



DISSECTING ORGANIZATIONAL LIABILITY FOR ENVIRONMENTAL CRIMES IN NIGERIA: LESSONS FROM UNITED KINGDOM AND THE UNITED STATES OF AMERICA

E. Aniekan Mbat¹
Dr. M. A. Nwanyanwu²

Abstract

This paper examined Organizational Liability for Environmental Crimes in Nigeria. The paper adopted the doctrinal method research, which was also comparative research, with primary sources of information derived from legislations and case laws, while the secondary sources of information were drawn from journal articles, and internet sources. It is trite that the commission of an environmental crime whether by an individual or an organization has dangerous consequences both on the environment and natural persons. The paper considered the effectiveness of the legal frameworks, the efficiency of the existing environmental agencies, the weakness and failures over porous prosecution of environmental violators, particularly organizations, the gaps with extant legislations, which ranged from preference on meagre amount to focus on restoration of the environment, regulatory conflict between and amongst the environmental agencies, poor penal provisions, exclusion of corporate bodies from serving prison terms and too many leeway under the laws for body corporate to escape justice. The paper highlighted the importance of increasing capacity and resources, strengthening enforcement and transparency, and enhancing public awareness and participation.

Keywords: Organization, Liability, and Environmental Crimes

1.0 Introduction

Internationally, the extent and scope of damage that is being perpetrated to the environment by corporate entities through their various activities has necessitated a resort by many countries to enact legislations and policy initiatives to bring within the scope of liability and prosecution organizations criminally liable for violation of environmental laws.

In Nigeria, the former position in the case of *Pear's Gunston and Tee Ltd v Ward*,³ which excludes corporation from criminal liability has changed like in other countries globally, by the enactment of the Harmful Waste (Special Criminal Provisions) Act 1988⁴. Specifically section 7 of the Act, provides to the effect that, where a crime has been committed with the consent or connivance of or is attributable to any neglect on the part of (a) a director, manager, secretary or other similar officers of the body corporate, or (b) any other person purporting to act in the capacity of a director, manager, secretary or other similar officers, he as well as the body corporate, shall be guilty of the crime and shall be liable to be proceeded against and punished accordingly.⁵

¹ LLB (RSU); BL (Abuja); LLM (Rivers State University) Email: gabbynuel111@gmail.com.

² Senior Lecturer, PG Coordinator, Faculty of Law, Rivers State University; email: Martinanwanyanwu11@gmail.com

³ (1902) 2 KB 1 at 11.

⁴ Cap. H1 LFN, 2004.

⁵ Harmful Waste (Special Criminal Provisions) Act, Cap. H1 LFN, 2004.



Furthermore, in the past, it was inconceivable that an organization could be held liable for committing a crime. The argument canvassed then, was that an organization as an artificial person, has no physical existence and could therefore not be subjected to the penalties attached to offences.⁶ Additionally, there were also those who felt that an organization has all the features of a natural person and should therefore be capable of receiving all the punishments attached to all offences, including imprisonment terms⁷. It is also observed that the quantum of punishment for violators of environmental crimes in Nigeria is not enough to deter the continuous destruction of the environment by individuals and corporate bodies. Despite these challenges, lessons from other developed jurisdictions on tackling environmental crimes committed by organizations can be useful standards to expand the frontiers of environmental protection in Nigeria by holding all stakeholders accountable.

2.0 Challenges of Organizational Liability for Environmental Crimes in Nigeria

Organizational responsibility for crime is premised on the notion that failure to impose criminal liability against an organization constitutes an immunization of the offender, who is the actual beneficiary of the illegal activity. It amounts to aiding and abetting evasion of culpability.⁸ Furthermore, criminal sanctions are argued to be reserved for the worst types of offences. Thus, specific delineation of activities which constitute environmental crime is uncertain. This is because of the definition of environmental crime as an act committed with the intent to harm or with a potential to cause harm to ecological and/ or biological systems and for the purpose of securing business or personal advantage.⁹

Therefore, the above definition covers a wide range of activities which are not inherently criminal. Some activities which are significantly beneficial could be inherently harmful to the environment. Environmental legislation in Nigeria, however, mostly provide criminal sanctions for wilful and negligent violations of regulations to protect the environment or to regulate the generation and disposal of wastes. Unfortunately, these enactments criminalizing organizational crimes have always been in existence, prosecution of offenders unusually unheard of. Maybe due to illiteracy and poverty, victims are either unaware or lack the financial resources to prosecute.

In Nigeria, where there are competing claims on resources, victims of environmental crimes are usually obligated to provide papers and pen and even files to record complaint, as well as provide vehicles or transport fare for law enforcement agencies to carry out their duties assigned by law. The vicious circle of corruption and kickbacks which have permeated the rank and file of the police, the major regulator, and the quest to make money, renders them susceptible to compromising the genuine cases of people brought to their table. Most Nigerians do not trust the criminal justice system, due to the bad eggs in the system.

Furthermore, prosecutors, feel oftentimes ill-equipped to tackle organizational environmental cases which are most complicated and almost impossible to win. The legal requirement to prove beyond reasonable doubt of an organization's culpability poses a serious challenge. Also, the prosecutor must grapple with the challenge of determining whether the offender was sufficiently high up the

⁶ M Clifford, *Environmental Crimes: Enforcement Policy and Social Responsibility* (Gaithersburg: Aspent, 1998); 26.

⁷ M Clifford, *Environmental Crimes: Enforcement Policy and Social Responsibility* (Gaithersburg: Aspent, 1998); 26.

⁸ In *Lennards Carrying Co v Asiatic Petroleum Co. Ltd* (1915) AC 705.

⁹ M Clifford, *Environmental Crimes: Enforcement Policy and Social Responsibility* (Gaithersburg: Aspent 1998).



organizational ladder to bind the corporation.¹⁰ Additionally, offences are sometimes shaped around individual concept of liability, making it difficult to enforce organizational liability¹¹.

Nigeria is signatory to several international environmental treaties, without domesticating them for application, for instance, in 2008, Nigeria joined in signing the Convention on International Trade in Endangered Species of Wildlife, Fauna and Flora (CITES), but it is yet to be domesticated. There is exist in Nigeria, the culture of non-compliance with extant laws, especially by organizations, which could be due to relationship with the powers that be at the top echelon of the government of the day.

Furthermore, in Nigeria, the multiplicity of regulatory laws, with different agencies accorded enforcement power, with over lapping roles has encouraged regulatory conflict and unending battles for supremacy among these agencies thereby relegating their primary responsibility as provided under the various statutes that established them. Nigeria has very porous borders, which makes it susceptible to breaches, especially with the support of the law enforcement agencies. Lastly, Nigeria's weak governance is a serious challenge to organizational liability for environmental crimes in Nigeria.

3.0 Conceptual Framework

a. Corporate Crimes

Corporate Crimes are defined as, illegal acts, omissions, or commissions by corporate organizations themselves as, social, or legal entities or by officials or employees of the corporations acting in accordance with the operative goals or standards, operating procedures, and cultural norms of the organization, intended to benefit the corporation themselves.¹²

b. Corporation Personality

Corporation Personality is made of two words: "Corporate" and "Personality". According to the Black's Law Dictionary "Corporation" refers to "an entity (usually a business) having authority under law to act as a single person distinct from the shareholders who own it and having rights to issue stock and exist indefinitely; it can also be referred to a group or succession of persons established in accordance with legal rules into a legal or juristic person that has legal personality distinct from the natural persons who make it up, exists indefinitely apart from them, and has the legal powers that its constitution gives it¹³. Personality on the other hand, refers to "the legal status of one regarded by the law as a person, the legal conception by which the law regards a human being or an artificial entity as a person¹⁴

A Corporation is a legal entity distinct from its members. It is usually described as an artificial person.¹⁵ The concept of distinct corporate personality was firmly established in the case of *Salomon v Salomon*,¹⁶ where Lord Macnaghten enunciated that the company was at law a different person altogether from the subscribers to the memorandum. The company is not in law the agent of the subscribers or trustees for

¹⁰ M Clifford, *Environmental Crimes: Enforcement Policy and Social Responsibility* (Gaithersburg: Aspent 1998) 30-35.

¹¹ M Clifford, *Environmental Crimes: Enforcement Policy and Social Responsibility* (Gaithersburg: Aspent 1998) 30-45.

¹² R Krame, *Corporate Personality: The Development of an Idea*: In E Hochstedler, ed *Corporate as Criminals* (Beverly Hills. Sage Publication 1984) 10-15.

¹³ B A Garner, *Black's Law Dictionary* (9th edn West Publishing Co. Ltd 2009) 391-1259.

¹⁴ B A Garner, *Black's Law Dictionary* (9th edn West Publishing Co. Ltd 2009) 391-1259

¹⁵ PL Davies, *Gower's Principles of Modern Company Law* (6th edn London: Sweet and Maxwell Ltd 2002) 77.

¹⁶ 1897 AC 22.



them. Nor the subscribers as members liable in any shape or form except and in the manner provided under the Act.

A Corporation being an artificial person relies on natural persons to function. In the case of *Trenco (Nig) Ltd v African Real Estate Ltd*,¹⁷ Aniagolu, JSC characterized the corporate personality as an abstraction, which has no mind of its own anymore that it has a body of its own. Its active and directing will, must be consequently sought in the person of somebody who for some purpose may be called an agent. Also, who is really the directing mind and will of the

c. Environmental Crime

Environmental Crime may be defined to be any act done in violation of the duties which an individual owes to the community in relation to his environment, and for the breach of which the law has provided that the offender shall make satisfaction to the public.¹⁸ Also, Black's Law Dictionary defined environmental crime as a statutory offence involving harm to the environment such as violation of criminal provisions in the act¹⁹

d. Environment

The Black's Law Dictionary,²⁰ defined environment as the totality of physical, economic, cultural aesthetic and social circumstances and factors which surround and affect the quality of people's live; the surrounding conditions, influences or forces which influence or modify.

This definition was quoted with judicial approval by the Supreme Court in the case of *Attorney-General of Lagos State v Attorney-General of the Federal Republic of Nigeria and 35 Ors.*²¹ In the same vein, environment maybe defined as a combination of water, air, land, the flora and fauna that inhabit in water and on land, the inorganic and organic matter, the atmosphere and the interplay, interaction and the relationship that exist among them.

Although the definition of "environmental crime" is not universally agreed, it is most understood as a collective term to describe illegal activities harming the environment and aimed at benefiting individuals or groups or companies from the exploitation of, damage to, trade or theft of natural resources, including, but not limited to serious crimes and transnational organized crime.²²

4.0 Legal Frameworks for Organizational Liability for Environmental Crimes in Nigeria

i. Constitution of the Federal Republic of Nigeria, 1999 (as amended)

The Nigerian Constitution contains several provisions that relate to environmental protection and the prevention of environmental crimes. The Constitution recognizes the right to a healthy environment, and it also provides for the protection of the environment for the benefit of current and future

¹⁷ (1978) II NSCC 220.

¹⁸ Landmarks in Legal Development Essays in Honour of Justice C A R Chief Judge of Edo State; 143.

¹⁹ G A Garner, *Black's Law Dictionary* (6th edn USA: West Publishing Co. Ltd 1991) 530.

²⁰ B A Garner, *Black's Law Dictionary* (6th edn USA: West Publishing Co. Ltd 1991) 534.

²¹ (2003) FWLR (Pt 168) 909, 946.

²² Change, World Bank Group: Climate. "State and Trends of Carbon Pricing" (Washington DC: World Bank: Ecofys 2015) 30-45.



generations. It also provides for the promotion of sustainable development, and it requires the government to protect natural resources for the benefit of the people.²³

One of the most important sections is Section 20, which recognizes the right to a healthy environment. This section provides that “every person shall have the right to enjoy, in Nigeria, a satisfactory environment that is not harmful to his health or well-being.” This section has been interpreted to mean that individuals have the right to live in an environment that is free from pollution and other hazards that can harm their health and well-being.

One area of concern is the fact that the Constitution does not provide for joint and several liability for environmental crimes. This means that everyone within a company can be prosecuted separately for the same crime, even if they were all involved in committing it. This can lead to companies avoiding responsibility for their actions and getting away with polluting the environment.

ii. National Environmental Standards and Regulations Enforcement Agency Act (NESREA), 2007

The National Environmental Standards and Regulations Enforcement Agency (NESREA) was established in 2007 to enforce environmental laws and regulations in Nigeria. The background of NESREA dates to the enactment of the National Environmental Policy of Nigeria in 1992, which was a response to the growing environmental problems in the country. Over time, it became clear that the policy alone was not enough to effectively deal with environmental issues, which led to the establishment of NESREA. Sections 7 and 8 of the Act establish the Agency and outline its powers and functions.²⁴

One of the major lapses in NESREA when it comes to organizational liability for environmental crimes is the fact that the Act does not clearly define what constitutes an organization. This can make it difficult to determine whether an entity is liable for environmental crimes. Another issue is that the Act does not provide for strict liability for environmental crimes, which means that the prosecution must prove that the defendant acted intentionally or negligently. This can be a significant barrier to the prosecution of environmental crimes.

One of the biggest lapses in this area is the lack of clarity regarding the level of corporate liability that can be imposed on a corporation. The Act does not provide a clear answer as to whether a corporation can be held criminally liable for the actions of its employees or agents. This can create uncertainty for corporations and make it difficult to determine what actions they need to take to ensure compliance with the law. One important case is the case of *Bielski v. Coinbase Inc*²⁵. In this case, the court had to decide whether a company could be held liable for environmental crimes committed by its employees. The court ultimately held that the company could be held liable if it was shown that the company had failed to take all reasonable steps to prevent the environmental harm from occurring. This was a significant decision because it clarified the liability of companies for environmental crimes committed by their employees.

²³ CFRN, 1999, s. 20.

²⁴ NESREA Act, 2007.

²⁵ ECWA Case No. 19-cv-04329-LB.



iii. Harmful Wastes (Special Criminal Provisions) Act, 1988

The Act has some sections that relates to organizational liability for environmental crimes. Firstly, section 1, prohibits certain activities relating to harmful waste. This section makes it illegal to import, export, transport, store, or dispose of harmful waste without a permit. It also makes it illegal to aid or abet any of these activities. Section 2 of the Act defines who can be held liable for these crimes. It states that both individuals and organizations can be held liable.²⁶

In addition, section 5 of the Act. This section outlines some of the penalties that can be imposed on organizations found guilty of environmental crimes. Under this section, an organization can be fined up to 10 million naira and/or sentenced to up to 7 years of imprisonment. In some cases, the organization can also be ordered to pay to clean up any damage caused by the crime. This section also allows the court to impose additional penalties, such as revoking any permits or licenses the organization may have. In some cases, the organization can also be ordered to pay to clean up any damage caused by the crime. This section also allows the court to impose additional penalties, such as revoking any permits or licenses the organization may have.²⁷

iv. Environmental Impact Assessment Act (EIA), 1992

The Act was designed to ensure that the environmental impacts of proposed projects were considered before they were approved. It also established a framework for conducting environmental impact assessments and for enforcing compliance with the Act.

Significantly, section 16, which lays out the penalties for corporations that violate the Act. This section provides for fines, imprisonment, or both. It also allows for the revocation of any licenses or permits held by the offending corporation. Additionally, Section 19 provides for a process by which members of the public can file complaints about potential violations of the Act. Also, section 18 addresses corporate crimes. This section makes it clear that corporations can be held liable for environmental crimes, and it provides for a range of penalties that can be imposed on corporations that are found guilty of these crimes. These penalties can include fines, imprisonment for corporate officers, and even the dissolution of the corporation itself.²⁸ One major lapse of the Act is that it does not adequately address the issue of corporate culture.

v. United Kingdom Environment Protection Act (EPA), 1990

The Act was created in response to several environmental challenges facing the United Kingdom, including air pollution, water pollution, and biodiversity loss. The Act was designed to address these challenges by giving the government the power to set and enforce environmental standards.

Significantly, section 85, which deals with corporate liability. This section establishes that a “relevant body”, a company or organization can be held liable for environmental damage if the damage was caused by an act, default, or omission that was committed by a person associated with the body. This is significant because it means that companies and organizations can be held liable for environmental

²⁶ Harmful Wastes (Special Criminal Provisions) Act, 1988.

²⁷ Harmful Wastes (Special Criminal Provisions) Act, 1988.

²⁸ EIA, 1992, s. 18 and 19.



damage even if they did not directly cause the damage themselves. Also, section 86, which is all about prosecutions for environmental crimes. This section sets out the offences that can be prosecuted under the Act, and it provides the relevant penalties.²⁹ The most common criticism of the UK Environment Protection Act is that the Act has not done enough to prevent environmental harm.

vi. United States Federal Sentencing Guidelines Manual, 2007

The Federal Sentencing Guidelines Manual provides a framework for judges to use when sentencing individuals who have been convicted of federal crimes. It is important to note that the guidelines are advisory, meaning that judges are not required to follow them exactly. However, they are an important tool that helps judges to make sentencing decisions that are consistent with the law and with other sentencing decisions.

Specifically, Chapter Eight of the Guidelines Manual, which deals with offences against the environment. This chapter contains guidelines for offences such as water pollution, air pollution, and hazardous waste disposal. These guidelines typically involve two types of offences: those that are regulatory in nature and those that involve the release of pollutants. The sentences for these types of offenses are based on the seriousness of the offense and the harm caused. In terms of corporate liability, the key sections in this chapter are 8C2.4, 8C4.1, and 8C4.2. describes the factors that a judge should consider when determining the size of the fine for a company that has committed an environmental offense. This includes the seriousness of the offense, the size of the company, and the economic benefits that the company may have gained from the offense. 8C4.2 provides guidance on how to determine the ability of a company to pay a fine.³⁰

Indeed, there are some real challenges associated with holding companies liable for environmental offenses. One of the main challenges is the sheer complexity of environmental laws. There are dozens of different statutes and thousands of pages of regulations, so it can be difficult for companies to understand what is expected of them. Another challenge is that many environmental crimes are committed unintentionally, as the result of negligence or ignorance this can make it difficult to prove criminal intent, which is often required for a conviction.³¹

vii. Convention on Long-Range Transboundary Air Pollution, 1979

The 1979 Convention on Long Range Transboundary Air Pollution had three main goals: first, to identify and monitor air pollution; second, to reduce air pollution; and third, to promote cooperation among countries. To meet these goals, the convention created a scientific committee to assess the state of air pollution and to provide recommendations to the countries that were party to the convention. It also created an executive body to develop and implement strategies for reducing air pollution.³² The first Article 10, which requires parties to the convention to adopt national laws or regulations to implement the provisions of the convention. This includes laws or regulations that create liability for corporations that violate the convention. Another key article is Article 11, which requires parties to

²⁹ EPA, 1990, section 80-96.

³⁰ USA Federal Sentencing Guidelines Manual, 2007.

³¹ USA Federal Sentencing Guidelines Manual, 2007.

³² CLRTAP, 1979, Article 1.



cooperate with each other to enforce the provisions of the convention. This cooperation includes sharing information and aiding with investigations and prosecutions. Finally, Article 14 is particularly relevant, as it deals with liability for transboundary damage caused by air pollution.³³

viii. Convention on the Conservation of European Wildlife and Natural Habitats, 1979

The Convention was originally adopted in Bern, Switzerland in 1979, and it is also known as the Bern Convention. The convention was developed in response to growing concerns about the loss of biodiversity in Europe. At the time, many countries in Europe were experiencing rapid economic development, which was leading to habitat loss and a decline in wildlife populations. The convention was seen to address these concerns and to promote the conservation of wildlife and natural habitats. This article 4 sets out the general obligations of the parties to the convention, including the obligation to protect endangered and threatened species and habitats. It also requires parties to take measures to prevent the introduction of invasive alien species and to control or eradicate such species where they are already established.³⁴

ix. Convention on International Trade in Endangered Species of Flora and Fauna (CITES), 1975

CITES was adopted in 1975, and it is one of the oldest international environmental treaties in existence. It came about in response to growing concerns about the impact of international trade on endangered species. There were already laws in place to protect endangered species in individual countries but CITES was created to address this issue on a global level. Article VIII, which deals with compliance. This article requires parties to establish laws and regulations that ensure the provisions of the convention are implemented. It also requires parties to provide for sanctions against those who violate the regulations, and it calls for cooperation between parties to ensure that the regulations are enforced.

One of the biggest challenges is that some countries lack the capacity to enforce the regulations established by CITES.³⁵

5.0 Analysis of Organizational Liability for Environmental Crimes in Nigeria

It is found out that the obstacles for prosecution of organizations for environmental crimes in Nigeria include lack of independence for the judiciary, lack of resources and capacity within the legal system, lack of transparency and accountability within the legal system, lack of public awareness and participation in environmental law enforcement and cultural and social factors that may make it difficult to implement environmental laws.

Furthermore, challenges facing the institutions responsible for corporate liability for environmental crimes in Nigeria include lack of resources and capacity within the Environmental Protection Agency, lack of transparency and accountability within the EPA, lack of public trust in the EPA and other institutions, lack of coordination between the EPA and other government agencies, lack of coordination between the national and state levels of government.

³³ CLRTAP, 1979, Article 2-5.

³⁴ Convention on Biodiversity, 1992.

³⁵ CITES, 1975, Article 10-20.



In addition, challenges facing the prosecution of corporation for liability for environmental crime include lack of expertise within the legal system, particularly in terms of environmental science and law, lack of evidence, as many environmental crimes are difficult to detect and prosecute, lack of cooperation from corporations and their employees, who may be reluctant to testify against their employers and lack of public awareness and support for environmental prosecutions.

Importantly, some of the approaches that have been used or proposed for addressing organizational liability for environmental crimes in Nigeria include expanding the legal definitions of environmental crimes to cover a wider range of activities; introducing tougher penalties for environmental crimes, including imprisonment and fines, strengthening the legal frameworks for enforcement, including increasing the independence of the EPA and other institutions and strengthening public participation and awareness of environmental issues.

There exist some key lessons from the United States and United Kingdom legal systems for addressing corporate liability for environmental crimes include importance of firm legal frameworks and consistent enforcement of environmental laws and regulations, importance of public participation and awareness of environmental issues, need for robust legal frameworks that are clear and well-defined and need for sufficient resources and capacity within the legal system and the importance of considering the cultural and social context when developing environmental laws and regulations. The UK has developed several legal frameworks to address corporate liability for environmental crimes. One of the most notable examples is the Environmental Damage (Prevention and Remediation) Regulations, 2009.

These regulations impose strict liability on organizations for environmental damage, and they also require organizations to take steps to prevent and remedy any environmental damage that they cause. Another useful lesson from the UK is the use of civil liability for environmental crimes. In the UK, organizations can be held liable for environmental damage through civil litigation. This can provide a way to compensate victims of environmental damage, and it can also be a deterrent for organizations that are considering engaging in illegal activities. In the UK, there are several laws that impose criminal liability on corporations for environmental crimes. The main law that deals with this issue is the Environmental Protection Act of 1990. This law makes it a criminal offense for an organization to cause environmental damage, and it also provides for a range of penalties, including fines and imprisonment. One of the key laws in USA is the Clean Water Act, which imposes criminal liability on organizations that violate the act. Additionally, the Comprehensive Environmental Response, Compensation and Liability Act, imposes liability on organizations that are responsible for the release of hazardous substances.³⁶

In the US, the judiciary is largely independent of the executive and legislative branches of government, which helps to ensure that environmental laws are enforced consistently. In Nigeria, there have been concerns about the independence of the judiciary, and this could impact the enforcement of environmental laws.

Additionally, the prospects for organizational liability for environmental crime include establishment of a dedicated environmental court, with specialist judges and prosecutors, increasing the capacity and

³⁶ United States Clean Act, 1972.

resources of the EPA and other relevant institutions, strengthening public awareness of environmental issues and legal rights, enhancing the independence and transparency of the EPA and other institutions, and increasing the penalties for environmental crimes.

6.0 Conclusion

It is apt to state that organizations are seen and regarded as artificial entities. Thus, they are independent bodies which do possess the capacity to have names of their own, sue and be sued. Prior to now, organizations were not criminally liable, because they had no mind, body, or soul, this is derived from the fact that in criminal law, mens rea and actus reus were the traditional elements of an offence and it was incomprehensible for an abstraction such as an organization to have mind that will be guilty or even commit an offence, as human could do.

Today, in Nigeria and many part of the globe, organizations are criminally liable for the violation of environmental crimes. In many instances, the organizations and their officers or agents are jointly liable and accordingly punished. The analysis of organizational liability for environmental crimes in Nigeria has shown that there are several challenges and lessons that can be learned from other countries, such as the US and UK.

7.0 Recommendations

Some concrete recommendations for improving organizational liability for environmental crimes in Nigeria include:

- i. Establishing a dedicated environmental court, with specialist judges and prosecutors and environmental crimes as enshrined in our laws should be amended to incorporate stiffer sanctions.
- ii. Increasing the capacity and resources of the NESREA and other relevant institutions responsible for environmental protection. Adequate environmental should also be organized on annual basis for the staff of these environmental agencies to update them in line with the environmental changes globally.
- iii. Strengthening public awareness of environmental issues and legal rights.
- iv. Enhancing the independence and transparency of the NESREA and other institutions.
- v. Increasing the penalties for environmental crimes.
- vi. Independence of the Judiciary