

REPORT

Field visit on the administrative approach

15-17 April 2026 – The Hague

Participants: ENAA SEC, NL, IT, EL, PT, SE.

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Introduction

The Ministry of Justice and Security of the Netherlands, with the support of the European Network on the Administrative Approach (ENAA), organised a field visit on the administrative approach to organised crime in The Hague from 15 to 17 April 2026. The visit brought together 22 participants from 16 EU Member States, alongside representatives of the ENAA Secretariat, creating a diverse platform for exchange between countries at different stages of developing administrative approaches.

The three-day programme combined strategic presentations, practical workshops and on-site visits, offering participants both conceptual insights and hands-on exposure to the Dutch model. The first day focused on the foundations of the administrative approach in the Netherlands, including presentations on the role of Regional Information and Expertise Centres (RIEC) and the application of the Bibob Act.

The second day shifted towards practice-oriented learning through workshops at LOODS 12 in Breda, a specialised training and experience centre focusing on subversive crime. These workshops were complemented by contributions from the Mayor of Breda and EURIEC, as well as further presentations from academia, the Ministry of Justice and Security and the Dutch police.

The final day centred on local implementation, with a visit to the municipality of The Hague. Local officials presented their work on tackling dishonest businesses and maintaining public order through administrative measures. A guided visit through the neighbourhood illustrated the tangible outcomes of long-term strategies.

The opening session set the tone by emphasising the growing need to strengthen efforts against organised crime. Participants were reminded that organised criminal groups continue to have a disruptive impact on society. Addressing these challenges requires a coordinated approach that mobilises all relevant actors, including prosecutors, law enforcement authorities and administrative bodies. Within this broader framework, the administrative approach was presented as an essential complement to criminal law. The organisers highlighted that the objective of the field visit is to encourage mutual learning and information exchange. Given the cross-border nature of organised crime, isolated national measures risk being undermined if criminal actors simply relocate their activities. This is particularly evident in sectors such as hospitality and logistics, where activities can shift between Member States with relative ease.

The Administrative Approach in the Netherlands

The first presentation introduced the administrative approach as developed in the Netherlands. Its origins lie in parliamentary inquiries that revealed the extent of criminal infiltration in sectors such as gaming, road transport and real estate. These findings highlighted the crucial role of local authorities, who are often best placed to prevent such infiltration through their regulatory powers.

Over time, the Dutch approach has evolved towards a stronger focus on organised crime, based on the understanding that such crime relies heavily on access to the legal economy. Administrative authorities—

including those responsible for taxation, customs, labour regulation and consumer protection—therefore play a key role in disrupting criminal activities. A central feature of the approach is its focus on situations rather than individuals. Measures are often directed at locations, sectors or economic opportunities that facilitate criminal activity, such as housing, hospitality businesses or retail environments. This reflects the recognition that the interface between the legal and illegal economy is where administrative interventions can be most effective.

The presentation further outlined a wide range of administrative powers and instruments. Mayors, in particular, have extensive responsibilities for maintaining public order and can impose measures such as area bans, preventive searches and the closure of premises. These powers have been strengthened in recent years, notably in response to incidents involving explosives. Additional instruments include zoning regulations, and various enforcement measures such as warnings, penalty payments and administrative fines. Authorities may also revoke permits or subsidies where necessary. Beyond enforcement, the administrative approach also encompasses preventive and supportive measures. These include awareness-raising, crime pattern analysis and efforts to strengthen administrative resilience, for instance by protecting public officials against intimidation.

The speaker highlighted the needs for the effective implementation of the administrative approach, including access to reliable information, strong inter-agency cooperation, sustained political commitment and training. Furthermore, the approach requires continuous monitoring and evaluation, as it is never “finished” but must evolve in response to changing circumstances.

The RIEC model

The presentation by the Regional Information and Expertise Centres (RIECs) focused on their role in addressing subversive crime, particularly in cases involving fluid criminal networks and significant financial gains.

The RIEC model is based on an integrated approach, bringing together different authorities to jointly analyse and address complex cases. A typical process begins with the identification of relevant partners, followed by the collection and analysis of information. Based on this analysis, a coordinated intervention is prepared and executed, with each partner acting within its own mandate. A practical example illustrated how this approach can be applied to a bar suspected of drug-related activities and illegal employment. Through coordinated action, the municipality was able to close the establishment, while tax authorities uncovered financial irregularities and other partners contributed additional measures.

Despite its effectiveness, the presentation also highlighted challenges, particularly for local authorities. Municipalities are responsible for a wide range of services and may lack the capacity or expertise to fully engage in complex information-sharing processes. This is especially the case for smaller municipalities, which may require additional support and training.

The Bibob Act

The Bibob Act was presented as a cornerstone of the Dutch administrative approach. Its primary objective is to prevent public authorities from facilitating organised crime by granting permits, subsidies or contracts to entities linked to criminal activities.

The instrument is preventive, optional and typically used as a measure of last resort. It is grounded in national legislation but implemented at local level, allowing municipalities to adapt its application to their specific risk contexts. Bibob screenings can be applied in a wide range of situations, including licensing procedures, public procurement, real estate transactions and subsidies. In practice, it is most frequently used in sectors that are particularly vulnerable to criminal infiltration, such as hospitality, construction and healthcare.

A key aspect of the Bibob process is the risk assessment, which may consider both direct and indirect links to criminal activity. Notably, a sufficiently substantiated suspicion may be sufficient to justify intervention. Depending on the outcome of the assessment, authorities may refuse or revoke a permit, impose conditions or conclude that no action is necessary. The system also allows for information-sharing between local authorities, including through a “tip-off” mechanism introduced in 2022.

The presentation addressed the extensive powers of the National Bibob Bureau to gather information from various sources, including law enforcement and tax authorities. However, international information exchange remains limited in practice, as it is not always supported by formal agreements.

Local initiatives: Breda

Presentation by the mayor of Breda

The second day of the field visit focused on the practical implementation of the administrative approach, beginning with a presentation by the Mayor of Breda. The presentation highlighted the city’s proactive and innovative strategies to disrupt organised crime, particularly in the drugs market. Breda has taken part in an experiment aimed at restructuring the cannabis supply chain. This involved the closure of coffee shops selling illegal drugs, combined with the introduction of a regulated system whereby cultivation licences are granted to producers and selling licences to authorised shops. The objective of this model is to reduce illegal production and cut off criminal profits by bringing parts of the supply chain under legal control.



The mayor further explained that while organised and so-called “subversive” crime is present throughout the Netherlands, certain regional characteristics make it more prevalent in the Brabant region. The proximity to national borders has facilitated cross-border criminal activities. In addition, the economic structure of the region also plays a part, as the presence of many business structures within a relatively small area fosters close cooperation networks, which can be exploited by criminal actors.

In response to these challenges, authorities in Breda have adopted an entrepreneurial mindset when developing strategies to counter organised crime. Recognising that criminal actors often invest illicit proceeds in legitimate sectors, such as sports clubs, the municipality has sought to strengthen resilience by engaging with private stakeholders. For instance, cooperation with sports associations aims to prevent the infiltration of criminal money and to increase awareness of associated risks.

The presentation also identified several priority areas for intervention, including drug-related crime, trafficking in human beings, cybercrime and fraud within the healthcare sector. Another growing concern relates to the recruitment of young people into criminal activities, including incidents targeting sensitive sites and the use of explosives. This phenomenon was linked to “Crime-as-a-Service” (CaaS), where criminal services are outsourced and made accessible to a broader group, including youth.

Workshops at LOODS 12

Following this presentation, participants took part in workshops at LOODS 12 in Breda, a specialised training centre focusing on subversive crime. The workshops provided practical insights into the operation of illegal drug laboratories. Participants were introduced to the various components required to set up such a lab, including precursor materials, chemical substances such as acids and solvents, suitable locations (often in isolated areas such as farm silos), technical equipment, transport logistics, specialised labour and communication tools.

Furthermore, the workshops highlighted common indicators that may signal the presence of a drug lab. These include the presence of suspicious vehicles such as white vans, unusual ventilation systems installed on rooftops, covered or condensed windows, environmental damage caused by chemical waste and distinctive smells associated with substances such as amphetamines. By recognising these indicators, local authorities and partnering stakeholders can better detect and respond to illicit activities.

Conference Dinner Presentations: The Administrative Approach in a broader context

During the conference dinner, three complementary presentations provided additional reflections on the role of the administrative approach within the broader strategy to tackle organised crime, combining perspectives from policy, law enforcement and academia.

From a policy perspective, the Dutch Ministry of Justice and Security emphasised the importance of a holistic approach structured around four pillars: disruption, prosecution, the protection of public officials and a broader preventive dimension. It was also highlighted that a national threat assessment, based on qualitative input from multiple partners, is being developed to better inform policymaking.

The police perspective underlined the importance of information-sharing within the administrative approach. While law enforcement is not always the competent authority to act, it often holds a strong information position and can play a crucial role in enabling other actors to intervene. This was illustrated by cases where administrative measures, such as the revocation of licences, were used in situations where criminal proceedings alone did not lead to immediate outcomes. At the same time, it was noted that this approach requires a shift in mindset, as well as additional training for police officers in administrative and public law.



Finally, the academic contribution focused on the development of the administrative approach over time and the increasing range of instruments available to authorities. These include coercive measures, administrative fines, and tools such as the closure of premises under the Opium Act or the revocation of licences through the Bibob framework. While these instruments enhance the preventive capacity of authorities, they also raise important dilemmas. In particular, the differences between administrative and criminal procedures in terms of legal safeguards. Additional challenges relate to disparities in capacity between municipalities and the inherently political dimension of administrative decision-making.

Field Visit to the municipality of The Hague

The final day of the field visit focused on the practical implementation of the administrative approach in The Hague. The municipality highlighted its dual role as both a local authority responsible for policy areas such as housing, education and safety, and as an international city.

Use of Administrative Powers under the Opium Act

A central element of the presentation was the application of Section 13b of the Opium Act, which allows the mayor to take measures in response to drug-related activities. These range from formal warnings for minor offences to financial penalties and the closure of premises. The decision-making process is structured. Law enforcement identifies signals of criminal activity and shares information with the municipality, after which legal services assess whether administrative action is justified. A draft decision is communicated to the residents or owners, who can present their views before a final decision is taken.

Decisions are guided by three criteria: the mayor's legal authority, the necessity of the measure and the visibility of the activity. The overarching principle is proportionality. This requires balancing public order concerns with the impact on individuals, including family situations, the presence of children, medical conditions and housing vulnerability, as well as economic consequences for businesses.

Closures and public order disturbances

Closures, particularly of residential properties, illustrate the balance between enforcement and social considerations. While such measures may place individuals in more vulnerable situations, they are considered necessary in certain cases to restore public order and protect the surrounding community.

The municipality also addressed the increase in incidents involving explosions targeting buildings. In urgent situations, the mayor may order rapid closure of a residence based on law enforcement information. Factors such as whether the building was the intended target, neighbourhood safety and the presence of minors influence the decision and duration of closure. Closures appear effective in stopping disturbances during the enforcement period and repeat incidents at the same location are relatively limited. However, challenges remain regarding the timing of reopening and the extent of support provided to displaced residents.



Approach to tackling dishonest businesses

The Hague has introduced an authorisation scheme requiring businesses in designated areas to obtain a permit, with the Bibob Act forming part of this process. Businesses must apply within a set timeframe, after which permits may be granted, refused or issued with conditions. Conditions can include adjustments such as limiting cash payments or improving security, with non-compliance leading to closure.

The scheme must be justified under the EU Services Directive and is supported by data from business registries, law enforcement and on-site verification. While resource-intensive, it has led to a reduction in problematic businesses, with some leaving the area before applying. Efforts are also made to attract legitimate businesses to improve local conditions.

Bibob assessments in practice

Bibob assessments extend beyond applicants to include associated third parties, such as financiers. Permits may be refused where there is insufficient financial transparency, false information or links to criminal activity. Examples presented included cases involving changes in ownership following criminal convictions and instances of labour exploitation. These illustrate both the preventive potential of the Bibob framework and the challenges posed by non-cooperation and limited information.

Conclusion

The field visit provided valuable insights into the Dutch administrative approach and its potential as a complementary tool in the fight against organised crime. The Dutch experience demonstrates that a coordinated, multi-agency strategy can effectively disrupt criminal activities by targeting their enabling environment. At the same time, the discussions highlighted that successful implementation depends on a combination of factors, including political commitment, inter-agency cooperation, adequate resources and continuous evaluation. For many participating Member States, the Dutch model serves as a source of inspiration. However, its potential replication to different national contexts will require careful consideration. Strengthening cooperation and knowledge exchange at European level will be essential to fully realise the potential of the administrative approach.