
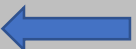


## 2022 National Enforcement Priorities Progress Report

National Enforcement Priority: GOVERNANCE - RMCEI Review & Reporting	
Local Authority:	Activities
 Looking back at the year	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>RMCEI reviews should evaluate progress of NEPs and assess if planned inspection targets are on track.</li> <li>RMCEI reviews should provide reasons for any deviation from targets, planned activities or objectives set out in the plan.</li> <li>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.</li> <li>The RMCEI Plan, RMCEI Data Return and NEP Progress Report should be submitted to the EPA on schedule.</li> </ul>	<p>A total of 9 no. reviews of the implementation of the RMCEI Plan 2022 were conducted throughout 2022.</p> <p>A record of these scheduled review meetings / Team Meetings is outlined at RMCEI Plan 2023 Section 6 Plan - A Record of Team Meetings held during 2022.</p> <p>On average an Environmental Team meeting was scheduled every 6 weeks to review the implementation of the plan.</p> <p>At each Team meeting the progress of the implementation of the plan was reviewed, any issues that were impacting or had the potential to impact delivery of the planned inspections was discussed and a solution, action plan agreed to pave the way forward.</p> <p>In addition, technical teams meetings were undertaken informally every 2 weeks to review progress, and allocated and discuss investigation of complaints.</p> <p>In September 2022 targets were reviewed and no change in target inspection were agreed with the Director of Service.</p> <p>At the October meeting of the Environment, Climate Action and Agriculture Strategic Policy Committee, the Senior Executive Engineer in the Environment made a presentation on the RMCEI Plan 2022 and Return 2021 to committee members, outlining and detailing the inspection programme undertaken by the Environment Team.</p>

National Enforcement Priority:	GOVERNANCE - Environmental Complaint Handling
Local Authority:	Activities
 Looking back at the year	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• Assignment of a dedicated Environmental Complaints Co-ordinator.</li> <li>• Implementation of the National Environmental Complaints Procedure.</li> <li>• Appropriate systems in place for recording and tracking environmental complaints.</li> <li>• Adequate resources assigned to complaint investigation in the RMCEI Plan.</li> <li>• Appropriate handling of EPA referred complaints and Section 63 Notices received by the local authority.</li> <li>• 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.</li> <li>• Analysis of complaints numbers and inspection intelligence that may have potential impacts on NEPs and other thematic areas.</li> <li>• Details of environmental complaint handling should be provided in the appropriate section of the NEP Progress Report.</li> <li>• Reporting of complaint numbers and investigation for each thematic area in the RMCEI Data Returns.</li> </ul>	<p>Leitrim County Council receives and responds to a wide range of Environment Complaints and incidents during the year and more than 390 complaints were actively followed up in 2022. These complaints and incidents are reported from other in-house departments, by the public using a dedicated email address: environment@leitrimcoco.ie, a dedicated Environmental Hotline number and via the EPAs National Environment Complaints system.</p> <p>All complaints are recorded and tracked on the Environmental Management Information System, Leitrim County Council has an Environmental Complaints Coordinator who screens and assigns appropriate resources to investigate the complaint. The Coordinator oversees the complaint ensuring timely investigation and reported outcome before closing out.</p> <p>Some minor complaints can be investigated, actions identified and undertaken achieving a positive environmental outcome in a short timeframe.</p> <p>Many other complaints entail complex investigations and can take many months to resolve and achieve a positive environmental outcome. Investigations could include numerous site inspections, follow up inspections and water sampling. Follow up detailed reports have to be written to accurately record site evidence, also numerous photographs are taken, maps and locations are studied and typically drone surveys of the affected sites are also conducted.</p> <p>In order to achieve a positive environmental outcome enforcement actions may be required, such as Section 12 notices under the Water Pollution Act and Section 14, 32, 71, 55 notices/ directions under the Waste Management Act and fines under Litter Pollution Act.</p> <p>If the complaint is water pollution the investigation may be in collaboration with Inland Fisheries, Waterways Ireland and LAWPRO. If the complaint is waste the investigation could be in collaboration with neighbouring Local Authorities, Customs and Excise, NTFSO and WERLA.</p> <p>Complaints are not closed out until an evidence based outcome/ compliance has been noted. Two such complaints are outlined below.</p> <p>Complaints received are broken down in table:</p>


Type	Received in 2022	Resolved 2022	For resolving 2023
Litter	90	86	4
Water / Wastewater	60	56	4
Air / Noise	17	17	0
Illegal Dumping line complaints	221	211	10
Waste C&D	7	6	1
<b>Total</b>	<b>395</b>	<b>376</b>	<b>19</b>

#### Forestry Complaints

Leitrim County Council is spending an ever-increasing amount of time investigating forestry complaints. These complaints involve an initial inspection followed by many re-inspections of remediation over many months. In 2022, 3 no. Section 12 notices were served on Forestry companies conducting clearfelling operations in Leitrim. Large volumes of silt were washed off sites into drains and streams due to forest guidelines and felling licence conditions not being adhered to. Remediation was extensive, time consuming and less effective than if employed preventatively. Leitrim County Council worked collaboratively with Forest Service and IFI inspectors to achieve best possible outcomes, however it is felt that the Forestry Service should be undertaking site inspections to ensure compliance to forest guidelines and felling licence and not waiting for a pollution event to occur before undertaking compliance inspections. Leitrim County Council submitted a case study in relation to a forestry incident in 2020.

#### Water Pollution Complaint - Carrick Marina

In December 2020, a complaint was received through the EPA, in relation to hydrocarbon and silt release from the Public Realm works and from the boat hire companies located at Carrick marina. Inspections of the boat companies in 2021 revealed housekeeping issues, poor diesel bund maintenance and poor management of surface/wash waters. Section 14 under the Waste Management Act, 1996 and Section 12 notice under the Water Pollution Act 1977 to 2007 were served on both companies. Remediation was slow due to Covid restrictions but works were largely completed by May 2022. Remediation has proved very effective with no oil slick related complaints being received by Leitrim County Council during Summer 2022. Further details may be found in Carrick Marina Case Study.

National Enforcement Priority: WATER – Pressures from Agriculture (slurry/soiled water collection and storage)	
Local Authority:	Activities
 Looking back at the year	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Take all necessary steps to ensure compliance, including follow up and close out of non-compliances.</li> <li>• Cross reporting of non-compliances to DAFM.</li> <li>• Document and report results for all farm inspections to the EPA.</li> </ul>	<p>The RMCEI Farm Programme comprises of a targeted farm inspection (10no) across a selected catchment, carryover from 2021, inspections arising from complaints and farms identified to rule out pollution concern.</p> <p>The Eslin sub catchment 26C_10_Eslin_Sc010 was the 2022 targeted catchment and comprises of Eslin 10_20_30_40. The EPA assessment of biological quality states four out of five sites are at moderate ecological condition with signs of enrichment throughout the river and the dominance of tolerant taxa reflected this. The site at Eslin Bridge 0200 was the only site to achieve good ecological condition as it had good numbers of sensitive taxa present.</p> <p>Eslin_10 is within a PAA (Lough Rowan). Eslin_20 is categorised as not as risk. Eslin_30 fits the catchment selection criteria. It is At Risk of failing to meet WFD Water Quality Objective with less than good status (Moderate) and downstream of a drop off from Good to Moderate status. Agriculture is identified as the Significant Pressure and is upstream of PAA (Rinn Forbes) where engagement opportunities would present to discuss pesticide usage/vigilance in the context of Longford Central DWS Lough Forbes &amp; RAL.</p> <p>Farm activity in the immediate vicinity of upper reach of Eslin 30 to the West of Lough McHugh as it flows south through Lough Erril was the focus with 9 1st time inspections were conducted on farms (8 in vicinity of Eslin_030 At Risk and 1 in the Eslin_020 Not At Risk (meeting the ‘small percentage’ criteria (11%).)</p> <p>Six other 1st time inspections were conducted in 2022 outside of the Eslin sub catchment (2 in Garadice NW_36_648 completing work of 2021 and 1 developed from a complaint in that Catchment, 1 in Rinn_10 from an issue of concern, 1 in Bonet_040 (developed from a complaint), 1no in Owenmore_020 (developed from a complaint).</p> <p>While the target of 10 inspection is low relative to the scale of agricultural pressure across County Leitrim and the level of farming activity, there was no additional HR capacity to increase this target. Furthermore, the target of 10 farms resulted in 28 farm visits (29 in 2021) across 23 farm holdings (17 in 2021). Of these 28 inspections 15 were first time inspections to new farms and 6 were carry over farms from 2021. Two farms fall under RMCEI 6.5.2 Non-Routine Farms (1 being the inspection of lands and 1 a desk top assessment with downstream sample).</p> <p>Of the 23 farm holdings 18 were in the At Risk Category and 5 in Not at Risks (21%).</p>

In 2022, 14 agriculture related complaints were received, 3 of which triggered farm inspections.

Of the total 23 cases 19 were closed within the year (82.6%) with a carryover of 4 cases.

A total of 40 letters were issued in 2022 (44 in 2021) including letters of intention to inspect with 9 enforcement letters (Warning/ Advice) and 17 close out letters.

The early commencement of inspections (February) reduced the carryover of files, 4 files will be brought into 2023.

During 2022, 7 farms were closed out after a single visit, 8 farms required 2 visits and 2 farms required 3 and 4 visits each. Where multiple letters were issued – each new letter addressed new issues flagged at the initial inspection and prioritising measures in line with the capacity of the farmer to comply. This phased and incremental approach works well and allows for sustainable enforcement.

No Section 12 Notices were issued in 2022 under the Water Pollution Acts. There was 1 cross report to DAFM with a 20% sanction arising from a farm inspected under RMCEI 6.4.4.

Inspections present the greatest opportunity for awareness raising and engagement on the impacts of agriculture on water quality and this is Leitrim County Councils main activity as part of the Lough Forbes Pesticide Focus Group.

The Risk status of the Eslin\_20 and Eslin\_30 has not altered between Cycle 2 and 3, however disappointingly the Eslin\_20 has dropped from good to moderate. It is hoped that the identification of farm issues ranging from moderate to serious will reverse this situation and one holding is flagged of particular significance – the yard and lands being hydrologically connected and upstream of the National Monitoring Point.

Collaborations were formed with LAWPRO (pesticide working group), ASSAP (referral of farm), DAFM (desktop assessment, cross reporting) in 2022. Our department fed into THE Leitrim Sustainable Agriculture Group with a presentation delivered on the GAP Regulations. There was connections with the Catchment Care programme to obtain data for a potential schools education package.

National Enforcement Priority: **WATER – Pressures from Agriculture (slurry and fertiliser spreading)**

Local Authority: **Activities**

 **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.

In 2022 there were 14 agriculture related complaints received and investigated by the Environment Department of Leitrim County Council. Of these complaints 8 specifically related to slurry spreading activities. After investigation XX compliance letters were issued and xx were deemed not to be a breach of the GAP Regulations.

During the 23 farm inspection conducted in 2022 there was engagement on slurry spreading with farmers reminded of requirements of the GAP Regulation and the need to observe buffer distances.

Reminders of the closed period dates and best practices with regard to slurry spreading was included with each letter of intention to inspect.

Initial and follow-up inspections were carried out across the open and closed period (from Feb, Apr, May, Jun, Jul, Oct, Nov and Dec) during these inspection there was no evidence of inappropriate spreading practices but the management of farm yard manure and buffer distance was an issue at one holding and followed up by compliance letter.

Our department contributed to the Leitrim Sustainable Agriculture Group by a presentation delivered on the GAP Regulations with emphasis on buffer distances and slurry spreading vigilance and participated in two other Teagasc events (farm walk and Contractor demonstration event). Both provided opportunities for discussion of GAP Requirements.

In March 2022 staff attended the Teagasc Precise Application of Fertilizer Webinar which allowed for up to date information transfer. Links from this YouTube event were disseminated with particular emphasis on spreader set-up and the elements that achieve precise and accurate chemical fertiliser application.

A listing of fertiliser spreading contractors actively working within the targeted catchment was compiled through the 2022 farm inspections. It is planned to progress to positive engagement on slurry and chemical spreading in 2023.

Arising from a complaint a tracking and record keeping requirement of all aspects of landspreading practices was placed on a Mart Facility along with the requirement for updated Nutrient Management Plan. This enforcement and monitoring will carryover into 2023.


20 planning application referrals were issued to the environmental department of these 5 planning files relating to agricultural developments were investigated 2022. Each desktop and inspection focused on suitable and sufficient

	<p>spreadland availability, stock numbers and storage capacity. 2 files were recommended with conditions and 3 required further information to satisfy no potential impact on water quality.</p>
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Drone flying training will be undertaken in 2023 and will enable a new type of detection in this area.

**National Enforcement Priority: WATER – Domestic Waste Water Treatment Systems / Septic Tanks**

**Local Authority: Activities**

 **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.

The National Inspection Plan (NIP) 2022-2026 requires that Leitrim County Council carry out a minimum of 8 inspections in 2022 and 10 per annum for 2023 -2026 as set out in the Table below. Water services authorities must also ensure the inspections are distributed in the three zones as prescribed, but this can be achieved over the five years of the plan.

LA Area	Inspections 2022 - 2026				Min in 2022	Min per annum 2023 - 2026
	Zone 1	Zone 2	Zone 3	Total		
Leitrim	19	14	15	48	8	10

Zone 2 includes Inspections of DWWTs in areas with higher relative risk to household wells.

The Geological Survey of Ireland prepared Zone of Contribution (ZOC) Reports for Carrigallen Group Water Scheme. These reports established the ZOC for the borehole wells, groundwater sources for the 2 no borehole wells serving this Private Group Water Scheme. The reports recommend that local septic tank inspections should be carried out within the ZOC for both borehole wells. The NIP states that Water Services authorities may also use local knowledge such as information on known water pollution. The borehole wells are located at Corriga and Gortermone and it was decided to focus the Risk Zone 2 Inspections in the 'ZOC' of these boreholes.

Year 1 (2022)		
Risk Zone	Townland Location	No. of Inspections
Category 2	Corriga, Gortermone, Gradoge, Tully South	10

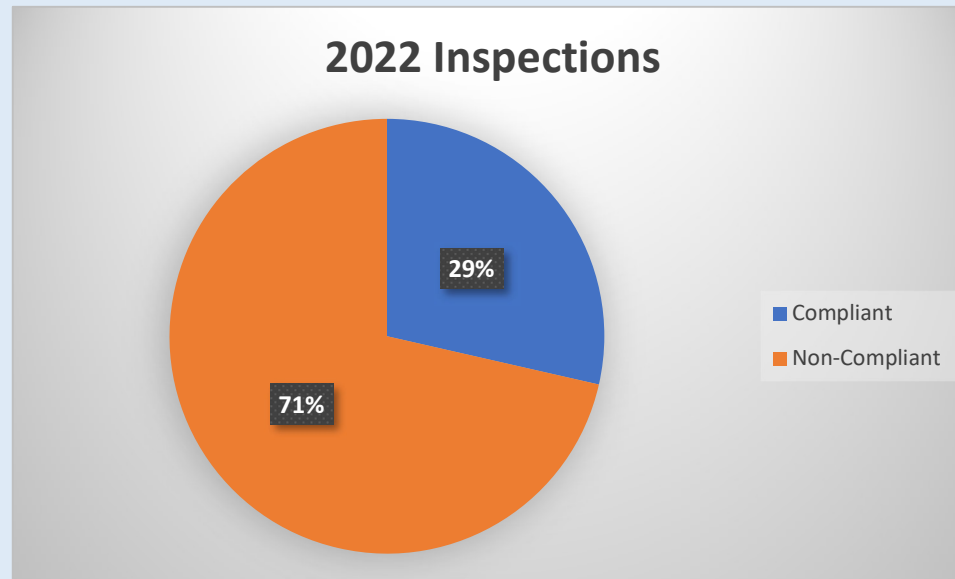
From Date: 01/01/2022 To Date: 31/12/2022

**Water Service Authority** Leitrim County Council  
**Inspection Type** Full

WATER SERVICE AUTHORITY	TOTAL Inspection	COMPLIANT	NON-COMPLIANT	TOTAL Properties	REGISTERED	UNREGISTERED
Leitrim County Council	14	4	10	14	13	1
<b>TOTAL</b>	<b>14</b>	<b>4</b>	<b>10</b>	<b>14</b>	<b>13</b>	<b>1</b>

In total, there were 14 inspections carried out in 2022, these included 9 inspections in the townland of Gortermone within the Zone of Contribution of Gortermone borehole. The additional 5 inspections were located in risk zones 1 & 3 and were inspected as local pollution was reported to be occurring from these DWWTs.

There was a high rate of non-compliant inspections in 2022 with 10 non-compliant DWWTs identified. This non-compliant rate of 71% has decreased from 89% non-compliant rate in 2021. The homeowners were issued with advisory notices to direct them to remediate their DWWTs by a set deadline. There was a mix of reasons for non-compliant systems across the inspections but the most common problems are “effluent ponding on the ground” or an “untreated discharge to surface water”.



The homeowners of the 4 compliant systems were issued with compliant certificates and information regarding the continued maintenance of their DWWTs.

In 2022 the Environment team carried out 21 verification inspections and closed 21 advisory notices. In addition, 3 new inspections were carried out on open advisory notices from 2014 where the property has changed ownership and an updated advisory notice was issued to the new property owner.

Leitrim County Council are continuing to engage with homeowners who have received advisory notices and are following the enforcement process as set out by the EPA. As can be seen by the table below, verification inspections in 2022 resulted in closing advisory notices across every year to date. A total of 39% advisory notices from 2014-2021 currently remain open which equates to 54 open advisory notices. (This does not include advisory notices from 2022).

**Summary of Advisory Notices 2014 – 2021**

	<b>Total No. Advisory Notices</b>	<b>No. Advisory Notices Closed</b>	<b>No. Open</b>	<b>2022 verifications</b>
<b>2014</b>	18	12	6	3 verifications
<b>2015</b>	16	13	3	1 verification
<b>2016</b>	20	15	5	1 verification
<b>2017</b>	16	13	3	1 verification
<b>2018</b>	19	10	9	2 verifications
<b>2019</b>	16	9	7	6 verifications
<b>2020</b>	10	4	6	1 verification
<b>2021</b>	24	9	15	6 verifications
<b>Total</b>	<b>139</b>	<b>85</b>	<b>54</b>	
%		61%	39%	<b>Closed 21 Advisory Notices</b>

In 2022 Leitrim County Council issued 69 letters to homeowners involved in the NIP. This correspondence included notification of inspections, issue of compliance certs, advisory notices, deadline extensions, overdue reminder letters, forthcoming deadline reminder letters and grant approval letters. One of the big issues that homeowners related to

Leitrim County Council was the lack of availability of contractors to carry out remedial works during 2022. This resulted in Leitrim County Council granting further extension deadlines to homeowners who were experiencing this issue.

Leitrim County Council carried out engagement with the public about the NIP process, answered queries related to registration of DWWTS and queries in relation to grant information. DWWTS leaflets were made available in our public offices, counters, and libraries. Prior to Inspections commencing in May 2022 an article and an advert was placed in the Leitrim Observer. Up to date information was also posted on the website and social media Facebook and Twitter posts were also published.

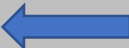
### **Non-Compliances**

Please note that a non-compliant system can fail an inspection for more than one reason. The main reasons for non-compliances in Co. Leitrim for the 2022 inspections are shown in the table below:

<b>Reasons for non-compliances</b>	<b>Number</b>
Tank in need of desludging	2
Untreated effluent discharging direct to surface water	6
Greywater discharging direct to surface water	6
Surface water/roof water runoff entering system	1
System components not fit for purpose/in need of repair	4
Effluent ponding on ground	2
Leak/discharge from system components	2

### **Presentation to SPC Meeting**

At the October meeting of the Environment, Climate Action and Agriculture Strategic Policy Committee, the Senior Executive Engineer in the Environment made a presentation about National Inspection Programme, outlining and detailing the inspection procedure and discussing issues relating to non-compliance of DWWTS to committee members.

National Enforcement Priority: <b>WATER – Discharge Licences / Misconnections</b>	
Local Authority:	Activities
 <b>Looking back at the year</b>	<p><b>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'.</b></p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• Ensure all Section 4 Discharge Licence conditions are consistent with the requirements of the Surface Waters and Groundwater regulations.</li> <li>• Undertake risk based inspections/monitoring of Section 4 Discharge Licences. Inspect all licences in areas where discharge licensing is a significant pressure.</li> <li>• Ensure that all licensable discharges are authorised by a Section 4 Discharge Licence.</li> <li>• Ensure compliance with discharge licence conditions and follow up and close out non-compliances and LAWPRO referrals on Section 4s and misconnections.</li> <li>• 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.</li> </ul>	<p><b>Discharge Licences:</b></p> <p>Section 4 monitoring is carried out on 11 discharge licences on a quarterly basis by Leitrim County Council; the frequency of monitoring is based on the RMCEI Risk Rating Tool (See Appendix X) and Inspection target in the RMCEI Plan. Following the quarterly Section 4 monitoring a follow up letter is sent to the licence holder to communicate with them the discharge licence analysis results and their compliance with the final discharge Emission Limit Values.</p> <p>At the start of 2022 a target of 33 inspections was agreed with EPA as no inspections took place in Q1 due to the Covid National lockdown. However, the progress of this work against our RMCEI target of 33 inspections in the year was impacted by health and safety issues in relation to 1 site. This site could not be inspected due to lack of accessibility and health &amp; safety concerns in Q3 &amp; Q4. Another site was also not inspected in Q3 &amp; Q4 as it was established that the site was not currently in operation and therefore no discharge was occurring. A revised target of 29 inspections was agreed at our RMCEI review in Q4. In total 29 site inspections took place in 2022 which is 100% of planned inspections.</p> <p>All 11 discharge licence sites were inspected in Q2. Inspections and sample analysis showed that 7 of these sites were compliant with their discharge licences. These compliant sites also include sites where no final effluent was discharging on the day of the inspection. 1 of the sites inspected had minor non-compliances and 3 sites had major non-compliances. Warning letters were issued to the licence holders with non-compliances to highlight the exceedances in the final effluent.</p> <p>9 site inspections were carried out in Q3 &amp; Q4. Sampling showed that there were 6 non-compliant sites during both Q3 &amp; Q4. Of the non-compliant sites there were 3 with minor non-compliances and 3 with major non-compliances. Inspections in Q4 showed similar results of 3 sites with minor non-compliances and 3 with major non-compliances.</p> <p>Ambient monitoring of upstream and downstream of the discharge points shows that there is no impact on the quality of the receiving waters at 8 of the Section 4 discharge sites. Therefore 73% of sites show no impact on receiving waters. The minor non-compliances at 3 of the sites in 2022 show no impact on receiving waters.</p> <p>2 of these non-compliant licence holders had previously been served Section 12 Notices in 2020 and these notices were revised in 2021 and the deadlines were extended to 31 March 2022 and 31 July 2022. The measures outlined in both of</p>

the Section 12 notices have not been fully addressed and the effluent discharging continues to be non-compliant with the discharge licence. Therefore, both of these cases have been referred for legal advice and prosecution.

Further monitoring and follow up work will be required to continue for all non-compliant licence holders in 2023.

**Misconnections:**

5 separate misconnections were reported and investigated in 2022 and these are recorded under Section 6.4.16. A total of 6 inspections were undertaken – 2 inspections at the same site. The misconnections were sewage discharging to drains along public roads and were in rural areas. The sewage discharge was from malfunctioning Wastewater Treatment Systems; 4 domestic and 1 commercial property. The 4 domestic wastewater systems were further inspected under the NIP programme and Advisory Notices were issued with remedial deadlines in 2023. Repair and servicing works were carried out on the commercial wastewater system in 2022 and further works will be carried out in 2023 to ensure the misconnection is fully rectified. All misconnections will be followed up in 2023 to ensure full compliance.

National Enforcement Priority: **WATER – Local Priorities and Water Quality Monitoring**

Local Authority: **Activities**

 **Looking back at the year**

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

- 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.

**WFD Monitoring:**

Leitrim agreed the WFD 2022 Sampling Plan of 576 samples with the EPA at the end of 2021. This large number of samples resulted from the monthly sampling of Lough Melvin for priority substances. Due to the inclement weather conditions for prolonged period in 2022, shore sampling had to employed for Lough Melvin on three occasions during the year. This resulted in 12 fewer samples being collected as there are only four accessible shore sites on Melvin while there are six open water sites. The EPA labs’ approval was always sought in advance of these changes due to poor weather. The total number of samples collected under the programme was 564.

LCC attended the Border Regional Operation Committee meetings throughout 2022 to keep up to date with all work being conducted by the catchment teams and other relevant agencies.

**Investigative Monitoring/Bathing Water Monitoring:**

Leitrim County Council planned nine bathing water inspections for 2022. This would involve taking eight samples at our one designated bathing water site, fortnightly during the bathing season 01st June to 15th September with one pre-season sample taken during the last week in May. Two other lake sites nominated by members of the public for Bathing Water designation were monitored fortnightly to establish water quality trends during the bathing season. Seven swim week samples were collected with a total of 34 bathing water samples being collected in 2022.

Our designated bathing water has maintained ‘Excellent’ status for the past 7 years. Although all bathing water samples for this site in 2022 were ‘Excellent’, for the second consecutive year, the presence of an algal bloom resulted in an ‘Advice not to Swim’ notice being erected on the 10th August 2022 and remained in place for the remainder of the Bathing Season. Information notices were erected on-site, on the LCC website and social media. There were articles published on the local newspaper and a member of staff was interviewed on local radio.

In April 2022, LCC in collaboration with Inland Fisheries Ireland, laid barley straw in the lake to reduce the proliferation of algae. Chlorophyll levels were monitored from April to September and fortnightly during the bathing season. The highest chlorophyll level was noted on the day the notice was erected.

Due to concerns over the integrity of the sewage holding tanks onsite, these were emptied, and the toilet block remained closed for the entire bathing season. Portaloo's were provided by Leitrim County Council for the season.

Looking ahead to 2023, further catchment assessments and community engagement are planned, to address the possible sources of nutrient pollution in the area. Barley straw will be laid on the lake early in the year but the quantity will be increased from that used in 2022.

Due to the very warm, dry weather in July 2022, many complaints of algal blooms on lakes were received by the Environment Section. Algal bloom information notices were erected at all sites reported. General algal bloom information and warnings were posted on LCC social media.

**Private Water Supplies:**

Leitrim County Council perform drinking water monitoring on regulated group water schemes that have a population greater than 100 people or use greater than 10m<sup>3</sup> of water per day. All other schemes that fall below these thresholds are exempted supplies under the Drinking Water Regulations and are not monitored by Leitrim County Council.

Currently Leitrim County Council maintain a register of 36 regulated group water schemes.

Population and volume data are recorded for group schemes. Population data for group schemes is assessed by considering the number of connections to each scheme and from subsidy applications.

All schemes are sampled at least twice a year for check sampling. Sample locations are chosen at different points on each scheme to determine compliancy levels at all areas of the scheme. The minimum number of check samples are based on population. A total of 79 check samples were completed in 2022. In 2021 93 check samples were taken and in 2020 75 check samples were taken. The reduction in sampling was due to the Covid-19 pandemic and the restriction of entering domestic properties to obtain samples.

Audit samples are taken on 8 group water schemes once per year.

Monitoring for radioactivity in regulated private water supplies is carried out in accordance with the EPA's Radiological Monitoring Programme, as and when required.

In 2022 Leitrim County Council recorded 98.6% compliancy for private drinking water supplies. In 2021 Leitrim County Council recorded 99.49% compliancy for private drinking water supplies. This is compared to 99.49% compliancy in 2021 and 97.81% compliancy in 2020.

In the event of a non-compliance failure, a notification is issued by the Water Services Department by email of the parameter failure to the Rural Water Department. A written notification is issued by the Rural Water Department to the designated contact

of the Group Water Scheme within 24 hours with details of the failed parameter(s) and a recommendation on how to remedy the failure. A deadline is issued to each scheme and a sample re-test is organised to re-examine the compliancy of the scheme.

Schemes that demonstrate consistent breaches of compliancy with the Drinking Water Regulations are investigated by the Rural Water Department. Engagement with the committee members (if available) takes place to determine the causes of non-compliancy and to examine if treatment sources or infrastructure requires upgrade. The Rural Water Department will engage with the scheme regarding any necessary upgrades required and a submission for funding from the Department of Housing, Local Government and Heritage is made to access funding to remedy any water quality issues.

An alternative solution to water quality breaches may also include amalgamation or rationalisation of group water schemes or connection to Irish Water's Public Water Network.

#### **Draft River Basin Management Plan**

In March 2022 Leitrim made comments to the Water Advisory Unit in Relation to the Draft River Basin Management Plan under the following topics: agriculture, forestry, wastewater from single house and ribbon development, pesticides, discharge licencing legislation and natural water resources.

At the August meeting of the Environment, Climate Action and Agriculture Strategic Policy Committee, the Senior Executive Engineer in the Environment made a presentation outlining the 3rd Draft River Basin Management Plan 2022-2027 Consultation Report to the committee members.

National Enforcement Priority:		<b>WASTE - Tackling significant illegal waste activities &amp; Multi-Agency Sites/Operators of Concern</b>	
Local Authority:		Activities	
 Looking back at the year			
<b>Describe what was carried out under this activity in the previous reporting year – e.g.</b> <ul style="list-style-type: none"> <li>• Targeted inspections and follow up enforcement actions of unauthorised collectors and site operators using intelligence from waste data flows, complaints and other available data.</li> <li>• Co-ordination with, and input from Revenue/Social Protection/An Garda Síochána in relation to unauthorised activity and identified sites of concern.</li> <li>• Multi-agency investigations for sites of concern.</li> <li>• Roadside check points.</li> <li>• Relevant Anti-Dumping Initiatives implemented.</li> <li>• Traceability requirements to be enforced at Permitted/Licensed sites.</li> <li>• Focus on those who are facilitating the unauthorised treatment of waste.</li> </ul>		<b><u>Illegal Waste Activity</u></b> <p>In late December 2021 a significant illegal dumping site, spanning two townlands and consisting of mainly household waste was detected. The dump appeared to have originated from a single household, but it had gone undiscovered by the effected landowners for a long time. At that time the landowner removed the waste from the site to an authorised facility.</p> <p>In January 2022 fresh dumping occurred at the site and without delay the WEO and Litter Warden visited the residence of the offender to complete an interview under caution and issue a Section 14 Direction to cease illegal disposal of waste and to commence using an authorised waste facility and maintain/submit receipts of same. After this visit, the illegal dumping at the site stopped. Early in 2022 a prosecution was initiated on the offender. This concluded in November 2022 with convictions and fines being imposed.</p> <p>Leitrim’s swift action in response to illegal dumping cases appears to have in some way contributed to the fall off in illegal dumping incidents and the number of complaints being reported to the Local Authority, (see Figure 1). Prosecution cases feature heavily in the local media; therefore, the public are now acutely aware that illegal dumping is being investigated with offenders penalised.</p> <p>A case study on this court case has also been completed to discuss in more detail and to share the enforcement tactics used.</p>	



**Figure 1:** Waste and Litter complaints and investigations by LCC from 2018 to 2022.

Leitrim County Council detect and respond to illegal dumping, waste and litter complaints swiftly by use of three Litter Wardens who are on patrol and responding to incidents on the ground. Significant sites and or where evidence is detected are then also inspected by the WEO so that the matter can be escalated swiftly by use of legal notices, Section 14 directions and where appropriate: initiation of a prosecution. The Waste Enforcement Office undertake a wide range of inspections to ensure compliance, investigate unauthorised activities to uncover and stamp out illegal waste activities. It is this presence of the Waste Enforcement Office on the ground, combined with visual enforcement, publicised prosecutions, and significant penalties that is driving compliance across the county.

Leitrim recently added this conviction to the Waste Convictions Register and this was used as an opportunity to provide in house training to a new WEO staff member on how to add convictions to, and maintain the convictions register.

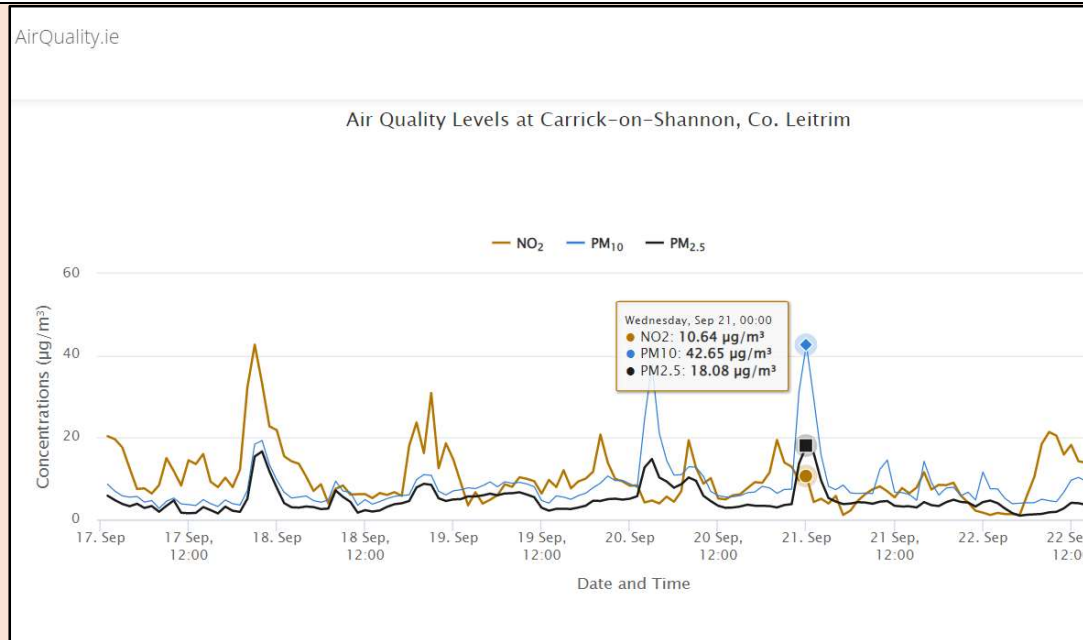
### Illegal Waste Collection

In 2022, 2 No. inspections were planned for investigating illegal waste collectors and 3 No. inspections were carried out. During 2022, one illegal waste collector was detected advertising their services online. The WERLA recommended Open-Source Internet investigations course was extremely useful in conducting these online investigations. A file on the perpetrator was prepared and Leitrim County Council are ready to take enforcement actions / interview under caution in early 2023. Should the interview / Direction fail to cause cessation of the illegal waste collection activity, Leitrim plan to set up a test purchase as per WERLA guidance on the procedure. Much research into this procedure was carried out in 2022 as all possible enforcement tactics were considered. The operation will involve collaboration between WERLA, AGS, Revenue, Housing Department, and possible referrals to the NTFSO and the Northern Ireland Environment Agency.

A separate case in 2022 involved a significant illegal dump in a halting site located in Carrick on Shannon. The investigation involved collaboration between Leitrim County Councils Housing Department and Waste Management Unit. The illegally dumped waste appeared to have the hallmarks of an illegal waste collector however no solid evidence on the collector could be ascertained. On completion of the environmental inspection of the illegally dumped waste, WEO's were threatened with a hammer. Within the illegally dumped material, evidence on an individual residing in another county was found and a prosecution case was prepared for the individual under the Waste Management Act. However, legal advice on the matter insisted the individual should be pursued under the Litter Pollution Act and therefore a Litter Fine was issued. This case remains open, and a prosecution may still result.

When the WEO's and housing staff left the area that evening, and before a clean-up of the waste could be arranged, the illegally dumped waste was ignited. Following the incident, no further illegal dumps have occurred at the halting site, however WEO's continually monitor for signs of illegal waste collection activities linked to this site. As part of the desktop study for preparing the prosecution, a review of data from the nearby EPA air monitoring station for the date in question was undertaken. The impact that the illegal waste collection and burning activity had on the wider environment was clearly detected on the monitoring station.

This highlights the importance of investigating and intercepting illegal waste collectors and it demonstrates the detrimental effects that such activities can have on the broader environment and on human health.



**Figure 2:** A large spike in PM10 was recorded at the Carrick on Shannon EPA air quality monitoring station at midnight on 21st September 2022. The largest concentration of PM10 recorded was 42.65mg/m<sup>3</sup>. This deterioration in air quality may well be partially linked to the waste burning at the Halting site on the evening of the 20th of September 2022.

#### Anti Dumping Initiatives

ADI 2022 funding was used to clean up some areas which are historically prone to illegal dumping. At one such site, ADI Funding was used to erect high level fencing as a preventative measure to reoccurrence. Funding was also used to clean up illegally dumped waste from a drain. Funding was then used to culvert said drain as a preventative measure against repeat dumping.

ADI funding was also used at a LA CAS to install improved and enhanced CCTV. This was done with prevention of theft of WEEE and illegal dumping in mind (as a deterrent) but in time it can also be used for enforcement purposes – assisting the WEO’s with detecting and identifying illegal dumpers.

#### Awareness and Training activities

Education and awareness campaigns to educate the Public on the Councils waste enforcement activities and to encouraging long-term behavioural change, i.e. Awareness articles in local newspapers, Billboard campaigns, Social media Awareness articles referencing the mywaste.ie website.

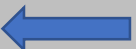
An additional, new WEO was appointed in Leitrim during 2022. They attended a training course which included 'Enforcement of Waste Regulations'. They also received in house training from the existing WEO.

#### **Multi-Agency Sites of Interest**

During 2022, no unauthorised sites of concern, (which would require a physical multi-agency approach) were detected in County Leitrim and therefore no works in this priority area were required. No "sites of concern" were noted in Leitrim in 2021, or 2020, while two significant and connected sites of concern were detected and shut down in 2018 & 2019.

In order to identify "sites of concern" notifiable to WERLA, that would require a multi-agency approach the following activities were undertaken:

- Patrols by Community Wardens and the WEO,
- Participation of WEO in multi-agency checkpoints with the Road Safety Authority and An Garda Siochana
- Thorough and swift investigation of waste complaints
- Use of internet and social media to gather information on unauthorised waste activities.
- Networking with WEOs in neighbouring Local Authorities
- Collaborating with WERLA and NTFSO in relation to cross border movement of metal

National Enforcement Priority:	WASTE - Construction and Demolition Activity
Local Authority:	Activities
 Looking back at the year	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• Risk based inspections of construction sites using WERLA intelligence and inspection templates.</li> <li>• Inspection of Article 27 sites of origin and destination to include material notified under Article 27 being accepted at WFP/Licensed sites.</li> <li>• Inspection of soil recovery sites to ensure only appropriate materials accepted.</li> <li>• Validation and inspection of WCP/WFP and licensed sites dealing with C&amp;D waste.</li> <li>• Take all necessary steps to resolve non-compliant issues including the selling of crushed concrete from WFPs/Licensed sites without EoW decision.</li> <li>• Incorporate proposed improvements to the Article 27 notification system.</li> <li>• Tracking of waste delivered to Licensed sites.</li> <li>• Based on researched data and local knowledge, identify authorised operators for further investigation and/or enforcement action.</li> <li>• 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.</li> </ul>	<p><b><u>Recovery and Disposal of waste from C&amp;D Sites:</u></b></p> <p>In 2022, 2 No. inspections were planned for investigating unauthorised C&amp;D sites. During 2022, 14 No. inspections were carried out in this area – (it is linked to economic activity and development trends and therefore difficult to plan for actual inspections, also includes re-inspections to assess compliance). In 2022, 5 No. Section 55 Notices were issued in relation to unregulated C&amp;D deposition sites. Some of these inspections involved collaboration with the planning enforcement officer. At suitable sites, a drone was used to capture the scale of the illegal waste deposition and or capture the waste in the context of it surrounds (ie: unauthorised C&amp;D waste deposited adjacent to a SAC).</p> <p>5 No. inspections in relation to C&amp;D handling and segregation were planned for 2022, however 8 No. inspections were carried out. The work surrounding these inspections included the issue of 1 No. Section 14 Direction, 1 No. report of unauthorised asbestos removal, 1 No. Litter Fine (discussed below), 1 No. interception of unauthorised C&amp;D waste removal on a Saturday by the SEE, and secondary verbal warning by WEO, validation of waste transfer dockets, and 1 No. C&amp;D waste management plan review.</p> <p>A large contractor (carrying out replacement of crash barriers on a national route on behalf of TII and LCC) was found to be storing waste crash barriers and concrete in the yard of a person deemed ‘not a fit and proper person’ due to a previous conviction under the WMA. The WEO scheduled a site inspection and requested the assistance of An Garda Síochána for H&amp;S reasons. This was due to previous, unsavoury, actions of the yard owner. The site was documented, and a Section 55 Notice was later issued. Simultaneously, a verbal warning was given to TII about their obligations under the WMA and LCC requested they speak with the contractor involved. The contractor was also requested (in writing by LCC projects office as directed by WEO) to remove waste stored in the yard and provide receipts of authorised waste removal &amp; disposal. The contractor acted quickly to remedy the situation and came into compliance soon after. The Section 55 Notice was also complied with. Three weeks after waste removal/completion of works, the patrolling WEO noted that a small pile of similar C&amp;D waste had been discarded along the N4 in the works area. A litter fine was subsequently issued to the contractor in respect of this. These enforcement works sent a clear message to both the contractor and the TII that a high standard of waste management was expected in Leitrim.</p> <p><b><u>Authorised C&amp;D Waste Facilities</u></b></p>

There is 1 no. private cert of registration authorised facility for C&D waste In Leitrim. In June 2022 an unannounced inspection was undertaken at this facility, compliance in relation to waste material acceptance was noted however, during subsequent patrols, concerns emerged over the volume of material at the site. AER submissions on volumes accepted have been checked with no obvious anomalies detected however discussions between the Planning Enforcement Office and the Waste Management Unit took place in 2022 and a joint inspection to assess levels on the site is planned for 2023.

#### **C&D Waste Collection Permit Holders**

One of the top 10 national C&D waste collectors is based in the County. The annual data validation audit on the NWCPO portal for this collector involved a significant amount of data to cross check and verify with numerous permitted waste facilities. During the validation process 10 No. data discrepancies were identified between the return and waste facility declarations. During the audit, all 10 of the discrepancies were investigated and either rectified by the collector or explained to a satisfactory standard. This work enables Leitrim to implement the cradle to grave approach when it comes to C&D waste and drives better compliance and reporting by permitted waste collectors.

One C&D waste collector, based in NI but validated by Leitrim has consistently failed to submit AERs through the NWCPO portal. This information and the number of FPN's issued to the collector was relayed to the NWCPO so that they could make an informed decision at permit review stage.

#### **Compliance Promotion & Awareness**

Year on year, an increasing number of C&D Waste Management Plans are being submitted to Leitrim County Council as part of the planning for large projects. Improvements in the quality of the C&D Waste Management Plans submitted are noted; this due to the waste enforcement conditions tagged to the planning approval and local engagement at pre-planning and pre-commencement stage and due to the national C&D waste management awareness campaigns and training. The waste management unit regularly guide contractors (at planning stage) to the EPA document titled 'the best practice guidelines for the preparation of resource and waste management plans for construction and demolition projects' (2021 revision).

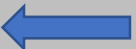
Ensuring that Construction & Demolition waste activities give consideration to and are informed on the above-named guidelines and on the applicable waste legislation continues to be a priority in Leitrim. Leitrim County Council actively promote the Article 27 notification process for greenfield soil and stone to developers in an attempt to reduce this material being classified as a waste.

#### **Article 27 Notifications Activity (Sites of Origin and destination)**

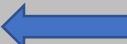
In 2022, 2 No. notifications under Article 27 were received and reviewed by Leitrim. One of the notified sites involved excavated road planings from a source site to a destination site for use as recyclable material at asphalt plants, while the other involved the moving of clean soil and stone materials. For the soil and stone site, Leitrim County Council requested that the notifier employ an independent assessor to advance trial holes and soil assessment in a few locations. These findings were presented to LCC and the report and site were reviewed with no issues observed.

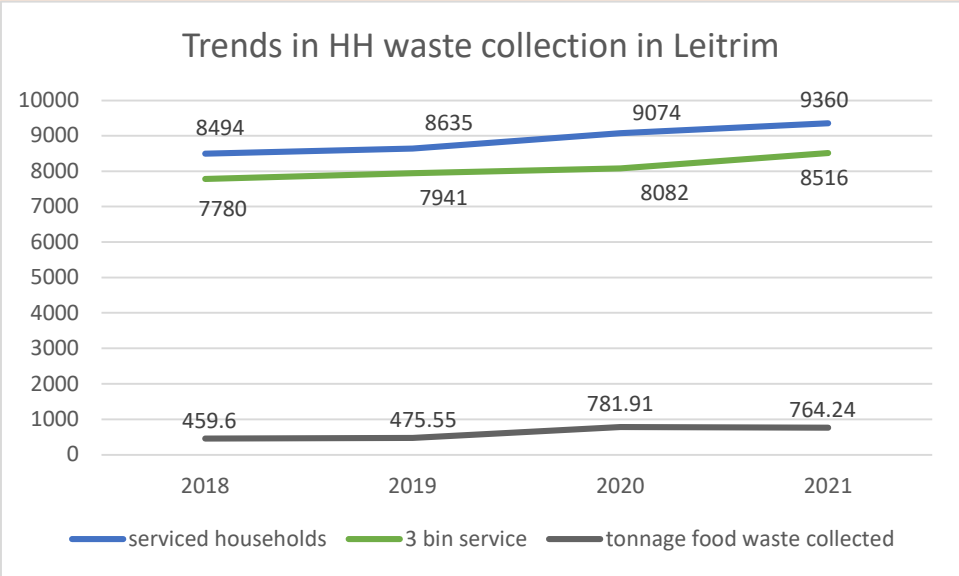
Once notifications were received a desktop study of the source and destination locations, along with the use of the by-product and all supporting documentation was undertaken. Site visits to both source and destination locations (where applicable) were conducted. Submissions are forwarded to the EPA Article 27 team, particularly if any concerning materials or sites are detected, however neither Article 27 notified in 2022 met these criteria.

In 2022, Leitrim County Council also submitted a detailed response to the consultation on the draft National Criteria for Greenfield Soil and Stone, for which much consideration and discussions took place.

National Enforcement Priority:	WASTE - End-of Life Vehicles (ELV) & the Waste Metal sector
Local Authority:	Activities
 Looking back at the year	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• Validation and inspection of records for WCP/WFP and licensed operators dealing with ELV and metal waste.</li> <li>• Take all necessary steps to resolve non-compliant issues.</li> </ul>	<p><b><u>Compliance Inspections at Authorised Sites</u></b></p> <p>There are 2 No. authorised ELV facilities based in Co. Leitrim. In 2022, 2 No. inspections of authorised ELVs were planned and 3 No. inspections were undertaken. In addition to the 3 No. physical inspections, one of the authorised ELV facilities underwent a waste facility permit review. This involved an extensive review of paperwork submissions and analysis of both recent and historical AER data. No issues were detected at this site and a renewed permit was granted. The work involved in reviewing the WFP submissions was extensive.</p> <p>No traceability issues were detected at either site, one site required a minor advisory being issued in relation to the waste battery storage unit. Both sites have a high compliance rate, are operated by professional individuals and both employ an independent environmental consultant to complete monitoring and data returns. A similar number of inspections were carried out in 2021.</p> <p><b><u>Unauthorised ELV Sites</u></b></p> <p>In 2022, 3 No. inspections were planned in relation to unauthorised ELV sites, and 7 No. inspections were carried out at 4 different sites. Some sites required numerous re-inspections. To deal with the unauthorised sites 4 No. Section 55 Notices were issued to landowners / site operators. As a deterrent to the public to use such sites, 7 No. Fixed Payment Notices were issued to persons who's waste vehicles were discovered at the sites.</p> <p>In one case it was communications from AGS which led LCC to discover the unauthorised site at an early stage in its development. The site was operating as a garage but was also buying waste vehicles for breaking to repair damaged vehicles for re-sale. LCC were able to visit the site quickly for an early intervention to the unauthorised activities. Section 55 Notices were issued on both the landowner and the site operator with most conditions mirroring each other but slight wording changes to reflect the level of involvement in site operations.</p> <p>The Section 55 notice not only dealt with both the unauthorised breaking and storage of waste vehicles, but also with legacy waste vehicles which had been discarded on the lands for many years. Due to the tip off from AGS and early intervention by LCC, any environmental pollution which may have been caused by the unauthorised breaking was diminished – as the site was in an isolated rural location this was a real possibility. During the Notice deadline extension period, a follow up check on social media was carried out and it was found</p>

	<p>that the operator was continuing to break waste vehicles at the site. A further unannounced site visit was conducted, and the site operator was interviewed under caution. After the site operator denied vehicle breaking was still occurring at the site the WEO produced pre-printed screen shots of advertisements for same. A verbal warning of the seriousness of the matter was then issued and a warning letter was issued to the landowner advising that legal proceedings may be initiated. On the final site visit the operator had come into compliance, waste transfer receipts were provided and validated, and the file was closed with a note for medium term monitoring. In total 13 tonnes of ELVs were removed from the site.</p>
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National Enforcement Priority:	WASTE - Waste Collection - Household & Commercial
Local Authority:	Activities
 Looking back at the year	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• Inspection of WCP operators for provision of 3 bin system.</li> <li>• Surveys of retail, hospitality and industrial sectors to ensure proper use of 3 bin system, segregation and use of authorised collectors.</li> <li>• Sampling/analysis of treated waste outputs</li> <li>• AER Validations on WCP and WFP priority lists.</li> <li>• Maintenance of register of households with/without a waste collection service and targeted inspections in areas with low compliance.</li> <li>• 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.</li> <li>• Monitoring of waste acceptance criteria at authorised sites e.g. WFP, Waste Transfer Sites, Landfills and Waste to Energy Plant.</li> </ul>	<p><b><u>Household Waste</u></b></p> <p>In 2022, 25 No. Household waste surveys were planned while 30 No. surveys were carried out. In 2022, 10 No. household waste presentation inspections were planned, and 11 No. inspections were carried out. These inspections were carried out on foot of complaints. In 2022, 8 No. Section 14 Directions were issued in relation to treatment, handling, storage, presentation or burning of household waste. In total 5 No. FPNs were issued for breaches of household waste presentation by-laws, and at year end all issues were resolved.</p> <p>While investigating a complaint in this area, one apartment block owner was found to be removing his tenants waste to an authorised facility for disposal without a licence. The complaint arose as they had failed to remove any waste for a long period leading to build up of rubbish and unsanitary conditions posing a risk to human health. Given its complexities, this complaint was prioritised - but the apartment block owner proved evasive and difficult to locate. The enforcement actions utilised to bring them into compliance involved issue of both a Section 14 Direction, a Section 18 Notice, several physical site inspections, investigative work, and a verbal warning. The person subsequently ceased the activity, and an authorised waste collection service was put in place to service the apartments with all waste account records being checked and verified.</p> <p><b><u>Waste Collection Permit Holders (kerbside) and brown bin</u></b></p> <p>During 2022 6 No. inspections in this area were planned and 8 No. inspections were carried out. Suspicions arose about one kerbside collector brown bin compliance (not segregating on collection) this was due to both analysis of data returns and complaints received from the public. The collector was warned and queried on this in writing and verbally on two different occasions and a surveillance operation on the ground was carried out. The surveillance operation did not indicate any misgivings but a targeted and specific Section 18 Notice has been prepared for the WCP holder involved and this will be issued early in 2023.</p>



**Figure 3.** Trends in Leitrim for three bin uptake and tonnages of HH food waste collected, (data sourced on NWCPO portal).

Trends in household food waste tonnages collected in Leitrim, and the number of residences on a three-bin system are encouraging, (Figure 3) however more work is required in this area. As Leitrim is a rural county, we have been encouraging the use of home food waste digestors as a means of on-site treatment, where site suitability allows and/or where brown bin collection is not feasible or available.

Some newspaper advertisements were run, that encouraged segregation of small electronics from the general waste bin. Another awareness item on reducing food waste was published.

**Commercial Waste**


In 2022, 5 No. commercial food waste inspections were planned, and 10 No. commercial food waste were carried out. Sites were selected with new business or not previously inspected businesses in mind, and with the analysis of Section 18 data returns from WCP holders, (which lists business not availing). This allowed for targeted and informed site selection. Of the 10 No. businesses inspected, 1 No. commercial food waste site was found to be non-complaint. A warning letter was sufficient to prompt compliance, and this was verified with a follow up inspection and waste account document validation.

**Waste collection permit holders (commercial)**

During 2022 12 No. inspections in relation to waste collection permit holders were planned while 14 No. inspections were carried out. Inspections included both desktop data audits and physical site visits. During the 2022 validation of NWCPO WCP holder annual return data, a discrepancy was noted with one commercial waste collector. The discrepancy indicated that they were collecting sanitary wastes and storing this (on a small scale) at their unlicensed depot for later collection by another commercial waste collector. Not only were they storing waste without a facility permit but when the waste was collected, it was being reclassified from sanitary waste to general commercial waste. Surveillance work on the collector also revealed that they were using new vehicles which were not listed on their permit. Advice and guidance were sought from WERLA on the matter before the collector was advised on the correct path to resolve the issue and to contact the NWCPO to add their new vehicles to the permit. A proportional, compliance assist approach was taken, rather than stringent enforcement as the individual had only recently taken over the commercial enterprise from the former operator. The collector is now in full compliance.

This work highlights the importance of reviewing data from Section 18 returns and NWCPO AERs. NWCPO permit holders AER checks and validations are carried out to monitor for and stamp out any unauthorised activity by permitted collectors.

During 2022, several waste collectors permit expired/entered the review stage. Information on poor AER submission and the issue of FPNs was relayed by the WEO to the NWCPO as part of this process, so that sub-standard WCP holders could be reviewed effectively. One warning letter was issued to a WCP holder during 2022.

National Enforcement Priority:	WASTE - Producer Responsibility Initiatives and additional local priorities
Local Authority:	Activities
 <b>Looking back at the year</b>	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• Identification and inspection of all suspected producers who require registration.</li> <li>• Examination of potential for information exchange between Local Government Sector and other Agencies, where appropriate.</li> <li>• 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).</li> <li>• (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 Compliers, Tyre Regs – Tyre Retailers).</li> </ul>	<p><b><u>Plastic Bag Levy:</u></b></p> <p>In 2022, 10 No. plastic bag levy inspections were planned, and 11 No. inspections were carried out. Good compliance was noted amongst retailers and many retailers only use paper bags. One non-compliance was detected, and a warning letter was issued in respect of same with follow up visit showing the retailer had moved into compliance.</p> <p><b><u>Vehicle importers:</u></b></p> <p>No inspections were planned, and no inspections were carried out as none have yet been identified in the County.</p> <p><b><u>Farm plastics:</u></b></p> <p>In 2022 5 No. inspections were planned and 5 No. inspections were carried out. These inspections were carried out jointly by the WEO and an IFFPG officer. The inspections were targeted with intel from the IFFPG officer on local farm contractors, in addition to inspections at the main Agri store outlets. Good compliance was detected in all sellers inspected. Discussions took place between WEO and IFFPG officer on cross border activity and the possibility of setting up a multi-agency roadblock with Customs, AGS, Cavan Co Co and Leitrim Co Co at Ballyconnel.</p> <p><b><u>SMP's:</u></b></p> <p>Two SMP's were identified and referred to Leitrim for investigation during 2022. In 2022 5 No. inspections were planned and 7 No. inspections were carried out – some of these were re-inspections or re-engagements. One of the SMP's was, on investigation, deemed 'not obligated' due to turnover. However, when their attention was brought to the regulations, they decided to join repak as a forward thinking move. The other SMP was found to have narrowly met the criteria for the previous calendar year but not in years prior to that. This SMP was reluctant to join and argued their case. They had lost the contract that pushed up their turnover in the previous calendar year and stated that they would not meet the criteria in the current year. Advice and guidance were sought from WERLA on the matter, and it was decided to seek confirmation of their statements from their accountant, including an estimated forecast for the current year and the loss of a major contract. Once verified,</p>

it was deemed appropriate to not enforce the regulations on this SMP given their circumstances, and the current economic issues facing businesses. However, during the engagement process this SMP was made aware of: the informed selection process available to LA's, the regulations and their obligations as a producer. They were also advised of potential changes to the SMP criteria soon.


**Waste Tyres:**

The tyre PRI compliance rate in Leitrim had fallen off significantly in recent years and when a WERLA document circulated in late 2021 indicated that Leitrim had one of the worst compliance rates nationally – Tyre compliance was made a local enforcement priority (as well as NEP) for 2022. Significant work was undertaken in this area in 2022 and this is discussed in more detail in one of our case studies.

At time of writing there are 2 No. outstanding unregistered tyre sellers in Leitrim however one has ceased the sale of tyres and has agreed to sign our self-declaration and the remaining seller appears to have ceased but will be subject to a test purchase early in 2023. The situation now appears to be near 100% compliance rate.

**Local Priorities: Civic Amenity Site**

One of Leitrim's Civic Amenity sites underwent an overhaul during 2022. Waste acceptance practices had deteriorated, threatening behaviour and theft of WEEE was a regular occurrence. To address the issues the SEE implemented the following: in house training and supervision of designated caretaker, deployment of additional staff from the environment department to engage with customers, promote and apply amenity site rules, inspect vehicle contents, and refuse entry to site abusers, assist with supervision of the WEEE housing unit, commence sale and supply of clear plastic bags at the site and ban the use of other bag types. Staff also carried out litter picks to curtail the poor appearance of the site. The WEEE housing unit now remains locked unless a patron enters the site with WEEE to dispose of. In addition to this, ADI funding was used to install CCTV at the site to deter any incidents of illegal dumping, abuse, or theft. A lot of time and resources were employed to implement change, educate site users, and eradicate site abusers. The above measures have had the desired effect; there is a notable visual improvement at the CAS, no recent reported WEEE thefts, and improved recycling practices.


National Enforcement Priority:	AIR - Solid Fuel Inspections
Local Authority:	Activities
 Looking back at the year	
<p><b><u>Describe what was carried out under this activity in the previous reporting year – e.g.</u></b></p> <ul style="list-style-type: none"> <li>• Tackle the sale of non-compliant fuel and its use via compliance promotion, inspection and enforcement of fuel merchants and retailers.</li> <li>• Participate in multi-agency operations investigating the sale of non-compliant fuels.</li> <li>• 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).</li> <li>• 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.</li> <li>• 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.</li> <li>• Build capacity through engaging, collaborating and sharing with colleagues in other local authorities via networks and working groups and participating in training events.</li> </ul>	<p>Until the introduction of the Air Pollution Act 1987 (Solid Fuels) Regulations 2022 (S.I. No. 529 of 2022) on the 31st October 2022, there were no designated ‘Low Smoke Areas’ in Co Leitrim, so solid fuel enforcement focused on the sulphur testing of fuel for compliance with the regulations.</p> <p>Following sulphur screening in November 2021, only one solid fuel product was found indicating non-compliance and a warning letter was sent to the supplier in early 2022, requesting independent test results for two products. Independent accredited results were received for one product, proving compliance of that product as of 25th February 2022. Results for the second product were never received. Two of the four coal products that had been found non complaint in 2020 were found compliant in November 2021 testing. These products were from two separate suppliers that had many previous non-compliances, and this was seen as a very positive result from continued enforcement efforts in the county.</p> <p>Solid fuel inspections were conducted in December 2022, after the new regulations were introduced. These inspections involved checking for the sale of non-approved fuels as well as purchasing solid fuel for sulphur analysis. This inspection was also used as an opportunity to engage with retailers and discuss the requirements of the new regulations.</p> <p>The Dept. of the Environment, Climate and Communications’ FAQ for Retailers was given to management at each of the retail outlets inspected. Most retailers were aware of the requirements of the new regulations. Eight retail outlets were inspected, bituminous coal was found for sale in 2 outlets. Other non-approved fuels were not found for sale in these outlets. Warning letters were sent to the retailers and suppliers. Three suppliers with products for sale in these outlets were found not to be registered with the EPA and warning letters were issued. EPA fuel registration confirmed that all three suppliers had been registered with the agency before the 31st October 2022 but failed to renew their registration after the introduction of the new legislation. The remaining six retail outlets were compliant with the regulations.</p> <p>In the RMCEI Plan 2022, Leitrim County Council proposed to sample 10 solid fuel products for sulphur analysis. During the eight inspections conducted in December 2022, 10 low smoke coal samples were purchased for sulphur analysis. Products were selected based on availability and previous non-compliance. If a particular</p>

product wasn't available for purchase, then a similar product by the same supplier was selected. Results are awaited.

Leitrim continued its participation in the Sulphur Testing Working Group (STWG) which is a working group consisting of representatives of Leitrim, Sligo and Donegal County Councils and the DECC. The aim of which is to develop a set of guidelines/best practise to share with all local authorities on the testing and sampling of sulphur in solid fuels based on our collective experience in enforcement of the regulations. There were three meetings during the year to discuss solid fuel testing results and different approaches to enforcement.

Leitrim conducted a pilot project in association with the DECC in October/November 2022. This project involved purchasing solid fuel products for smoke emissions testing: low smoke coal; dry timber; wet timber; sod peat; peat briquettes; smoky coal; coal blend product. Leitrim County Council co-ordinated the sampling, repackaging and transport of the products to Kiwa Gastec for accredited testing in the UK.

Leitrim attended the Spring LAIG meeting online and the Autumn LAIG meeting in person in Mullingar, Co Westmeath. The latter included an introduction to the new solid fuel regulations which was particularly beneficial. Leitrim also attended the DECC local authority workshop in relation to enforcement of new solid fuel regulations in October 2022.

National Enforcement Priority:	AIR - Air Quality Monitoring Activities and Data Use
Local Authority:	Activities
 Looking back at the year	
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• Work with the EPA to complete the expansion of the <b>Ambient Air Monitoring Programme</b> network including:             <ol style="list-style-type: none"> <li>1. Assist EPA to determine viable locations for air quality monitoring stations.</li> <li>2. Assist EPA to progress the siting of air quality monitoring stations.</li> <li>3. 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.</li> <li>4. Assist (where possible, to the best extent possible) EPA to maintain existing and new air quality monitoring stations.</li> </ol> </li> <li>• Review local air quality data to identify hotspots and to prioritise sites/areas for action.</li> <li>• 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.</li> </ul>	<p><b>Ambient Air Quality Monitoring Station</b></p> <p>There is 1 no. Ambient Air Quality Monitoring (AAQM) station in County Leitrim located in Carrick on Shannon along the N4 route. The AAQM station was commissioned in late December 2020. The Installation ground works, and ducting required for the unit was carried out by Leitrim County Council staff and an external electrical contractor carried out the electrical installation in September 2020 and the ESB connection was then completed in October 2020.</p> <p>The AAQM station is automated and operated by the EPA, it is identified by the EPA as Station 80. Carrick-on-Shannon, Co. Leitrim and provides data for nitrogen dioxide and particulate matter (PM10 and PM2.5).</p> <p>The EPA manages the National Ambient Air Quality Monitoring Network and the monitoring data from the unit in Carrick on Shannon is available at the following link: <a href="https://airquality.ie/station/EPA-80">https://airquality.ie/station/EPA-80</a>.</p> <p>The Leitrim County Council website now hosts a “live” data link to the monitoring data from Station 80 in Carrick on Shannon.</p> <p>The EPA Air Quality website shows interesting information for the public such as the Air Quality Index for Health. The EPA’s Air Quality Index for Health (AQIH) is a number from 1 to 10 that tells you what the air quality currently is in the station nearest you and whether this might affect the health of you or your child. A reading of 10 means the air quality is very poor and a reading of one to three inclusive means that the air quality is good. The Air Quality Index for Health for Station 80 in Carrick on Shannon is “1”; which is classed as Good.</p> <p>The EPA advised in October 2020 that they intended to circulate a basic maintenance manual for Local Authorities to assist with common troubleshooting of problems at these units, also advised was an intention by the EPA to provide basic level maintenance training for Local Authorities, we await an update from the EPA.</p> <p>Leitrim County Council placed an article in the Leitrim Observer in March 2022 to increase public awareness about the Ambient Air Quality Monitoring unit in Carrick on Shannon. This article included information in relation to the Air Quality information available on the Council and EPAs website.</p>

# AIR QUALITY

- Air Pollution can have a detrimental effect on the health of people, particularly vulnerable groups such as the elderly, children, infants and people with respiratory illness.
- According to the Asthma Society of Ireland, nearly 2,000 lives are lost on the island of Ireland each year from smoky coal pollution.
- Many people may think that they are doing the right thing by burning household waste in reducing the amount of waste going to landfill and saving money - but they are both causing long term environmental pollution and interfering with the lives of others living in their area.
- Leitrim County Council conduct investigations on air pollution issues and odour nuisance within the county, which may include - Illegal burning of waste; odour nuisance; emissions from industry; emissions from commercial activities; marketing, sale, distribution and burning of specified fuels.
- **DID YOU KNOW..... Live air quality data is now available for Carrick on Shannon since the installation of an EPA air quality monitoring station in the town in 2020. This data can be accessed at: <https://airquality.ie/station/EPA-80>.**



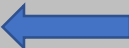
Figure 1. Extract from article in the Leitrim Observer in March 2022.


## Sulphur Tubes

In addition, working in collaboration with the EPA, Leitrim have installed and are monitoring Sulphur levels in the air during winter months of 2021/2022, sulphur is collected from the atmosphere via sulphur tubes at 8 no. locations in and around Carrick on Shannon.

The main source of sulphur dioxide in Ireland is burning coal and oil to heat homes and industries and to produce electricity. It is an irritant gas which attacks the throat and lungs.

Sulphur levels in Leitrim are low, with the highest reading for SO<sub>2</sub> at a tube located in a older Council housing estate, where many residents are elderly; therefore heating their homes all day and in fuel poverty.

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><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Prepare and submit the Annual Noise Action Plan Progress Report to the EPA by 28<sup>th</sup> February.</li> <li>• Annual Noise Action Plan Progress Report should demonstrate progress on the key issues and priority areas for action.</li> </ul>	<p>Leitrim County Council will submit the 2022 Annual Report to the EPA by 28<sup>th</sup> February 2023 detailing all actions taken in the previous 12 months under the local authority's Noise Action Plan 2019-2023.</p>

National Enforcement Priority:	AIR - Air & Noise Controls in Planning Assessments
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 though the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>• Pre-planning assessments of air and noise impacts.</li> <li>• 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 planning enforcement is more appropriate.</li> <li>• Increased public awareness of noise induced health impacts.</li> </ul>	<p>The Planning Department refers planning applications to the Environment Department for report and recommendations with respect to Air and Noise Control, typically such applications are for commercial premises, quarries, and wind farm applications.</p> <p><b><u>Noise issues</u></b></p> <p>Leitrim County Council has received ongoing noise complaints from several complainants who live adjacent to a wind farm. The Environment Dept work closely with the Planning Dept to ascertain whether the wind farm is operating in compliance with the noise limit set in the planning conditions for the wind farm. The wind farm owner was instructed to carry out noise measurements at 3no. locations, representative of the nearest dwellings neighbouring this wind farm site.</p> <p>The noise measurement survey analysis and report concluded that the assessment of the measured noise levels showed that the noise levels from the wind turbines at the 3no. measurement locations are below the noise limit (43 dB LA90) demonstrating compliance with the planning condition.</p> <p><b><u>Public Awareness of Noise</u></b></p> <p>Leitrim County Council placed an article in the Leitrim Observer in March 2022 to increase public awareness about Noise. This article included information in relation to how to make a complaint to the Council about noise nuisance and also information about the Council's Noise Action Plan 2018-2023 to address environmental noise on major roads.</p>

# NOISE

- Whenever you consider a noise to be so loud, so repeated, so continuous, of such duration or pitch or occurring at such times that it gives you reasonable cause for annoyance, you can initiate action to deal with it.
- You may exercise your right to make a formal complaint to the district court to deal with noise nuisance under Section 108 of the EPA Act 1992. This legislation can be used for neighbourhood or community noise that is regarded as a civil matter. To find out more information on Noise Regulations visit [www.enfo.ie](http://www.enfo.ie).
- The procedure for making a complaint to Leitrim County Council of noise nuisance from commercial or industrial sources can be found on [www.leitrimcoco.ie](http://www.leitrimcoco.ie).
- **DID YOU KNOW..... Leitrim County Council have prepared the Noise Action Plan 2018-2023 to address environmental noise from major roads. The Plan can be viewed at [www.leitrimcoco.ie](http://www.leitrimcoco.ie).**

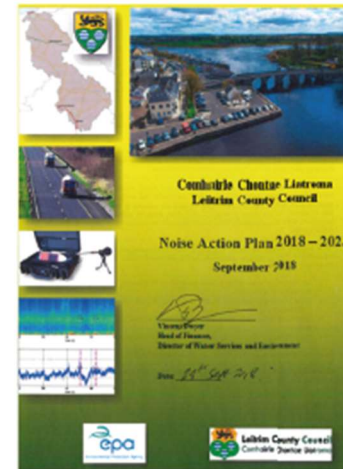



Figure 1. Extract from article in the Leitrim Observer in March 2022.

National Enforcement Priority:	AIR – Local Enforcement Issues
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><b>Describe what was carried out under this activity in the previous reporting year – e.g.</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>Make available on their websites, the EPA vehicle refinishers video and use appropriate channels to promote it.</li> <li>Inspect and carry out any required enforcement actions under Sections 107 and 108 of the EPA Act 1992, in order to limit noise nuisance.</li> <li>Build capacity through engaging, collaborating and sharing with colleagues in other local authorities via networks and working groups and participating in training events.</li> </ul>	<p><b><u>Deco Paints Regulations:</u></b></p> <p>Leitrim’s target is 2 no. inspections to be carried out under the 2012 European Union (Paints, varnishes, vehicle refinishing products and activities) Regulations, 2012 (S.I. No. 564 of 2012). In 2022 there was 2no. of inspections of Vehicle Refinishing Operators carried out in County Leitrim, resulting in issuing 2 Certificates of Compliance to the operators. The inspections were focussed on the compliance of the operator, but also Inspectors were checking if the operator is following good practice, good record keeping of the VOC material purchased, and on using certified products by the operator, also provision of appropriate training of staff and health and safety procedures being respected. An assessment of the premises was also carried out to make sure there is no illegal practices or no other environmental issues, i.e.: no risk of pollution to surface water or groundwater.</p> <p>When an unauthorised activity is confirmed, the operator receives information on the registration process and is issued a letter with requirement of applying for the Certificate of Compliance and to employ Approved Assessor to carry out an inspection and issue the report with the recommendations.</p> <p>At the end of 2022 there was 4 no. of Vehicle Refinishing Operators with a valid Certificate of Compliance with 2no. issued in 2022.</p> <p><b><u>Solvents Regulations:</u></b></p> <p>There are no dry cleaning business in County Leitrim and therefore none registered or certified with the local authority in 2022.</p>

**Petroleum Vapour Regulations:**

In 2022, Co. Leitrim had the responsibility for the enforcement of Stage 1b Petroleum Vapour Recovery at Service Stations. Currently there are no service stations in Co. Leitrim that require testing for Stage II Recovery.

Leitrim County Council issued letters to 6 service stations in 2022. These letters included 2 Advisory letters, 3 warning letters and 1 renewal reminder letter. Leitrim County Council issued Certificates of Testing to 4 service stations in 2022 following receipt of the approved assessor's reports. This brings the number of service stations who are compliant with the Petroleum Vapour Emission Regulations at the end of December 2022 to a total of 5. This represents an improvement in enforcement compared to a total of 2 compliant service stations at the end of December 2021.

The letters that were issued in 2022 followed the template letters that are included in NIECE's new guidance document; Stage 1b Petroleum Vapour Emissions Recovery. Two members of the environment team attended a one-day training workshop in Castlebar regional training centre in October 2022. The training has been developed and organised by NIECE for local authority staff on the implementation and enforcement of The Air Pollution Act 1987 (Petroleum Vapour Emission) Regulations 1997.

**Licensed sites under the Air Pollution Act:**

There are no licensed sites under the Air Pollution Act in Leitrim.

**Local air and noise issues:**

There were no air or noise issues of note in Leitrim during 2022.