Introduction

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

Strengthening the future of the European Public Prosecutor's Office: an introduction

Dominik Brodowski & Sebastian Trautmann[*]

In June 2021, the newly established European Public Prosecutor's Office (EPPO) became fully operational in its task to investigate and prosecute crimes against the financial interests of the European Union (so-called PIF offences). Based on initial practical experiences and theoretical reflections on the EPPO's functioning, several areas for improvements in its legal framework have emerged. This article provides an overview of the state of the EPPO, its founding regulation, ideas for its improvement, and briefly introduces the contributions included in this volume.

1 The EPPO as motor for transformation in the European 'Area of Freedom, Security and Justice'

On 1 June 2021, the EPPO 'assume[d] the investigative and prosecutorial tasks' in line with Article 120(2) of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office (EPPO Regulation). As the first supranational prosecutorial institution, it began representing Europe in courtrooms across Europe, and it symbolises the European interests at stake when crimes committed against the financial interests of the EU are brought to justice.[1]

Such a far-reaching 'milestone'[2] of European integration in the field of criminal justice could not be reached overnight. Instead, the seed for the

* The article reflects solely the opinion of the author as a private individual and is not related to the official position of the EPPO.

1 Just see D Brodowski, 'Die europäische Staatsanwaltschaft als Meilenstein supranationaler Kriminalpolitik' (2022) *Goltdammer's Archiv für Strafrecht* 421; F Meyer '§ 3 Aufgaben der EUStA – Rolle im System europäischer Strafverfolgung' in H-H Herrnfeld and R Esser (eds), *Europäische Staatsanwaltschaft. Handbuch* (Nomos 2022) mn 3.

2 This metaphor is used widely, just see S Allegrezza 'A European Public Prosecutor Office to Protect Common Financial Interests: A Milestone for the EU Integration

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

EPPO was planted around thirty years ago[3] and found its way into the Lisbon Treaty in Article 86 of the Treaty on the Functioning of the European Union (TFEU). Once the Commission tabled its proposal in 2013,[4] a tedious legislative process followed,[5] where a political compromise could be reached on a decentralised 'Single Office' (Article 8(1) EPPO Regulation), prosecuting PIF crimes (as defined in national law implementing EU directives, Article 22 EPPO Regulation), and operating on the basis of national criminal procedure unless the EPPO Regulation contains specific rules (Article 5(3) EPPO Regulation).

The unique setting and design of the EPPO – and the underlying regulatory choices – create not only a fascinating research area, but also substantial momentum for the further evolution of European criminal justice as one of the pillars of the European 'Area of Freedom, Security and Justice' (AFSJ) set out in Article 3(2) of the Treaty on European Union (TEU). It raises a multitude of questions, such as: Has the EPPO become a guardian of common European values, in particular the rule of law, and thus a cornerstone of European integration? What impact do the EPPO and its further development have on the future of the 'Area of Freedom, Security and Justice'? Do the EPPO and the supranationalisation caused by its establishment contribute to a new self-image, but also to a new external perception of the EU?

These were the guiding questions for a first EPPO-related workshop at Villa Vigoni, the German-Italian Centre for European Dialogue in Menaggio, Italy, in October 2023, supported by Saarland University and its Cluster of European Research (CEUS). In view of its interdisciplinary focus on projections upon, reflections about, and transformations of Europe, the workshop was structured in three sections.

Process' in K Ambos and P Rackow (eds), *The Cambridge Companion to European Criminal Law* (Cambridge University Press 2023) 413; E Schramm 'Auf dem Weg zur Europäischen Staatsanwaltschaft' (2014) 69 *JuristenZeitung* 749, 757; MA Zöller and S Bock '§ 22 Europäische Staatsanwaltschaft' in M Böse (ed) *Enzyklopädie Europarecht, Bd. 11 – Europäisches Strafrecht* (2nd edn, Nomos 2021) mn 51.

3 M Delmas-Marty and J Vervaele (eds), *The Implementation of the Corpus Juris in the Member States* (Intersentia 2000).

4 European Commission, 'Proposal for a Council Regulation on the establishment of the European Public Prosecutor's Office', COM(2013) 534 final.

5 Just see H-H Herrnfeld, 'Introduction' in H-H Herrnfeld, D Brodowski and C Burchard (eds), *European Public Prosecutor's Office: Article-by-Article Commentary* (Nomos 2021) mn 1 ff.

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

In relation to *projections upon the EPPO*, the tensions created by supranational prosecution vis-à-vis state sovereignty (such as highlighted by the German Federal Constitutional Court in relation to criminal justice[6]) mean that the EPPO reshapes the image of European criminal justice from a horizontal 'cooperation model' towards a vertical 'interaction model'. This, as well as the task of the EPPO to protect the financial interests of the EU by means of criminal justice, goes along with far-reaching normative, political and societal expectations. Even though the EPPO can already refer to numerous investigations, prosecutions and adjudications, the challenges created by the supranational setting and many design choices of the EPPO Regulation raise the question to what extent the EPPO can live up to these expectations – and what needs to be changed so that it can fulfil them.

Reflections on the role of the EPPO in the AFSJ were based on the linkage between criminal justice and the EPPO on the one hand, and the rule of law on the other hand. To some extent, the EPPO itself may be considered a guardian of the rule of law. It investigates and prosecutes severe forms of norm violations, and thereby structurally tries to prevent further breaches of such laws – and does so 'in full compliance[7] with the rights of suspects and accused persons enshrined in the Charter' (Article 41(1) EPPO Regulation). On a more fundamental level, its basis *in law* and its protection *by means of law* contribute to an understanding of Europe that is based on the rule of law, and not on a rule of power and force.

Moreover, the establishment of the EPPO and nowadays its operation create *transformations of Europe* and may serve as a 'laboratory' for the future evolution of European criminal justice.[8] The EPPO transforms criminal justice in the Member States,[9] the interaction between them, and may

6 German Federal Constitutional Court (BVerfG), judgment of 30 June 2009 – 2 BvE 2/08 and others *Lisbon Treaty* ECLI:DE:BVerfG:2009:es20090630.2bve000208 = BVerfGE 123, 267 paras 252 f.

7 On the far-reaching statement of 'full compliance', see D Brodowski, 'Article 41' in H-H Herrnfeld, D Brodowski and C Burchard (eds) (n 5) mn 22.

8 V Franssen and M Simonato, 'The European Public Prosecutor's Office (EPPO) as a laboratory of comparative law' in M Luchtman (ed), *Of swords and shields: due process and crime control in times of globalization. Liber amicorum prof. dr. J.A.E. Vervaele* (Eleven 2023) 553.

9 See, for instance, T Huyeng and S Kurt, 'Clash of Prosecutors. Die Europäische Staatsanwaltschaft als Garant für den kroatischen Rechtsstaat' (Verfassungsblog, 13 December 2024), at https://verfassungsblog.de/clash-of-prosecutors/; M Slimani, 'The influence of the European Public Prosecutor's Office on French criminal law' (2023) *New Journal of European Criminal Law* 294; R Vassileva, 'The EPPO as a Domesticated

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

also cause transformations beyond the borders of the EU, such as when a supranational prosecution authority sends out MLA requests to third countries.[10] Its successes may also serve as a motor for further supranationalisation in other areas of European integration. At the same time, its unique design may also underline how national criminal justice systems may become 'united in diversity'. Besides the normative and structural transformations, the EPPO has the potential to transform mindsets – that of prosecutors,[11] that of criminals who now have to fear a more effective prosecution of PIF offences, but also that of the general public if it becomes aware that the EU is not a toothless tiger, but upholds its laws by means of an effective, yet hybrid criminal justice system too.

2 The need to further strengthen the EPPO

Taking the first years of practice into consideration, the implementation and impact of the EPPO Regulation, the effectiveness and efficiency of the EPPO and its working practices will be put into the spotlight in the course of the review required by Article 119 of the EPPO Regulation which is to be completed by 2026.[12] This provision also sets out that legislative proposals should be put forward if 'it is necessary to have additional or more detailed rules on the setting up of the EPPO, its functions or the procedure applicable to its activities, including its cross-border investigations.' To bridge between this future legislative agenda and the theoretical foundations built in the first workshop in 2024, participants of a second workshop in spring 2025, again at Villa Vigoni, assessed the potential for improvements of the legal framework, discussed specific policy options, and clarified challenges

Cat: A Perspective from Bulgaria' (Verfassungsblog, 13 June 2024), at https://verfassungsblog.de/the-eppo-bulgaria/.

10 On the effects on Switzerland, just see T Fingerhuth and S Matjaz, 'Die Europäische Staatsanwaltschaft und ihre Bedeutung für die Schweiz' (2023) *forumpoenale* 115.

11 See the contribution by *Vitková* in this volume.

12 See also the (extended) compliance assessment conducted on behalf of the Commission, at https://www.europarl.europa.eu/thinktank/en/events/details/study-presentation-compatibility-of-nati/20240118EOT08142 and summarized by M Engelhart, 'Compliance with the EPPO Regulation. Study Results on the "Implementation" of Council Regulation (EU) 2017/1939 in the Member States' (2024) *eucrim* 54.

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

the EPPO faces today and which require legislative actions.[13] Taking inspiration from a keynote by the European Chief Prosecutor Laura Codruta Kövesi, three sections focused on distinct areas that require critical review and potential updates of the EPPO's normative framework.

Firstly, the material competence of the EPPO (Article 22 EPPO Regulation) is clearly the result of a political compromise, where some political blockade could only be overcome once the ECJ had issued a judgment on the link between VAT fraud and EU financial interests.[14] From the perspective of the Member States, additional safeguards have been added to the EPPO Regulation by excluding 'criminal offences in respect of national direct taxes including offences inextricably linked thereto' from the EPPO's material competence (Article 22(4) EPPO Regulation), by limiting the exercise of the material competence (Article 25 EPPO Regulation, also in conjunction with Article 27 EPPO Regulation), and by tasking national authorities to decide on conflicts of competence (Article 25(6) EPPO Regulation). Moreover, the focus on specific offences, including inextricably linked ones (Article 22(3) EPPO Regulation), instead of the broader context under investigation leads to friction in the daily operation of the EPPO. In view of this, there is not only a need to discuss whether, when and to what extent the EPPO's competence should be expanded to other fields of criminality, such as violations of restrictive measures,[15] but also how the distribution of competence within the field of PIF offences may be clarified.[16]

---

13 For a summary of the conference, see L Jakobi and G Theodorakakou 'Notes on a conference at Villa Vigoni, Lake Como, Italy, 31 March – 2 April 2025 (2025) *eucrim*, at https://eucrim.eu/news/strengthening-the-future-of-the-eppo-conference-report/.

14 ECJ, Case C-105/14 *Taricco et al.*, ECLI:EU:C:2015:555, paras 49 ff., in particular para 52.

15 See the contribution by *Petzsche* in this volume; see additionally A Seebon, 'Europäische Staatsanwaltschaft – Zuständigkeit auch für die Verfolgung von Verstößen gegen restriktive Maßnahmen der Europäischen Union?' (2024) *Kriminalpolitische Zeitschrift* 431; J Fontaine, 'L'extension de la compétence matérielle du Parquet européen aux infractions environnementales : une fausse bonne idée?' (2023) *Revue pénale luxembourgeoise* 19.

16 See, among others, L Bachmaier Winter, 'EPPO versus national prosecution office. A conflicting case of competence with broader dimensions' in M Luchtman (ed) (n 8) 515; B Márton, 'The Conflict of Competence between the European Public Prosecutor's Office and Spanish Prosecutors – Lessons Learned' (2022) *eucrim* 286; L Neumann, 'The EPPO's Material Competence and the Misconception of „inextricably linked offences"' (2022) 12 *European Criminal Law Review* 235; T Gut, 'EPPO's

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

The unique design of how investigations encompassing several participating Member States are handled within the EPPO has gained much interest,[17] also in the wake of the first ECJ judgment on the EPPO Regulation in *G.K. and Others*.[18] Considering the 'Single Office' approach of the Regulation, it becomes terminologically difficult to consider such investigations to be 'cross-border', as the heading of Article 31 of the EPPO Regulation stipulates. Yet from the viewpoint of national criminal justice systems, and, in particular, from the viewpoint of the national courts tasked with adjudicating offences prosecuted by the EPPO, they oftentimes have to handle and use evidence obtained in a different national criminal justice system and acquired (at least partly) on the basis of 'foreign' codes of criminal procedure. Moreover, the ECJ decided against a 'single judicial authorization' in the current design of Article 31 of the EPPO Regulation. Therefore, the legislative choices underpinning the 'cross-border' acquisition of evidence, the free flow of evidence (Article 37 EPPO Regulation), but also the effects the EPPO's powers have on defence rights (cf. Article

material competence and its exercise: a critical appraisal of the EPPO Regulation after the first year of operations' (2023) 23 *ERA Forum* 283.

17 See, among others, M Caianiello, 'Sometimes the More is Less. Transnational Investigations in the EPPO System After the Judgment of the EU Court of Justice' (2024) 32 *European Journal of Crime, Criminal Law and Criminal Justice* 87; N Franssen, 'The judgment in G.K. e.a. (parquet européen) brought the EPPO a pre-Christmas tiding of comfort and joy but will that feeling last?' (European Law Blog, 15 January 2024), at https://www.europeanlawblog.eu/pub/the-judgment-in-g-k-e-a-parquet-europee n-brought-the-eppo-a-pre-christmas-tiding-of-comfort-and-joy-but-will-that-feelin g-last/release/1; H-H Herrnfeld, 'Efficiency contra legem? Remarks on the Advocate General's Opinion Delivered on 22 June 2023 in Case C-281/22 G.K. and Others (Parquet européen)' (2023) *eucrim* 229; A Mosna 'Effective judicial protection as a central issue in EPPO cross-border investigations: The ECJ's first ruling in *G.K. an Others*' (2024) 61 *Common Market Law Review* 1345; J Öberg, 'Judicial Cooperation between European Prosecutors and the Incomplete Federalisation of EU Criminal Procedure CJEU ruling in G. K. e.a. (Parquet européen)' (2024) 189 *EU Law Live* 1; I Zerbes, 'Beweiserhebung und Beweisverwertung in EUStA-Verfahren – Dogmatische Probleme des Beweismitteltransfers' in T Niedernhuber (ed), *Die neue Europäische Staatsanwaltschaft. Bedeutung, Herausforderungen und erste Erfahrungen* (Nomos 2023) 69; R Zerbst, 'Judicial Authorisation of Cross-border Investigation Measures Conducted by the European Public Prosecutor's Office: A Comment on the Grand Chamber of the Court of Justice of the European Union's Judgment in the Case C-281/22' (2024) 14 *European Criminal Law Review* 94.

18 ECJ, Case C-281/22 *G.K. and Others (Parquet européen)*, ECLI:EU:C:2023:1018.

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

41 EPPO Regulation) warrant closer analysis, same as the distinct design of legal review prescribed by Article 42 of the EPPO Regulation.[19]

On a more structural level, the EPPO and its future success as a cornerstone of the protection of the rule of law in the AFSJ require that its independence is upheld, yet it remains accountable. At the same time, its legislative framework as well as its daily operation is highly dependent on Member States.[20] This becomes most prominent in the European Delegated Prosecutors (EDPs), who are recruited from national criminal justice systems, whose numbers are to be negotiated with the Member States (Article 13(2) EPPO Regulation), and who depend on support from local staff. Budgetary constraints, both at the Union and at the Member States' level, further affect the EPPO's ability to fulfil its tasks. To safeguard the EPPO's success in the future, it is important to guarantee sufficient resources for the EPPO, yet without overburdening Member States and their criminal justice systems that face resource and recruiting problems themselves. No less important is balancing the EPPO's independence with parliamentary oversight and a strong legal review of its actions. In view of this, the low number of decisions the ECJ had yet to take on EPPO-related matters is striking.

3 Overview of the contributions

This volume builds upon impulses presented and discussions held in the aforementioned workshops at Villa Vigoni. It brings together contributions from practitioners, regulators, and academics analysing EPPO's construction, and aimed at strengthening EPPO's role in the European Area of Freedom, Security and Justice.

The first section takes up the theme of the first workshop: Has the EPPO become a motor for transformation in the European 'Area of Freedom, Security and Justice'? **Luca Pressacco** gives '*an introduction to the EPPO's prospects: expectations, status quo and potential*', focusing on the competences and their exercise as well as on the construction of the EPPO, and how the EU is moving towards a 'federalised' criminal justice system.

19 On Art 42, see also the recent judgment ECJ, Case C-292/23 *I.R.O. and F.J.L.R.*, ECLI:EU:C:2025:255.

20 See, among others, B Márton 'Independence of the European Public Prosecutor's Office in the context of the appointment procedures' (2024) 15 *New Journal of European Criminal Law* 146.

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

Taking up another of the core themes of the first workshop, **Gabriella Di Paolo** analyses '*the EPPO's transformative powers on criminal justice in the Member States*'. She discerns three modes of transformation: amendments to or reforms of Member States' laws, re-interpretations of existing norms, and a cultural shift, where 'the EPPO's operations may foster a new mindset and way of thinking'. Along the same lines, **Petra Vítková** shares her reflections as an EDP in her contribution titled '*The EPPO's transformative power on criminal justice in the Member States – experiences of a European Delegated Prosecutor of the Czech Republic*'. In particular, she emphasises that the EPPO does not only transform norms but also minds. In his comment on '*the EPPO Permanent Chambers: a new right on the horizon?*', **Andrea Venegoni** reflects on the legislative history, structure and functioning of the unique feature of EPPO's operation that its investigations involve Permanent Chambers consisting of three European Prosecutors (EPs) or the European Chief Prosecutor (ECP) from different Member States than the one where the investigation is being handled. Therefore, according to him, its decisions synthesise European law, (various) national laws and 'common sense'. The section concludes with a comment by **Liane Wörner** on how the EPPO's role model can – and should – extend to the protection of the rule of law and the rights of the accused: '*Future model or pipe dream – European transnational investigation being both effective and safeguarding fundamental rights of the accused*'.

The next three sections take a more concrete view on the state of the EPPO Regulation, surrounding legislative frameworks, and options for reform. In relation to EPPO's 'jurisdiction' *ratione materiae*, **Anneke Petzsche** raises the question on the '*competences of the EPPO: Is it time for an expansion?*'. In her analysis, she discusses the criteria to be used in deciding on an expansion of the EPPO's competences, and on why violations of restrictive measures meet these criteria, but terrorist offences do not. In view of the overlapping competences and the need to resolve '*conflicts of competences between the EPPO and national prosecution authorities*', **Luca Pressacco** highlights that this topic goes beyond 'merely dividing the working load between offices performing the same functions' and discusses three approaches on how to address the conflicts arising from the current design of the EPPO Regulation.

Under the heading of '*acquisition and use of evidence in EPPO proceedings*', **Hans-Holger Herrnfeld** shows that regarding Article 31 of the EPPO Regulation, which concerns the '*Cross-border acquisition of evidence*', sever-

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

al questions of interpretation are still unresolved, in spite of the ECJ's judgment in *G.K. and Others*.[21] Taking the ECJ's objections against a 'single judicial authorisation' into account, he proposes concrete amendments to this and surrounding provisions of the EPPO Regulation. In '*rethinking Article 37 of the EPPO Regulation: toward a coherent EU approach to evidence admissibility and exclusion*', **Michele Caianiello & Isadora Neroni Rezende** consider that this provision currently takes a minimalist approach. In order to strengthen the legitimacy of EPPO proceedings, in particular in cross-border criminal proceedings, they discuss various approaches on how this provision could be strengthened. In their contribution on '*Article 41 of the EPPO Regulation setting common standards on cross-border EPPO investigations – needs for reform*', **Liane Wörner & Luis Jakobi** highlight that the Europeanisation of the prosecution must also be balanced with a Europeanisation of defence rights. They show that EPPO proceedings serve as a 'problem amplifier' for fundamental rights issues surrounding cross-border investigations, and call – in the long run – for the introduction of a European investigating judge to determine the lawfulness of European investigation measures. In her contribution titled '*between national procedural law and Union oversight: Article 42 of the EPPO Regulation and the emerging jurisprudence of national and EU courts*', **Katalin Ligeti** reflects on potential gaps in judicial protection based on first jurisprudence on EPPO investigations and prosecutions on the national and EU level. While she sees 'currently insufficient evidence either that national courts are incapable of reviewing the EPPO's procedural acts […] or that they interpret EU law adequately', she voices concern that, so far, very few EPPO-related references for a preliminary ruling have reached the Court of Justice.[22]

The last section discusses **EPPO's institutional independence and sustainability.** In his contribution on the '*(in-)dependency of the EPPO on national resources*', **Lorenzo Salazar** discusses how the institutional design of the EPPO guarantees its independency, but also how its accountability can and must be maintained, in particular vis-à-vis the EU institutions. However, he concludes that some recalibration is needed to further strengthen both independency and accountability, such as on budgetary autonomy, the status of EDPs and (local) support staff. These latter questions are ex-

21 ECJ, Case C-281/22 *G.K. and Others (Parquet européen)*, ECLI:EU:C:2023:1018.

22 Besides ECJ, Case C-281/22 *G.K. and Others (Parquet européen)*, ECLI:EU:C:2023:1018, and ECJ, Case C-292/23 *EPPO v I.R.O. and F.J.L.R.*, ECLI:EU:C:2025:255, recently Case C-407/25 became pending, which addresses the consequences of a failure to notify a case to the EPPO.

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

plored in greater depth in **Garonne Bezjak**'s reflections on the '*institutional independence and sustainability: selection, status and number of EDPs and support staff*'. Considering the EPPO's hybrid structure and necessary links between Member States and the EPPO, she puts particular emphasis on the status of the EDPs as 'Special Advisors' and whether this should be changed to 'Temporary Agents' of the EU, but also on the tensions surrounding demands for an increase in support staff. A different perspective on the same underlying relationship between independence and responsibility is taken by **Marius Bulancea**. In his contribution on '*the EPPO's institutional responsibility: the annual report as a strategic cornerstone in the EU's anti-fraud architecture*', he sets out how the accountability of the EPPO, but also policy making in European and national settings is improved by the obligations set out in Article 7 of the EPPO Regulation. Besides the Annual Report, the role of the European Chief Prosecutor is highlighted in this context. A chapter by **Dominik Brodowski** on '*judicial review in view of EPPO's independence*' concludes this volume and focuses on the interrelation between these two concepts – and how legislative amendments may strengthen them.

Bibliography

Allegrezza S, 'A European Public Prosecutor Office to Protect Common Financial Interests: A Milestone for the EU Integration Process' in K Ambos and P Rackow (eds), *The Cambridge Companion to European Criminal Law* (Cambridge University Press 2023) 413

Bachmaier Winter L, 'EPPO versus national prosecution office. A conflicting case of competence with broader dimensions' in M Luchtman (ed), *Of swords and shields: due process and crime control in times of globalization. Liber amicorum prof. dr. J.A.E. Vervaele* (Eleven 2023) 515

Brodowski D, 'Article 41' in H-H Herrnfeld, D Brodowski and C Burchard (eds), *European Public Prosecutor's Office: Article-by-Article Commentary* (Nomos 2021)

— — 'Die europäische Staatsanwaltschaft als Meilenstein supranationaler Kriminalpolitik' (2022) *Goltdammer's Archiv für Strafrecht* 421

Caianiello M, 'Sometimes the More is Less. Transnational Investigations in the EPPO System After the Judgment of the EU Court of Justice' (2024) 32 *European Journal of Crime, Criminal Law and Criminal Justice* 87

Delmas-Marty M and Vervaele J (eds), *The Implementation of the Corpus Juris in the Member States* (Intersentia 2000)

Engelhart M, 'Compliance with the EPPO Regulation. Study Results on the "Implementation" of Council Regulation (EU) 2017/1939 in the Member States' (2024) *eucrim* 54

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

Fingerhuth T and Matjaz S, 'Die Europäische Staatsanwaltschaft und ihre Bedeutung für die Schweiz' (2023) *forumpoenale* 115

Fontaine J, 'L'extension de la compétence matérielle du Parquet européen aux infractions environnementales : une fausse bonne idée?' (2023) 11 *Revue pénale luxembourgeoise* 19

Franssen N, 'The judgment in G.K. e.a. (parquet européen) brought the EPPO a pre-Christmas tiding of comfort and joy but will that feeling last?' (European Law Blog, 15 January 2024), at https://www.europeanlawblog.eu/pub/the-judgment-in-g-k-e-a-parquet-europeen-brought-the-eppo-a-pre-christmas-tiding-of-comfort-and-joy-but-will-that-feeling-last/release/1

Franssen V and Simonato M, 'The European Public Prosecutor's Office (EPPO) as a laboratory of comparative law' in M Luchtman (ed), *Of swords and shields: due process and crime control in times of globalization. Liber amicorum prof. dr. J.A.E. Vervaele* (Eleven 2023) 553

Gut T, 'EPPO's material competence and its exercise: a critical appraisal of the EPPO Regulation after the first year of operations' (2023) 23 *ERA Forum* 283

Herrnfeld H-H, 'Introduction' in H-H Herrnfeld, D Brodowski and C Burchard (eds), *European Public Prosecutor's Office: Article-by-Article Commentary* (Nomos 2021)

— — 'Efficiency contra legem? Remarks on the Advocate General's Opinion Delivered on 22 June 2023 in Case C-281/22 G.K. and Others (Parquet européen)' (2023) *eucrim* 229

Huyeng T and Kurt S 'Clash of Prosecutors. Die Europäische Staatsanwaltschaft als Garant für den kroatischen Rechtsstaat' (Verfassungsblog, 13 December 2024), at https://verfassungsblog.de/clash-of-prosecutors/

Jakobi L and Theodorakakou G 'Notes on a conference at Villa Vigoni, Lake Como, Italy, 31 March – 2 April 2025' (2025) *eucrim*, at https://eucrim.eu/news/strengthening-the-future-of-the-eppo-conference-report/

Márton B, 'The Conflict of Competence between the European Public Prosecutor's Office and Spanish Prosecutors – Lessons Learned' (2022) *eucrim* 286

— — 'Independence of the European Public Prosecutor's Office in the context of the appointment procedures' (2024) 15 *New Journal of European Criminal Law* 146

Meyer F '§ 3 Aufgaben der EUStA – Rolle im System europäischer Strafverfolgung' in H-H Herrnfeld and R Esser (eds), *Europäische Staatsanwaltschaft. Handbuch* (Nomos 2022)

Mosna A 'Effective judicial protection as a central issue in EPPO cross-border investigations: The ECJ's first ruling in *G.K. an Others*' (2024) 61 *Common Market Law Review* 1345

Neumann L, 'The EPPO's Material Competence and the Misconception of „inextricably linked offences"' (2022) 12 *European Criminal Law Review* 235

Öberg J, 'Judicial Cooperation between European Prosecutors and the Incomplete Federalisation of EU Criminal Procedure CJEU ruling in G. K. e.a. (Parquet européen)' (2024) 189 *EU Law Live*

Schramm E 'Auf dem Weg zur Europäischen Staatsanwaltschaft' (2014) 69 *JuristenZeitung* 749

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY

Seebon A, 'Europäische Staatsanwaltschaft – Zuständigkeit auch für die Verfolgung von Verstößen gegen restriktive Maßnahmen der Europäischen Union?' (2024) *Kriminalpolitische Zeitschrift* 431

Slimani M, 'The influence of the European Public Prosecutor's Office on French criminal law' (2023) *New Journal of European Criminal Law* 294

Vassileva R, 'The EPPO as a Domesticated Cat: A Perspective from Bulgaria' (Verfassungsblog, 13 June 2024), at https://verfassungsblog.de/the-eppo-bulgaria/

Zerbes I, 'Beweiserhebung und Beweisverwertung in EUStA-Verfahren – Dogmatische Probleme des Beweismitteltransfers' in T Niedernhuber (ed), *Die neue Europäische Staatsanwaltschaft. Bedeutung, Herausforderungen und erste Erfahrungen* (Nomos 2023)

Zerbst R, 'Judicial Authorisation of Cross-border Investigation Measures Conducted by the European Public Prosecutor's Office: A Comment on the Grand Chamber of the Court of Justice of the European Union's Judgment in the Case C-281/22' (2024) 14 *European Criminal Law Review* 94

Zöller MA and Bock S '§ 22 Europäische Staatsanwaltschaft' in M Böse (ed) *Enzyklopädie Europarecht, Bd. 11 – Europäisches Strafrecht* (2nd edn, Nomos 2021)

https://doi.org/10.5771/9783748967415-15 https://www.inlibra.com/de/page/agb - Open Access - (cc) BY