Identifying high risk waste crime e.g. high financial rewards, high environmental impact
- Waste crime detection and disruption methods
- Waste crime indicators
- Processes to help identify and disrupt waste crime
- International Waste Management vulnerability
- Intelligence gathering and sharing
- Waste crime risk assessments Other:
- \_\_\_\_\_

36. Is there any other subject you feel is in need of training that is not mentioned above?

*Mark only one oval.*

Yes  No

37. If you answered YES above, please specify

\_\_\_\_\_

**38. What type of waste crime do you deal with the most often?**

*Check all that apply.*

- Illegal Landfilling Fly
- tipping Illegal
- Disposal
- Illegal Recovery e.g. waste recycling Illegal
- burning
- Illegal export of waste Mis-
- Description of waste Tax
- Avoidance
- Other: \_\_\_\_\_

39. How do you get to know when waste crime is happening?

*Check all that apply.*

- Information from public Information
- from other agencies Information from
- waste data Information from other
- countries Intelligence
- Other: \_\_\_\_\_

40. Did you receive any training(s) on investigating waste crime and evidence gathering?

*Mark only one oval.*

- Yes No
- Other:
- \_\_\_\_\_

41. How do you decide which waste crime is serious and which is not so serious?

*Check all that apply.*

- We do not know what is serious and what is not serious
- We deal with whatever comes in first
- We have no way of determining what is serious
- Managers decide
- Other: \_\_\_\_\_

42. Do you share information with other countries or agencies about waste crime?

*Mark only one oval.*

- Yes No
- Other:
- \_\_\_\_\_

43. If you responded YES to the question above please specify below:

\_\_\_\_\_

**44. How do you detect illegal traffic?**

*Check all that apply.*

Information received from other countries

Intelligence received

Do not know Other:

\_\_\_\_\_

45. Please explain your response above

\_\_\_\_\_

**46. Do you work with prosecutors and courts to punish waste crime?**

*Mark only one oval.*

Yes  No

Other:

\_\_\_\_\_

47. If you answered YES above, please explain

\_\_\_\_\_

**48. What are your enforcement options for dealing with waste crime? Check all that applies**

*Check all that apply.*

Warning Letter Fine

Jail Other:

\_\_\_\_\_

49. Which are the main problems with waste crime?

*Check all that apply.*

Odour

Water Pollution Air

Pollution Land

Pollution Tax

Avoidance

Corruption

Other: \_\_\_\_\_

50. Would you be able to describe why waste crime happens and how this can be stopped?

*Check all that apply.*

Yes - I know why waste crime happens

No - I do not know why waste crime happens

I would need more training to understand why waste crime happens and how it can be

stopped

Other: \_\_\_\_\_

51. In your opinion, is it the same people or organisations that commit the waste crime regularly?

*Check all that apply.*

- Same people commit waste crime
- Same companies commit waste crime
- It is random
- I do not know who is committing waste crime
- Other: \_\_\_\_\_

52. In your opinion, is punishment for waste crime effective and proportionate?

*Check all that apply.*

- Yes there is punishment but not satisfactory
- Punishment is not always applied
- Punishment is not consistent
- Punishment is not linked to the seriousness of the crime
- Other: \_\_\_\_\_

53. Please explain your answer above

\_\_\_\_\_

**54. How do you deal with waste crime and is it effective?**

*Check all that apply.*

- We do not deal with waste crime effectively
- We are effective at dealing with waste crime
- We are inconsistent at dealing with waste crime
- Other: \_\_\_\_\_

55. Please explain your response above

\_\_\_\_\_

**56. Do you have regular waste training?**

*Mark only one oval.*

- Yes, we have regular waste training
- No, we have infrequent waste training
- No, we do not receive waste training

57. Have you found the training in your organisation adequate for detecting waste crime and regulating waste management?

*Mark only one oval.*

- Yes No
- Not applicable
- Other: \_\_\_\_\_

58. How can waste crime training be improved for you?

*Check all that apply.*

- Better focussed on problem areas Better
- use of technology
- Better trainers More
- operational
- I do not receive training on waste crime
- Other: \_\_\_\_\_

59. Do you work with other agencies or organisations when dealing with waste crime?

*Mark only one oval.*

- Yes No
- Other:
- \_\_\_\_\_

60. Do you feel that the process and training in your organisation help you to detect and prosecute waste crime?

*Mark only one oval.*

- Yes No
- Not applicable
- Other: \_\_\_\_\_

61. Do you get enough training and should you get more?

*Check all that apply.*

- We get training but not on the correct subject We
- do not get enough training
- We do get enough training

We get the correct amount of training Other:

62. Do you feel training should be regular and if so, how often?

*Check all that apply.*

Yes – annually

Yes – every 6 months

No - regular training is not necessary Other:

\_\_\_\_\_

## Training needs

In this section, we are going to ask you what you consider to be the most relevant training needs for you

63. What further training would you benefit from to fully implement your duty in the prohibition of transnational crime?

*Check all that apply.*

Transnational crime investigation

Check Point Anti-smuggling

Transnational Crime Intelligence Collection and Analysis

Police control and investigation

Transnational Crime Awareness

Other: \_\_\_\_\_

64. What type of informal learning do you find most beneficial?

Please rate on a scale of 1-6 (1=highest, 6=lowest)

*Mark only one oval per row.*

	1	2	3	4	5	6
On the job learning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working alongside experienced colleagues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working as part of a team Self-analysis or reflection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Networking with others doing similar work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

65. Which of the following training formats would you be likely to participate in?

*Check all that apply.*

Classroom training

Workshop-style event

Webinar presentations

- Distance education that can be completed at your own pace (e.g., satellite or web-based courses)
- A combination of classroom instruction and distance education
- Other: \_\_\_\_\_

66. What type of (initial and continuing) training methods do you think practitioners benefit from the most?

*Check all that apply.*

- Lecture
- Group discussion
- Case studies Video presentation Role
- simulations Practical
- toolkits On-the-job training
- Use of practical toolkits/Applications Other:
- \_\_\_\_\_

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*Mark only one oval.*

- I agree with the terms and conditions (in this case, you can click on submit below) I
- do not agree (in this case please cancel your submission)

Thank you for your feedback!