


2022 National Enforcement Priorities Progress Report

National Enforcement Priority:		GOVERNANCE - RMCEI Review & Reporting
Local Authority:	Activities	
 Looking back at the year	<p>Tell the story of what your council did on this priority in the reporting year. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>	
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> The RMCEI Plan frequency of reviews should be bi-annual at a minimum. The review frequency and the outcomes should be included in the progress report. RMCEI reviews should evaluate progress of NEPs and assess if planned inspection targets are on track. RMCEI reviews should provide reasons for any deviation from targets, planned activities or objectives set out in the plan. RMCEI reviews should be presented to the Director of Services/Senior Engineer/Senior Management/Environment Strategic Policy Committee at least once during the earlier part of the year, to facilitate plan review. The RMCEI Plan, RMCEI Data Return and NEP Progress Report should be submitted to the EPA on schedule. 	<p><u>RMCEI Review and Reporting</u></p> <p>Limerick City and County Council uses SUGAR CRM in order to manage and report on Complaints, Inspections, Enforcements, Fines, Prosecutions and Permits.</p> <p>The system is built on 2 main constituent elements.</p> <p>(1) Service Catalogue – list of Services (which pre-dates the LGMA Service Catalogue). Within each Service is a short description of the service, Service Manager data, together with an online link to the parent legislation. There is also an FAQ document and information leaflets available within the Service to assist Staff to allocate work to the correct Primary Service. New Primary Services can be added to the catalogue as required e.g. Mercury Regulations.</p> <p>(2)UCN – Unique Customer Number and UBN – Unique Business Number.</p> <p>When input to the modules by staff, use of UCN and UBN allows historical data to be maintained i.e. one can search by UBN/UCN to view records as appropriate. This aids Environmental Enforcement Staff in research which allows appropriate compliance/enforcement action to be undertaken. This function also allows extract of Register data across the spectrum of Environmental Legislation e.g. Successful Waste Prosecutions register/Household Waste Register.</p>	

K reports & Management overview

After continuous development with our Digital Strategy Team, the Council can now produce 13 versatile, detailed and summary K reports in MS Excel format for all the above-mentioned modules. This data is primarily used to complete RMCEI and for other reporting requirements. It is particularly useful from a review perspective and inspection planning perspective. The process is completed using the Service Catalogue and the data input by the Environmental Staff & Customer Services Staff on a year round basis. We have a process of continuous audit and adjustment in terms of primary service, status and date of closure input. Management dashlets are available to give real time access to the modules which are a useful management aid.


Sharepoint & Connectivity with SUGAR CRM

The Council has recently introduced Sharepoint which is now our main repository for data storage. The Environment Section developed the facility to input a secure link to the relevant Sharepoint Folder within the Case and Inspection modules located in SUGAR CRM. This allows ease of access from SUGAR CRM to background data, photographs, documentation. Balance of records to be moved over to Sharepoint.

Hardcopy file management – work in progress. Research as to whether we should move from MS Access to MS excel. In excess of 14,200 hardcopy historical files on hands with permanent retention status in accordance with the National Retention Policy.

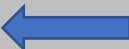
RMCEI Review Plan

The Council carried out a regular review process over the 12 month period to manage progress and ensure targets were being met. Following these assessments, a briefing session was undertaken with Senior Management to highlight areas of concern, staffing issues and risks associated in achieving our programme of works. Details of review were brought to Director at Senior Team meetings.


National Enforcement Priority: GOVERNANCE - Environmental Complaint Handling	
Local Authority:	Activities
 Looking back at the year	<p>Tell the story of what your council did on this priority in the reporting year. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Assignment of a dedicated Environmental Complaints Co-ordinator. • Implementation of the National Environmental Complaints Procedure. • Appropriate systems in place for recording and tracking environmental complaints. • Adequate resources assigned to complaint investigation in the RMCEI Plan. • Appropriate handling of EPA referred complaints and Section 63 Notices received by the local authority. • Ensuring timely investigation of complaints and reporting of complaints outcomes. This should include progress on complaints outstanding from previous years and the timeframes for complaint investigation. • Analysis of complaints numbers and inspection intelligence that may have potential impacts on NEPs and other thematic areas. • Details of environmental complaint handling should be provided in the appropriate section of the NEP Progress Report. 	<p>Environmental Complaint Handling.</p> <p>Limerick City and County Council uses SUGAR CRM in order to manage and report on Complaints. Complaints are recorded via Customer Services and assigned to the relevant team using the relevant Primary Service. This results in an email to all team members, complaint assignment to the relevant enforcement personnel for investigation. Complaints can be raised by the Public and Councillors on www.mylimerick.ie and also by telephone and email to the Customer Services Section.</p> <p>All complaints including NIECE complaints and EPA notifications are recorded on our CRM system and assigned to relevant Team for onward assignment to relevant personnel.</p> <p><i>The system is built on 2 main constituent elements. (1) Service Catalogue and (2) UCN and UBN as set out above (RMCEI /Review and Reporting).</i></p> <p>Once assigned, complaints are investigated and updated on CRM. The Public log allows us to update any complainant as to the progress of the complaint. <i>Cases are generally resolved once the environmental pollution has been remedied. Resolution email sent to customer with Public log info included. Facility within SUGAR to email from within the case. Case location plotted on Google maps.</i></p> <p>Some cases are closed unresolved when no evidence can be found to pursue the matter further. All correspondence lists the relevant case number and or UBN/UCN.</p> <p>Open cases are reviewed by management weekly to ensure all cases are assigned and in progress. There are Bi-monthly meetings with the Customer Service team to review the operation of our CRM system and to see if any improvements can be made. There has been a significant reduction of 26% in the opening balance of cases at the beginning of 2022 to the current opening balance at the beginning of 2023. This is an indication of the success of this management tool.</p>

<ul style="list-style-type: none"> Reporting of complaint numbers and investigation for each thematic area in the RMCEI Data Returns. 	<p>All inspections, fines, Enforcements and prosecutions are linked back to the original case and the work flow of each case can be easily tracked and reported.</p> <p>Driving compliance using “Compliance assistance”</p> <p>A Website content review process has been commenced in 2022 and continues in 2023. This is to most update information is available on the website, including links to www.mywaste.ie, to increase awareness and ensure accessibility for users.</p> <p>We are taking a proactive approach across all the Environment Dept with our Environment Awareness Officer to maximise the impact of Environmental Awareness Campaigns and avail of all funding resources available.</p>
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NEP Assessment Criteria		
A	For regulated / authorised sites, a compliance rate documented and compared over the previous years, and analysed or explained;	CORE
B	Demonstrate appropriate site selection methodology and inspection implementation and/or early interventions;	
C	Demonstration that non-compliances/unauthorised activities are being detected and are being followed up – and some progress in the NEP is shown;	
D	Clear example(s) of a positive environmental outcome(s) – something was achieved to improve the environment (not simply reached a target of inspections);	
E	Clear useful learning in a NEP area (positive or negative e.g. what to do, or what not to do, or identification of illegal sites or unauthorised operators);	Complementary
F	Collaborative work with WERLA, NTFSO, RWMPO, LAWPRO, EPA, Catchment Care Projects, inter-departmental within the local authority or with other local authorities; cross cutting NEP collaboration;	
G	Demonstration of a proactive approach , or innovation in dealing with a problem or demonstration of an enforcement curiosity ;	
H	Compliance promotion and awareness raising activities;	
I	Activities on data validation, data analysis, systems development, website development ;	
J	Significant enforcement actions/prosecutions and the outcomes such as remediation, sharing of lessons learnt to aid national consistency of enforcement;	
K	Case studies written up and shared that encompass any of the above properties.	


National Enforcement Priority: WATER – Pressures from Agriculture (slurry/soiled water collection and storage)	
Local Authority:	Activities
 Looking back at the year	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the ‘RMCEI data returns’ or your ‘RMCEI Plan’.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Inspections of farmyards in areas where agriculture is identified as a significant pressure, with a small percentage in other areas, as defined in the National Agricultural Inspection Programme for local authorities. • Undertake targeted agricultural inspections specific to the pollutants of concern (P, N and organics), using the EPA Pollution Impact Potential (PIP) maps and EPAs Targeting Agricultural Measures Map. • Take all necessary steps to ensure compliance, including follow up and close out of non-compliances. • Cross reporting of non-compliances to DAFM. • Document and report results for all farm inspections to the EPA. 	<p>During 2022 we continued to focus efforts on 21 no. of our 24 selected waterbodies for Investigative Assessment work (A Master List of identified pressures was prepared and we continued to work with farmers to ensure that identified issues were resolved). It is proposed to complete I.A.s on the remaining 3 no. (of 24 selected) waterbodies and an additional 5 no. unassigned waterbodies during 2023.</p> <p>659- no. farm inspections were carried out in 2022 (includes inspections, re-inspections etc .)</p> <p>Where issues were identified following farm inspections the farmer was requested to submit a Farmyard Management Plan prepared by a suitably qualified Agriculturalist with a time-table for required works to be completed. These plans were checked and followed up to ensure that required works were being carried out in a timely manner.</p> <p>LCCC's laboratory sampled the 24 water bodies we had prioritised for chemistry analysis on a monthly basis. The data obtained allow us to prioritise our inspections to where the analysis indicated there was an impact from agriculture. Along with percentage dissolved oxygen, the parameters analysed were phosphorus, nitrate and ammonia.</p> <p>On-going chemistry sampling will provide a baseline and when combined with on-going biological sampling will provide an accurate picture in relation to water quality status and risk (trending).</p>

	<p>Also, in 2022 , the Water Framework Directive team responded to 63 complaints which were notified and recorded on a SUGAR based crm system. All complaints were investigated and appropriate action taken to ensure an effective remedy was found.</p> <p>During 2022 - 21no. cross-compliance reports were forwarded to DAFM for significant breaches of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2022. We continued to work with these farmers to ensure that such breaches will not occur again.</p> <p>All agricultural planning applications are inspected (with requirement for FMPs). In 2022 110 planning applications were processed and appropriate recommendations or conditions attached.</p> <p>During 2022 pesticide exceedances were recorded in the River Deel and on the River Feale . As a resulting action LCCC wrote all the farmers in upstream catchments. In total 932 farmers in the Deel Catchment and 70 farmers on the Feale were written to and advised on best practice use of Pesticides in relation to reducing the risk to waters.</p> <p>During 2022 LCCC was proactive in engaging and communication with the agricultural community.</p> <p>In the late spring, early summer LCCC produced newspaper articles for farmers in relation to silage-making and reminded them of their responsibility to ensure facilities for collection storage and management of effluents were sufficient.</p> <p>Later in the year another newspaper article appeared in local press in relation to changes (dates and practices) contained in the revised GAP Regulations. This article was also directed towards agricultural contractors.</p> <p>Separately agricultural contractors were written to reminding them of their responsibilities in relation to minimizing impact on waters and compliance with GAP Regulations.</p> <p>A handbook also issues to Farmers upon inspection - outlining measures to be taken to protect waters. This will be revised further in 2023 to include any necessary updates.</p>
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National Enforcement Priority: WATER – Pressures from Agriculture (slurry and fertiliser spreading)	
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><u>Describe what was carried out under this activity in the previous reporting year – e.g.</u></p> <ul style="list-style-type: none"> • 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. 	<p>All new farm inspections included a farm walk with the farmer where the Source-Pathway-Receptor model was explained and preferential flow paths were identified. Furthermore, PIP (pollution impact potential) maps relating to his / her lands are discussed. If receptive, farmers were encouraged to install extra buffers or interception planting in preferential flow paths.</p> <p>In 2022, greater emphasis was placed on the inspection of farm roadways and of minimising any direct runoff of soiled water from such road ways.</p> <p>The issue of silage effluent/soil rain water from open silage pit faces in winter months impacting on waters (when the pit is opened) is of growing concern. In order to determine impact on waters LCCC inspected the clean water discharge point to the relevant drain / stream during all farmyard inspections. Where the presence of sewage fungus was observed the farmer was requested to undertake remediation works so as to break the S-P-R pathway. While the GAP regulations do not prohibit the discharge of rain water from pits when open, LCCC are observing that these discharges are impacting on localised water quality.</p> <p>Limerick County has about 600 high stocked derogation farms mainly in the dairy sector. In 2022, the WFD team inspected 50 of these farms. These were carried out towards the end of 2022 and outstanding administration (requesting further information) will be finalized in early 2023.</p> <p>In mid 2022 the DAFM, EPA and LGMA, established a working group to develop protocols, policies and priorities etc. for the National Agricultural Inspection Programme (NIAP). This working group meets on a regular basis and developed documents and templates which have and will be shared with all Local Authorities. One of the</p>

	<p>groups main aims is to aid consistency around the country and to disseminate knowledge. The Senior Executive Scientist in LCCC is a member of the working group.</p>
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National Enforcement Priority: WATER – Domestic Waste Water Treatment Systems / Septic Tanks	
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>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> 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. 	<p>DWWTSs for inspection in 2022 were selected based on known waterbodies failing to meet their requirements to meet at least Good Status under the WFD, that are near watercourses and that are in the required risk categories under the NIP. 52 inspections were selected to be inspected in the Local Inspection Plan were selected from the twenty-three Areas for Action.</p> <p>68 inspections carried out in 2022 (68 full inspections/17 verification inspections)</p> <p>37% of full inspections were non-compliant – mainly due to desludging and minor issues with manhole/AJ covers.</p> <p>Positive outcomes are reduction in water pollution due to discharges to surface waters and public health due to effluent ponding – appropriate WWTS installed based on site assessments in accordance with the EPA Code of Practise.</p> <p>In relation to public engagement, the Council provides information on its website regarding sludge removal and appropriate contractors and a list of suitably qualified site assessors. Where persons are concerned about an upcoming inspection a Council engineer will always speak to the owner/resident by phone, or in person, to talk through the procedure. The EPA leaflets “is your well at risk from your septic tank” and “What to expect from a septic tank inspection” are included in relevant outgoing correspondence. Cover letters issued with advisory notices and notices of compliance include guidance to accessing authorised sludge collectors on www.nwcpo.ie.</p>

National Enforcement Priority: WATER – Discharge Licences / Misconnections	
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>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Ensure all Section 4 Discharge Licence conditions are consistent with the requirements of the Surface Waters and Groundwater regulations. • Undertake risk based inspections/monitoring of Section 4 Discharge Licences. Inspect all licences in areas where discharge licensing is a significant pressure. • Ensure that all licensable discharges are authorised by a Section 4 Discharge Licence. • Ensure compliance with discharge licence conditions and follow up and close out non-compliances and LAWPRO referrals on Section 4s and misconnections. • Follow up on misconnections that have been identified as impacting on water quality, to ensure that works are undertaken by property owners to remediate such misconnections. 	<p><u>Discharge Licences:</u></p> <p>At the end of 2022, LC&CC had 36 live “Section 4” licences. This is an increase of 6 on the 2021 figure. A live application process is in train (at the time of writing) for a 37th licence.</p> <p>The 37th has come about on foot of a complaint from a member of the public visiting a tourist area during the prolonged dry spell and noticing water pollution. We have engaged proactively with the operator of the facility who has engaged a consultant to prepare an application for a licence.</p> <p>As a result of the easing of public health restrictions, a total of 28 licence compliance inspections including 16 audit inspections were undertaken during the 2022 calendar year at a cross-section of sites, including medical facilities, hotels and concrete plants. There was a 75% compliance rate on these inspections.</p> <p>Nevertheless self-monitoring reports continued to be assessed regardless and were monitored for levels of compliance.</p> <p>We place a strong emphasis on monitoring effluent from medical facilities because of the high anti-biotic content in their effluent which significantly reduces the rate of bacterial action.</p> <p>We also monitor closely, effluent from quarries and concrete manufacturing plants in rural areas of Co. Limerick given the potential for contamination of adjoining agricultural land. There are at least seven facilities of interest in this regard.</p> <p>Generally speaking, compliance was found to be relatively good albeit that there were delays in submitting monitoring results. We would estimate the compliance rate as being about 80% and we have a policy of highlighting issues to licencees where problems are detected.</p>

	<p><u>Misconnections:</u></p> <p>During 2022, staff investigated reports of water pollution in NE Co. Limerick from an outfall and identified a “misconnection” in a housing estate. This matter was referred to the roads maintenance function and Irish Water who attended accordingly.</p>
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National Enforcement Priority: WATER – Local Priorities and Water Quality Monitoring	
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>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Complete statutory monitoring for WFD surveillance and operational monitoring, investigative monitoring and bathing water monitoring. • Inspect and follow up any local issues (not covered by other NEPs), including non-compliances with water quality standards and LAWPRO referrals. • Address any climate related water quality issues, e.g. impacts due to extreme weather events. • Registration and monitoring of all private drinking water supplies. Investigate supplies that fail to meet drinking water quality standards and take necessary enforcement action. • Engage with LAWPRO and Regional Committees on the implementation of RBMP Actions. 	<p><u>WFD Monitoring:</u></p> <p>With respect to WFD monitoring 43 river sites 5 times a year, 7 sites 7 times a year, and 1 lake site 4 times a year were sampled on behalf of the EPA in the county. Dissolved oxygen (DO) saturation as a percentage results were communicated with the Environment section by email in order to give an indication of the status of water quality. Risk assessments of EPA sampling locations were reviewed in 2022 to also include photos to record the current appearance and characteristics of the sampling sites.</p> <p><u>Investigative Monitoring:</u></p> <p>The Investigate Monitoring Programme was revised in 2022 to eliminate duplication with the EPA sampling programme, incorporate 24 Priority Action Areas identified after LAWPRO/LCCC consultation and to develop a baseline study of ambient monitoring sites of certified wastewater treatment plants to build up data on the local impact in the catchment.</p> <p>This resulted in 51 different river sites monitored at a frequency ranging from 5 times to 11 times. 32 rivers sites associated with 16 unlicensed waste water plants were monitored twice. Lake monitoring also included with 2 lakes sites monitored at a frequency ranging from 5 times to 11 times. Outside of the bathing season, ammonia monitoring also undertaken at 3 sites in the Askeaton area to monitor water quality. In 2022 two more sampling sites were added in order to investigate the feasibility of developing an outdoor recreation area in Rathkeale.</p> <p>On behalf of LAWPRO analysis was undertaken at 28 river sites across 4 waterbodies.</p>

In scheduled and non-routine sampling the parameters ammonia as mg/L as N and dissolved oxygen (DO) saturation as a percentage were selected to determine the status of water quality. The Laboratory reported high ammonia and low DO results to the Environment section by email on at least 35 occasions in 2022.

It was noted in 2022 that 10.6% of samples analysed had an ammonia result in excess of 0.07 mg/L N. This included 28 waterbodies at 44 sampling sites.

With respect to DO, it was noted that 3.4% of samples analysed had a DO level below 80% covering 10 waterbodies at 20 sampling sites. 2% of samples have a DO of over 120% at 5 waterbodies at 13 sites.

Initial results of ambient monitoring sites of certified wastewater treatment plants in 2022 indicate high ammonia results downstream of 8 plants compared to upstream sites. These results were communicated to Uisce Eireann

Bathing Water Monitoring:

Bathing waters monitoring was increased from 4 to 6 bathing water sites sampled fortnightly during bathing season (June 1st to Sept 15th). The additional bathing monitoring was undertaken in areas known to be used by swimming clubs. In July two more sampling sites were added in order to investigate the feasibility of developing an outdoor recreation area in Rathkeale.

The 2022 bathing water results for 4 sites have been tabulated with the previous two years results to give an indicative quality classification of “Poor” at two sites and “Excellent” at another two sites. 2 Do Not Swim notices were issued in 2021 remain in place relating to areas known to be used by swimming clubs.

The surface water strategic assessment of Limerick City & Environs identified potential issues with outfalls with targeted monitoring proposed. Some locations identified within Clare county and communicated to Clare County Council to investigate. Uisce Eireann also contacted. A submission for funding under the Small Town and Villages funding scheme to upgrade the sewage system in Askeaton and upgrade to Glin WWTP at design stage. An awareness programme on Fats Oils and Greases (FOGs) is being developed for Limerick city and Askeaton.

The EPA, Clare County Council and Tipperary County Council were contacted regarding best practice in the application and management of designated bathing areas in particular with freshwater sites.

Private Water Supplies:

Small Private Supplies (SPS) registration is promoted by means of form on the local authority website. A notice regarding private regulated water supplies and a registration form are available on the LCCC website (<https://www.limerick.ie/council/services/water-and-drainage/rural-water-programme/private-regulated-water-supply-register>). A register is maintained by the Rural Water Unit containing the following information contact details, source type, volume supplied, treatment and individual type served.

For the Group Water Schemes (GWS) records, the section contacted all group water schemes in the County with a view to obtaining up to date information on committee details, source type, treatment, population served and water quality/supply issue planning. This involved the issuing of a questionnaire in March along with the invitation to request funding under the Multi Annual Rural Water Programme. In addition 4 GWS Workshops were organised in April to offer support and guidance of all GWS related issues. As a result 32 questionnaires received. The Laboratory also participated in the Review Local Authority Natural Water Functions and Resources. In May. A Department Group Water Schemes and Small Private Water Supplies Water Supply Information Survey was completed in November 2022.

All locations sampled for private supplies are grid referenced and recorded in the laboratory database system. For GWS schemes selection of sampling locations is determined by reviewing data held in the Laboratory database over the last five years as well as based on sampler's knowledge and experience. This helps to ensure that the same locations are not sampled each year in order to demonstrate samples are evenly spread and representative of water in the supply zone. For smaller GWS and SPS, there are generally few, if any, alternative sampling locations. Historical maps of the private water supplies distribution network are maintained in hardcopy on-site in the laboratory main office.

In 2022 the Laboratory took 385 samples from 107 GWS (public, private and unregulated smaller schemes) and SPS supplies in scheduled and non-routine monitoring. In addition DBO (Design Build Operate) GWS submitted 140 sample reports to be processed. 21.6% of samples taken related to investigative/follow-up sampling. All regulatory monitoring data for private supplies is publicly available on the local authority website <https://waterquality.limerick.ie/> along with percentage compliance rates for each parameter.

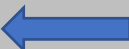
Where parametric failures occurred in 2022 following regulatory sampling and testing by the laboratory, follow-up/ investigative sampling was undertaken (83 samples in total) together with Health Service Executive (HSE) consultation as required. Drinking water restriction notices were issued (6 Boiling Water Notices 2 Do Not Consume Notices) and audits (4 in total) of the operation of the private water supplies treatment systems also undertaken.

Low chlorine readings (less than 0.1mg/l) noted by samplers were communicated to the Rural Water Unit/SPS owner on the day of sampling. Additional microbiological and chlorine testing also undertaken, where applicable, in the area at the time of sampling. GWS management typically responded within 3 days of notification. Almost 13% of SPS experienced low chlorine issues, with 5% with associated non-compliance for microbiological tests. Almost 9% of regulated GWS (public, private) encountered low chlorine issues with 1 GWS also having a parametric microbiological failure. This figure increases to 30% for unregulated GWS low chlorine issues, with 20% also having associated microbiological non-compliances.


For SPS, 100% compliance rate noted in 87% of supplies. 10% of SPS had parametric failures with microbiological tests (Coliforms, Colony counts), while almost 3% experienced metals non compliances. Microbiological compliance rate for ranged from 50% (regulatory data only) to 80% (including follow up sampling). In one SPS the coliforms compliance rate drifted from 50% to 33.3% including follow up samples. Chemical compliance rate ranged from 0% (regulatory data only) to 80% (including follow up sampling). 4 water restriction notices issued to SPS, 3 lifted by end year but 1 imposed on the same SPS. Another SPS have a boiling notice as a long-term measure and was audited in 2022. Another SPS was audited for low chlorine issues. A boiling water notice from 2021 was also lifted in 2022.

For public GWS, 100% compliance rate noted in all schemes sampled. For private GWS supplies, microbiological issue (Coliforms) noted in one supply. Microbiological compliance rate for ranged from 66.7% (regulatory data only) to 71.4% (including follow up sampling). One boiling water notice was imposed as a private GWS introduced an alternative supply of unknown water quality. It was lifted following compliance microbiological chlorine and cryptosporidium testing and audit. For unregulated GWS schemes after regulatory monitoring, microbiological issue (Coliforms) noted in 1 supply. Microbiological compliance rate for ranged from 66.7% (regulatory data only) drifting to 50% (including follow up sampling). Following an

	<p>investigation into low chlorines on the same supply, Ecoli detected which caused compliance rate to change from 100% (regulatory data only) drifting to 75% (including follow up sampling). This supply has a long-term boiling water notice which was re-issued again in 2022 as a reminder following the Ecoli detection.</p> <p>Water quality issues in private supplies were discussed at two HSE drinking water liaison group meetings with Uisce Eireann also in attendance and three rural water monitoring committee meetings in 2022. Work also commenced on developing a GWS operational manual</p>
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National Enforcement Priority: WASTE - Tackling significant illegal waste activities & Multi-Agency Sites/Operators of Concern	
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’. Note that Criteria A (to provide a compliance rate and comparison with previous years) is not specifically applicable under this NEP.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Targeted inspections and follow up enforcement actions of unauthorised collectors and site operators using intelligence from waste data flows, complaints and other available data. • Co-ordination with, and input from Revenue/Social Protection/An Garda Síochána in relation to unauthorised activity and identified sites of concern. • Multi-agency investigations for sites of concern. • Roadside check points. • Relevant Anti-Dumping Initiatives implemented. • Traceability requirements to be enforced at Permitted/Licensed sites. • Focus on those who are facilitating the unauthorised treatment of waste. 	<p><u>Illegal Waste Activity</u></p> <p>Reports from the public of significant unauthorised waste activity were investigated and in each case with involvement from other departments, other agencies and WERLA.</p> <p>In terms of achieving positive environmental outcomes, due legal and environmental process has been followed through in each of these cases, some of which are still live. However, sites have been cleared and unauthorised waste activities have ceased at these locations.</p> <p><u>Multi-Agency Sites of Interest</u></p> <p><u>Priority Sites:</u></p> <p>In 2022, Limerick City and County Council received complaints from the public via correspondence and our Sugar CRM system of illegal dumping of debris from the demolition of a nursing home This is a follow on complaint of alleged dumping of commercial waste from a complaint received in 2020. During the 2020 investigation, a section 14 direction was issued to the Owners directing them to utilise authorised waste collectors for the removal of all waste from the Nursing Home going forward. It also directed them to maintain a waste register for all waste removed from the site. Our 2022 investigation generated multiple sites of interest with one site containing cross contamination with medical records, medical wastes and demolition wastes. The site was leased by an adjacent farmer and from a follow on inspection of his farm revealed the importation and burning of household, commercial and medical waste at the rear of his farm. The presence of significant</p>

	<p>amounts of medical records complicated the removal process as well as each site being owned by different owners. Due to the circumstances and nature of the wastes involved a multiagency investigative approach was adopted and included An Garda Síochána, Data Commissioner and the HSE working in conjunction with LCCC. S14 Directions and S55 Notices were served for the associated sites. Investigation of cases continues with legal proceedings initiated against one Partnership and another pending.</p> <p>In addition Limerick City and County Council had scheduled 2 Multi agency Checkpoints operations on the M7 Motorway including An Garda Síochána and Revenue, however due to unsuitable weather conditions and staffing issues these operations did not proceed on health and safety grounds but will form part of our programme of works for 2023.</p>
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National Enforcement Priority: WASTE - Construction and Demolition Activity	
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>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Risk based inspections of construction sites using WERLA intelligence and inspection templates. • Inspection of Article 27 sites of origin and destination to include material notified under Article 27 being accepted at WFP/Licensed sites. • Inspection of soil recovery sites to ensure only appropriate materials accepted. • Validation and inspection of WCP/WFP and licensed sites dealing with C&D waste. • Take all necessary steps to resolve non-compliant issues including the selling of crushed concrete from WFPs/Licensed sites without EoW decision. • Incorporate proposed improvements to the Article 27 notification system. • Tracking of waste delivered to Licensed sites. • Based on researched data and local knowledge, identify authorised operators for further investigation and/or enforcement action. 	<p><u>Risk based inspection of construction sites</u></p> <p><u>Planning & Waste Management process:</u></p> <p>In light of the extent of C&D waste activities in Co. Limerick and in an effort to pre-empt compliance issues, all planning applications are reviewed weekly to identify possible waste and hazardous waste generation.</p> <p>In 2022, 187 No. recommendations with standard conditions were forwarded to the Planning Authority. This was a 48% reduction from 357 recommendations reported in 2021. The reduction is largely due to a departmental decision to refocus resources on the higher waste streams and refurbishment works and to remove the requirement of waste management plans for one off houses on green field sites. As per previous years the standard conditions require the submission of site-specific waste management plans (WMPs) prior to commencement of works for approval and submission of a Refurbishment Demolition Asbestos Survey (RDAS) where applicable. The Planning Authority in turn include these conditions in their Further Information requests and conditions of decisions to grant as appropriate.</p> <p>To ensure site specific WMPs and RDASs are submitted prior to commencement, we utilise the building control management system to crosscheck commencement notices with submissions or the absence thereof (which need further investigation).</p> <p>There was 14% increase in the number of WMPs requested in 2022 with 257 WMPs requested and 179 received and deemed compliant. We achieved a higher compliance rate of 70% in 2022 when compared to a compliance of rate of 65% in 2021 (225 requested with 147 compliant). Of the plans submitted 12% of applicants required additional assistance to complete plans correctly.</p> <p>In relation to WMPs not submitted/non-compliant, Limerick City and County Council provides a template plan to aid the developer/applicant in producing a satisfactory WMP. The template plan contains information on</p>

- 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.

how to search the NWCPO website for authorised WFP Holders, WCP Holders and lists most commonly used C&D LoWs. The WMPs gives us the opportunity to review waste collectors and waste facilities and to identify possible anomalies e.g. listed facilities that may be closed, facilities not listed on WCP holder's permit, notify adjoining LAs of significant quantities of waste proposed to be brought to WFPs in their functional areas. In 2022, 2 No WMP was passed to Clare County Council with a proposed 2,700 tonnes of soil and stone to be transferred to a COR facility in Co. Clare. 21 No WMPs were submitted with insufficient details and on instruction and advice, resubmitted with the correct information.

Cradle to Grave Inspections:

An example of cradle to grave site inspections in 2022 was for Sisk incorporating multiple sites in the Castletroy area. For the waste streams generated, Sisk utilised a smartwaste software package recording all dockets and movement of waste streams. WCPH dockets inspected were in good order. Representative dockets 5536 & 5932 were used for cradle to grave validation which both deemed compliant.

Asbestos Surveys:

98 No. refurbishment demolition asbestos surveys were requested in 2022. 91 asbestos surveys received - 51 identified with asbestos and 14 waste transfer forms submitted. In most cases, although asbestos was identified, the project works did not interfere with the asbestos containing materials. Total asbestos disposal equated to 45 tonnes.

Statutory Notices:

In 2022 the following statutory notices were issued following non- compliance of unauthorised and permitted facilities;

- 27 No. Section 14 Directions were issued. 19 No S14 Directions were successfully resolved in 2022 with 5 No. still in progress at the beginning of 2023. 2 No S14 Directions upgraded to S55 Notices due to service issues and 1 No legal proceedings initiated for S14 non-compliance.
- 10 No. S55 notices were issued of which 2 No were resolved in 2022 and 5 No remaining in progress.. 1 No S55 resolved via landfill levy payment and 2 No Legal proceedings initiated for S55 Non-compliances).


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

In 2022, C&D AR data was validated for 35 WCP and 17 WFP/CoR. One major C&D WFP holder was identified for further investigation in 2021. The facility was inspected twice in 2021. The inspections uncovered potential non-compliance regarding crushed concrete leaving the site. The permit holder was instructed to keep the waste on-site as per the WFP conditions and directed to the EPA for Article 28 compliance. In 2022 follow up inspections indicated the facility permit holder has complied with instruction and is assisting the Regional Waste Office in regards to an End of Waste Project.


Article 27 Notifications Activity (Sites of Origin and destination)

In 2022 Limerick City and County Council were notified of 13 No. Article 27 notifications. A significant decrease from 2021 figures of 33 No. Article 27 notifications. All notified sites were inspected with no issues identified. A follow up of a case identified in 2021 with Japanese Knotweed where Section 14 directions (8 No) were issued and 3 sites were involved was undertaken in 2022. All notices were complied with and the 3 no associated sites were found to be Japanese Knotweed free. The parent source site containing Japanese Knotweed underwent an in-depth investigation, treatment and segregation programme. On receiving a license from the NPWS the segregated knotweed was removed to a licensed facility in 2022. The remaining treated and uncontaminated residual spoil was transported to a waste facility for observation and treatment as a precaution. Total quantity of residual spoil was 1,360 tonnes.

Further checks were carried out in 2022 by Authorised officers of vehicles in transit containing wastes. A total of 13 no Fixed payment notices were issued for non-compliances of waste collection permit conditions.

National Enforcement Priority: WASTE - End-of Life Vehicles (ELV) & the Waste Metal sector	
Local Authority:	Activities
 Looking back at the year	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Risk based inspections of Authorised Treatment Facilities and other ELV sites using WERLA intelligence and inspection templates (at least one inspection per annum of permitted sites). • Validation and inspection of records for WCP/WFP and licensed operators dealing with ELV and metal waste. • Take all necessary steps to resolve non-compliant issues. 	<p>There are 16 No. ATFs in the County. Limerick City and County Council assigns a risk rating to each site (High risk Rating = 2, Medium risk rating= 9, Low C Rating = 5)</p> <p>There has been a focus on 1 high risk site in 2022 in particular. This is metal recovery facility and is listed in the EPA priority permitted facilities for AR validation. 4 inspections were carried out at the site in 2022.</p> <p>Legal proceedings were initiated in 2021 under Section 32 and S39 of the WMA on foot of a fire incident in 2021. The case was heard in 2022 and it was proven but no prosecution was recorded against the company who were ordered to pay 10,000 Euros to charity. Housekeeping at the facility has improved but there are ongoing compliance issues including a minor fire in August 2022. Issues will be addressed in 2023 through the current review application on hand. This company operates 2 other permitted facilities (one ATF and one metal storage facility) Both of these site are listed in the EPA priority permitted facilities for AR validation (both Moderate risk ratings)</p> <p>6 Other ATFs (all Moderate risk rating) inspected in 2022 – one in relation to review applications. The other five sites did not require any further action and were deemed compliant.</p> <p>All ATFs were subject to AR validation. Of the 16 ATFS, 2 were deemed inconclusive (90% compliance rate 68% compliance rate in 2021). All ATF ARs that were deemed inconclusive in 2021 were targeted for 2022 and were contacted remotely or in person for AR validation. There was a marked improvement with a 90% compliance rate in 2022.</p> <p>All ATFs are required to record the destruction of End of Life Vehicles either using the Department of Transport online system or the Manual system operated by Limerick City and County Council. For the manual Certificates of Destruction, the permit holder must complete this information in a template developed by Limerick City and</p>

	<p>County Council. A staff member then checks the returns to ensure compliance. All 32 inspections were compliant in 2022. Limerick City and County Council is also in regular contact with the Department of Transport to confirm whether or not ATF sites are authorised to allow electronic COD system to function. GW/SW monitoring conditioned under Waste facility permits are reported quarterly or annually to the Limerick City and County Council. All results are checked to ensure they are in compliance.</p> <p>In 2022, 3 No. unauthorised ELV sites were inspected-1 did not require any action , 2 were issued and complied with directions and have been cleared.</p> <p>One of these sites involved the unauthorised disposal of cars on the banks of a river several decades ago and there were the region of 20 vehicles removed and cleared from river bank. We ensured that Fisheries were briefed on this over the course of the investigation and that the integrity of the embankment maintained.</p> <p>Another one of these sites were also referred for investigation by NTFSO as they were exporting ELVs and parts. The NTFSO also issued a direction.</p>
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National Enforcement Priority: WASTE - Waste Collection - Household & Commercial	
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>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Inspection of WCP operators for provision of 3 bin system. • Surveys of retail, hospitality and industrial sectors to ensure proper use of 3 bin system, segregation and use of authorised collectors. • Sampling/analysis of treated waste outputs • AER Validations on WCP and WFP priority lists. • Maintenance of register of households with/without a waste collection service and targeted inspections in areas with low compliance. • Focused monitoring of the resources and systems available for gathering and reporting waste data to be carried out as part of site audits at waste facilities/waste collectors. • Monitoring of waste acceptance criteria at authorised sites e.g. WFP, Waste Transfer Sites, Landfills and Waste to Energy Plant. 	<p><u>Household Waste</u></p> <p>Household surveys-</p> <p>Household Waste Disposal Surveys</p> <p>The main purpose of completing an extensive review of Household waste disposal, is to get an insight into the compliance level of specific areas and where necessary, follow up on individual households who do not have a bin service in place/sufficient disposal methods for their household waste. The aim of this method is to increase overall compliance in household waste disposal and reduce the level of illegal dumping. It can also lead to obtaining valuable information on illegal waste disposal contractors.</p> <p>A brief synopsis of the process is as follow:</p> <p>Risk assessment of Locations carried out through examining complaints data for Littering and Dumping complaints, examining NPLMS survey data, IBAL litter reports and through information provided by Environmental inspectors through their routine patrols and other information gathered from our environmental inspections.</p> <p>Once problem Areas/Estates are identified, the first step is to contact the main bin service providers and establish which households have up to date accounts with regular collections.</p> <p>The remaining houses are then sent a household waste disposal survey, which is to be completed and returned to the Council within 14 days.</p>

Once the completed surveys are returned, confirmation is sought from the relevant bin service providers. Where an issue is identified, further correspondence with the individual house is completed as appropriate and compliance sought. If there is no correspondence from the household, follow up is completed via reminder letters.

Where there are ongoing issues or no correspondence received, an Official Notice is sent to the household. Where there is still no compliance Legal action is considered by the Council.

In 2022 the following was the breakdown of various stages.


- 1395 surveys completed, out of which 1256 were planned.
- Confirmation received from bin providers =726 Initial Compliance rate 52%
- Surveys issued =669
- Reminders issued = 389 At this stage 1006 Households in compliance or 72%
- Final reminders issued = 200 – At this stage 1195 Households in compliance or 86%
- Section 18 Notice = 115 which shows a 92% compliance rate at this stage (after final reminder letter being sent)
- Complied = 52 shows a 95% compliance rate over all.
- Non-compliance = 63
- Insufficient info to proceed to court = 24,
- Court proceedings = 27,
- Closed off at this stage = 12
- Court outcome - 6 successful, 5 struck out as compliance achieved, 16 awaiting hearing.

Commercial Waste

Commercial Food – All 46 commercial food waste producing premises on the Council “scheduled” inspection list were emailed received information in relation to the “stop food waste” program and segregation of waste. 9 food waste inspections completed in 2022, 8 of the premises were compliant. The 1 that were non-compliant were inspected in December 2022 and will be followed up in 2023 for compliance.

WCP Collector Compliance/ARs. –

	<p>As part of the RWMO AR validations 5 No. Waste collectors who provide a household kerbside collection in Limerick were inspected. The 5 collectors inspected service 90% (53531 households) of the Households with a collection service in Limerick City and County. The validation process involved calculating the average weight per household in each local authority area from the ARs and comparing this figure to randomly selected routes during the validation meeting. All required follow up inspections to close out their ARs, 5 out of 5 ARs were validated.</p> <p>3 no. Household waste collectors were inspected due to queries from Customers regarding collection times. Like last year the NWCPO were contacted as part of the investigation and it was confirmed that restrictions for collection times have been removed as part of Covid 19 measures. Time restrictions were re-introduced from 1st September 2022.</p>
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National Enforcement Priority: WASTE - Producer Responsibility Initiatives and additional local priorities	
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><u>Describe what was carried out under this activity in the previous reporting year – e.g.</u></p> <ul style="list-style-type: none"> • Identification and inspection of all suspected producers who require registration. • Examination of potential for information exchange between Local Government Sector and other Agencies, where appropriate. • Relevant PRIs with local impact and local priorities, not covered by the other waste NEPS, should be reported (e.g. where suspected producers are not registered or are non-compliant). • (RMECI PRIs: WEEE Regs, Battery Regs, Suspected Vehicle Importers (ELV Regulations 2016), Farm Plastics, Plastic Bag Levy, Packaging Regs – Suspected Major Producers and Registered Self Compliers, Tyre Regs – Tyre Retailers). 	<p><u>Packaging Self compliers/Enforcement</u></p> <p>Packaging self compliers- Limerick City and County Council re-registered 4 producers as self-compliers in 2022 All re-registration documents were checked and premises were inspected to ensure proper signage and take back facilities are in place.</p> <p>Packaging Enforcement – following liaison with WERLA, 4 desktop inspections were undertaken with 1 Regulation 25 notice issued. (Irish Wire Products).</p> <p>We continued engagement with a non- compliant company from 2021 and worked with them to ensure they completed their packing audit for 2022. We are currently awaiting the audit findings and will be following up in 2023.</p> <p><u>WEEE/Batteries</u></p> <p>Having commenced collaborative meetings with the Environmental Awareness Officer, and consulted with WERLA and ERP in Q3 of 2022, the following works program commenced in Q4 of 2022. 1 collection point was arranged with ERP with the support of Castletroy College Secondary school. 2022 Tonnages collected in Limerick are awaited from ERP.</p> <p>(1)10 WEEE inspections were undertaken (9 retail, 1 collection point) 2 were compliant and 7 needed further inspection.</p> <p>15 Battery inspections were undertaken (10 retail, 4 Primary schools and 1 collection point) 2 were compliant, 8 (including schools) need further contact and 2 retailers are earmarked for enforcement action.</p>

(2) Statutory notices for display at till of retail outlets were amended by LCCC to include ERP contact details and Limerick City and County Council logos together with www.limerickrecyclingcentre.ie details. This has resulted in a more appealing notice which we have been advised by retailers does attract more attention from the public.

(3) Supply of 200 flat packed battery boxes, reusable bags and 200 Battery Tubes for Schools requested from ERP. Generic Battery/WEEE sticky labels requested and received from www.mywaste.ie for use during 2023.

Plastic Bag Levy

During 2022 the 10 planned inspections were undertaken. Compliance rate was 100%. Retailers are generally selling the 70c strong plastic bags. However, we have been advised that plastic bags are being supplied by Take away restaurants and butchers without charge. In addition, 4 retail carrier bags with non- recyclable handles were located and matter referred over to WERLA. We have also come across charging for paper bags 15c from clothes retailer. This matter will also be referred to WERLA for information.

End of Life Vehicle Producers and End of Life Tyre Retailers


Tyres Regs – 17 inspections carried out in 2022. Of these 7 were compliant, 4 are no longer operational or selling tyres so no further requirement for Cirol ELT registration and 6 were non-compliant. A letter has been sent to all non-compliant retailers to register. Follow up for registration in 2022 to be completed.

ELVs Regs – 11 Inspections carried out in 2022. 6 were compliant. 5 identified importers of vehicles online are still non-compliant and re-inspections are planned for 2023.


Farm Plastics Collection points


7 Collection points were authorised in conjunction with IFFPG in 2022. Unfortunately, the number of collection points has reduced from 9 in 2019, to 8 in 2020 and 2021 and 7 in 2022. Limerick City and County Council hosts 1 collection point at Gortadroma Landfill site each year and advertises the collection points on its media channels. Tonnages collected remain well in excess of 3,000 tonnes for the 3 waste types (Twine/Netting, Nitrogen bags and Black Plastic).

	Net	Other Bags	Farm Film Plastic Tonnes	Total
2017	123.31	151	1799.47	2073.78
2018	516	347	2003.63	2866.63
2019	539	676	1786.43	3001.43
2020	495	747	1965.79	3207.79
2021	686	972	1934.4	3592.4
2022	606	863	1790.23	3259.23

National Enforcement Priority: AIR - Solid Fuel Inspections	
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><u>Describe what was carried out under this activity in the previous reporting year – e.g.</u></p> <ul style="list-style-type: none"> • Tackle the sale of non-compliant fuel and its use via compliance promotion, inspection and enforcement of fuel merchants and retailers. • Participate in multi-agency operations investigating the sale of non-compliant fuels. • Develop and implement a programme for the sampling and analysis of fuel types (this can be carried out per individual local authority or a joint approach can be adopted with other local authorities). • Carry out awareness programme to promote compliance by increasing the awareness of how the choices people make in heating their homes impacts on their air quality and health and legal obligations. • Establish and/or maintain a list, including the number and profile of solid-fuel merchants operating in each local authority area, including those using social medial platforms to market solids fuels. • Build capacity through engaging, collaborating and sharing with colleagues in other local authorities via networks and working groups and participating in training events. 	<p>Securing compliance remained challenging given the ease with which bituminous coal may be purchased in, and exported from, non “specified” areas for the first ten months in 2022.</p> <p>Generally speaking, compliance at the vast majority of retail outlets was excellent while breaches were in the main attributable to a small number of outlets, on-line advertising and mobile operators.</p> <p>Nevertheless, Limerick City & County Council continued to respond to reports of suspected breaches and to follow through accordingly.</p> <p>The new <i>Air Pollution Act (Solid Fuels) Regulations 2022</i> came into effect on 31st October 2022. On foot of advice from DECC, no inspections were undertaken in November and December although an on-line trader was written to in relation to the sale of turf.</p> <p>There were 15 inspections during the 2022 calendar year, 11 of which at retail outlets with a further 4 at, or outside private houses. Prioritisation for outlets was based on previously garnered intelligence and for houses, based on reports received from the public. There was a 95% compliance rate in solid fuel inspecitons.</p> <p>All retail outlets were found to be compliant and in the case of one private dwelling, the matter was dealt with by a graded series of enforcement letters.</p> <p>Council staff are committed to increasing on-line surveillance of solid fuel sales during the 2023 calendar year and to ensuring that as many staff as possible are familiar with the new regulations.</p> <p>It is departmental policy to publicise the benefits of clean air and approved solid fuels, particularly through social media and particularly during spells of cold still weather conditions.</p>

	<p>The department has also prepared a “Frequently Asked Questions” document for the Council’s Customer Services Department to assist members of the public enquiring about the new regulations.</p> <p>A member of staff from the department continues to co-chair the national Local Authority Implementation Group for the Solid Fuels Regulations and to promote active co-operation between local authorities in this regard.</p>
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National Enforcement Priority:	AIR - Air Quality Monitoring Activities and Data Use
Local Authority:	Activities
 Looking back at the year	<p>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the previous reporting year – e.g.</p> <ul style="list-style-type: none"> • Work with the EPA to complete the expansion of the Ambient Air Monitoring Programme network including: <ol style="list-style-type: none"> 1. Assist EPA to determine viable locations for air quality monitoring stations. 2. Assist EPA to progress the siting of air quality monitoring stations. 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. 4. Assist (where possible, to the best extent possible) EPA to maintain existing and new air quality monitoring stations. • Review local air quality data to identify hotspots and to prioritise sites/areas for action. • Ensure local air quality data, including a map, is made available to the general public as soon as technically possible for each local authority. As a minimum, a link to the relevant page(s) of the EPA site should be placed on each local authority website. 	<p>The Council has supported the EPA in 2022 with the management of the AAMP.</p> <p>The Council continued to aid the EPA with the management and maintenance of monitoring stations at Henry Street, People's Park and in Abbeyfeale (undertook filter changes quarterly in 2022) and access provided to allow service and calibration.</p> <p>The Council manages, itself, particulate and gas monitors at O'Connell Street, Castletroy and Mungret. The particulate monitoring is linked to the EPA's www.airquality.ie website (the Council). The Council's monitoring data is available to the public on www.airqweb.com. The Council prepared monthly reports for 2022 on air quality in Limerick, based on the Council's monitoring, which is available online at www.limerick.ie/council. The Council also invited tenders on eTenders for a contractor to continue the management and maintenance of the Council's air quality monitors, for a period of three years. This will cover the filter changes, removal and reinstatement of monitors related to calibration and servicing, resolving faults and ensuring at least one replacement monitor is available should a monitor not be operating. The Council liaises closely with the EPA and HSE should there be high or anomalous readings from the Mungret monitor or if there is a fault at that site.</p> <p>The Council also aided the EPA and managed the monthly deployment of diffusion tubes at thirteen sites in Limerick City and sending them monthly to the laboratory in the UK. All diffusion tubes were deployed each month in 2022.</p>

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 though the ‘RMCEI data returns’ or your ‘RMCEI Plan’.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p><u>Describe what was carried out under this activity in the previous reporting year – e.g.</u></p> <ul style="list-style-type: none"> • Deliver the Round 4 Noise Mapping requirements as set out in the Environmental Noise Regulations of 2018. This includes the timely submission of any relevant datasets and information in the required format as requested by the RMO/Urban Agglomeration Project Team and/or any other specified body. • Prepare and submit the Annual Noise Action Plan Progress Report to the EPA by 28th February. • Annual Noise Action Plan Progress Report should demonstrate progress on the key issues and priority areas for action. 	<p>Noise - Comply with the Environmental Noise Directive</p> <p>The Council has five noise monitors in Limerick – three fixed and two mobile Type 2 sound level monitors. The three fixed noise monitors are at O’Connell Street, People’s Park and Lough Gur. The two latter monitors are used for the measurement of sound in the review of potential quiet areas. The O’Connell Street monitor is to assess noise levels in the heart of the City.</p> <p>The Council has engaged strongly in 2022 with the Agglomeration Project Coordination Team, Dublin City Council, and their consultants, Noise Consultants Ltd. to ensure all noise monitoring, road traffic figures and GIS data was available for the strategic noise mapping which was completed on time in December 2022. TII undertook the strategic noise mapping with support from the Council, outside the Agglomeration in the County, in 2022 (it should be complete mid-January 2023).</p> <p>Our NAP 2018-23 requires the Council to:</p> <ul style="list-style-type: none"> • avoid future populations being exposed to excessive road noise, through planning; • reduce noise levels for communities where they are exposed to excessive levels of road noise; • identify potential quiet areas for designation. <p><u>Avoid</u></p> <p>During 2022 the Council has reviewed planning applications for 570 proposed residential units in Limerick requiring the ProPG (Planning & Noise) approach to be taken by applicants and preparation of Acoustic Design Statements.</p>

Reduce


In acknowledgement of the work the Council undertook preparing a cost benefit assessment, reviewing the monetised benefit to health by implementing noise mitigation measures for the M7 motorway in the Castletroy/Monaleen area, TII in collaboration with the Council undertook resurfacing works to lay a low noise road surface in 2022 between Junctions 28 and 30. Unfortunately, TII have since announced that they will not carry out similar work for two other cost benefit assessments the Council has prepared for the M20 in Limerick (Ballycummin and Patrickswell). The Council has been in contact with the Department of Environment in 2022 to explore other funding options. The Department of Environment has written to the Council and understands that a mechanism/process needs to be put in place for Local Authorities to apply for funding.

Quiet areas


Noise monitoring data has been reviewed for People's Park and Lough Gur to establish a long-term Lden for these locations (54dB and 57dB respectively). While Lough Gur meets an upper threshold commonly used of 55dB Lden it is still relatively high for a rural area. The noise level of 57dB Lden at the centre of the People's Park exceeds a threshold of 55dB Lden and is also less than 10dB below the outer limits of the park. Consequently, an objective and subjective method of review sound in the review of potential quiet areas is being developed by the Council.

Two soundwalks were organised by the Council in Limerick City in 2022 for the public along O'Callaghan Strand besides the Shannon River.

A new sound level monitor was purchased in relation to GoGreenRoutes (through the EU Horizon 2020 Action Programme) and the Castletroy Greenway to investigate sound along the route (to be installed in January 2023).

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>Describe what was carried out under this activity in the <u>previous reporting year</u> – e.g.</p> <ul style="list-style-type: none"> • Pre-planning assessments of air and noise impacts. • Environment staff assist in follow up of air and noise issues including use of Section 107 and 108 of the EPA Act, the Air Pollution Act and liaising with planners where planning enforcement is more appropriate. • Increased public awareness of noise induced health impacts. 	<p>Planning Review process – The Planning department distributes a planning list weekly to the environment section. This is assessed for likely environmental issues and circulated to the relevant division of the Environmental section for review and comment.</p> <p>Noise The assessment and conditioning of planning permissions in relation to new residential development and transportation noise was undertaken using the ProPG approach (i.e. the requirement of good acoustic design in applications). Where specific recommendations have been made in submitted Acoustic Design Statements (e.g. recommendations for the acoustic performance of glazing) then conditions have been attached to planning permissions.</p> <p>Noise monitoring was undertaken by the Council in 2021 of noise levels at a residential site near a wind farm in Co. Limerick, which the Council believes the operator is not compliant with their planning condition in relation to noise. This has resulted in the issuing of a Planning Enforcement Notice to the operator. The operator has engaged with the Planning Authority in 2021 to resolve the non-compliance. This case is ongoing.</p> <p>Air/Noise Technical staff continued to monitor applications for planning permission where the installation of mechanical extraction & ventilation systems was proposed in multi-occupancy buildings, in the interests of minimising any noise or odour impacts for adjacent residents.</p>

	<p>A significant upsurge in planning applications for food-service establishments in multi-occupancy urban developments was noted during 2022. Staff have also noted a significant upsurge in complaints about extraction apparatus and had to respond on a number of occasions accordingly.</p> <p>Staff also monitored planning applications for private dwelling extensions, particularly for single-storey extensions where the erection of a chimney could potentially create smoke nuisance for adjacent residents.</p>
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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 though the ‘RMCEI data returns’ or your ‘RMCEI Plan’.</p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p>Describe what was carried out under this activity in the <u>previous reporting year</u> – e.g.</p> <ul style="list-style-type: none"> Inspect and carry out any required enforcement actions of facilities/activities as specified in the RMCEI template and/or as otherwise determined by the local authority. Make available on their websites, the EPA vehicle refinishers video and use appropriate channels to promote it. Inspect and carry out any required enforcement actions under Sections 107 and 108 of the EPA Act 1992, in order to limit noise nuisance. Build capacity through engaging, collaborating and sharing with colleagues in other local authorities via networks and working groups and participating in training events. 	<p><u>Deco Paints Regulations:</u></p> <p>At any one time, c. 22 to 25 vehicle refinishing installations held valid Certificates of Compliance as issued by the Council. 14 inspections of installations were undertaken during 2022 and compliant with the regulations.</p> <p>In some instances, certificates had expired and were renewed late due to operators booking assessments at the last minute. Operators were reminded of their obligations in this regard.</p> <p>The detection of non-certified operators remains problematic and is highly dependent on intelligence received from compliant operators. The Council has also received reports of “back street” operators from anonymous sources but these are consistently hard to detect.</p> <p><u>Solvents Regulations:</u></p> <p>There were between five and seven operators holding valid certificates of compliance over the year. The sector has contracted somewhat in recent years with the increase in informal dressing at the workplace. Some installations remain problematic as they seemed reluctant to renew their certificates. It was noted however, that operators did experience genuine difficulty in compiling returns for per usage.</p> <p><u>Licensed sites under the Air Pollution Act:</u></p> <p>There is one licensed site in mid County Limerick (asphalt plant). However, we are awaiting confirmation that the plant has been commissioned before we commence inspections here.</p>

Local air and noise issues:

Air pollution enforcement staff liaised closely with waste enforcement staff in relation to reports of the unauthorised burning of waste. 94 such reports were received by LC&CC during 2022. However, a significant number of these reports were anonymous and the related investigations were problematic as were those where incriminating evidence was burnt. Nevertheless, efforts are made to trace all offenders. We found 1 site of significant interest for which legal proceedings commenced on 17th January 2023.