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DELF

DEFENCE EXTRADITION LAWYERS FORUM

NEWS

Welcome to edition 34 of the Defence Extradition Lawyers Forum newsletter. This issue includes an in-depth analysis of Romania's specialty rule from our International Officer, Adrian Sandru, highlighting its practical implications for cross-border criminal justice cooperation. We have some fascinating updates on the recent Supreme Court decisions in *Andrysiewicz v Poland* and *El-Khouri v the Government of the United States*. We also bring you our usual updates on on-going activities, social events and CPT reports.

A message from the Chair

It is my pleasure to introduce the 34th edition of the DELF newsletter. I hope that you enjoy reading the fantastic articles contributed by our DELF members, which are as informative and insightful as ever.

It's hard to believe that we are in September already and I would like to offer a sincere thanks to the Committee who have worked extremely hard to put on a brilliant program of social and educational events so far this year.

We are now looking forward to the DELF Annual Conference this month, which has a stellar line up of speakers and is shaping up to be a superb event. This is a real testament to the excellent organisation of the Conference subcommittee and our Administrator, Harriet Devey, who have contributed a huge amount of their valuable time and energy into making it all happen.

An extra special 'thank you' must go my Vice-Chair, Ben Joyes, who has been wonderfully steering the DELF ship over the last few months whilst I have been adjusting to life as a new parent!

As ever, DELF is here to represent your interests, so please do not hesitate to contact us with ideas, views or any issues you would like us to address.

Maeve Keenan
Kingsley Napley LLP

Upcoming Activities

DELF Annual Conference 2025 - Friday 12 September

The DELF Annual Conference will take place on Friday 12 September 2025 at Savoy Place, London WC2R 0BL.

We are delighted to confirm that Edward Fitzgerald KC of Doughty Street Chambers will deliver the keynote address, and that panels will cover the following topics:

- Twin tracks or diverging roads? Mapping European extradition practices
- Right-wing populism in the US: what next for the rule of law?
- The prevention of torture
- Practical issues and key stakeholders

Although full tickets for the conference have now sold out, there are a limited number of standalone tickets available for the drinks reception at a price of £35 for members and £60 for non-members.

You can book your ticket through the website or by emailing the DELF Administrator (admin@delf.org.uk).

We are very grateful to our sponsors: 5 St Andrew's Hill, 6KBW College Hill, 9BR Chambers, Boutique Law, Furnival Chambers, Legastat and Studio Legale Capellupo.

Liaison

We continue to make representations on behalf of our members to the Criminal Procedure Rules Committee, the LAA, the Administrative Court staff and the Senior District Judge's office. If members have any issues they would like DELF to raise please email enquiries@delf.org.uk

Past Educational Events

Introduction to Defence Challenges in Extradition - 13 March 2025

The annual "Introduction to Extradition" was hosted by Serjeant's Inn Chambers, London on 13 March. As ever, this was a popular event, well attended by new and established practitioners with updates on recent cases and the approach to Part I, Part II and appeals efficiently canvassed by Hannah Hinton (Serjeants' Inn), Anand Doobay (Boutique Law) and Rebecca Hill (5SAH). There was a lively Q&A; attendance from our partners overseas; and a drinks reception enjoyed by all.

Trust your neighbour? Mutual recognition of extradition decisions: ECJ examines extradition to Georgia from Belgium and France of the same requested person – 18 June 2025

On Wednesday 18 June 2025, DELF hosted a seminar at 5 St Andrew's Hill on a current case pending before the European Court of Justice (ECJ) concerning the mutual recognition of extradition decisions.

The seminar was chaired by Ben Keith with two speakers, Jean-Christophe De Block and Marie Poirot, who represented the same Requested Person in his extradition proceedings, first in Belgium and subsequently in France (respectively). The Requested Person was a Greek citizen facing extradition to Georgia, where he had been sentenced in absentia to life imprisonment.

Jean-Christophe De Block provided an overview of the Belgian extradition proceedings, which involved arguments pertaining to Article 3 ECHR, Article 6 ECHR and political motivation. The Brussels Court of Appeal ultimately refused extradition on the basis of risks of violation of Articles 3 and 6 ECHR.

The Requested Person was later arrested in France on the same extradition request. Marie Poirot provided an overview of the French extradition proceedings. Unusually, both the Public Prosecutor and the Requested Person requested that the Montpellier Court of Appeal refuse extradition in accordance with the judgment of the Belgian court. The French court decided to refer the matter to the ECJ to ask whether it is bound by the decision of the Belgian court.

The Advocate General of France proposed that the ECJ's answer to the preliminary request should be that neither Article 67(3) TFEU, nor Article 82(1) TFEU, nor the free movement of EU citizens under Articles 21 and 18 TFEU entail the applicability of EU law to a request for the extradition of a national of another Member State to a third State where that person was only in transit in the requested Member State when he or she was arrested.

The ECJ judgment is available here: https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:62025CJ0219

Georgina Lane and George Smart
5 St Andrew's Hill Chambers

Past Social Events

DELF Annual Dinner – May 2025

The DELF annual dinner took place on 9 May 2025, marking another fantastic sold-out event. The Merchant Taylors Hall was the perfect venue for the event; the court yard allowed guests to mingle and enjoy a glass of fizz in the open summer air before the formal dinner. Guests were treated to an inspiring and hilarious keynote speech by District Judge Zani and danced the night away to the live band. Thank you to all who attended and made the night so special!

DELF summer drinks – 15 July 2025

On 15 July 2025, the DELF summer party was held at the beautiful Rotunda, Kings Place, London. It was a lovely evening, with great company. Thank you to all who joined us.

We are especially grateful to our Social Secretaries, James Peacham and Simrit Sidhu, who organised these events.

Romania's specialty rule: the gap between legal recognition and practical enforcement

The specialty rule, a cornerstone of international extradition law, ensures that a person surrendered under an extradition order cannot be prosecuted, tried, or punished for an offence other than that for which they were extradited. While Romania's domestic law—particularly Law no. 302/2004—formally recognises this principle, in practice, effective enforcement remains elusive.

Under the Trade and Cooperation Agreement (TCA), the specialty principle should apply seamlessly within the Romanian legal framework. Yet, the country's procedural laws fail to offer a direct remedy when this principle is breached. Although Article 598 of the Romanian Criminal Procedure Code provides a general mechanism known as a "challenge to enforcement," this remedy is not tailored for the complexities of extradition. Designed to address fundamental obstacles to executing a sentence—such as the death of the convicted person or a sentence already served—it does not specify how to deal with discrepancies arising from limited extradition orders.

This lack of clarity is compounded by divergent case law. In 2020, the High Court of Cassation and Justice acknowledged the absence of a uniform approach. While most courts agreed that individuals should not be punished for offences excluded from the extradition agreement, the High Court offered no definitive guidance. As a result, lower courts have been left to navigate a murky legal landscape, often resulting in the execution of sentences that do not fully respect the specialty principle.

The recent decision of the Bucharest Tribunal (Decision no. 1532/2023 of 11 December 2023) starkly illustrates the problem. The Tribunal explicitly stated that breaches of the specialty rule cannot be raised through the existing challenge to enforcement procedure. This ruling effectively shuts down an already uncertain avenue for redress, leaving no specific procedural tool for individuals who find themselves serving a sentence for an offence not covered by their extradition order.

Case studies highlight the consequences of this legal vacuum. In one instance, *Viorel Nonea v Judecătoria Oradea* (Case no. CO/2388/202), Romanian authorities were expected to disaggregate sentences to exclude penalties rejected by the UK court. Instead, no effective steps were taken. Available information suggests that only a small fraction—perhaps less than 5%—of attempts to challenge enforcement based on specialty issues meet with any success. Most are either dismissed or never reach a substantive review.

The practical result is a breach of trust in international cooperation. The specialty rule underpins mutual confidence between states engaging in extradition. When a requested state fails to uphold its obligations, it risks undermining the international framework meant to facilitate efficient and fair judicial cooperation.

In short, Romania's problem is not a theoretical misunderstanding of the specialty principle, but rather a systemic failure to implement it. Without a clear procedural path, Romanian courts struggle to respect limited extradition decisions. Legislative or judicial reforms are urgently needed. Until such changes are enacted, the specialty rule will remain more aspiration than assurance, leaving individuals without a meaningful remedy and compromising the rule's very purpose.

Adrian Șandru,
International Officer, DELF
Partner SANDRU Avocati & LEXURE Hub, Romania

Andrysiewicz v Poland [2025] UKSC 23 - A shot across the bows for Article 8

Introduction

On 11 June 2025, the Supreme Court handed down judgment in *Andrysiewicz v Poland* [2025] UKSC 23, providing definitive clarification on how UK Courts should address the prospect of early release in extradition cases.

Though one of the certified questions focussed on Polish early release provisions, the Supreme Court set out that the principles set out "can be read across to early release provisions in other requesting states" (§66). The decision confirms that a restrictive approach should be applied to early release provisions in the Article 8 ECHR balancing exercise and will only tip the balance in rare cases.

Andrysiewicz is a clear shot across the bows for practitioners, and raises practical ethical issues for those appearing in such cases.

Key Points

- Article 8 challenges will only rarely succeed: The Court reaffirmed that Article 8 defences to extradition will only rarely succeed, and only where the impact on family life is exceptionally severe (§43)
- Restrictive approach to early release: Save in "rare cases", only the bare possibility of early release under foreign law (such as the Polish Penal Code) should be considered, and it should be given little weight in the Article 8 proportionality assessment (§77–78).
- No speculation on merits: Courts should not generally attempt to predict the likelihood of early release or assess its merits, except where there is overwhelming and uncontested evidence on four specific matters (§80).
- 'Rare cases' exception: The exception applies only if there is agreed or uncontested evidence demonstrating an overwhelming probability of: (1) release upon application in the issuing country, (2) the timing of release, (3) probation period and conditions, and (4) that there would be no adverse impact on the offender or public from the lack of supervision as a result of discharge (§80)
- Case management: The Supreme Court encourages robust case management to ensure Article 8 arguments—especially those based on early release—are only advanced in appropriate, evidence-based cases (§81–82).
- Practical impact: Practitioners should review existing and future cases relying on early release arguments, as such arguments are now unlikely to succeed unless they clearly meet the 'rare case' criteria.

Factual background

Ewa Andrysiewicz was convicted in Poland in 2016 of fraud offences relating to events between 2007 and 2008, receiving a two-year prison sentence that was initially suspended for five years. After failing to comply with the suspension conditions, the sentence was activated in 2018. In September 2020, the Polish authorities issued an

Arrest Warrant seeking her extradition to serve the sentence. Ms Andrysiewicz, who had been living in the UK since 2016, was arrested in London in January 2023 and opposed extradition on Article 8 ECHR grounds, relying in part on the possibility of early release from her sentence under Polish law.

Although she ultimately served the equivalent of her sentence while on remand and the extradition warrant was withdrawn, the Supreme Court proceeded to hear her appeal to resolve important legal questions about the relevance of early release provisions in Article 8 proportionality assessments.

Article 8 in extradition cases

The Court took great care to draw out passages from the key authorities on the treatment of Article 8 ECHR (§§31-43), and emphasising the high bar to be reached: the consequences of interference with Article 8 rights must be exceptionally serious before this can outweigh the importance of extradition.

The Court, in no uncertain terms, highlighted and criticised the regular deployment of Article 8 in extradition cases:

"42…Contrary to Lord Brown's prediction in Norris, the incidence of extradition cases in which article 8 is invoked has shown no sign of declining. On the contrary, it appears that it is continuing unabated. … It seems that an article 8 "defence" is raised almost as a matter of course in virtually every extradition case."

The judgment drew attention to the "deliberate" distinction drawn in *in H(H) v Deputy Prosecutor of the Italian Republic, Genoa* [2012] UKSC 25 between "private and family life" and "article 8 rights of the family" (§37).

The Court stressed that it is "most unlikely" that a challenge to extradition based on Article 8 will succeed based in a disproportionate interference with "private life", and where family life is relied on, it will only be in cases of "exceptionally severe impact" that there will be any prospects of success.

Automatic vs Discretionary Early Release: Why It Matters

If a requested person might be released early from their prison sentence following extradition, should this affect the proportionality assessment under Article 8? And if so, to what extent should English courts attempt to predict the likelihood of such release?

These questions produced what the Supreme Court described as "divergent and inconsistent approaches" on appeal, creating an unsatisfactory patchwork of conflicting authorities (§1).

The difference between "automatic" and "discretionary" release is an important one. The latter makes it difficult for the UK Court to predict when and if release will occur. Even the former, however, is not a "get out of jail free" card.

Automatic release

In an "extreme case", where early release operates "automatically so that early release can be precisely calculated and predicted" that "might possibly" outweigh public interest where there is a combination of other "exceptionally compelling" features. Set against that, the court in the requesting state will be "deprived of the opportunity to impose appropriate licence conditions" which must equally count in the executing court's analysis (§45).

Discretionary release and the "three options"

Some cases will involve judgment or discretion in the requesting state. Swift J, whose decision was under appeal, identified three possible approaches the court might take, each of which was examined by the Supreme Court. The Supreme Court, like a proverbial Goldilocks, tested all three.

Option One: "Too cold". Rigidly disregarding the existence of foreign early release laws as they are a matter for the requesting state, and no weight should attach to the possibility of release on licence.

The Supreme Court acknowledged "considerable merit" in this approach, due to its consistency with international comity principles, and that it did not "effectively usurp" the decision of the requesting state's authorities (§70).

However, they ultimately rejected this approach as it was "unrealistic not to recognise the existence of article 77 of the Polish Penal Code" which would provide a mechanism for release (§70).

Option Three: "too hot" Actively assess the likely merits of early release applications and attach significant weight to positive assessments in the proportionality exercise; the approach taken by Fordham J in *Dobrowolski v District Court in Bydgoszcz* [2023] EWHC 763 (Admin).

The Supreme Court found that it was contradictory for courts to: (a) accept that early release decisions belong to Polish courts; (b) evaluate the merits of applications to those courts; and (c) prevent Polish courts from making decisions by refusing extradition based on that evaluation (§72). This approach also breached international comity, by usurping the role of the Polish Court (§74). Such an approach failed to take into account the fact that the "pros" in favour of extradition (the ability to impose licence or probation conditions) would outweigh the "cons" in favour of discharge (the likelihood of early release); §75.

Option Two: "just right". A tempered middle ground; acknowledging the reality of early release provisions but avoiding overreach.

The Supreme Court endorsed the approach of acknowledging the existence of early release provisions but attaching only 'little weight' to them in the Article 8 assessment. As the Court explained, 'it is unrealistic not to recognise the existence of article 77 of the Polish Penal Code' (§70), but, save in 'rare cases,' UK courts should not attempt to predict the likelihood of early release (§77). The "bare possibility" (or, dare one say, bear possibility…) of early release adds little weight to the Article 8 proportionality exercise (§78).

Moreover, this is offset by the fact that refusing extradition would deprive the requesting state of the opportunity to impose licence conditions or probation, a factor which will generally outweigh any speculative benefit to the requested person

The 'Rare Cases' Exception: A High Bar

Having tasted and settled on the correct temperature of early release porridge, the Court turned to "rare cases".

The Supreme Court defined a "rare case" as one where there is agreed or uncontested evidence demonstrating an "overwhelming probability" of all four of the following (§80):

a) That the requested person would be released upon application under the relevant legal provisions;
b) When that release would take place;
c) The specific probation period and conditions that would apply
d) That the English court's inability to impose or supervise such conditions would not adversely affect either the offender or the public.

Practical Implications for Practitioners

The Supreme Court criticised the routine use of Article 8 in extradition cases, noting that such challenges should now be rare and subject to stricter scrutiny (§81).

While the Court called for "robust case management" to ensure Article 8 is only raised in appropriate cases, it offered no detailed guidance on implementation. It is unclear how the "appreciation by the legal aid authorities" is to be put into practice. The idea that the Legal Aid Authority should be reaching a determination at the early stage of a cases is one which will doubtless be concerning to practitioners.

In practice, this will require practitioners to obtain clear instructions early and to develop cases swiftly to determine if the threshold for "exceptional interference" is met. Private life (rather than family life) claims will be harder to run and require frank advice to clients.

As to early release provisions, the clear direction at (§82) is that the Court should not be spending time and resources anticipating the outcome in the issuing judicial authority of applications for early release save in exceptional circumstances.

UK courts will now likely place additional emphasis on the weight to be attached to probation/licensing supervision after release, and the consequential removal of the right of states to apply such measures.

Practitioners will need to ask themselves: 1) does this meet the 'rare cases' test? 2) If so, taking the case "at its highest" will the additional weight to be attributed to the possibility of early release, together with other factors, outweigh public interest? If not, then salvation is not to be found there (§82).

Ultimately, determining whether a case is truly exceptional remains a matter of judgment, even for experienced lawyers and judges. As they say: two lawyers, three opinions.

Conclusion

Andrysiewicz represents a significant victory for requesting states and a corresponding setback for requested persons. The decision will make it much harder to run successful Article 8 challenges based on speculation about early release.

Practitioners would be well-advised to review any existing cases where early release arguments feature prominently. Unless they fall within the Supreme Court's narrow definition of "rare cases" - and few will - such arguments are now likely to carry minimal weight.

The decision reflects the Supreme Court's clear view that the extradition process has become too tolerant of speculative challenges that serve mainly to delay rather than to identify genuine cases of disproportionate interference with human rights.

For practitioners, the message is clear: Article 8 challenges must be exceptional to succeed, and speculation about early release is not a reliable path.

Jonathan Swain
9BRChambers

El Khouri: redefining the dual criminality test and limiting extra-territorial jurisdiction in money laundering cases

In a world where crimes, with increasing frequency, cross borders and involve conduct which occurs in countries outside the one where the complaints are made, there is a need for the law and its jurisdictional reach to catch up. Arguably, Parliament needs to bring our money laundering laws up to date to reflect this fast-changing criminal world.

In *El-Khouri v USA* [2025] UKSC 3, the Supreme Court reviewed and changed the approach to be taken to dual criminality in extradition cases where conduct occurs outside of the requesting state. It was case about insider dealing and the resulting flow of money. The Supreme Court's decision, handed down on 12th February 2025, significantly impacts extradition cases under the Extradition Act 2003 ('the 2003 Act') and will also have an effect in domestic prosecutions under the Proceeds of Crime Act ('POCA 2002') for conduct which occurred outside England and Wales.

Mr El-Khouri was wanted in the US to face trial on charges concerning securities fraud, wire fraud, fraud in connection with a tender offer and conspiracy to commit such offences. The allegation was that he made substantial payments to a middleman, who was located in places including London and Paris, to obtain confidential inside information about prospective mergers and acquisitions of companies listed on US stock exchanges and then used this information to trade securities and make large profits. These transactions were done through a UK-based broker.

Whilst the conduct could have been prosecuted for insider trading in this jurisdiction, the UK Financial Conduct Authority decided not to prosecute, after carrying out an investigation.

In the extradition proceedings, the defence representatives argued that the conduct alleged in the extradition request did not constitute an extradition offence under the Act as it did not satisfy the requirement for double criminality under section 137 of the Extradition Act. Section 137(3) provides that dual criminality will be satisfied where the

conduct occurred in the category 2 territory (here the US) and that the conduct would constitute an offence punishable with at least 12 months' imprisonment under the law of the UK if it occurred here. Section 137(4) applies to conduct which occurred outside the category 2 territory and requires that in corresponding circumstances the equivalent conduct would constitute an extra-territorial offence under the law of the relevant part of the United Kingdom punishable with imprisonment of at least 12 months. These provisions echo those in Part 1 (usually European) cases.

The law on dual criminality had, up to this point, been shaped by *King's Prosecutor, Brussels v Cando Armas* [2005] UKHL 67. The House of Lords had determined that where conduct takes place outside of the requesting state but has an intended effect within it, that is enough to meet dual criminality requirements under s137(3)). Thus, the law was that conduct could be taken to have occurred in the territory simply by virtue of the effects being 'intentionally felt', irrespective of where the person was at the time.

The Cando Armas principle had been consistently upheld and consistently applied for two decades. Against this background it was perhaps surprising that the Supreme Court were critical of Counsel for failing to challenge the long-established position . The reasoning the Supreme Court ultimately settled upon was unexpected on all sides.

The joint judgement written by Lord Lloyd-Jones and Lord Leggatt, with whom Lord Reed, Lord Briggs and Lord Stephens agree, rejected the observations of Lord Hope. The Supreme Court declared his obiter dicta remarks in Cando Armas as interchangeably "illogical", "mistaken", "flawed" and "defective". The Court concluded that application of the Cando Armas approach "created a paradox comparable to the fate of Schrödinger's cat", where the same acts could be classified as being committed "outside" the requesting state because they occur geographically outside of it, whilst simultaneously being committed "in" it because that is where their intended effects are felt. The Court held that this approach could not 'withstand[ing] scrutiny' because it does not accord with the statutory language and renders the distinction between the mutually exclusive categories in sections 137(3) and 137(4) unworkable.

Having so stringently rejected this previously settled principle of extradition law the Court set about outlining the correct approach. To the hypothetical reasonable onlooker the approach endorsed is the obvious and common-sense interpretation of the statute; whether the conduct specified in the extradition request occurred in or outside the requesting state for the purposes of section 65(3) and 65(4) is a question of fact to be answered simply by considering where the acts of the requested person specified in the extradition request are alleged to have occurred (ignoring mere narrative background and focusing on the substance of the criminality alleged).

Extradition practitioners are left weighing up the consequences of this seismic shift in approach. Where the 'effects' doctrine provided an easy answer, there is now no shortcut for requesting states when seeking to meet their evidential burden in establishing dual criminality. Time will tell how prosecutors endeavour to meet this challenge but the discussions below (in relation to the domestic position) may offer some answers.

A number of ambiguities remain. The Supreme Court observed that sections 137(3) and (4) were "clearly intended to be mutually exclusive" and offer a "binary choice" however it did not interfere with the principle that conduct need not occur exclusively within the requesting state for it to be considered as occurring in that state. In the context of increasing trans-national offending (including online and more traditional international criminal enterprise) the question remains as to the approach to be adopted where criminality falls equally within and without of the jurisdiction.

The impact of *El Khouri* is not confined however to extradition cases. The importance for domestic law results from the Supreme Court's finding that *R v Rogers* [2014] EWCA Crim 1680 was wrongly decided. Rogers was a case in which it was held that conduct carried out by the Appellant wholly in Spain could be tried in England as an offence of money-laundering (converting criminal property) under s.327(1)(c) of the Proceeds of Crime Act 2002 ("POCA").

The primary basis of English criminal jurisdiction is territorial. We prosecute in our courts acts (or conduct) committed within England and Wales. In some cases Parliament has legislated for extra-territorial criminal jurisdiction. Examples are to be found in the Criminal Justice Act 1993, for theft, fraud, blackmail, handling stolen goods, etc (but not money-laundering), and in the Bribery Act 2010.

There are also common law expressions of extra-territoriality, the leading modern case being *R v Smith (Wallace Duncan) (No 4)* [2004] EWCA Crim 631 in which it was held that where "a substantial measure of the activities

constituting a crime" (not necessarily its consequences) take place in England then a crime justiciable in England is committed, unless there is some rule of international comity to the contrary.

In *Rogers* the Court of Appeal held that the Appellant's conduct of converting criminal property in Spain was justiciable in England for two reasons: firstly, because by s.340(11) of POCA Parliament had intended to confer extra-territorial jurisdiction in relation to s.327 offences where the acts were committed abroad. Secondly, applying *R v Smith*, because the antecedent crime which made the money "criminal property" took place in England, it followed that "the significant part of the criminality underlying the case took place in England".

Rogers was relied upon by the USA in *El-Khouri* as a last-ditch effort to justify their argument that El-Khouri's conduct, which had almost all taken place in England, amounted to an extradition offence under s.137(4) of the Extradition Act 2003 because equivalent conduct in the USA would amount to an extra-territorial money-laundering offence triable in England.

The Supreme Court held that the Court of Appeal's reliance in *Rogers* upon s.340(11) POCA was misplaced, and that in fact that subsection indicated the reverse – that s.327 did not have extra-territorial effect – and that "it follows … that *Rogers* was wrongly decided".

The Supreme Court did not address the second (common law) line of reasoning in *Rogers*: whether that survives is a matter for another court on another day. In the meantime it would be relatively simple for Parliament to clear the matter up by making express provision for extra-territoriality of POCA offences if it wanted to.

To view the article in the Solicitors' Journal, please click here.

Andrew Bird KC, Louisa Collins and Rebecca Hill
5 St Andrew's Hill Chambers

CPT Updates

The Council of Europe Committee on the Prevention of Torture and Inhuman and Degrading Treatment or Punishment (CPT) has recently published its reports on:

- Slovakia – see article here
- Slovenia – see article here
- Greenland – see article here
- Malta - see article here
- Ireland – see article here

The CPT has announced it has undertaken the following visits:

- Liechtenstein – see article here
- Turkey – see article here
- Spain – see article here
- Belgium – see article here
- Scotland – see article here

Membership

Membership runs from January to December annually. If you wish to join DELF for the first time since 1 January 2025, please e-mail your name, professional title, firm / chambers / employer, e-mail address and the category of membership that you wish to join DELF under, with "DELF Membership" in the subject heading to the e-mail address membership@delf.org.uk and follow the payment instructions set out below.

Fees for 2025 are as follows:

£75 – Full membership: Silks/Partners - Open to practising lawyers who are Partners in a law firm or Barristers who have taken Silk, whose practice includes representing requested persons in extradition cases. Full membership is also open to Senior lawyers in equivalent positions practising outside of England and Wales whose practice includes representing requested persons in extradition cases.

£60 - Full Membership: Barristers/Solicitors/Legal Executives/Advocates - Open (subject to approval by the Committee) to any Solicitor, Junior Barrister or member of the Institute of Legal Executives practising in the field of extradition and legal academic staff, whose practice includes representing requested persons in extradition cases. Full membership is also open to lawyers practising outside of England and Wales whose practice includes representing requested persons in extradition cases.

£25 - Associate Membership - Trainee Solicitors, Pupil Barristers and Paralegals

£15 - Correspondent Membership - Open to court staff and other lawyers practising in the field of extradition

Fees can be paid in a group payment by a firm or Chambers administrator, or can be paid individually. If you are paying for more than one member in the same transfer, please email the details of who you have paid for and at what levels of membership they are joining at to membership@delf.org.uk after you have transferred the membership fees.

If you are simply paying for your own membership fee, please use your name as a reference on the bank transfer. There is no need to email to confirm transfer in this case.

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