
# EUROPEAN ARREST WARRANT

## RESULTS OF THE FIRST SEMINAR OF THE AWARE PROJECT

The EAW AWARE Seminar Series are three, high-level information and networking events, aimed at European judges, prosecutors, lawyers and academics working and researching around the European Arrest Warrant tool. The seminars were held in Bremen (October 2019), Bucharest (March 2020) and Lisbon (October 2020), and funded by the European Commission Justice Programme. The series is led by Bremen Ministry of Justice and Constitution and Bremen Higher Regional Court of Appeal (Germany), with the support of partners Superior Council of Magistracy (SCM) (Romania), IPS (Portugal) and Antigone (Italy), and guided by an Advisory Committee of Loyola University (Spain) and the National School of Judiciary and Public Prosecution (Poland).

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# THE EUROPEAN ARREST WARRANT (EAW).

## LEGAL FRAMEWORK

The European Arrest Warrant (EAW) finds its legal basis in the Council Framework Decision on the European Arrest Warrant of 13.06.2002 (2002/584/JHA), as amended by Council Framework Decision of 26.02.2009 (2009/299/JHA) (FD-EAW).

It is based on the principle of **mutual recognition** of judicial decisions between MS (Art. 1(2)).

In order to issue an EAW, the requesting authorities have to fill a **general uniform EAW form document** (Art. 8) stating (among other things) the general information of the requested person and the offence that s/he is requested for. There is **catalogue of offences** thanks to which executing States no longer need to establish double criminality (Art. 2(2)). For all other offences that are not in this specific list, the double criminality needs to be ascertained.

The main purpose of the introduction of the EAW was to simplify and accelerate extradition proceedings. Therefore, the Framework Decision includes only a limited list of grounds for refusal of execution in Arts. 3, 4 and 4a. Currently, the focus of discussion – and the topic of this publication – is whether judges can and have to refuse the execution of an EAW for other reasons as well.

## MANDATORY REFUSAL (ART. 3)

- AMNESTIES
- (YOUNG) **AGE OF WANTED PERSON** (NO CRIMINAL LIABILITY)
- **NE BIS IN IDEM** SITUATION

## OPTIONAL REFUSAL (ART. 4, 4A):

- **LACK OF DOUBLE CRIMINALITY** (FOR NON-LISTED CRIMES)
- ***NE BIS IN IDEM*** (PROSECUTION OR DECISION NOT TO PROSECUTE IN OTHER MEMBER STATE)
- **IN ABSENTIA-CASES**
- **STATUTE-BARRED** IN EXECUTING MS IF FALLS WITHIN ITS JURISDICTION
- **TERRITORIAL ISSUES**
- **OWN INVESTIGATION** (WHERE THE REQUESTED PERSON IS BEING PROSECUTED IN THE EXECUTING MS FOR THE SAME ACT AS THAT ON WHICH THE EUROPEAN ARREST WARRANT IS BASED)
- IF THE REQUESTED PERSON IS A **NATIONAL OR RESIDENT** OF THE EXECUTING STATE (IF THE EAW WAS ISSUED FOR THE ENFORCEMENT OF A SENTENCE), SAID STATE CAN TAKE OVER THE ENFORCEMENT OF THE SENTENCE.

# HOW ABOUT HUMAN RIGHTS?

In the **Framework Decision on EAW there is no provision which provides that the protection of human rights in general might be a reason** for the refusal of execution of EAW, though reference is made in the preamble.

## DETENTION CONDITIONS

The Charter of Fundamental Rights of the European Union (the Charter) contains a general prohibition of torture and other inhuman or degrading treatments. This is an absolute prohibition and therefore, the European Court of Justice (ECJ) in its groundbreaking decisions **Aranyosi and Căldăraru** (Cases C-404/15 and C-659/15 PPU, 05.04.2016) stated that the EAW Framework Decision does not affect the **States' general obligation to respect the fundamental rights** enshrined in the Charter.

This means that the execution of EAW must be refused if it would lead to violation of this prohibition in the issuing State.

## RIGHT TO A FAIR TRIAL

Since the right to a fair trial is so fundamental for the good functioning of a democracy, the ECJ has decided with the "LM" decision (C-216/18 PPU LM) that if there are sufficient grounds to believe that the requested individual is at real risk of suffering a breach of his/her fundamental right to a fair trial, **the executing judicial authority must refrain from giving effect to the EAW related to him.**

**IN 2017, 14,491 EAWs ISSUED AND 6,371 EXECUTED**

Average length of time from arrest until surrender:

- 15 days (with consent)
- 40 days (without consent)

# EAW AND PRISON CONDITIONS

## COMPETENCES AND RESPONSIBILITIES OF THE EXECUTING STATE

As already mentioned, following the *Aranyosi* and *Căldăraru* cases, the ECJ decided that it is the competence and responsibility of the executing judge to guarantee the requested person's human rights against risks in the issuing State. **In practice, the ECJ has elaborated a two-stage approach (also known as Aranyosi** test) to determine the risk of inhuman treatment.

**First stage**: if the executing State has objective, reliable, specific and properly updated evidence on prison conditions that demonstrate systemic deficiencies in the issuing State, the executing State must determine whether this evidence shows the **real risk of inhuman or degrading treatment** posed by the general conditions of detention in the issuing State.

**Second stage**: if the courts of the executing State have determined that there is such a risk (first stage), they have to conduct an **individual assessment** of the real risk that the requested person be subjected to inhuman or degrading treatment in the concrete case. If this risk cannot be discounted, the surrender procedure must be postponed/terminated.

## SOURCES TO DEMONSTRATE SYSTEMIC DEFICIENCIES IN THE ISSUING STATE

- Judgements of the European Court of Human Rights (ECtHR)
- Reports of the Committee for the Prevention of Torture (CPT)
- Reports of other international (e.g. UN bodies)
- Reports of other NGOs
- Information available from national case law

## RELEVANT INFORMATION TO EXCLUDE A REAL RISK OF INHUMAN TREATMENT

- Concrete conditions of detention for the requested person (e.g., reporting an improvement of conditions or specifying specific prisons for the requested person)
- Comprehensive data on conditions of detention, including mitigating factors
- Information must cover conditions of detention in all prisons in which, the requested person is intended to be detained
- The availability of judicial remedies under national law against conditions of detention might be relevant, but their availability as such does not exclude risk of inhuman treatment

# HOW IS THE TWO-STAGE APPROACH TO BE APPLIED IN PRACTICE?

In its subsequent case law (in particular in the case **Dorobantu**, C-128/18, 15.10.2019), the ECJ clarified some principles and procedures to apply the two-stage approach, in particular:

- The two-stage approach has to be applied even if the requested person consents to its surrender (absolute prohibition of torture)
- The executing authority must request all necessary information on the conditions in which the person concerned will be detained in the issuing state
- The executing authority must rely on the assurances from the issuing State that on the basis of the concrete conditions of detention in the issuing state, the requested person will not be subjected to inhuman or degrading treatment; however, in exceptional circumstances where the executing authority finds that the person concerned is still at risk despite such an assurance, the executing authority can refuse to execute the EAW.
- The refusal of execution of EAW on the basis of national law (even if it provides for stricter standards of detention) is not allowed
- The applicable standards of detention are those developed by the ECtHR:
  - the primarily relevant factor is the personal space available to each prisoner
  - other factors to be taken into account for a general assessment of the standards of detention include issues such as sanitary conditions and the detainee's freedom of movement within the prison.

# PRISON CONDITIONS

## BASING THE STANDARDS FOR CONDITIONS OF DETENTION ON ECTHR STANDARDS

**Standards on conditions of detention** can be deduced by the jurisprudence of the ECtHR falling especially under **article 3 of the European Convention of Human Rights (ECHR)**.

Article 3 establishes the absolute prohibition of torture. The ECJ has decided that these standards are to be respected also under the system of the EAW and the European Charter.

In order to constitute a violation of Art. 3, an act of ill-treatment must reach a **"minimum level of severity",** the assessment of which depends on:

- cumulative effect of problems,
- duration of ill-treatment,
- physical and mental effects,
- sex, age and state of health of the victim.

## ARTICLE 3 ECHR

### "NO ONE SHALL BE SUBJECTED TO TORTURE OR TO INHUMAN OR DEGRADING TREATMENT OR PUNISHMENT."

As a general principle, the suffering and humiliation of the deprivation of liberty must go beyond that inevitable element of suffering and humiliation connected with detention. Also, the intention to humiliate or debase is a relevant factor, but not necessary to find a violation. Finally, financial or logistical difficulties are no excuse to breach Art. 3.

In the following pages, are reported the standards of the ECtHR on some specific issues regarding detention conditions.


# HAVING TROUBLE FINDING RELEVANT OR IMPORTANT NEW CASE-LAW AMIDST THE LARGE STREAM OF CASES DECIDED IN STRASBOURG?

HUDOC ECtHR Database
https://hudoc.echr.coe.int/eng#{"documentcollectionid2":["GRANDCHAMBER","CHAMBER"]}

Short video on how to search HUDOC
https://www.youtube.com/watch?v=reO12mvvlYE&feature=plcp

Finding and Understanding the Case-Law: https://www.echr.coe.int/Documents/CLIP_Finding_understanding_case_law_ENG.pdf (English version)

Case –law analysis: https://www.echr.coe.int/Pages/home.aspx?p=caselaw/analysis&c (link to all languages via home page)

Criminal detention conditions in the European Union: rules and reality
https://fra.europa.eu/sites/default/files/fra_uploads/fra-2019-criminal-detention-conditions-in-the-eu_en.pdf

# PERSONAL SPACE AVAILABLE TO DETAINEES

The most important problem concerning the issue of prison conditions in the application of the EAW system is **overcrowding** and the ECtHR has often found a violation of art. 3 of the ECtHR because the standards on **personal space available to each detainee** were not met in a multi-occupancy cell.

**Less than 3 sq. m.**

The lack of space is so serious that it gives rise to a strong presumption of a breach of article 3. No other aggravating factors are relevant.

**Between 3-4 sq. m.**

Space is a significant factor that needs to be taken in consideration along with other factors (e.g. time spent in the cell).

**More than 4 sq. m.**

Space is not an issue, other factors are relevant for the decision.

The calculation is made by **taking the overall surface of the cell without counting the in-cell sanitary facilities, but including the space taken up by furniture**. The standards are the same for sentenced and remand detainees.

## AGGRAVATING FACTORS

- State of repair and cleanliness
- Access to natural light, ventilation and heating
- Sanitary facilitie
- Outdoor exercise
- Purposeful activities

## COMPENSATING FACTORS

- Short period/occasional/ minor reductions
- Out-of-cell time and activities
- Appropriate detention facility, i.e. no other aggravating factors

# CASE STUDY

## MURŠIĆ V. CROATIA, NO. 7334/13, 20/12/ 2016

The applicant complained that he disposed of less than 3 sq. m. in multi-occupancy cells for a period of fifty days, and that there were periods in which he was placed in cells of 3 and 4 sq. m. Cells were badly maintained, humid, dirty and insufficiently equipped; the sanitary facilities were not separated from the rest of the cell. He did not have access to work, recreational nor educational activities. He was allowed to move freely outside the cell between 4 pm and 7 pm.

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# SANITARY CONDITIONS

So far, refusals to execute an EAW by the courts on the basis of inhuman prison conditions in the issuing State have been based solely on a lack of personal space. Under the case law of the ECtHR, however, other factors could have to be considered as well (as aggravating or compensating factors), if it is found that these factors constitute general or systemic problems in the conditions of detention in the issuing state. Concerning sanitary conditions as an example of such other factors, the ECtHR generally refers to the standards set under the European Prison Rules (EPR). The EPR state that the spaces where detainees work or live should have windows allowing the entrance of natural light and adequate ventilation. Artificial light also has to be provided (Rule 18.2). The prison facility should always be kept clean (Rule 19.1) and upon entrance, detainees should be accommodated in clean cells (Rule 19.2). Prisoners should also be given general cleaning materials (Rule 19.6).

Sanitary facilities should be hygienic and detainees' privacy should be respected (Rule 19.3), prisoners should be able to bath or shower at least twice a week and be provided with toiletries Rules 19.4 and 19.6).

The CPT (European Committee for the Prevention of Torture) highlighted that running water should be available and the detainee should have access to a toilet facility either inside or outside the cell.

# CASE STUDY

## CANALI V. FRANCE, NO. 40119/09

The applicant shared a cell measuring 9 sq. m. with another prisoner for six months. The living area was very cramped, but wasn't in itself a violation of Article 3. In addition, Mr Canali could spend very limited time outside his cell and the sanitary facilities and hygiene were not acceptable for a multi occupancy cell, since the toilet annex was only partially closed off. The Court found that cumulative effect of the cramped conditions and the failings in respect of hygiene regulations had aroused in the applicant feelings of despair and inferiority capable of debasing and humiliating him. These conditions of detention amounted to degrading treatment, leading to a violation of Article 3.

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# OUT-OF-CELL TIME AND PURPOSEFUL ACTIVITIES

The ECtHR also refers to the CPT (European Committee for the Prevention of Torture) standards when considering the question of the freedom of movement of the detainee, which could also in an EAW case be considered as an aggravating or compensating factor in the determination of whether prison conditions constitute a breach of the detainee's human rights. In particular, the Court in the abovementioned Muršić judgement states the following:

"[A]ll prisoners, without exception, must be allowed at least **one hour of exercise in the open air every day** and **preferably as part of a broader programme of out-of-cell activities**, bearing in mind that outdoor exercise facilities should be reasonably spacious and whenever possible offer shelter from inclement weather (see further Neshkov and Others, cited above, § 234). Indeed, according to the relevant international standards **prisoners should be able to spend a reasonable part of the day outside their cells**, engaged in **purposeful activity of a varied nature** (work, recreation, education)".

The CPT pointed out that detainees should be engaged in purposeful activities outside their cells for **a minimum** of eight hours a day.

# EAW AND REQUIREMENTS FOR A FAIR TRIAL

In 2018, the ECJ had to answer to a question posed by an Irish court on the **right to a fair trial**. In the recent "LM" decision (C-216/18 PPU LM), the Irish court asked whether it could apply the **Aranyosi test** on an important issue such as the right to a fair trial, i.e. whether the courts of the executing State have to refuse the enforcement of an EAW where there is the danger that the requested person would not have a fair trial before the courts of the issuing State. The issuing State of the EAW was Poland, which at the time was already under the scrutiny of the EU Commission because of the risk of a threat to the rule of law in the country.

The ECJ responded positively and specified the two stages of the test that need to be taken.

## FIRST STAGE

The executing State has to assess whether the requesting State satisfies the requirements of **judicial independence** from a **systemic** point of view. If there is a real risk of systematic deficiencies, the court has to carry out an individual assessment.

## SECOND STAGE

The executing State has to assess the actual impact of the systemic deficiencies on the independency of the tribunal that has jurisdiction over the proceeding. If so, a specific assessment has to verify if the particular circumstances of the case (e.g. personal situation, nature of the offence) would put the requested person in a real risk to suffer a breach of the right to a fair trial.

In the "LM" case, the ECJ concluded that if the executing judicial authority cannot "discount the existence of a real risk that the individual concerned will suffer in the issuing Member State a breach of his fundamental right to an independent tribunal and, therefore, of the essence of his fundamental right to a fair trial, the executing judicial authority must refrain from giving effect to the European arrest warrant relating to him".

## SPECIFICATIONS ON THE FIRST STAGE

- The information has to be based on information that is "objective, reliable, specific and properly update".
- The executing State does not need to make its own assessment if the requesting State is already under scrutiny for the breach of Article 7.1 of the TEU ("clear risk of serious breach" of EU values) if the evidence suggests that there are systematic deficiencies in the judiciary.

## A SPECIFIC ASSESSMENT HAS TO BE CARRIED OUT ON THE BASIS OF…

- any information provided by the requested person who expresses concerns on his/her situation,
- any supplementary information requested by the executing judicial authority to the issuing judicial authority that is necessary to assess whether there is a risk of breach of the right to a fair trial,
- any other information requested by the executing judicial authority to the central authority of the issuing State.


## ECTHR CASE-LAW

In 1989, with the *Soering v. The United Kingdom* judgement the ECtHR established that the right to a fair trial is essential to a democratic society and does not exclude that an issue might be raised in exceptional circumstances if the requested person "has suffered or risks suffering a flagrant denial of a fair trial in the requesting country".

In the 2012 *Othman (Abu Qatada) v. The United Kingdom* judgement, the ECtHR specified that the breach of the principles of fair trial has to "amount to a nullification or destruction of the very essence of the right" guaranteed by Article 6 of the ECHR. This means that it has to go beyond mere irregularities or lack of safeguards in the trial procedures.

## MORE REFERRALS FOR PRELIMINARY JUDGMENTS TO THE ECJ

The development of the system of the EAW is primarily driven by the ECJ. In order to give the ECJ the possibility to clarify and develop the application of the EAW, national courts should make use of their right and duty to a make referrals for preliminary judgments to the ECJ.

A request for a preliminary ruling must be precise and should consider the relevance and necessary content of assurances. It should have an understanding of double criminality requirements and relevance of consent of the requested person.

## APPLICATIONS TO THE ECTHR

Applications to the ECtHR are made by individuals claiming a breach of their human rights. Although it might appear easy to file an application to the ECtHR, only a limited number will be successful. However, these successful applications have an impact: not only do they provide redress for the individual, but can also improve conditions of detention in 47 countries.

# HOW TO ENSURE AN APPLICATION WILL HAVE AN IMPACT

- ✓ Ensure it is a valid application and a case that merits being communicated to the Government
- ✓ A Committee/Chamber/Grand Chamber must render a decision and there must be an enforcement mechanism
- ✓ Use relevant sources of information about detention conditions, such as:

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- the European Judicial Network Practical Tools for Judicial Cooperation in your country https://www.ejn-crimjust.europa.eu/ejn/EJN_Home.aspx
- Fundamental Rights Agency papers https://fra.europa.eu/en/products/search and other FRA information:
  - ★ CPT Annual Reports published under Article 12 of the European Convention for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment https://www.coe.int/en/web/cpt/annual-reports
  - ★ ECtHR decisions https://www.echr.coe.int/Pages/home.aspx?p=caselaw&c=
- And ECtHR Information Notes, which contain legal summaries of cases of the Court that are considered of particular interest, with translations into the other official language https://www.echr.coe.int/Pages/home.aspx?p=caselaw/analysis/clin

# PROMOTING EU-WIDE DISCUSSION OF EXTRADITION ISSUES AND DECISIONS

European Commission webpage with handbook and other materials https://ec.europa.eu/info/law/cross-border-cases/judicial-cooperation/types-judicial-cooperation/european-arrestwarrant_en#handbookonhowtoissueandexecuteaeaw

ECtHR Seminars and Online Reports https://www.echr.coe.int/Pages/home.aspx?p=events/ev_ar&c

European Judicial Training Network training courses http://www.ejtn.eu/Catalogue/EJTNs-searchable-database/

E-Justice.eu e-learning course on EAW https://e-justice.europa.eu/content_european_arrest_warrant-90-en.do

ERA Specialised e-learning course: The EAW: 10 key questions for defence counsel https://www.era.int/cgi-bin/cms?_SID=NEW&_sprache=en&_bereich=artikel&_aktion=detail&idartikel=124952

# FOCUS ON: GERMANY

In 2018 Germany issued 2.822 European Arrest Warrants (EAW). 1.185 persons were surrendered to Germany. In the same year 1.240 persons were surrendered from Germany to another European member state. In 226 cases, extradition was denied. Despite the fact that in 50% of all cases the suspect consented to surrender, the average time to decide each case was longer than in the years before. Taking into account current jurisprudence of the European Court of Justice in Luxembourg, the European Court for Human Rights in Strasbourg and the German Federal Constitutional Court, it seems that deciding on EAW cases get more and more difficult and we might risk the main advantages of EAW proceedings in concurrence with traditional extradition proceedings: mutual trust between EU member states which allows for shorter requests, easier evaluation in the executing state and quicker decisions leading to less time spent in prison.

More about use of EAW in Germany

From EUCRIM

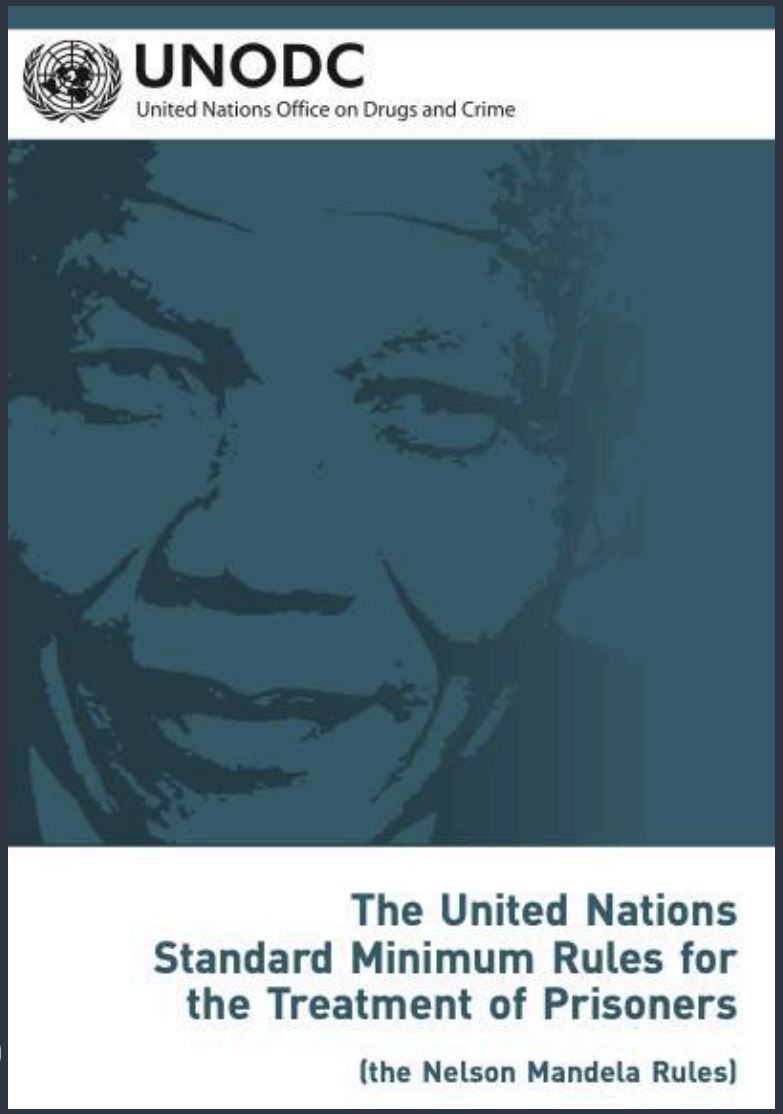
https://eucrim.eu/search/?q=germany+EAW

# THE EAW TOOL FROM THE PRISON GOVERNOR PERSPECTIVE:

National legislation (Prison Act) and the European Prison Rules describe the legal standards that must be observed in custody in order to achieve the goal of detention (to re-socialise) and of course to comply with the standards for the protection of human rights. Judges should seek direct contact in order to generate a common understanding of prison conditions that establish humane penal system and criminal justice in a balanced relationship.

Prison governors seek to improve conditions in the prison. It is recognised that an effective, fair, accountable and humane criminal justice system is based on the commitment to uphold the protection of human rights in the administration of prison institutions. Prison governors shall promote safety, security and humane conditions for prisoners to all time.

- European Prison Rules (translated into all EU languages) https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d8d25
- United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules) https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-ebook.pdf
- United Nations Rules for the Protection of Juveniles Deprived of their Liberty https://www.unodc.org/pdf/criminal_justice/United_Nations_Rules_for_the_Protection_of_Juveniles_Deprived_of_their_Liberty.pdf
- United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders with their Commentary (the Bangkok Rules) https://www.unodc.org/documents/justice-and-prison-reform/Bangkok_Rules_ENG_22032015.pdf



# LEGAL REMEDIES FOR REQUESTED PERSONS IN EAW CASES

1 **Defence against extradition in the issuing State:**

- consulting foreign legal experts
- reviewing/attacking extradition request in the issuing State
- co-operation with judicial authorities in issuing State as an alternative

2 **Requests for preliminary rulings of the ECJ**

defence lawyers can seek to convince the executing court to request preliminary rulings of the ECJ, e.g. on double criminality or conditions of detention issues

3 **Providing executing Court with information**

provide executing courts with information about proceedings in issuing State (e.g., in absentia proceedings) or about human rights concerns (e.g., prison conditions)

4 **Questioning detention in extradition proceedings**

- provide information about factors mitigating flight risk (e.g., steady job, family)
- voluntary surrender/offering bail and other methods to counter flight risk

Where do judges find training in other mutual trust tools? European Criminal Bar Association Handbook on the EAW for Defence Lawyers http://handbook.ecba-eaw.org/

# FOCUS ON PRISONERS WITH MENTAL DISABILITIES AND/OR HEALTH CONDITIONS

The Nelson Mandela Rules number 109 covers persons who are found to be not criminally responsible, or later diagnosed with severe mental disabilities and/or health conditions, for whom staying in prison would mean an exacerbation of their condition. For these, the rules recommend transfer them to mental health facilities as soon as possible. Other prisoners with mental disabilities and/or health conditions can be treated in specialized facilities under the supervision of qualified health-care professionals. The health-care service shall provide for the psychiatric treatment of all other prisoners who are in need of such treatment. Rule 110 underlines the need to ensure if necessary the continuation of psychiatric treatment after release and the provision of social-psychiatric aftercare.

# BREMEN SECURE MENTAL HEALTH CLINIC

During the October 2019 Bremen Seminar, participants visited the Secure Mental Facility, which currently houses 132 men and 8 women in secure conditions, referred from Bremen Prison system, across various levels of treatment (from intensive therapy to preparation for release). The equivalent cost is 380€ per person per day, the average stay is 5-6 years and the average age of clients is around 30 years old. Staff note in recent years an increase in drug-related mental health issues and in foreign nationals in the system. In the latter, every effort is made to support their rehabilitation in their home environment on release. Around 5% make a full recovery.

World Health Organisation: Europe Office site for mental health in prison http://www.euro.who.int/en/health-topics/health-determinants/prisons-and-health/focus-areas/mental-health

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2020