



European Union Network for the  
Implementation and Enforcement  
of Environmental Law



Funded by the  
European Union

# National Peer Review Initiative (NPRI)

## Overall report 2019 – 2024

The Project Team Coordinators:

Giuseppe Sgorbati (IT)

Fabio Carella (IT)

Marc du Maine (NL)

Date of report: 21/12/2024

Report number: 2022(VI)WG1

Report adopted at IMPEL General Assembly Meeting: Adopted by written procedure on 20/03/2025



## Table of content

<b>1. INTRODUCTION.....</b>	<b>3</b>
<b>2. CONTEXT AND OBJECTIVES.....</b>	<b>3</b>
<b>3. NPRI PROJECT PHASES I, II, III AND IV .....</b>	<b>3</b>
3.1 NPRI PHASE I .....	3
3.2 NPRI PHASE II .....	4
3.3 NPRI PHASE III .....	4
3.4 NPRI PHASE IV .....	5
<b>4. THE NPRI METHODOLOGY AND MANUAL.....</b>	<b>5</b>
4.1 CHANGES, UPDATES AND ADDITIONS TO THE NPRI MANUAL .....	6
<b>5. PARTICIPATION IN PROJECT ACTIVITIES 2019 – 2024, STATISTICAL DESCRIPTION .....</b>	<b>6</b>
5.1 STATISTICAL DESCRIPTION .....	8
<b>6. VALUE OF THE NPRI PROJECT .....</b>	<b>8</b>
<b>7. EVALUATING NPRI IMPLEMENTATION AND DESIGN .....</b>	<b>9</b>
<b>8. PROJECT STATISTICS IN THE PERIOD 2022 – 2024: THE MISSIONS.....</b>	<b>10</b>
8.1 STATISTICS OF MISSIONS AND SEMINARS (EVENTS) .....	10
<b>9. PROJECT MANAGEMENT AND SUPPORT .....</b>	<b>11</b>
<b>10. CREDITS .....</b>	<b>11</b>



# 1. Introduction

The work of IMPEL is supported by the European Commission (EC). Since 2018, the EC encourages the implementation of actions included in the Environmental Compliance and Assurance Initiative (ECA) and called IMPEL to intensify its efforts. IMPEL plays an important role in the implementation of the ECA Initiative, among others by the implementation of Peer Reviews. The Commission encouraged IMPEL in strengthening the instrument ‘Peer Review’ and strongly supports IMPEL’s initiative to develop and implement a National Peer Review Instrument (NPRI) to be used at national level by environmental authorities. IMPEL’s General Assembly decided in 2018 to conduct the project ‘establishing a National Peer Review Initiative (NPRI)’, of which the phases I, II, III and IV were executed from 2019 until 31 December 2024.

## 2. Context and objectives

IMPEL has more than 20 years’ experience with the implementation of peer reviews. These experiences inspired Italy and The Netherlands to develop a peer review concept and methodology that can be applied autonomously at national, regional, local, and organizational level, the so-called National Peer Review Initiative (NPRI).

The NPRI is a systematic approach, methodology and guidance, based on flexibility and to be used related to specific country and organisational needs, and implemented by own experts. The tool aims to support increase of capabilities at various levels (local, regional, national, and organisational), and to facilitate homogeneity and harmonisation of performance of authorities in environmental matters and to foster processes that contribute to a better harmonised implementation of environmental legislation.

## 3. NPRI Project phases I, II, III and IV

To date, the NPRI has been implemented in four phases, in a logical progression from the development of the methodology to its implementation in the broadest sense by countries and organisations. These are briefly described below:

### 3.1 NPRI Phase I

From April 2019 to March 31, 2020, the first phase of the project, “Establishing a National Peer Review Initiative (NPRI),” was implemented. The project aimed to define guidelines for national networks to conduct peer reviews at various levels. This was achieved through:

1. **Surveys and Preliminary Studies:** Initial studies focused on peer review methodologies and the experiences of European countries and international organizations.
2. **Workshops and Brainstorm Sessions:** Discussions on assessment frameworks and support mechanisms contributed to the development of the NPRI draft methodology.



3. **Country Visits:** Field visits to selected countries enriched the discussions and informed the final draft.

These activities culminated in a (draft) NPRI methodology, forming the project's core output. The methodology is a 'living' document and will be refined and completed based on use and practical testing. The NPRI methodology will significantly enhance IMPEL's toolbox and align with the European Commission's Environmental Compliance Assurance (ECA) Action Plan. Overall, Phase I established a foundational framework for implementing peer reviews, marking a substantial step toward fostering compliance and environmental governance.

## 3.2 NPRI Phase II

From February 1 to March 31, 2021, Phase II of the "Establishing a National Peer Review Initiative (NPRI)" project was conducted, building on the foundational work of Phase I. The key activities and outcomes of Phase II were as follows:

1. **Foundation from Phase I:** Leveraged the draft NPRI Methodology and Guidance, preliminary studies on peer review methodologies, and an internal IMPEL survey.
2. **Stakeholder Engagement:** Conducted Project Management Team meetings and two online seminars (March 16 and 30, 2021), which provided valuable input for refining the methodology.
3. **Development of NPRI Resources:** Produced a consolidated report including the updated NPRI Methodology and Guidance, supported by seven detailed annexes offering specific guidance for implementing the NPRI scheme.
4. **Preparations for Phase III:** Focused on testing the NPRI methodology in 2–3 volunteer countries. Discussions with several countries and organizations explored opportunities for piloting the methodology in Phase III.
5. **Approval of Phase III:** Drafted and presented the Terms of Reference for Phase III to IMPEL's General Assembly, which approved the continuation of the project.

Phase II established a refined framework and solid foundation for Phase III, emphasizing practical application and testing of the NPRI methodology in selected countries.

## 3.3 NPRI Phase III

Phase III of the "Establishing a National Peer Review Initiative (NPRI)" project focused on implementing the NPRI methodology in volunteering countries and strengthening collaboration with interested stakeholders. Building on the foundations of Phases I and II, the main activities and outcomes of Phase III included:

1. **Strategic Preparation:** Drafted and discussed several strategic documents to guide NPRI implementation and tailored expert services for developing specific NPRI schemes in volunteering countries.
2. **Thematic Focus:** Addressed and supported diverse themes such as harmonizing permitting processes under the Water Framework Directive and coordinating cross-border waste shipment inspections among stakeholders.



3. **Stakeholder Engagement and Support:** Strengthened contacts with interested countries through stakeholder meetings and expert consultations, providing hands-on support in preparing for NPRI implementation.
4. **Groundwork for Implementation:** Designed schedules, planned country visits, and organized stakeholder meetings to facilitate practical application and ensure smooth implementation of NPRIs.

Phase III established the practical basis for NPRI deployment, focusing on real-world application, stakeholder collaboration, and addressing thematic challenges, laying a strong foundation for advancing environmental compliance and governance across participating countries.

### 3.4 NPRI Phase IV

Phase IV of the “Establishing a National Peer Review Initiative (NPRI)” project concentrated on implementing NPRIs in selected countries, providing substantial support on various topics. The activities and achievements of this phase include:

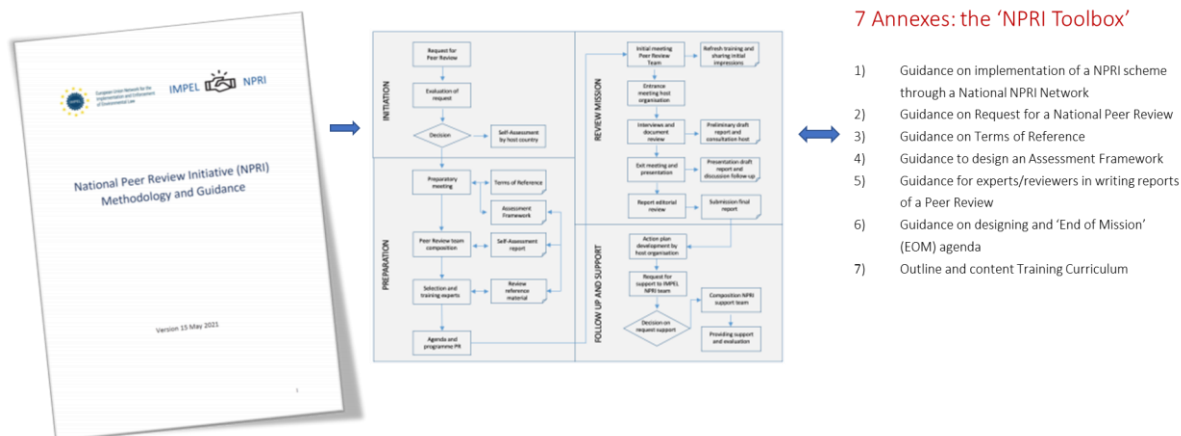
1. **Topic-Specific NPRIs:** Supported NPRIs addressing:
  - Harmonizing permitting processes under the Water Framework Directive.
  - Aligning inspection procedures for cross-border waste shipments among diverse stakeholders.
  - Standardizing surveillance and enforcement practices within the Natura 2000 framework.
2. **Innovative Developments:** Assisted in establishing a new directorate within an inspectorate to develop advanced facilities and instruments for surveillance and combating environmental crime.
3. **Practical Implementation:** Conducted country visits, facilitated stakeholder meetings, and provided comprehensive support to ensure smooth preparation and execution of NPRIs.

Phase IV marked a pivotal stage by transitioning from planning to active implementation, emphasizing practical application, stakeholder collaboration, and addressing specific environmental challenges through tailored NPRIs.

## 4. The NPRI methodology and manual

In the first phase of the project, careful research was carried out to find a method to support countries and their organisations in implementing an NPRI that was appropriate to the objectives being pursued. In this context, existing methodologies (national and international) were reviewed to develop a methodology tailored to the NPRI. The result is a comprehensive methodological approach that can be used in its entirety or in parts. The methodology is flexible in nature and can be used according to the specific needs of the user. The method has seven practical annexes that can help the user to put different parts of the method into practice. The following figure shows a summary of the method, the annexes and a process diagram for use:

## Methodology



15

### 4.1 Changes, updates and additions to the NPRI Manual

During the development of the activities, a number of key themes were identified and will be incorporated into a near future update of the methodology and the associated NPRI manual. These include:

- Explanation and application examples of techniques for conducting Stakeholder Analysis
- Use of SWOT (Strengths, Weaknesses, Opportunities, Threats) technique for analysis of organisations
- Use of surveys to define the operational framework and challenges of networks of organisations
- Description of basic principles of decision-making processes
- Techniques for determining and defining intervention priorities
- Evaluation of the use of NPRI techniques in the perspective of the implementation of Articles 19 and 21 of the ECD

Based on new and additional insights gained from the application of the NPRI approach in different countries, the following new and complementary annexes have been developed and will be incorporated into the text with reference to the substantive annexes in the next update of the existing manual:

- Annex VIII: Evaluation of complex processes
- Annex IX: Stakeholder analysis
- Annex X: Prioritisation in the Planning of Environmental Protection Activities
- Annex XI: SWOT analysis
- Annex XII: Survey on Coordination and Collaboration 2024
- Annex XIII: Models of NPRI - Innovations

## 5. Participation in project activities 2019 – 2024, statistical description

Many activities were carried out over the course of the project and are presented in chronological order in the timeline below. The activities range from e.g. project development, scoping, methodology development, country visits, seminars, awareness raising, stakeholder analysis and concrete implementation of NPRI on a wide and diverse range of topics. From this range of activities, important statistics can be derived and presented as follows:

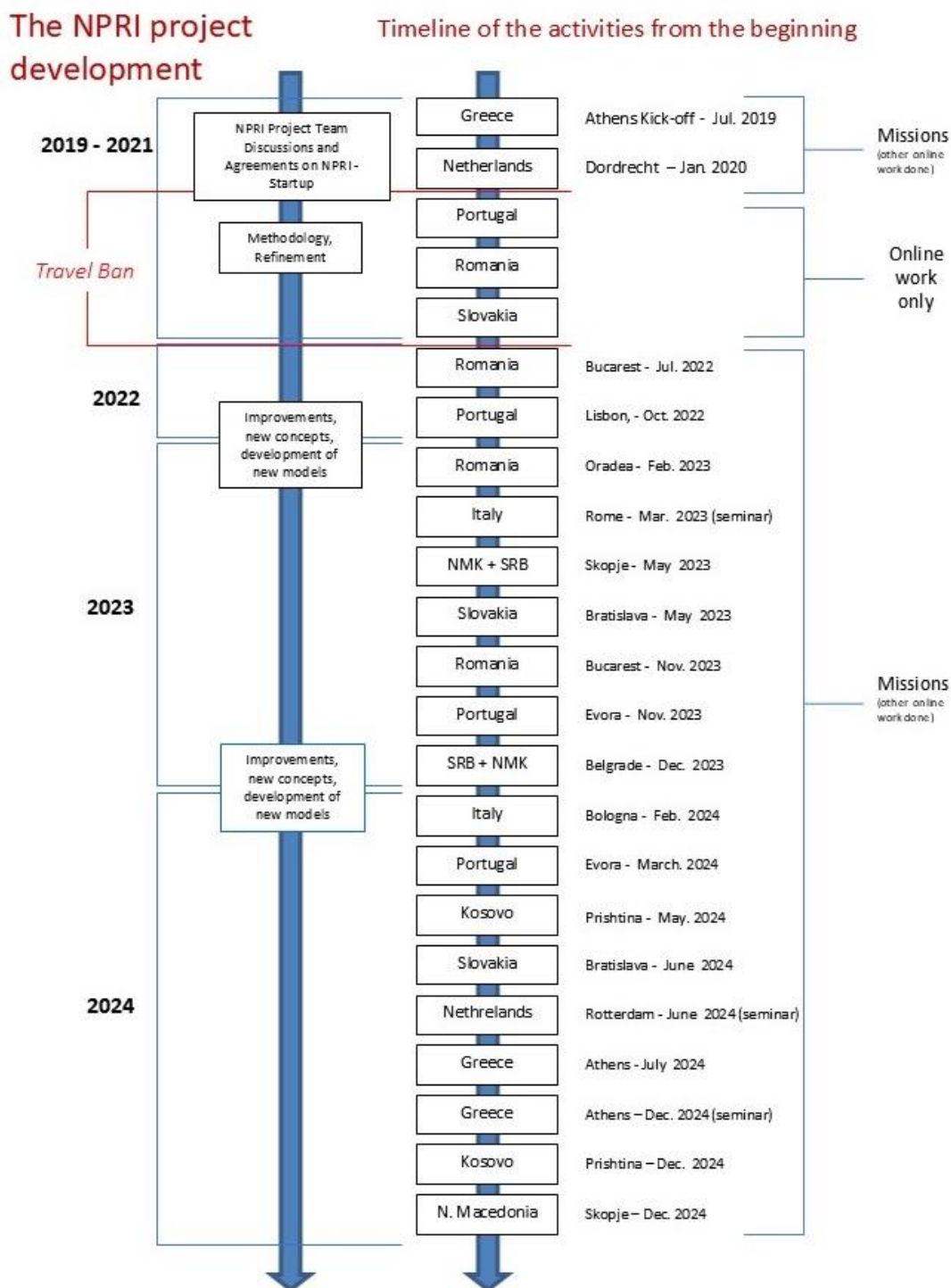


Figure: Timeline of the project development and events from the beginning (2019) to the end of the three-year period 2022 – 2024.



## 5.1 Statistical description

A simple statistical description of the scope of the project, using as a proxy the number of participants in the project events (country visits plus seminars), may be useful to clarify the extent of participation in the project and the impact in the different organisations and countries that decided to actively participate in the NPRI activities. The missions were carried out in countries that decided to develop internal capacity to carry out peer reviews within their own organisation or with representatives of different organisations from the same country, in order to make the implementation of institutional activities or complex procedures involving different authorities more homogeneous and effective. Consequently, in many cases the meetings involved several competent authorities, not just the IMPEL member organisation formally participating in the NPRI project. Most importantly, the missions were also an important opportunity for project participants from other countries to observe the approaches taken by their colleagues in developing peer review activities in their own countries, and to learn about the techniques and approaches they use, in a mutual teaching and learning process.

## 6. Value of the NPRI project

The value of the NPRI project has proved to be greater and more significant than anticipated at the outset, both nationally and internationally.

There has been an intensive exchange between national authorities, not only, as is usually the case, for the purpose of cooperation on individual cases or activities, but for a more complete picture of environmental issues, examining environmental, administrative and criminal justice issues in a more comprehensive approach. This approach laid the groundwork for the formalisation of cooperation activities later provided for by the new Environmental Crime Directive (ECD).

At national level, the conditions were created for concrete cooperation between the different elements of the compliance chain: inspectors, police, prosecutors and judges working in the environmental field often met and worked together to solve problems and challenges. It was a concrete case of national cooperation between authorities that are separately part of the IMPEL, EnviCrimeNet, ENPE and EUFJE networks. Many other authorities also participated in NPRI activities at the invitation of IMPEL members.

The presence of several countries at the meetings concretely strengthened the environmental inspectors' sense of belonging to the European Union project. This was particularly important for the candidate countries, which benefited greatly from the activities through direct exchanges with colleagues "from the EU". These exchanges made it possible to compare not only operational practices but also organisational models and, above all, to see how an analytical and multi-factorial approach, as proposed by the NPRI project, helps in practice to solve the problems they face.

It should be stressed that the commitment to attend the meetings is only a limited part of the commitment made by the project participants. Each mission was preceded and followed by intensive preparatory and follow-up work, as well as all the specific activities at national level, based on the guidance provided both by the NPRI methodological manuals and, par excellence, by the project coordinators and colleagues from other countries who had already applied the NPRI techniques.





Some seminars took place online (about 5%) and the total number of participants in such events should be increased accordingly. A numerical analysis of the activities carried out reveals many other positive aspects.

## 7. Evaluating NPRI implementation and design

Important lessons have been learnt from the various meetings and exchanges of information with countries and organisations, including the European Commission. It should be noted that the following list is a snapshot of experiences and suggestions:

- The European Commission has repeatedly stated that the NPRI approach makes a significant contribution to the implementation of the Environmental Compliance and Assurance (ECA) initiative and that wider use of the tool, including in cooperation with the other four networks, should be an ongoing factor. With the new ECD to be implemented, this tool is considered important by the Commission.
- Countries and organisations conclude that the implementation of an NPRI contributes significantly to the development of criteria and the homogenization of an approach, as well as to the development and implementation of standards and legal requirements.
- NPRI all differ in purpose, approach, and implementation. Practice shows that the flexible design NPRI methodology facilitates this diversity in implementation. All experiences so far show a close involvement and support of the top management of the organizations. This is prominent in all projects and is an essential condition for success.
- Extensive experience has been gained with the various "standard" elements of the methodology, such as: scoping, stakeholder analysis, drafting terms of reference, organizing stakeholder meetings, etc. The method is widely used, and the process followed helps organizations to identify challenges, but also to seek and find common solutions. New topics have also been proposed for further development and expansion of the NPRI methodology, such as the use of case studies to help explain an NPRI, SWOT analysis, stakeholder analysis, analysis of questionnaire results, Levels of Environmental Technical Performance (LEPTA), etc.
- Countries using the NPRI report significant progress and results in further professionalizing their organization and working with key stakeholders.
- Countries and organisations also conclude that further development of the methodology and its components as a 'living' document should be encouraged to make the existing NPRI toolbox more complete.
- Furthermore, countries and organisations stress that it is important to preserve the accumulated experience as a kind of "institutional memory of NPRI" and to transform it into follow-up actions for more general use.



## 8. Project statistics in the period 2022 – 2024: the missions

The missions have been carried out since July 2022, almost immediately after the lifting of the travel ban due to the COVID pandemic. These statistics do not consider all the preparatory work done - online - before the travel ban was lifted.

### 8.1 Statistics of missions and seminars (events)

Number of operational country visits carried out	15
Number of seminars	3
Total number of events	18
Number of countries visited	8
Number of attendances at events (country visits + seminars)	393
Number of participants (people who attended at least one event)	233
Average number of event participations per project participant	1,7
Number of countries of origin of event participants	14
Number of organisations involved	49
Typology of organizations that took part in the work	<ol style="list-style-type: none"> <li>1. Inspectors</li> <li>2. Environmental police</li> <li>3. Judges</li> <li>4. Prosecutors</li> <li>5. Ministries of the Environment</li> <li>6. Local governments</li> <li>7. Environmental and nature conservation agencies</li> <li>8. Customs</li> <li>9. Consumer Protection Association</li> <li>10. Organisations for cooperation</li> <li>11. NGO</li> <li>12. Other</li> </ol>

Number of country visits (hosts + guests)	305
Total hosts in country visits	192
Total guests in country visits	132
Average number of guests per host	0,6
Number of seminar participations	88
Number of people who attended at least one seminar	62
Number of Communications of European Commission in Seminars	3 out of 3



## 9. Project management and support

Among the various comments made are the enormous organisational efforts of the project coordinators and the excellent support provided by the IMPEL Secretariat.

Special mention should be made of the support provided by the external consultant, who was responsible for providing specialised and expert support not otherwise available within the network, adding experience and vision, and easing the necessary burden of preparing reports and analyses, allowing the project participants to concentrate on operational activities.

## 10. Credits

We thank the members of the project who have contributed with their experience, and good will, to its development, and in particular those who have decided to participate in missions in various countries both to bring their experience to colleagues, but also to view, in the field, the experiences conducted by colleagues and learn from them the practical translation of the various elements of the methodology.

The IMPEL Secretariat must also be remembered in these thanks: the project, unusual in terms of the number of participants, missions, seminars, could not have been carried out with the quality that characterized it without the constant and intense commitment that was put in place by the Secretariat and without the patience that was sometimes necessary, we acknowledge, to accompany it even in the less simple situations that sometimes emerged.

A special thanks to Chris Dijkens for the fundamental activities carried out within the project, with a continuous connection and comparison with his own peer review experiences carried out in support of global organizations, for making his experience, his knowledge of national and European institutions and his authority available with great simplicity. Thanks that would not be due, considering the professional relationship that linked him to the project, but entirely motivated by the fact that the activity carried out has largely exceeded the limits of this professional relationship, to the point of making it difficult to compare it with the formal expectations of the project.

In addition, an affectionate thanks to Peter-Jan Van Zanten (NL) who, progressing in his career, had to operationally abandon the project, while always remaining in touch with it and distilling his contribution in an uninterrupted relationship and dialogue.

Finally, a heartfelt thank you to Marc du Maine (NL), who has taken over the coordination of the project from Pieter-Jan with great commitment and efficiency, also to maintain the line of the project promoting nations, Holland and Italy, which, given the experiences made in their countries, is unchanged.