

**Strategy for Preventing Environmental Offences 2021–2026  
and Action Programme 2021–2022**

## **STRATEGIC GUIDELINES 2026**

1. Ensuring the functioning, sharing of good practices and continuity of interagency cooperation for the prevention of environmental offences across sectoral boundaries at the national and regional level
2. Coordinating ministries' performance management and other guidance in the context of environmental offence matters
3. Collaborating in the planning and further implementation of joint training on environmental offences for various authorities
4. Refining existing statistical and monitoring data and utilising this in the efforts to prevent environmental offences
5. In national legislative projects, ensuring that these support the detection and investigation of environmental offences. Also monitoring the development of legislation concerning environmental offences at the international and EU level
6. Proactively influencing the reduction of environmental offences through education and other means
7. Organising the monitoring of the development of international environmental offences and engaging in closer collaboration between the authorities operating in international networks to prevent environmental offences

# **ACTION PROGRAMME FOR PREVENTING ENVIRONMENTAL OFFENCES 2021–2022**

The action programme contains concrete and topical measures aimed at meeting the objectives set in the strategic guidelines.

Phases of measures other than those requiring continuous development is illustrated in this programme using the following traffic light system



**The measure has not yet been launched**



**The measure is ongoing**



**The measure has been completed**

**STRATEGIC GUIDELINE: Ensuring the functioning, sharing of good practices and continuity of interagency cooperation in the prevention of environmental offences across sectoral boundaries at the national and regional level**

## **1. Developing the prevention of environmental offences in national and regional cooperation groups**

The implementation of the Strategy for Preventing Environmental Offences and the related Action Programme will be ensured and the action programme will be updated periodically in a regularly assembling national interagency cooperation group.

This group will monitor, support and coordinate regional interagency groups that work in a network-like manner.

Pending projects will be used to develop the practices of pre-trial investigation and prosecution authorities and cooperation related to pre-trial investigation.

The regional groups will be encouraged to interact on operating models and best practices, such as effective preventive actions by the supervisory authorities and the police, and to convey information arising from the regional groups on practical challenges to the national cooperation group through the national environmental crime coordinator employed by the police.

Attention will be paid to a need to transfer expertise and memberships of the cooperation networks in a controlled manner when there are changes to the employees involved in preventing environmental offences.

*Timetable: 2021–2022*

*Responsibility: Ministry of the Environment, Ministry of the Interior, Ministry of Justice*

## **2. Clarifying the questions related to the division of tasks between central and local supervisory authorities**

The division of labour and cooperation related to environmental offences between municipalities and the Centres for Economic Development, Transport and the Environment will be clarified. The role and tasks of the rescue authorities will also be taken into consideration. In the first phase, the division of labour will be examined based on the used methods.

The Centres for Economic Development, Transport and the Environment will be encouraged to take environmental offences into account as a theme or as individual presentations given at environmental meetings targeted at municipalities.

The opportunities for appointing contact persons for environmental offences to the Centres for Economic Development, Transport and the Environment will be investigated.

*Timetable: 2021–2022*

*Responsibility: Ministry of the Environment, Ministry of the Interior, and supervisory authorities*



**STRATEGIC GUIDELINE: Coordinating ministries' performance management and other guidance in the context of environmental offence matters**

## **3. Environmental offence matters under the guidance of the Ministry of the Interior, the Ministry of the Environment, the Ministry of Economic Affairs and Employment, the Ministry of Justice and the Ministry of Finance**

The ministries ensure with their guidance that the agencies and bodies within the ministry's administrative branch will introduce the strategic guidelines for preventing environmental offences to their practical operations. With these sets of guidance, the Ministry of the Interior will set targets related to environmental offences for the National Police Board and the Border Guard; the Ministry of the Environment for the Centres for Economic Development, Transport and the Environment; the Ministry of Justice for the National Prosecution Authority; and the Ministry of Finance for the Finnish Customs.

*Timetable: 2021–2022*

*Responsibility: Ministry of the Interior, Ministry of the Environment, Ministry of Finance and Ministry of Economic Affairs and Employment*

## **4. Monitoring the progress of the regional government reform and other topical reforms, and ensuring that the current level of prevention and investigation of environmental offences is maintained and improved**

The national cooperation group will monitor ongoing changes in administration and ensure that the current level of prevention of environmental offences and cooperation between the authorities is not compromised. If the group becomes aware of issues that jeopardise the prevention of environmental offences, the group will prepare measures to combat the harmful development.

When developing the career paths and specialisation of prosecutors, environmental offences are taken into account as one of the special competence areas of a prosecutor.

*Timetable: 2021–2022*

*Responsibility: national and regional interagency cooperation groups established by the strategy for preventing environmental offences and Ministry of Justice*



**STRATEGIC GUIDELINE: Collaborating in the planning and further implementation of joint training on environmental offences for various authorities**

## **5. Improving the competence and professional development of persons involved in the interagency cooperation and the available training on environmental offences**

The Police University College (Polamk) has been entrusted with organising joint training on the prevention of environmental offences under the Action Programme for Preventing Environmental Offences 2015–2016. In the period 2017–2018, the Police University College carried out a degree programme that presented the key environmental offence types and related regulation. The training material is available on the updated Ministry of the Environment website. The material has been divided into themes and can be found on the Preventing environmental pollution-> Environmental offences section.

In addition, during the period of implementation of the action programme, targeted training on environmental offence issues will be provided for the judges of courts and other key authorities for which a separate assessment will be carried out during the period.

*Timetable: 2021–2022*

*Responsibility: Police University College, Ministry of Justice and other authorities*



**STRATEGIC GUIDELINE: Refining existing statistical and monitoring data and utilising this in the efforts to prevent environmental offences**

**6. Ensuring that there are no obstacles to the necessary exchange of information between the authorities Utilising databases to ensure effective prevention of environmental offences**

Efforts have been made to chart potential information sources relevant to the development of the prevention of environmental offences and the system for investigating environmental offences. These include, at least, the databases of the pre-trial investigation authorities and the tax authority, the licence and supervision information system of the Centres for Economic Development, Transport and the Environment, and databases maintained by municipalities. In addition to access to databases, attention must be paid to the interpretation of data. The digitalisation of the entire central government sector helps working towards the set objective.

In the regional interagency cooperation groups, the aim is to monitor the case law of environmental offences in district courts in order to form a local situation picture.

*Timetable: 2021–2022*

*Responsibility: ministries and other actors*



**7. Examining the financial benefits gained from environmental offences in quantitative terms and whether any of the public funds saved by the measures to combat environmental offences could be reallocated to the prevention work**

In the period 2019–2020, a project was carried out under the Government’s analysis, assessment and research activities to investigate the situation picture of the financial benefits gained from environmental offences (<https://tietokayttoon.fi/-/ymparistorikoshyotyjen-tilannekuva-ymrihy->).

The project revealed that the profits gained from convicted offences are considerable in terms of euros, even though some of the profits appear not to be identified or claimed or the courts fail to confiscate criminal profits. Confiscating criminal profits appears to be particularly challenging if a decision of restoring the damage done must be made in the same context. The recommendations in the project’s final report included the following development targets: the cooperation carried out in the pre-trial investigation process should pay more attention to identifying and investigating criminal profits, environmental offence matters should be focused on authorities specialised in them, the process of the recovery of criminal profits and restoration should be clarified, and training should be provided particularly on identifying, calculating and assessing criminal profits.

The project also explored possible ways of allocating the criminal profits obtained by the state to the measures aimed at preventing environmental offences. None of the approaches examined in this context emerged as better than their alternatives. There were also various challenges related to implementing the presented alternatives.

*Timetable: 2021–2022*

*Responsibility: Ministry of the Environment, Ministry of Justice and Ministry of the Interior*



**STRATEGIC GUIDELINE:** In national legislative projects, ensuring that these support the detection and investigation of environmental offences. Also monitoring the development of legislation concerning environmental offences at the international and EU level

## **8. Fixing the status of the supervisory authority as the injured party in various environmental offences**

Under section 188 (2) of the Environmental Protection Act, if there is an infringement of the public interest, the Centre for Economic Development, Transport and the Environment as the state supervisory authority is considered to be the injured party in criminal matters. The Nature Conservation Act does not include an equivalent provision, failing to specify an injured party in the pre-trial investigation and criminal proceedings for the purpose of safeguarding major public interest. The reform of the Nature Conservation Act in the period 2020–2021 will include adding a provision on the status of the Finnish Centre for Economic Development, Transport and the Environment as the injured party in the Nature Conservation Act.

*Timetable: 2021*

*Responsibility: Ministry of the Environment and supervisory authorities*



## **9. National implementation of the Directive on the protection of persons who report breaches of Union law**

The directive must be implemented nationally by 16 December 2021. The purpose of the Directive is to enhance the implementation of Union law and policies in the fields covered by the Directive, including environmental protection, by establishing common minimum requirements for the provision of high-level protection for persons reporting breaches of Union law. The measures required for the implementation of the Directive in Finland will be specified in early 2021. The cooperation group for the prevention of environmental offences monitors the implementation and supports the achievement of the measures specified in the directive in environmental administration.

*Timetable: 2021*

*Responsibility: Ministry of Justice and sectoral authorities*



## **10. Monitoring the development of national regulation towards administrative sanctions and influencing the development of existing administrative sanctions**

One of the problems in the fight against environmental offences has concerned the difficulty of making those responsible for minor offences effectively liable for their actions by imposing a sanction even for minor offences.

Indeed, the Programme of Prime Minister Sanna Marin’s Government includes an entry that notes that there is need to investigate the efficiency of the prevention of environmental offences and the related sanctions system.

Participation in the legislative drafting process for amending the Act on Environmental Protection in Maritime Transport to ensure a functional system for imposing oil discharge penalties and to lay down provisions on an administrative sulphur emission penalty. The implementation and impacts of the legislative amendment will be monitored.



**STRATEGIC GUIDELINE: Proactively influencing the reduction of environmental offences through education and other means**

### **11. Increasing public awareness of the obligations laid down in environmental and nature conservation legislation, and emphasising the importance of reporting environmental offences**

Suitable channels, such as the groups of regional agents and particularly regional interagency cooperation groups, will be used to provide the general public with information about the opportunities for preventing environmental offences and the practices used in reporting offences. The aim is to influence attitudes so that even minor environmental violations are deemed unacceptable. Environmental offences committed in business activities are often also financial offences. In this respect, the challenges of environmental offences are similar to those that emerge in combating the grey economy and financial crime.

The training materials produced in the degree programme for the prevention of environmental offences will be utilised in ensuring better awareness in different forums. Those operating at the regional level will be encouraged to participate in the theme weeks and intensive surveillance campaigns for the prevention of environmental offences.

Publicity campaigns that aim at raising awareness of themes related to environmental offences, such as littering and appropriate recycling, will be carried out.

Monitoring raids will be developed for activities with a high risk of environmental offences in collaboration between various authorities.

*Timetable: 2021–2022*

*Responsibility: Ministry of the Environment, Ministry of Justice and Ministry of the Interior*



**STRATEGIC GUIDELINE: Organising the monitoring of the development of international environmental offences and engaging in closer collaboration between the authorities operating in international networks to prevent environmental offences**

## **12. Clarifying whether there is need to expand the monitoring of the development of international environmental offences**

Until now, the National Bureau of Investigation has been the sole national authority monitoring international environmental offences through INTERPOL working groups. This monitoring will be continued at least in these working groups. The flow of information from international cooperation groups to the national cooperation group will be ensured on topics such as currently ongoing Europol/EMPACT project on environmental crime. Efforts will be made to share information about the international focus areas and topical campaigns or measures by the EMPACT project more effectively to the national responsible authorities.

It will be ensured that the international cooperation will take into account any emerging international trends that may have an impact on the environmental offences investigated in Finland, such as international illegal waste streams and trade in threatened plant and animal species.

Participation in international environmental crime conferences will be ensured and efforts will be made to organise national meetings between the authorities involved in international networks preventing environmental offences.

*Timetable: 2021–2022*

*Responsibility: Ministry of the Environment and Finnish Customs, police administration/ National Bureau of Investigation (NBI)*



## **13. Assessing the impacts of the increased interagency cooperation resulting from the Strategy and Action Programme for Preventing Environmental Offences on existing groups of authorities**

The other groups included in the interagency cooperation and topics that have arisen in them will be examined once a year.

*Timetable: 2021–2022*

*Responsibility: Ministry of the Interior and other ministries*

**The Action Programme for Preventing Environmental Offences will be updated and renewed as necessary every two years. A national interagency cooperation group for the prevention of environmental offences that crosses sectoral boundaries is responsible for updating and monitoring the implementation of the action programme.**