

Roscommon County Council 2022 National Enforcement Priorities Progress Report

National Enforcement Priority: GOVERNANCE - RMCEI Review & Reporting	
Local Authority:	Activities
<p style="font-size: 2em; color: #0056b3; margin: 0;">↓</p> <p style="font-weight: bold; margin: 0;">Looking back at the year</p>	<p>Tell the story of what your council did on this priority in the reporting year. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> The RMCEI Plan frequency of reviews should be bi-annual at a minimum. The review frequency and the outcomes should be included in the progress report. RMCEI reviews should evaluate progress of NEPs and assess if planned inspection targets are on track. RMCEI reviews should provide reasons for any deviation from targets, planned activities or objectives set out in the plan. RMCEI reviews should be presented to the Director of Services/Senior Engineer/Senior Management/Environment Strategic Policy Committee at least once during the earlier part of the year, to facilitate plan review. The RMCEI Plan, RMCEI Data Return and NEP Progress Report should be submitted to the EPA on schedule. 	<p>Roscommon County Council's Environment Unit hold integrated performance management (IPM) meetings each month and these meetings are attended by all Environment staff. Live minutes are taken at each meeting. "Progress per month" and "total progress to date" are reviewed against the RMCEI Plan targets for the year and any positive or negative deviations from the planned numbers were interrogated.</p> <p>Based on these progress reviews, where possible, available resources were assigned to any categories falling short of progress targets. This information from the IPM meetings is also used to assist in the preparation the LGMA monthly returns.</p> <p>2022 saw a number of staff changes in the Environment Unit, with the number of available enforcement staff dropping as low as two for a number of weeks. This impacted our ability to achieve our planned targets in a number of categories, and combined with a change in the two senior management roles (SEO and SEE) with inexperienced new personnel joining the Unit resulted in the planned targets not being achieved in some areas.</p> <p>The Environment Unit Head (SEO) and Director of Services are invited to all IPM RMCEI review meetings and generally attend as many as their schedule allow. This allows immediate escalation of live issues and provides regular updates on RMCEI progress to Senior Management throughout the year – including progress against planned activities.</p> <p>Staff resourcing needs were taken on board by Senior Management and approval for additional resources for 2023 have been sanctioned.</p>

National Enforcement Priority:

Local Authority:



Looking back at the year

GOVERNANCE - Environmental Complaint Handling

Activities

Tell the story of what your council did on this priority in the reporting year. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.

[Guideline of 500 words per priority area]

Describe what was carried out under this activity in the previous reporting year - e.g.

- Assignment of a dedicated Environmental Complaints Coordinator.
- Implementation of the National Environmental Complaints Procedure.
- Appropriate systems in place for recording and tracking environmental complaints.
- Adequate resources assigned to complaint investigation in the RMCEI Plan.
- Appropriate handling of EPA referred complaints and Section 63 Notices received by the local authority.
- Ensuring timely investigation of complaints and reporting of complaints outcomes. This should include progress on complaints outstanding from previous years and the timeframes for complaint investigation.
- Analysis of complaints numbers and inspection intelligence that may have potential impacts on NEPs and other thematic areas.
- Details of environmental complaint handling should be provided in the appropriate section of the NEP Progress Report.
- Reporting of complaint numbers and investigation for each thematic area in the RMCEI Data Returns.

Roscommon County Council have appointed the senior member of our Environment Administration Team as the designated Environmental Complaints Coordinator. Roscommon County Council use a case management system - Report It - which was developed in partnership with Firmstep in 2021. Environmental complaints that are received by telephone, email or in person are logged on the system by the Environment Administration Team, or alternatively they can be logged directly by a member of the public.

A drop down menu of complaint categories are available to the person logging the complaint and the complaints are automatically assigned based on the category selected. Litter cases go directly to the Litter Warden Team and all other cases go to the RMCEI Coordinator to be distributed to the appropriate Enforcement Officer. Resources for 2022 continued to be an issue, but a core staff for the year included two Litter Wardens and between two and four Enforcement officers - as personnel left and joined the Environment Unit.

On receipt of EPA referred complaints, these are immediately logged on the system by the Environment Administration Team and the complaints process outlined above are followed.

No section 63 notices were received in 2022.

Investigation of complaints was prioritised throughout the year to ensure that any new issue was inspected and actioned in a timely manner. The Report It system has a function that notifies the complainant when the complaint is closed and relevant information relation to the complaint raised.


Location mapping is an in-built feature of the complaints system and all complaints can be reviewed using the Environment Unit ArcGIS Mapping system and cases can be sorted and filtered by date, category and status. This allows detailed tracking of complaint numbers, including both new and open/unresolved cases.

The system also allows issues or complaints 'hotspots' to be easily identified which feeds in to future environment enforcement intelligence planning. The Arc GIS system allows for .csv files to be exported allowing further analysis of the raw data to be interrogated which can be used to feed into next year's RMCEI plan.

There were a total of 314 open complaints at the start of 2022 and by year end this number had reduced to 187. All remaining complaints from the old system were migrated over to Report It.

NEP Assessment Criteria

	CORE	Complementary
A	For regulated / authorised sites, a compliance rate documented and compared over the previous years, and analysed or explained;	
B	Demonstrate appropriate site selection methodology and inspection implementation and/or early interventions;	
C	Demonstration that non-compliances/unauthorised activities are being detected and are being followed up – and some progress in the NEP is shown;	
D	Clear example(s) of a positive environmental outcome(s) – something was achieved to improve the environment (not simply reached a target of inspections);	
E	Clear useful learning in a NEP area (positive or negative e.g. what to do, or what not to do, or identification of illegal sites or unauthorised operators);	
F	Collaborative work with WERLA, NTFSO, RWMPPO, LAWPRO, EPA, Catchment Care Projects, inter-departmental within the local authority or with other local authorities; cross cutting NEP collaboration;	
G	Demonstration of a proactive approach , or innovation in dealing with a problem or demonstration of an enforcement curiosity ;	
H	Compliance promotion and awareness raising activities;	
I	Activities on data validation, data analysis, systems development, website development ;	
J	Significant enforcement actions/prosecutions and the outcomes such as remediation, sharing of lessons learnt to aid national consistency of enforcement;	
K	Case studies written up and shared that encompass any of the above properties.	

National Enforcement Priority: WATER – Pressures from Agriculture (slurry/soiled water collection and storage)	
Local Authority:	Activities
<p style="text-align: center;"> Looking back at the year</p> <p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Inspections of farmyards in areas where agriculture is identified as a significant pressure, with a small percentage in other areas, as defined in the National Agricultural Inspection Programme for local authorities. • Undertake targeted agricultural inspections specific to the pollutants of concern (P, N and organics), using the EPA Pollution Impact Potential (PIP) maps and EPAs Targeting Agricultural Measures Map. • Take all necessary steps to ensure compliance, including follow up and close out of non-compliances. • Cross reporting of non-compliances to DAFM. • Document and report results for all farm inspections to the EPA. 	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p> <p>Roscommon have a number of high status catchments within the county. The selection of farms to be inspected in 2022 under the catchment programme were based on the Derryhippo river catchment which is at poor status based on 2020 monitoring point assessment and is at risk of not achieving good status within requirements for the WFD. Farm surveys were completed in the catchment with SSIS assessments being completed U/S and D/S of area of farm inspections. All farms where planning applications were received were visited, and farms associated with application and storage of sewerage sludge were also inspected.</p> <p>Roscommon County Council has a number of high status catchments and areas not at risk. Both are reviewed when selecting farms and the latest planning data is considered to see if there is any potential increase in farm activities in a particular area. No major developments were identified in 2021 to influence the 2022 plan.</p> <p>GAP Inspections:</p> <p>25 farm inspections completed over the year, 21 of which relate to new farms. Of the 21, 4 were found to have inadequate slurry/soiled water storage by visual inspection or on review of farm records, stocking capacity was not reflected in storage capacity.</p> <p>Planning files:</p> <p>17 planning files were reviewed for future farm development, and of these three were found not to have adequate storage for slurry soiled water and further information was sought in relation to same.</p>

Sewerage Sludge:

11 farm facilities used for storage of sewerage sludge were reviewed along with reviews of 31 Nutrient Management Plans for application of sludge's in 2022 and all were found to have adequate storage capacity.

Four farms were found to have minor defects in relation to structure or activities, these were all remediated in 2022 and these farm improvement works were completed with aid of advisor.

No referrals were received from LAWPRO and no cross reports were submitted to DAFM in 2022. Roscommon County Council continue to work with LAWPRO on catchment assessments. One staff member of Roscommon County Council now sits on the National Agri Inspection Programme review. Roscommon County Council also attends WROC meetings hosted by LAWPRO and these host all stakeholders in the water arena.

Each individual farm inspection involves an element of awareness raising and compliance assistance. An overview of why the farm visit is being carried out, and any potential water quality issues or impacts within catchment is given.

Awareness was raised at each of the 21 farm visited and farms used for the application and storage of sewerage sludge through one-to-one interactions with farmers during inspections. In December 2022, Roscommon County Council produced an advertising and awareness campaign on slurry spreading on activities in closed season, through social media.

WATER – Pressures from Agriculture (slurry and fertiliser spreading)

National Enforcement Priority:

Local Authority:

Activities

Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.

[Guideline of 500 words per priority area]



Looking back at the year

Describe what was carried out under this activity in the previous reporting year – e.g.

- Inspections of farmlands in areas where agriculture is identified as a significant pressure, with a small percentage in other areas, as defined in the National Agricultural Inspection Programme for local authorities.
- Undertake targeted agricultural inspections specific to the pollutants of concern (P, N and organics), using the EPA Pollution Impact Potential (PIP) maps and EPAS Targeting Agricultural Measures Map.
- Take all necessary steps to ensure compliance, including follow up and close out of non-compliances.
- Cross reporting of non-compliances to DAFM.
- Document and report results for all farm inspections to the EPA.

Roscommon have a number of high status catchments within the county. The selection of farms to be inspected in 2022 under the catchment programme were based on the Derryhippo river catchment which is at poor status based on 2020 monitoring point assessment and is at risk of not achieving good status within requirements for the WFD. Farm surveys were completed in the catchment with SSIS assessments being completed U/S and D/S of area of farm inspections. All farms where planning applications were received were visited, and farms associated with application and storage of sewerage sludge were also inspected.

Roscommon County Council has a number of high status catchments and areas not at risk. Both are reviewed when selecting farms and the latest planning data is considered to see if there is any potential increase in farm activities in a particular area. No major developments were identified in 2021 to influence the 2022 plan.

Of the 21 farms visited in the Derryhippo catchment, four were found to have inadequate information and records available relating to on-farm activities. The survey work was also used as an overall opportunity to raise awareness of potential impacts on waters with the farmers. Four farms were found to have minor defects in relation to structure or activities, and these were all remediated in 2022 and these farm improvement works were completed with aid of advisor.

No referrals were received from LAWPRO and no cross reports were submitted to DAFM. Roscommon County Council continue to work with LAWPRO on catchment assessments. One staff member of Roscommon County Council now sits on the National Agri Inspection Programme review. Roscommon County Council also attends WROC meetings hosted by LAWPRO and these host all stakeholders in the water arena

GAP inspections: 25 farm inspections were completed over year, 21 of which relate to new farms. 11 on farm facilities used for storage of sewerage sludge were reviewed along with 31 Nutrient

Management Plans for application of sludge's in 2022. NMP reviews include a land walk relating to spreading activities for the year.

Where non-compliances are identified, these are notified to DAFM for significant issues. Non-compliances are detected through on farm visits and through review of available data on the farm activity. Where minor improvement works are identified these are agreed with individual farmers and their farm advisor. SSIS, small stream impact scores, were completed before surveying and where any stream was found to be heavily impacted a follow-up survey will be completed in 2023.

Collaboration with Inland Fisheries Ireland took place at the Castlereagh improvement works on River Francis and investigation of a misconnection of surface water sewer was completed. Roscommon County Council attends WROC meetings hosted by LAWPRO and these host all stakeholders in the water arena. Four individual engagement days were completed with catchment scientist for county Roscommon in 2022.

Staff resources continued to be an issue in 2022 and as result the Roscommon has not achieved its goal in terms of improvement of water quality. Effective improvement in water quality requires regular and continued inspection of farm activities on the ground.

Each individual farm inspection involves an element of awareness raising and compliance assistance. An overview of why the farm visit is being carried out and any potential water quality issues or impacts within catchment is given.

Awareness was raised at each of the 21 farms visited and farms used for the application and storage of sewerage sludge through one-to-one interactions with farmers during inspection. In December 2022, Roscommon County Council produced an advertising and awareness campaign on slurry spreading on activities in closed season through social media.

WATER – Domestic Waste Water Treatment Systems / Septic Tanks

National Enforcement Priority:

Local Authority:

Activities

Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.

[Guideline of 500 words per priority area]

Looking back at the year

Describe what was carried out under this activity in the previous reporting year – e.g.

- Undertake the allocated number of DWWTS / Septic Tank inspections under the National Inspection Plan for Domestic Waste Water Treatment Systems 2022 - 2026.
- Take all necessary steps to follow up and ensure advisory notices are closed out.
- When selecting households for inspection, consider areas where LAWPRO have issued letters of grant eligibility and homeowners have not taken action.

All inspections of DWWTS/septic tanks are selected on risk based methodology as set out under the National Inspection Plan. Dwellings in close proximity to water courses, drinking water sources or shallow soils are targeted. 13 inspections were completed in 2022 and all were uploaded to EDEN by February 2023. A failure rate of 69% was recorded in 2022 which is in-line with the 2021 failure rate of 67% with non-compliances determined using the national inspection protocol.


A programme for closure of open advisory notices was devised in 2022, with the initial focus being to progress these, where possible, through engagement with householders who have, or are nearly at, completion of remedial works on site. Reminder letters are issued to householders in relation to advisory notices and continued engagement with their agents by the Roscommon County Council Enforcement Team is maintained to ensure suitable designs to serve the dwelling are submitted and installed.

In 2022, 21 open advisory notice were closed with new DWWTS being installed as required under the advisory notices. The improvement of these 21 DWWTS will reduce the risk of environmental pollution and associated risks to human health and the environment at these locations.

Engagement with the public continued in 2022 with promotional material published on social media and in local papers throughout the year. A strong emphasis was placed on the requirement for regular maintenance of DWWTS. Publication of national reports in the local newspapers was also included.

There were no LAWPRO referrals in 2022. Six high status objective catchment area grants for improvement of DWWTS were progressed in 2022, with a number of upgrade works completed. Regular engagement with the EPA continued in 2022 in relation to closure of open historic advisory notices.

There were no significant enforcement actions taken in 2022.

WATER – Discharge Licences / Misconnections	
<p>National Enforcement Priority:</p> <p>Local Authority:</p> <p style="text-align: center;"> Looking back at the year</p>	<p>Activities</p> <p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting though the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Ensure all Section 4 Discharge Licence conditions are consistent with the requirements of the Surface Waters and Groundwater regulations. • Undertake risk based inspections/monitoring of Section 4 Discharge Licences. Inspect all licences in areas where discharge licensing is a significant pressure. • Ensure that all licensable discharges are authorised by a Section 4 Discharge Licence. • Ensure compliance with discharge licence conditions and follow up and close out non-compliances and LAWPRO referrals on Section 4s and misconnections. • Follow up on misconnections that have been identified as impacting on water quality, to ensure that works are undertaken by property owners to remediate such misconnections. 	<p>Roscommon County Council carried out 211 sampling events on licenced discharges within the county - related to both S4 and S16 licenced facilities.</p> <p>Discharge Licences:</p> <p>All licenced premises are sampled and audited as needs arise. Compliance is predominantly assessed on discharge sampling and analysis. Non-compliances are followed up with notification letters to licence holders – requiring a remedial action plan to be submitted. Non-licenced discharges/premises are identified through intelligence such as local knowledge, planning file reviews etc.</p> <p>All sites holding discharge licences were sampled, with the exception of FOG licences, and 2022 saw a return to pre-Covid levels of sampling schedules. FOG issues were addressed as they arose in local sewer networks following notification by WSA.</p> <p>As part of the Roscommon County Council sampling programme, it is routine for split samples to be taken. These samples are used as a robust metric to validate emissions monitoring which are carried out by the licenced premises itself.</p> <p>Altogether, 190 samples were taken of S4 discharges. The compliance rate in relation to emission limits ranged from 75 to 100%. Of the twenty S4 licences, three remained in full (100%) compliance for 2022. The overall compliance rate for the year is lower than recorded in 2021 where six licenced premises were found to be fully compliant with emission limit values. This variation is reflective of the increase in Roscommon County Council monitoring of facilities to that of pre-Covid level.</p> <p>Five premises/facilities continued to have or had re-occurring non-compliances of >20% for the year. These non-compliance rates will be subject to full audit.</p>

Enforcement activities in 2022 identified two premises which have changed ownership and that were previously unauthorised. Discharge licence applications for both were received in late 2022 with view to issuing licences in 2023.

Where non-compliances were recorded, warning letters issued to the licensee requiring the submission of remedial action to prevent future non-compliances.

Clear correlation was observed between the reduction in monitoring activities over the Covid period and the subsequent reduction in compliance rates for facilities. This has informed the enforcement strategy for Roscommon County Council for next year with an increase in regulatory activities and surveillance of premises planned.

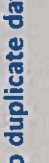
There were no LAWPRO referrals in 2022. Roscommon County Council engaged with LAWPRO where licenced discharged were located with PAA's and aided in the evaluation of the potential effects of the discharge on the receiving environment. To date this work has not triggered the requirement for a licence review.

Misconnections:

One misconnection was detected to the Francis River in 2022. This source was found to be from a local hairdressers and was remediated in a timely manner following intervention from Roscommon County Council.

WATER – Local Priorities and Water Quality Monitoring

<p>National Enforcement Priority:</p> <p>Local Authority:</p>	<p>Activities</p> <p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Looking back at the year</p>	<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Complete statutory monitoring for WFD surveillance and operational monitoring, investigative monitoring and bathing water monitoring. • Inspect and follow up any local issues (not covered by other NEPs), including non-compliances with water quality standards and LAWPRO referrals. • Address any climate related water quality issues, e.g. impacts due to extreme weather events. • Registration and monitoring of all private drinking water supplies. Investigate supplies that fail to meet drinking water quality standards and take necessary enforcement action. • Engage with LAWPRO and Regional Committees on the implementation of RBMP Actions.



In 2022, assessments were completed on the Derryhippo catchment. The Derryhippo river is at poor status based on 2020 monitoring point assessment and is at risk of not achieving good status within requirements for the WFD. The catchment assessment was carried out under the restore function under WFD. Farm surveys were completed in the catchment with SSIS assessments being completed U/S and D/S of area of farm inspections.

Roscommon County Council has a number of high status catchments and areas not at risk. Both are reviewed when selecting farms and the latest planning data is considered to see if there is any potential increase in farm activities in a particular area. No major developments were identified in 2021 to influence the 2022 plan.

A public awareness campaign was run by the government in 2022 allowing the public to identify locations for consideration as bathing waters. Four potential locations in Roscommon were identified by public under this campaign.

Planning inspections:

As part of protect and restore function under WFD, Roscommon County Council carries out inspections of sites associated with development for rural dwellings and other developments that could impact on water - ground and surface. A total of 508 planning inspections were completed. These assessments were to ensure that sites were suitable for the installation of DWWTS and that the appropriate treatment system or measures were put in place to reduce the potential impact on waters.

Forestry Related Assessments:

Assessments of afforestation, tree felling and roads construction were also completed. A total of 78 assessments completed and measures identified to prevent potential impact on water and incorporating mitigation measures where required.


No major incidents were detected in 2023. Quarterly meeting with WROC, LAWPRO were held in 2022. The Lough Forbes pesticides Group engagement continued with working group meetings held throughout 2022.

WFD Monitoring:

Roscommon County Council provides lab service to LAWPRO, who collected 832 samples as part of investigative and WFD monitoring programmes both within County Roscommon and other neighbouring counties. Roscommon County Council also undertook lake sampling both in Roscommon and on behalf of other LA's under the national lake monitoring programme - carried out on behalf of the EPA.

Private Water Supplies:

17 small private supplies and 34 group water scheme samples were collected and assessed for compliance with drinking water standards. Regulatory sampling continued and if non-compliance was detected, then HSE protocol was followed and re-sampling of scheme was completed within as short a timeframe as possible. No exceedance was detected in 2022. WFD monitoring programme completed and target achieved.

WASTE - Tackling significant illegal waste activities & Multi-Agency Sites/Operators of Concern	
National Enforcement Priority:	Activities
Local Authority:	Activities
 Looking back at the year	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'. Note that Criteria A (to provide a compliance rate and comparison with previous years) is not specifically applicable under this NEP.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Targeted inspections and follow up enforcement actions of unauthorised collectors and site operators using intelligence from waste data flows, complaints and other available data. • Co-ordination with, and input from Revenue/Social Protection/An Garda Síochána in relation to unauthorised activity and identified sites of concern. • Multi-agency investigations for sites of concern. • Roadside check points. • Relevant Anti-Dumping Initiatives implemented. • Traceability requirements to be enforced at Permitted/Licensed sites. • Focus on those who are facilitating the unauthorised treatment of waste. 	<p>Illegal Waste Activity</p> <p>Investigations into illegal waste activities were carried out in accordance with the Roscommon County Council Enforcement Policy and EPA Code of Practice. All complaints of illegal dumping were investigated in 2022 but no significant illegal waste collection operators were identified. Roscommon County Council continue to investigate illegal dumping and unauthorised collectors. Household Waste Byelaw inspections concentrated on areas where ongoing complaints regarding Illegal Dumping were occurring.</p> <p>Anti-dumping initiatives continued to be implemented in 2022 awareness raising through social media, local press and radio, including bulky goods collections and clean ups of roadside dumping. A radio advertisement campaign highlighting unauthorised waste collection was completed and a new anti-dumping flyer was developed. The focus of the ADI campaign was based on prevention, abatement, education and enforcement.</p> <p>The Roscommon County Council Environment Unit activities received significant coverage on the local newspapers and feedback from the public was extremely positive with the before and after photos of the clean-up sites being particularly effective.</p> <p>There were bulky goods collections held at each of our four Civic Amenity Sites and this initiative resulted in almost 28 tonnes of bulky waste being collected – including mattresses, bed bases and armchairs. A number of focused roadside dumping clean-ups were organised by the Environment Unit in close collaboration with our Municipal District teams. In total 26 kms of road was cleaned with almost 1 tonne of litter being collected. A further 33 tonnes of waste was removed from a dumping hotspot in the west of the county including 620kg of tyres. The total weight of dumped tyres removed was 19</p>

tonnes for the county. Litter Wardens continue to monitor sites that were clean-up to ensure any repeat offending is monitored. Anti-dumping Signs were installed at dumping hotspots.

Multi-Agency Sites of Interest

No Multi-Agency Sites of interest were notified or inspected in 2022.

Refer also to case studies 1, 2 & 3.

National Enforcement Priority:

WASTE - Construction and Demolition Activity

Local Authority:

Activities



Looking back at the year

Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.
[Guideline of 500 words per priority area]

Describe what was carried out under this activity in the previous reporting year – e.g.

- Risk based inspections of construction sites using WERLA intelligence and inspection templates.
- Inspection of Article 27 sites of origin and destination to include material notified under Article 27 being accepted at WFP/Licensed sites.
- Inspection of soil recovery sites to ensure only appropriate materials accepted.
- Validation and inspection of WCP/WFP and licensed sites dealing with C&D waste.
- Take all necessary steps to resolve non-compliant issues including the selling of crushed concrete from WFPs/Licensed sites without EoW decision.
- Incorporate proposed improvements to the Article 27 notification system.
- Tracking of waste delivered to Licensed sites.
- Based on researched data and local knowledge, identify authorised operators for further investigation and/or enforcement action.
- 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.

Risk based inspection of construction sites:

All planning files received by Roscommon County Council in 2022 were reviewed for C&D waste and, where appropriate, planning conditions were applied relating to Waste Management Plans etc. No large scale private construction projects were notified in 2022. A Waste Enforcement Officer attended all major pre-planning meetings for proposed large scale development projects. All planning applications are assessed by the Environment Unit and conditions added that all C&D waste to be segregated and disposed by Authorised Collectors to permitted waste facilities - in accordance with the WMA. Waste Management Plans must be submitted for significant projects, or for projects with hazardous waste in accordance with EPA (2021) Best Practice Guidelines. Three building projects were inspected for compliance with C&D requirements. No issues were reported relating to soil recovery sites in 2022. All complaints for dumping of C&D waste investigated.


Validation and inspection of Waste Collection Permit (WCP)/Waste Facility Permit (WFP) (including Soil Recovery Sites):


Due to ongoing staff resource issues in 2022, the AER data for 2021 and validation of WCP's have not yet been validated. Inspection of permitted soil and stone sites were completed with no non-compliances recorded.

Article 27 Notifications Activity (Sites of Origin and destination):

Three Article 27 referrals were received relating to road based material in 2022. One site inspection was carried out with no issues detected.

WASTE - End-of Life Vehicles (ELV) & the Waste Metal sector


<p>National Enforcement Priority:</p> <p>Local Authority:</p> <p> Looking back at the year</p>	<p>Activities</p> <p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p> <p>Due to ongoing Environment Unit staff resourcing issue continuing throughout the year, very little progress was made on this National Enforcement in 2022. This deficit will be addressed in 2023 once additional resources are put in place for the Waste Enforcement Team.</p> <p>Notwithstanding the resourcing issues, Roscommon County Council continued to engage with CUWERLA in 2022 and participated in a multi-agency inspection, with CUWERLA and two neighbouring Local Authorities, of an Authorised Treatment Facility in Co. Galway. This facility was found to be complaint and demonstrated excellent record keeping and processes. The knowledge learned from this site visit will be incorporated into inspections in Co. Roscommon in 2023.</p>
<p>Describe what was carried out under this activity in the <u>previous reporting year</u> -- e.g.</p> <ul style="list-style-type: none"> • Risk based inspections of Authorised Treatment Facilities and other ELV sites using WERLA intelligence and inspection templates (at least one inspection per annum of permitted sites). • Validation and inspection of records for WCP/WFP and licensed operators dealing with ELV and metal waste. • Take all necessary steps to resolve non-compliant issues. 	

WASTE - Waste Collection - Household & Commercial	
National Enforcement Priority:	Activities
<p>Local Authority:</p> <p> Looking back at the year</p>	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <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 e.g. WFP, Waste Transfer Sites, Landfills and Waste to Energy Plant. 	<p>Note: Household/Commercial waste collection permit holders operating within County Roscommon are not based in the county and the AERs for these waste collectors are reviewed and validated by other local authorities.</p> <p>Household Waste:</p> <p>Roscommon County Council select properties for Household Waste Byelaw surveys based on areas of the county where there is significant illegal dumping activity occurring or areas where a high volume of complaints are received. Our Litter Wardens completed 477 household waste bye law surveys in 2022 using the Roscommon County Council developed Waste Byelaw survey app. By year end, there were a total of 222 non-compliant cases remaining open and these will be subject to follow-up enforcement letters and inspections in 2023. Compliance rates are analysed geographically using ARC GIS mapping to highlight compliance rates by location and year.</p> <p>To promote the Household Waste Bye Laws requirement, Roscommon County Council secured ADI funding to run an awareness campaign in 2022 on local radio, local papers and social media using "Unauthorised Waste Collectors / illegal dumping flyer" and also ran an awareness campaign using national material from MyWaste.ie "your Country Your Waste" and "your Village Your County". Clean up activities including the National Spring Clean campaign were also publicised. Promotion of bulky goods collection and Civic Amenity Site awareness through social media was particularly effective - reaching a total of 27,103. In addition, 43 social media posts were uploaded in relation to correct household waste disposal.</p> <p>Due to repeated illegal household waste dumping issues at some bring banks, audio and VMS devices were installed at six locations where an anti-dumping message is played to deter potential offenders. The success of this scheme will be monitored over the next year. Raising awareness through a radio campaign also undertaken.</p>

Commercial Waste

29 commercial site surveys were completed in 2022 to monitor compliance with the three bin system. The locations of these surveys were chosen at random unless there was a specific issue or complaint relating to a commercial premise or complaint.

Refer also to case studies 2, 3 & 4.

WASTE - Producer Responsibility Initiatives and additional local priorities	
National Enforcement Priority:	Activities
<p>Local Authority:</p> <p> Looking back at the year</p> <p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Identification and inspection of all suspected producers who require registration. • Examination of potential for information exchange between Local Government Sector and other Agencies, where appropriate. • Relevant PRIs with local impact and local priorities, not covered by the other waste NEPS, should be reported (e.g. where suspected producers are not registered or are non-compliant). • (RMECI PRIs: WEEE Regs, Battery Regs, Suspected Vehicle Importers (ELV Regulations 2016), Farm Plastics, Plastic Bag Levy, Packaging Regs – Suspected Major Producers and Registered Self Compilers, Tyre Regs – Tyre Retailers). 	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p> <p>Three additional members were added to ELVES in Roscommon in 2022 after inspections of suspected vehicle importers and warning letters were issued. One case was referred to CUWERA and Revenue and will be followed up in 2023. This case involved an operator producing receipts showing vehicles were purchased from an Irish Company as Irish Registered Vehicles. Report came back from revenue indicating that the company was involved in placing vehicles on the market since 2019.</p> <p>A number of WEEE, batteries and tyre regulation inspections were carried out, however no follow up enforcement was carried out in 2022. Two tyre, four battery and three WEEE non-compliances will be followed up in 2023. Compliance of ELVES increased from four in 2021 to seven in 2022. WEEE compliances recorded a significant increase - up from 48% in 2021 to 89% in 2022. Battery compliances dipped slightly – down to 83% in 2022 from 89% in 2021. Tyre compliance showed a slight increase – from 68% in 2021 to 77% in 2022.</p> <p>Sites for inspection were chosen using a variety of intelligence – WERLA supplied list was used to select suspected vehicle importers, and this list was added to as more information came in throughout the year. Suspected major producers under the packaging regulations also were sourced from WERLA. WEEE, batteries and tyre sites were selected at random across the county. A bespoke Roscommon County Council Inspection App is used for carrying out WEEE, batteries and tyre inspections.</p> <p>Roscommon County Council have four Civic Amenity Sites and operations are in compliance with EPA authorisations</p>

AIR - Solid Fuel Inspections

National Enforcement Priority:

Local Authority:

Activities

 Looking back at the year

Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.

[Guideline of 500 words per priority area]

Describe what was carried out under this activity in the previous reporting year – e.g.

Eight solid fuel retailers were inspected in 2022 and no non-complaint fuels were recorded on site during these site visits. Seven known retailers of solid fuel in the Low Smoke Zone (LSZ) - greater Monksland area of Co. Roscommon - were included. One retailer located outside the LSZ was visited as he sells products into the LSZ but only smokeless fuels on inspection and interview.

- Tackle the sale of non-compliant fuel and its use via compliance promotion, inspection and enforcement of fuel merchants and retailers.
- Participate in multi-agency operations investigating the sale of non-compliant fuels.
- Develop and implement a programme for the sampling and analysis of fuel types (this can be carried out per individual local authority or a joint approach can be adopted with other local authorities).
- Carry out awareness programme to promote compliance by increasing the awareness of how the choices people make in heating their homes impacts on their air quality and health and legal obligations.
- Establish and/or maintain a list, including the number and profile of solid-fuel merchants operating in each local authority area, including those using social medial platforms to market solids fuels.
- Build capacity through engaging, collaborating and sharing with colleagues in other local authorities via networks and working groups and participating in training events.

The programme of solid fuel sampling and analysis is based on national guidance. Roscommon County Council did not undertake sampling in 2022 as we were aware that a number of adjoining LA's had sampled the same products for sale within the county. Informal network of contacts exists with adjoining local authorities, Leitrim, Longford, Westmeath, Galway and Mayo. Roscommon County Council engaged with adjoining LA's or through the national enforcement network and direct contact on the sampling of complaint products. Quarterly solid fuel inspector network meetings were attended on an ongoing basis by Roscommon County Council staff. All EPA and Department workshops and training events were attended. No multi agency operations were required within county in 2022.

A list of retailers within existing low smoke zone in south of the county is maintained on an ongoing basis and the frequency of inspection was based on annual visits during the main coal/solid fuel burning season. An online search for retailers did not return any additional ones based in the Monksland area.

Awareness programmes were carried out in line with the national programme through social media posts and adverts being published in local papers. The national advertising campaigns also published in local and social media and awareness in local schools was also undertaken. Information on the council web site updated to reflect implementation of the new solid fuel regulations.

Levels of compliance for retailers remained excellent, as has been the outcome over the last number of years. Engagement with retailer managers on the new regulations coming into force in 2022 was very positive.

National Enforcement Priority: AIR - Air Quality Monitoring Activities and Data Use	
Local Authority:	Activities
<p>Looking back at the year</p> <p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> Work with the EPA to complete the expansion of the Ambient Air Monitoring Programme network including: <ol style="list-style-type: none"> Assist EPA to determine viable locations for air quality monitoring stations. Assist EPA to progress the siting of air quality monitoring stations. Assist EPA to troubleshoot issues at existing air quality monitoring stations including the nomination and notification to the EPA of a primary and secondary contact person. Assist (where possible, to the best extent possible) EPA to maintain existing and new air quality monitoring stations. Review local air quality data to identify hotspots and to prioritise sites/areas for action. Ensure local air quality data, including a map, is made available to the general public as soon as technically possible for each local authority. As a minimum, a link to the relevant page(s) of the EPA site should be placed on each local authority website. 	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p> <p>There are two operational facilities licensed under the Air Pollution Act, both of which are bitumen production facilities located within quarries. Regulation of these premises continued in 2022 with submission of monitoring reports. The two facilities were monitored quarterly and remained compliant within licenced conditions. One facility implemented a system of continuous improvements in 2022 to reduce emissions.</p> <p>Roscommon County Council is obliged to support and install one air monitoring station within the county under national roll out. This air monitoring station is located adjacent to Aras an Chonate, Roscommon County Council HQ and the air remained at good quality through the year. There is another air quality monitor located at Athlone Civic Centre & Library, Co Westmeath which is used as potential indicator of air quality in the greater Athlone area including Monksland, Co. Roscommon. This station recorded predominantly good air quality throughout the year except for three days, one in February and two in December.</p> <p>The Roscommon town station is routinely checked and maintenance/calibration of system is carried out as required. RCC facilitated the EPA and consultants (EMS) in ongoing routine quarterly maintenance of the air quality monitor. The EPA assisted in troubleshooting of monitoring station when the air monitor failed to operate correctly on 8 consecutive days in June and 5 consecutive days in August 2022. The air monitor continued to trip out and the issue was found to be related to a build-up of condensation in the housing of the monitoring system. [redacted] is nominated primary contact for the monitoring station and [redacted] secondary contact.</p> <p>Formal quarterly reviews of air quality in the county was carried out on station output located in Roscommon Town and this review also included data from adjoining counties where monitoring stations are in relatively close proximity to the county such as Athlone. These reports were submitted</p>


to internal quarterly Management Team meetings. Air quality remained good at the monitoring station in Roscommon Town.

Results from the monitoring station in Athone was used to pinpoint retail inspections and solid fuel inspections were carried out in the Monksland and Hodson Bay area in December. Data from the Athone air monitor, the nearest monitoring station to the only low smoke zone within the county in Monksland and surrounding area, informed these inspections and the opportunity to promote awareness for premises selling fuels was taken when conducting these inspections.

RCC gave consideration to expansion of AAMP and identified a couple of areas with potential for further assessment in 2023.

Roscommon County Council web site has a link to EPA real time air monitoring <https://www.roscommoncoco.ie/coco/en/services/environment/air-and-noise-regulation/air-quality/>. It is not feasible currently to host the live map on the council web site. An opportunity to raise awareness of air quality was used through An Taisce Clean Air Week – where promotion using advertising campaigns through social media and newspapers on clean air and potential effects of burning of fossil fuels throughout the year was promoted. RCC also undertook awareness campaigns under Clean Air schools programme and national air pollution advertising campaign.

Use of monitoring stations in adjoining counties can be of benefit in informing activities in particular in more urban centres. Review of potential sites for expansion of the site monitoring network within the county was carried out and informed a feasibility study to be completed in 2023. No unauthorised activities or non-compliances were identified in 2022 and facilities & premises were kept under routine review.

National Enforcement Priority: AIR - Environmental Noise Directive (END) Activities/ Noise Plans	
Local Authority:	Activities
 Looking back at the year	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Deliver the Round 4 Noise Mapping requirements as set out in the Environmental Noise Regulations of 2018. This includes the timely submission of any relevant datasets and information in the required format as requested by the RMO/Urban Agglomeration Project Team and/or any other specified body. • Prepare and submit the Annual Noise Action Plan Progress Report to the EPA by 28th February. • Annual Noise Action Plan Progress Report should demonstrate progress on the key issues and priority areas for action. 	<p>Submission of the local authority Noise Action Plan (NAP) Progress Report by the 28th of February 2022:</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Due to the ongoing Environment Unit staff resourcing issue continuing throughout the year, no progress was made, including monitoring requirements, and no outcomes were achieved relating to the Noise Action Plan in 2022. No Quiet Areas were delimited in 2022.</p> <p>The Round 3 Strategic Noise Maps have been published on the Roscommon County Council website under Appendix D of the 218-2023 Noise Action Plan, along with a link to the TII website to access the national map data. All requested data relating to the Round 4 noise mapping were submitted to the RMO.</p> <p>The Roscommon County Council Environment Unit are undergoing a restructuring process and Senior Management have sanctioned additional resources for a new team dedicated to addressing Water, Air and Noise National Enforcement Priorities including implementation of the Noise Action Plan. Recruitment of the new staff is complete, and this new team is in place for 2023.</p>

AIR - Air & Noise Controls in Planning Assessments

National Enforcement Priority:

Local Authority:

Activities

Looking back at the year

Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.

[Guideline of 500 words per priority area]

Describe what was carried out under this activity in the previous reporting year – e.g.

Prior to 2022, the responsibility for review of files relating to existing quarry operations had reverted back to the Roscommon County Council Planning Unit. As a result, the Environment Department did not review quarterly reports from quarry operations. However, all active air pollution licences are subject to routine and annual monitoring. Our Environment Unit reviewed and inspected the two existing facilities with operational air pollution licences and both were found to be compliant. No non-compliances relating to complaints were received in 2022.

The Environment Unit was represented at a total of 11 major pre-planning meetings in 2022 with specific reference to air and noise regulatory control requirements, which had, or were likely to have, a specific risk of impact on environment air and noise due to the scale of the proposed developments. The developments included crematoriums, quarries, and large scale industrial developments. All planning applications are screened for potential air noise impacts and large scale quarries, industrial and similar developments are subject to greater scrutiny. Applications are assessed based on person's knowledge, with reference to national guidance and standards e.g. NG4 and relevant British Standards for noise monitoring, and relevant dust monitoring standards - TA Luft etc. Standard noise condition has been agreed and are applied by the Planning Unit on all permissions. The Planning Enforcement team carry out enforcement activities when complaints are received.

- Pre-planning assessments of air and noise impacts.
- Environment staff assist in follow up of air and noise issues including use of Section 107 and 108 of the EPA Act, the Air Pollution Act and liaising with planners where enforcement is more appropriate.
- Increased public awareness of noise induced health impacts.

Applications for two new quarries were assessed for noise and air impacts - one rock extraction and the other was for sand/gravel extraction using the process outlines above. A number of odour complaints were received relating to EPA licenced facility. Roscommon County Council liaised with EPA's Regional Officer in relation to the issue and to ongoing complaints received

The Environment Unit conducted a number of inspections on two unauthorised development sites where excessive noise was being produced. Powers under Sections 170 & 108 not used but the Environment staff will be witnesses under planning enforcement notices issued by the Planning Unit.

On review of this National Enforcement Priority, it is evident that the reliance by the Environment Unit on the Planning Unit for compliance reviews relating to quarries - and similar operations not licenced under the Air Pollution Act - is not the best process from an environmental risk perspective. For 2023, this process will be reviewed and the Environment Unit will take on a more central role in assessing planning compliance where it is directly related to Environmental monitoring.

AIR – Local Enforcement Issues	
National Enforcement Priority:	Activities
Local Authority:	
<p>Looking back at the year</p>	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> Inspect and carry out any required enforcement actions of facilities/activities as specified in the RMCEI template and/or as otherwise determined by the local authority. Make available on their websites, the EPA vehicle refinishers video and use appropriate channels to promote it. Inspect and carry out any required enforcement actions under Sections 107 and 108 of the EPA Act 1992, in order to limit noise nuisance. Build capacity through engaging, collaborating and sharing with colleagues in other local authorities via networks and working groups and participating in training events. 	<p>Across all aspects of this National Enforcement Priority, the stakeholders are not proactively engaged in the renewal of registration. This issue will require increased enforcement activity by Roscommon County Council in 2023 to reaffirm that non-compliance will be addressed rigorously within the provision of the regulations. This in particular applies under Deco Paints Regulations & Solvents Regulations. Collaboration opportunities with adjoining Local Authorities on enforcement activates where inter county facility operations exist will be explored.</p> <p><u>Deco Paints Regulations:</u> 10 of the 14 premises were inspected in 2022 with warnings issued to premises where certificates of compliance had expired. These sites will be subject to enforcement in 2023. All known operators will need to be inspected in order to ensure that the facility maintains their registrations.</p> <p><u>Solvents Regulations:</u> 7 of the 14 premises were inspected in 2022 with warnings issued to premises where certificates of compliance had expired. These sites will be subject to enforcement in 2023 with warnings issued to premises where certificates of compliance had expired. These sites will be subject to enforcement in 2023.</p> <p><u>Petroleum Vapour Regulations:</u> Two applications were submitted towards the end of 2022 and these will be processed in 2023</p>

Licensed sites under the Air Pollution Act:

The two licensed sites were inspected – refer to the Air & Noise Controls in Planning Assessments NEP report.

Local air and noise issues: Odour complains received in relation to EPA licenced facility were referred to relevant inspectorate.