

Local Authority Environmental Enforcement Performance

4 Networks Conference, Rome

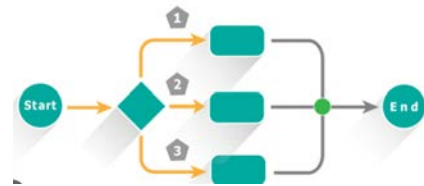
29th September 2023

Valerie Doyle, Environmental Protection Agency, Ireland

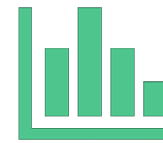
Outline



Introduction &
Objectives



Overview of the
Process



Emerging Results



Key Learnings

Introduction



- Measure effectiveness of inspection and enforcement activities of local authorities deliver for the environment.
- RMCEI – IMPEL ‘Doing the Right Thing’
- EU Compliance Assurance
- 20 National Enforcement Priorities
- 31 Local Authorities
- 3-year cycle (2022 – 2024)



Governance Processes



Waste



Water



Air & Noise

Strong outcome focus



- Better segregation, more recycling
- Reduction in unauthorised activity
- Water bodies targeted, improvements shown, discharges stopped, issues resolved?
- Non compliant septic tanks rectified and closed out.
- Air Quality – PM_{2.5} - will the national ban make a difference?
- Noise Action plans – implementation measures completed

Performance Framework Process



Define Priorities

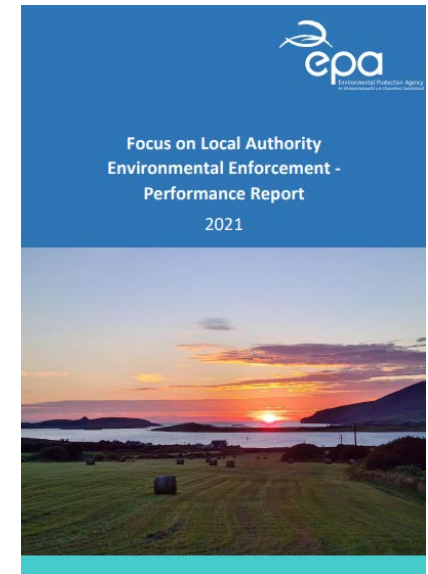
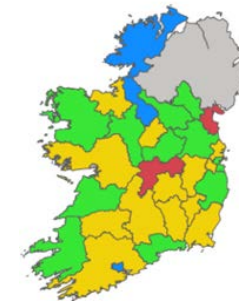
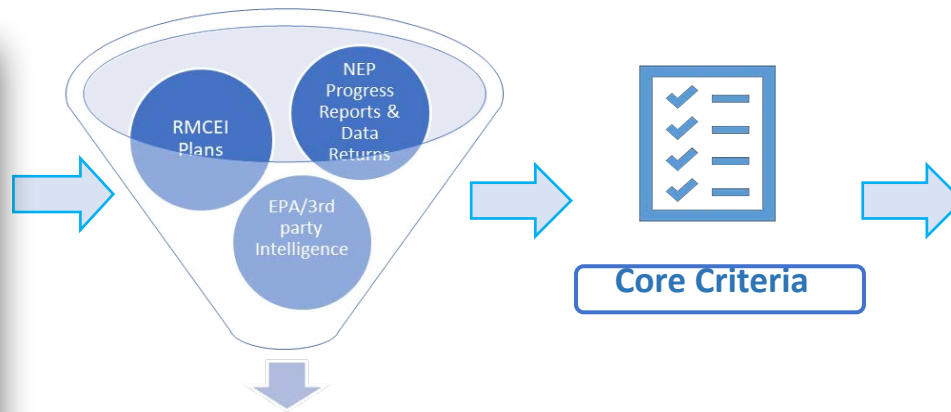
LA Develop Plan and Report

Assess Performance

Report Results

National Report

National Enforcement Priorities (NEPs) 2022 – 2024	
Governance Processes: <ul style="list-style-type: none"> RMCEI Plan: Planning for the NEPs RMCEI Plan: Environmental Resource Planning RMCEI Plan: Environmental Outcomes RMCEI: Review and Reporting Environmental Complaint Handling 	Water: <ul style="list-style-type: none"> Water Quality Monitoring Agriculture/Farm Inspections Septic Tanks (Domestic Waste Water Treatment Systems) Inspections Monitoring & Enforcement of Section 4 Licences (including LAWPRO referrals) Monitoring & Enforcement of Private Water Supplies
Waste: <ul style="list-style-type: none"> Tackling Significant Illegal Waste Activity / Multi-Agency Sites of Interest Construction and Demolition Waste End-of-Life Vehicles & Metal Waste Waste Collection Household and Commercial Waste Producer Responsibility Initiatives/Local Issues 	Air & Noise: <ul style="list-style-type: none"> Air Monitoring Solid Fuel Inspections Environmental Noise Directive (END) Activities/Noise Plans Planning Assessments Local Enforcement Issues



National Enforcement Priorities



Water	Waste	Air and Noise
<ul style="list-style-type: none"> Pressures from Agriculture (Farm Yards) - slurry/soiled water collection and storage 	<ul style="list-style-type: none"> Tackling Illegal Waste and Multi-Agency Sites/Operators of Concern 	<ul style="list-style-type: none"> Solid Fuel
<ul style="list-style-type: none"> Pressures from Agriculture (Farmland) - slurry and fertiliser spreading 	<ul style="list-style-type: none"> Construction and Demolition Waste 	<ul style="list-style-type: none"> Air Quality Monitoring and Data Use
<ul style="list-style-type: none"> Domestic Waste Water Treatment Systems / Septic Tanks 	<ul style="list-style-type: none"> End of Life Vehicles and Metals 	<ul style="list-style-type: none"> Environmental Noise Directive (ENDs)
<ul style="list-style-type: none"> Discharge Licences / Misconnections 	<ul style="list-style-type: none"> Household and Commercial Waste 	<ul style="list-style-type: none"> Air and Noise Control (including Planning)
<ul style="list-style-type: none"> Local Priorities and Water Quality Monitoring 	<ul style="list-style-type: none"> Producer Responsibility Initiatives and Local Priorities 	<ul style="list-style-type: none"> Ongoing Air and Noise Enforcement Work

National Enforcement Priorities



Each NEP defined in terms of objective, outcomes and activities required.

<p><i>Household and Commercial Waste</i></p>	<p>Maximise segregation, and recycling of municipal waste</p>	<ul style="list-style-type: none">• 3 bin systems are in place and being utilised <u>i.e.</u> separation of dry recyclables and organic materials at all commercial sites.• Accurate waste classification and quantification of waste data in AERs from WCP and WFP operators of municipal waste.• High level of compliance amongst households availing of a door-to-door waste collection service or a suitable alternative.	<ul style="list-style-type: none">– Inspection of WCP operators for provision of 3 bin system.– Surveys of retail, hospitality and industrial sectors to ensure proper use of 3 bin system, segregation and use of authorised collectors.– Sampling/analysis of treated waste outputs– AER Validations on WCP and WFP priority lists.– Maintenance of register of households with/without a waste collection service and targeted inspections in areas with low compliance.– Focused monitoring of the resources and systems available for gathering and reporting waste data to be carried out as part of site audits at waste facilities/waste collectors.– Monitoring of waste acceptance criteria at authorised sites <u>e.g.</u> WFP, Waste Transfer Sites, Landfills and Waste to Energy Plant.
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LA Annual Reporting



RMCEI Plan

Activities Report

Qualitative Narrative



RMCEI Annual Return : 01/01/2022 - 31/12/2022

- Case Studies In Progress
- Staff Resources In Progress
- Licences, Permits and Certificates of Registration To Be Approved
- Waste Complaints In Progress**
- Water /Wastewater, Air/Noise and Planning Complaints In Progress
- Waste Inspections In Progress
- Water & Wastewater Inspections In Progress
- Air & Noise Inspections In Progress
- Environmental Planning Inspections In Progress

Waste Complaints

Waste Complaints

4.1 Waste Complaints

4.1.1 Litter (excluding fly tipping and illegal disposal)

a) Complaints Open from Previous Year:	10
b) Complaints Received:	12
c) Complaints Investigated:	20
d) Complaints Closed:	20
e) Complaints Remaining Open at End of Year:	2
f) % of Complaints Investigated (RWMP - Section 19.7.F3.2):	100%

4.1.2 Non C&D Waste (includes fly tipping and illegal disposal)

a) Complaints Open from Previous Year:	0
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Local Authority:	Activities
	<p>what your council did on this priority in 2020. It is an opportunity to capture the impacts of the work completed to drive compliance. [400 words per priority area]</p> <p>carried out under this activity IN THE PREVIOUS</p> <ul style="list-style-type: none"> • Farm Inspections are carried out in accordance with the GAP Regulations, SI 605 EU (Good Agricultural Practice) as amended. A Risk based approach was used for the selection of the catchment area to stay outside of a priority Area for Action. • The local authority published an article on slurry spreading to coincide with the opening of the slurry spreading season in the County; published in a local newspaper along with the Infographic that the local authority had developed, which shows the buffer distances for slurry spreading on farmland. • In 2020 these inspections focused on farmyards along the shorelines of X lake, a large waterbody within 100m of surface water and associated cross compliance penalty was submitted by the local authority with the RMCEI 2020 Report. • In addition, we considered that working in this catchment in 2020 was a good strategy to follow on from the 2019 work the Environment Department carried out through its National Inspection Plan work. In 2019, the Environment Department carried out several its National Inspection Plan Inspections in the hinterland of X Lake using the Risk Zone criteria provided by the EPA and reference to the local authority's National Inspection Programme 2018-2021 for selection of properties. • While Agricultural activity is at a low level within this catchment, the herd size is above the county average. Farm enterprises in the area are mixed with cattle, sheep and sheep farming carried out and many farmers are part time with off-farm employment. • No farm inspection was closed out after a first inspection and no Section 12 Notices under the Water Pollution Act 2003 were issued. The Environment Department requires that a Remedial Action Plan be prepared by an agricultural adviser identified during the inspection; on most farms a 2nd Farm Inspection is required to close out the action process.

Appropriate site selection

SOP developed
Case study
Learnings

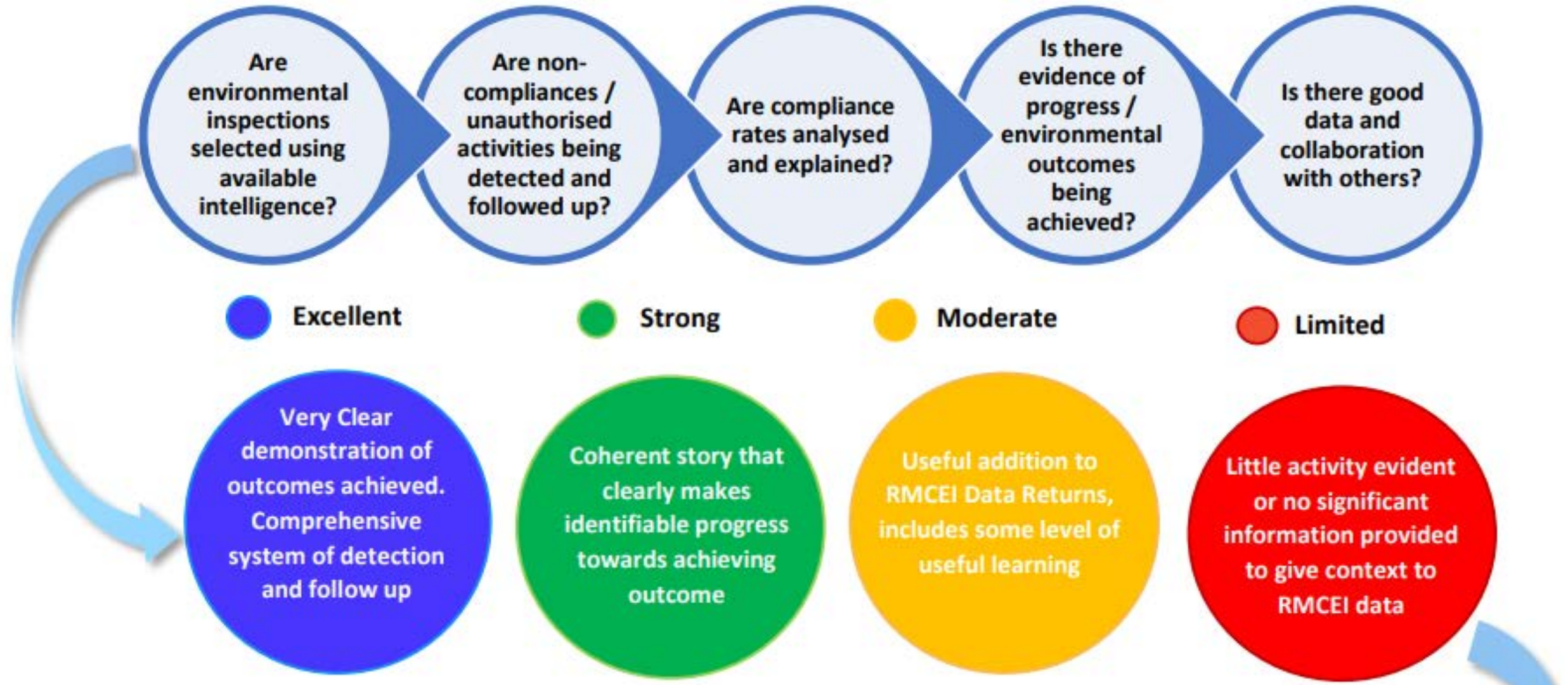
Awareness raising

Inspection intelligence

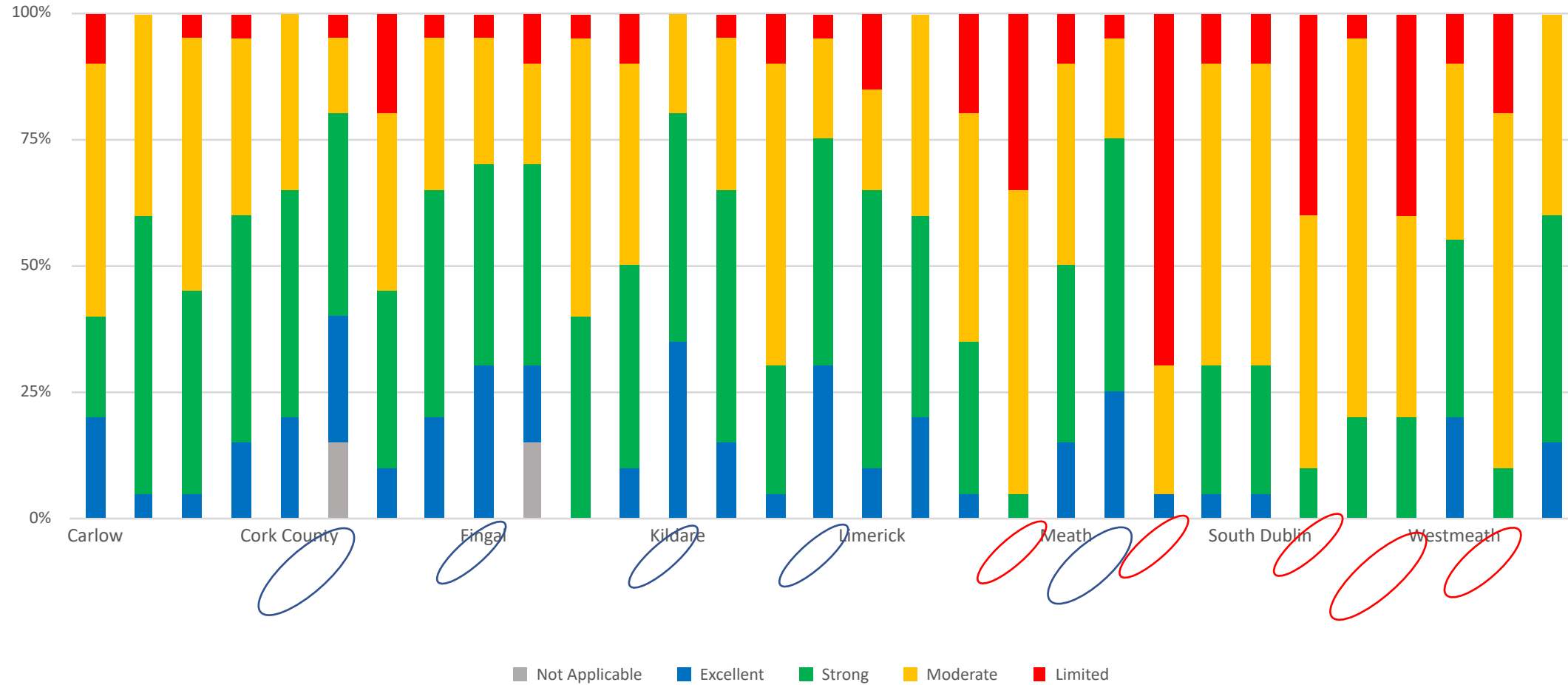
Compliance follow-up

Outcomes?
??

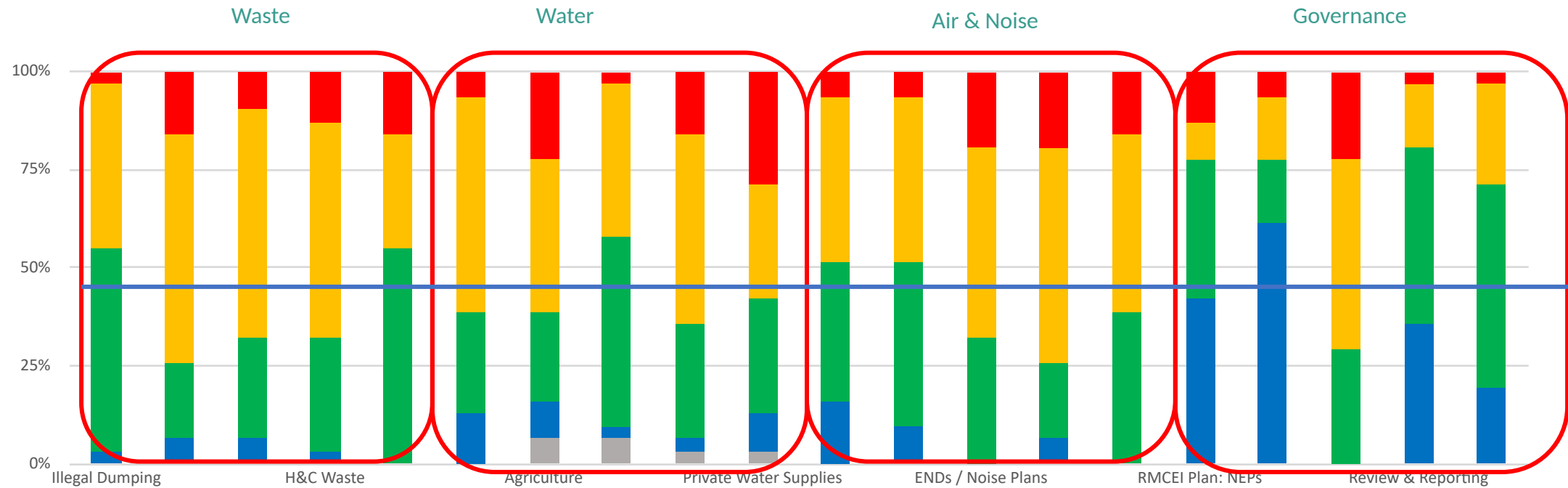
Assessment Process – 20 Priorities



2021 Results by Local Authority

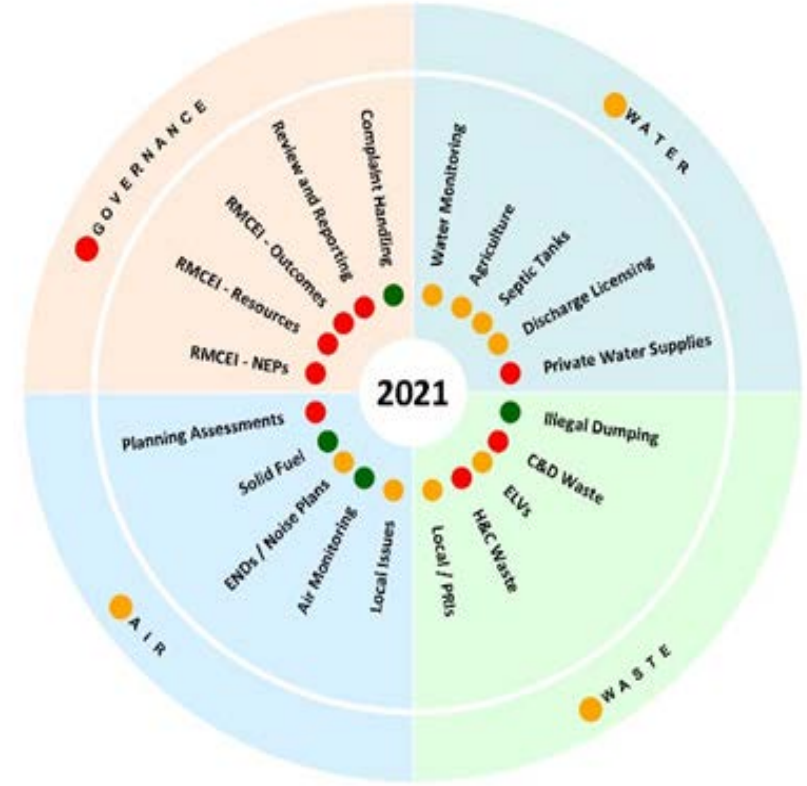
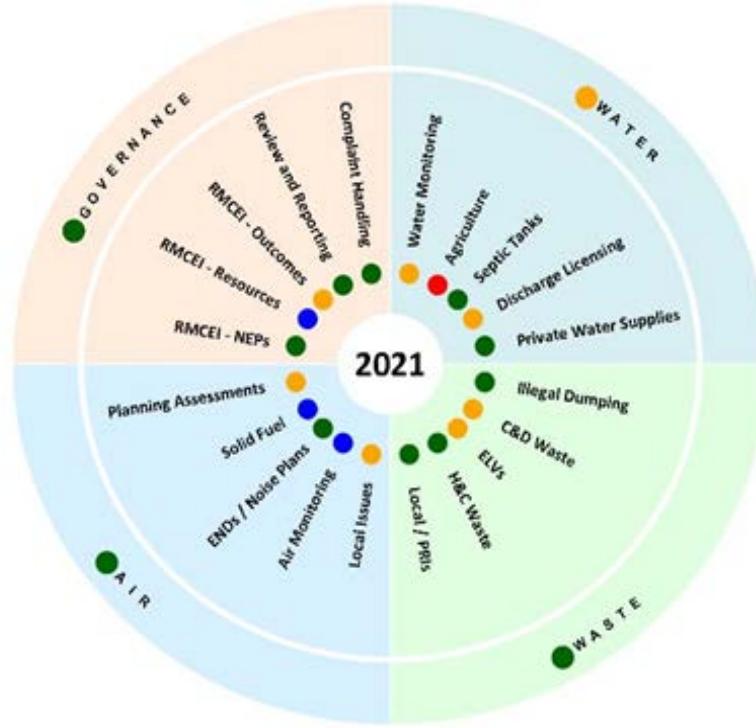
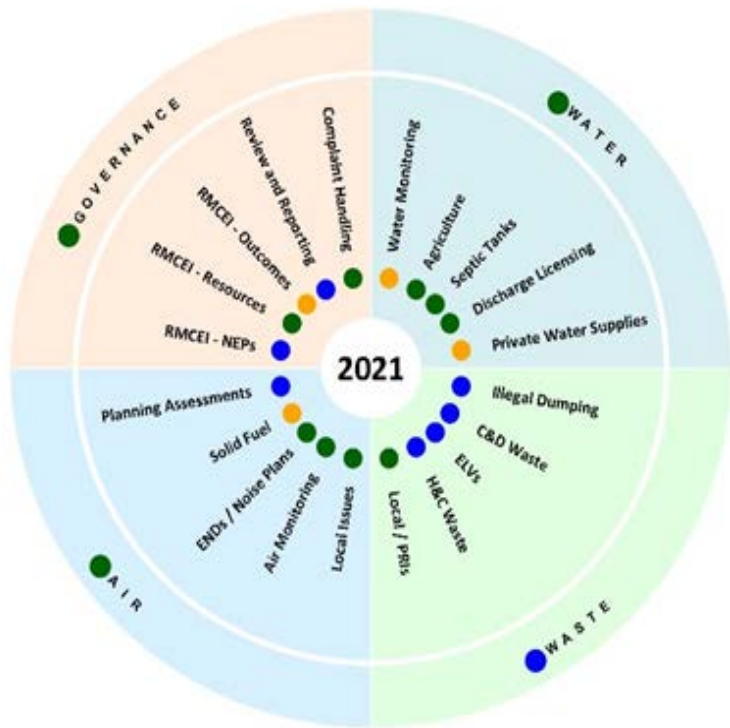


2021 Results by National Environmental Priority



Not Applicable
 Excellent
 Strong
 Moderate
 Limited

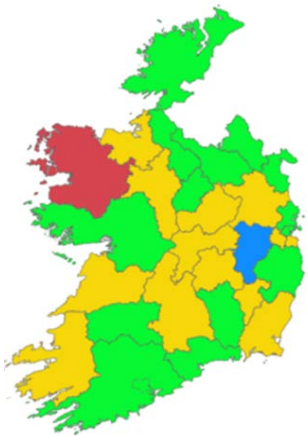
2021 Local Authority Reports



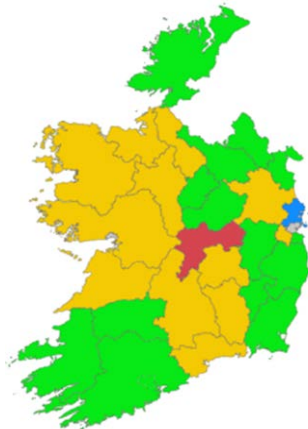
2021 National Reports



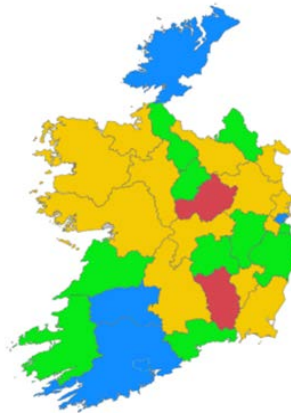
Illegal waste activities



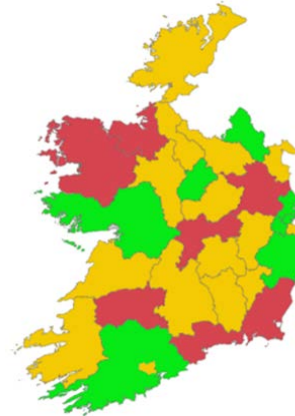
Septic Tanks



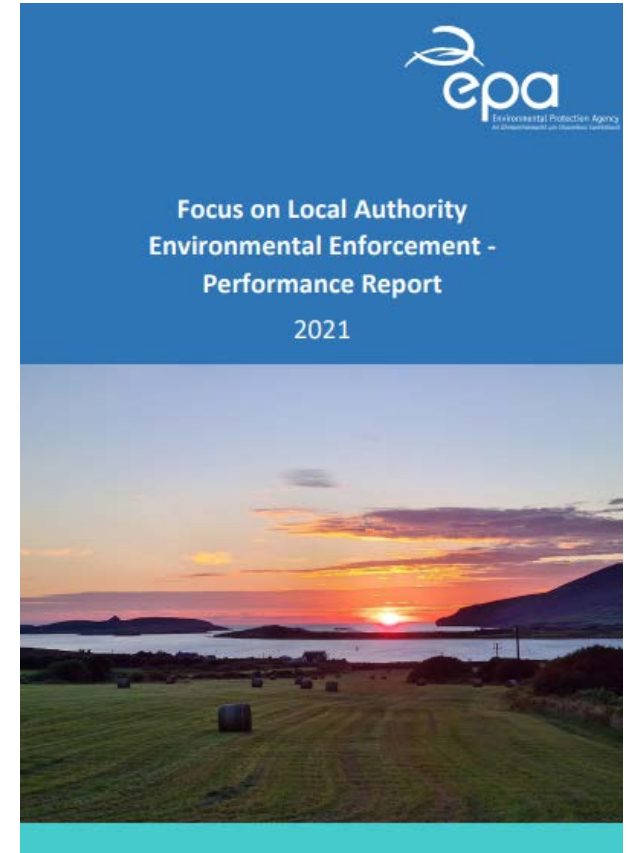
Air Monitoring



RMCEI Plan: Environmental Outcomes



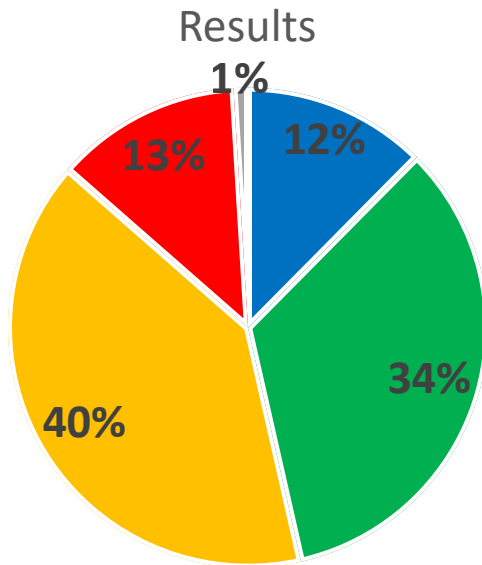
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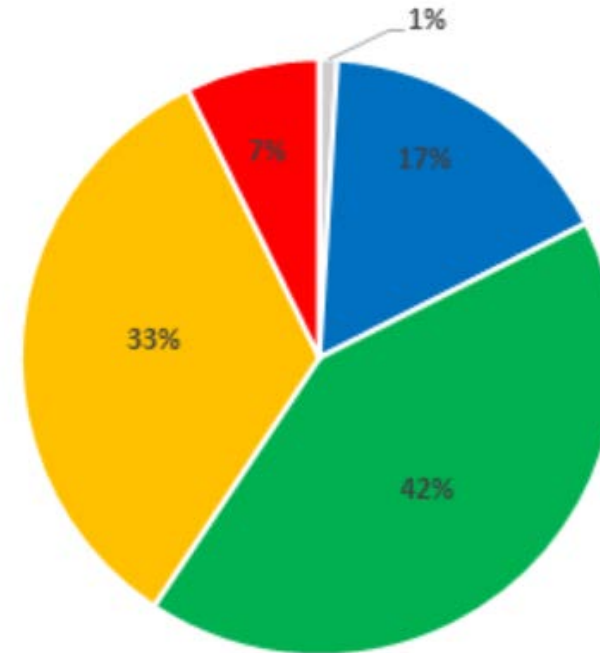
2021 V 2022 Emerging Results



2021 LAPF Assessment



2022 LAPF Assessment Results



- Excellent
- Strong
- Moderate
- Limited
- Not Applicable

Preliminary Results for 2022



- Overall score increased from 46% to 59%
- Overall score for all NEPs improved
- Number of Local Authorities scoring 70% or greater increased from 5 to 10.
- 3 of the 5 lowest local authorities have improved significantly
- Control of Illegal Dumping activities is one of highest performing NEPs.
- Agriculture inspections on the increase and more targeted towards WB at risk.
- Recycling targets are challenging and efforts to secure better segregation at source is required.
- More progress needed to protect public health – e.g. control on noise pollution

Some Key learnings

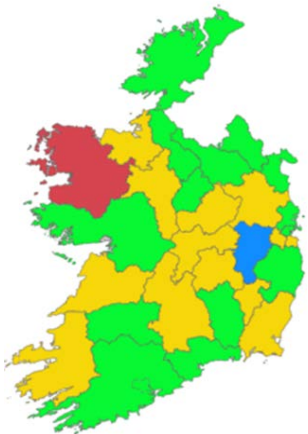
- What gets measured gets done
 - risk based prioritisation provides foundation.
- Intensive engagement necessary
 - importance of NIECE/WERLA networks.
- Keep focus on what we are trying to achieve
 - not the numbers of inspections.
- Paper doesn't refuse ink, need to ground truth self reporting
 - third party data and audits.



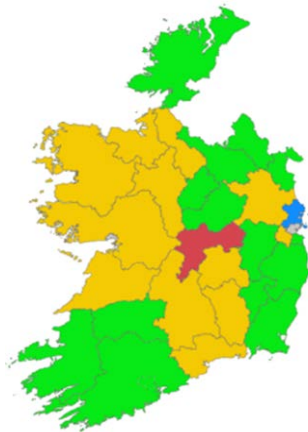
Thank You



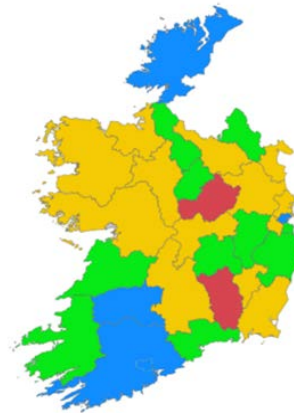
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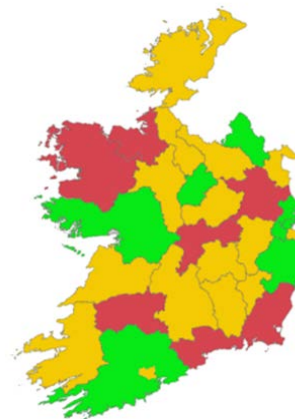
Septic Tanks



Air Monitoring



RMCEI Plan: Environmental Outcomes



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