



Comhairle Contae Lú  
Louth County Council

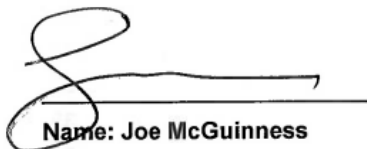
## Environment & Climate Action Inspection & Compliance Plan 2023

*This Inspection & Compliance Plan outlines the Recommended Minimum Criteria for Environmental Inspections in Member States (European Regulation 2001/331/EC).*

RMCEI CO-ORDINATORS:

Claire Hughes, Senior Executive Engineer  
Sean Callaghan, Executive Scientist

Approved by:



A handwritten signature in black ink, appearing to read 'Joe McGuinness', written over a horizontal line.

Name: Joe McGuinness

Position: Director of Services

Date of Approval: 28<sup>th</sup> February 2023

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## Glossary/Definitions

Activity - The aim of the activity should be to achieve the intermediate outcomes and/or the final environmental outcome associated with the National Priority

Additional Intermediate outcome – Other outcomes, identified by a Council, outside those that have been specified by the EPA in the RMCEI Return template

ATF – Authorised Treatment Facility (processing of ELVs);

Baseline - To measure the progress in achieving the intermediate outcome over time, a baseline value must be established. Data gathered in subsequent years can then be compared to the baseline value in order to measure progress towards achieving the intermediate outcome.

C&D – Construction & Demolition (Waste);

CCMA – County & City Management Association;

CoR – Certificate of Registration;

DAFM – Department of Agriculture Food & Marine;

DECC – Department of the Environment, Climate Action & Communications;

DHPLH – Department of Housing, Planning, Local Government and Heritage;

DWWTS – Domestic Wastewater Treatment System;

Environmental inspection according to RMCEI includes:

site visits,

monitoring achievement of environmental quality standards,

consideration of environmental audit reports and statements,

consideration and verification of any self-monitoring carried out by or on behalf of operators of controlled installations,

assessing the activities and operations carried out at the controlled installation,

checking the premises and the relevant equipment (including the adequacy with which it is maintained) and the adequacy of the environmental management at the site,

Checking the relevant records kept by the operators of controlled installations.

ELV – End of Life Vehicle;

EPA – Environmental Protection Agency;

Final Environmental Outcome - is a measurable change in the environment, e.g. cleaner air or improved water quality

GAP – Good Agricultural Practice for the protection of waters Regulations;

LAWPRO – Local Authority Waters Programme;

Metric – A metric is a way of measuring the progress to achieving the intermediate outcome or the objective

NIECE – Network for Ireland’s Environmental Compliance & Enforcement;

NIP – National Inspection Plan;

Non-routine inspection – an inspection carried out in such cases in response to complaints, in connection with the issuing, renewal or modification of an authorisation, permit or licence, or in the investigation of accidents, incidents and occurrences of non-compliance.

PMDS – Performance Management Development System;

PRI/EPRI – Producer Responsibility Initiative or EPRI Extended Producer Responsibility Initiative;

RBMP – River Basin Management Plan;

RMCEI – EU Recommendation on Minimum Criteria for Environmental Inspections;

Routine inspection – an inspection carried out as part of a planned inspections programme, e.g. scheduled inspection of a permitted facility, scheduled monitoring of a licensed discharged; compliance assessment of a regulated facility, etc.

Specified Intermediate outcome – Those intermediate Outcomes specified by the EPA in the RMCEI Return template

TARGET - Once the baseline is established, the goal should be to reduce/increase the baseline value over time, thereby achieving the intermediate outcome. A target is the value to which the baseline value is aimed to be reduced (or increased) to for that year. A qualitative target can be developed where a baseline has not been established or targets may also be set centrally to ensure a consistent approach to achieving an intermediate outcome/objective”

VOC – Volatile Organic Compounds;

WEEE – Waste Electrical & Electronic Equipment;

WERLA – Waste Enforcement Regional Lead Authority;

WFD – Water Framework Directive/ WFP – Waste Facility Permit.

## 1. Introduction

### 1.1 Plan Details

**Table 1: Plan Details**

Geographic Area	County Louth
Population	139,100 (2022 Census)
Calendar Year	2023
RMCEI Coordinator(s) Name and Position	Claire Hughes, Senior Executive Engineer Sean Callaghan, Executive Scientist

### 1.2 Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan

**Table 2 Expected Known Once-Off Challenges that may be faced in Implementation of this Plan (if any) & how these will be addressed**

Description of known challenge and outline of how these will be addressed
<p>1. From mid-2022 and following into 2023, there has been a reduction in staff resources (namely a vacant Technician Grade 1, Executive Scientist (which has been replaced by a Senior Executive Engineer) and now an Executive Technician). As a result, there has been a reduction in the overall numbers of inspections that have been completed in 2022 and again, this will also have a direct effect on the numbers of inspections that can be completed in 2023. Louth County Council will endeavour to complete all associated NEP inspections however, it should be noted that the overall total number of inspections may be impacted due to the staff shortages. The inspection sites selected for the 2023 calendar year will be based on available resources, prioritisation and risk assessment.</p>
<p>2. Under Data Protection Guidelines, Local Authorities have been restricted in the use of CCTV to identify and target litter and waste offenders. Local Authorities currently cannot use images of offender's faces to issue fines hence this has greatly impacted Louth County Council's ability to enforce fines and prosecutions in this area. Under the new Circular Economy Act which was signed into law in 2022, the processing of personal data may be carried out by local Authorities tasked with enforcing litter and waste law. Louth County Council will continue to work with the Department of the Environment and WERLA to ensure that the privacy rights of all individuals are respected and protected while also attempting to address incidences of illegal dumping and littering.</p>
<p>3. Due to close location of the border with Northern Ireland, there is a continuous risk of cross border illegal waste activity which will continue to be monitored by Louth County Council. Louth County Council will also continue to liaise with TFS in relation to these challenges as they arise.</p>
<p>4. Litter management was previously a function of the Operations Department of Louth County Council, however, from Q3 2022, this function has been reassigned to the Environment Department. As a result, staffing resources must be redirected to undertake this additional function and this will have a direct effect on the numbers of inspections that can be completed in 2023. Louth County Council will endeavour to complete all associated NEP inspections.</p>
<p>5. There are additional requirements placed on Local Authorities relating to Climate Change – Planning, Mitigation and Decarbonisation. As a result, staffing resources must be</p>

redirected to meet these challenges and this will have a direct effect on the numbers of inspections that can be completed in 2023. Louth County Council will endeavour to complete all associated NEP inspections.

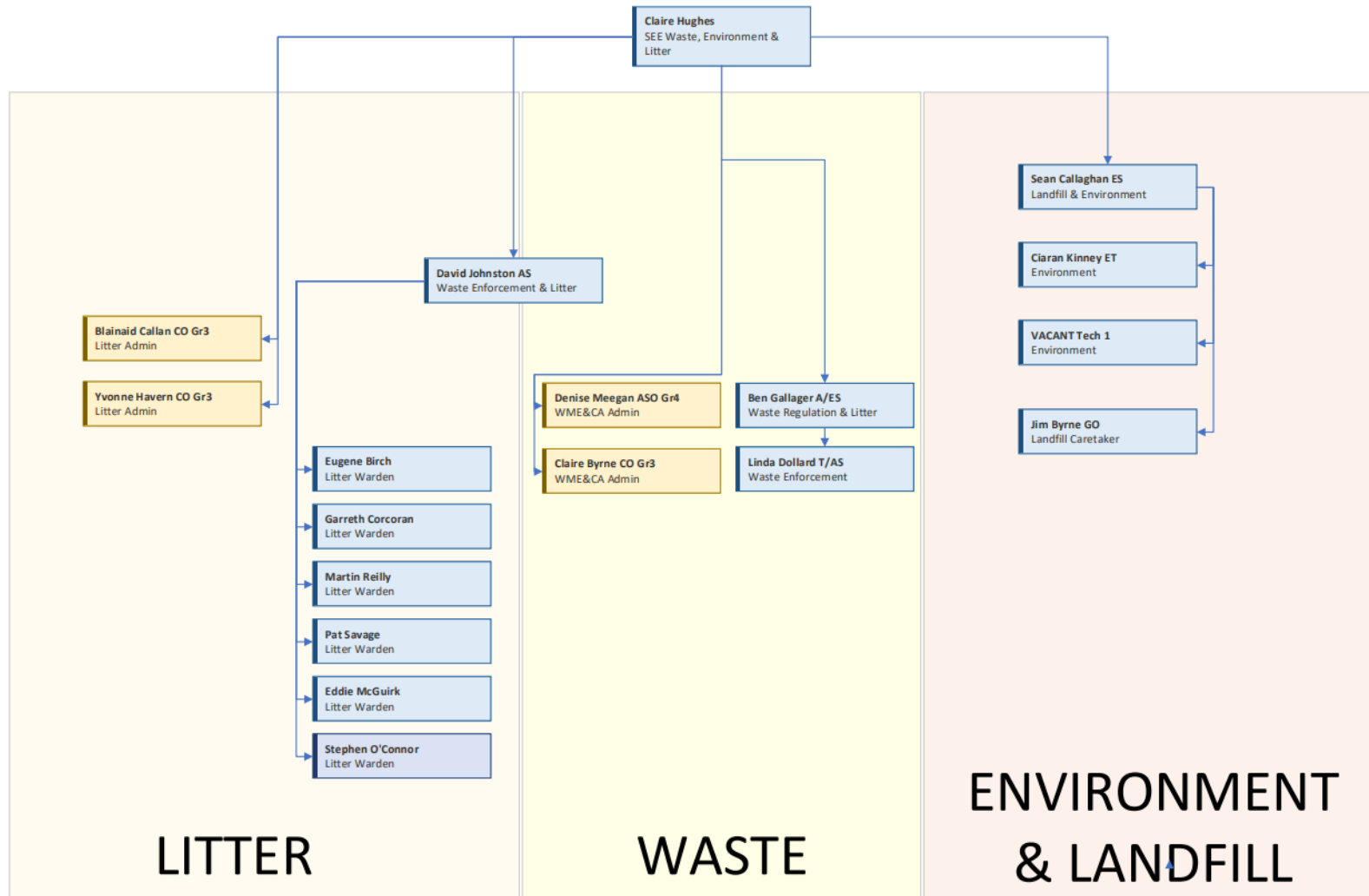
### 1.3 Staff Structure

The Environment, Waste & Litter team in Louth County Council are responsible for the delivery of this plan. Litter Management was previously a function of the Operations Department of Louth County Council however, this function was transferred to the Environment Department in Q3 2022. The Environmental Awareness function and the management of private Drinking water Supplies the responsibility of other internal departments of Louth County Council.

The Environment, Waste & Litter Team in Louth County Council currently consists of the following positions:

- X1 Senior Engineer
- X1 Senior Executive Engineer
- X1 Executive Scientist
- X3 Assistant Scientists
- X1 Executive Technician (post became vacant in Q1 2023)
- X1 Technician Grade 1 (vacant post)
- X6 Litter Wardens
- X1 Landfill General Operative
- X1 Administrative Assistant Staff Office
- X3 Clerical Officers

Figure 1 Environment, Waste & Litter Team - Staff Structure



## 2. Priorities for Environmental Enforcement for the Year Ahead

### 2.1 National Environmental Enforcement Priorities for the Year Ahead

Table 3 National Environmental Priorities Checklist

Ref. No	National Environmental Priorities	Have you completed a National Priority Template for this Priority (Appendix A)?		Where you have answered a "NO" please provide a comment to explain.
		Yes	No	
1.0	Water - Improving Water Status in all waterbodies			
1.1	Pressures from agriculture (slurry, soiled water collection and storage)	Yes		
1.2	Pressures from agriculture (slurry and fertiliser spreading)	Yes		
1.3	DWWTS/Septic tanks	Yes		
1.4	Discharge licences/misconnections	Yes		
1.5	Local priorities and water quality monitoring	Yes		
2.0	Air - Protecting public health and to improve and maintain air quality			
2.1	Solid fuel	Yes		
2.2	Air quality monitoring and data use	Yes		
2.3	Environmental noise directive	Yes		
2.4	Air and noise control including planning	Yes		

Ref. No	National Environmental Priorities	Have you completed a National Priority Template for this Priority (Appendix A)?		Where you have answered "NO" please provide a comment to explain.
		Yes	No	
2.5	On-going air and noise enforcement work	Yes		
3.0	Waste - Improving waste management and protecting our environment			
3.1	Tackling illegal waste activity and multiagency sites/operators of concern	yes		
3.2	Construction and demolition waste	yes		
3.3	ELV and metals	yes		
3.4	Household and commercial waste	yes		
3.5	Producer responsibility initiatives and additional local priorities (Diesel laundering-local priority)	yes		

## 2.2 Ongoing RMCEI/Local Priorities

**Table 4 (i) Additional Local Priorities**

Local Priorities	Yes	No	Where you have answered 'No' please provide a reason why
Are additional local priorities included in the Plan for the year ahead?	Yes		

**Table 4 (ii) Work Planned with Regional Lead Authorities**

Authority	Plans for the Year ahead
<p>This may include work with some of the following bodies not referred to above:</p> <p>e.g. WERLA, Teagasc &amp; Dept of Agriculture Food &amp; the Marine (DAFM), EPA, DECC &amp; DHPLG, LAWPRO (including LAWCO)</p> <p>If all such work has already been referred to above leave this blank.</p>	<ul style="list-style-type: none"> <li>• On-going work with LAWPRO through regional meetings, sharing of information and dealing with referrals for farm and septic tank inspections. Co-operation on priority areas for action and water bodies at risk.</li> <li>• On-going Work with Revenue, TFS, AGS and WERLA on joint inspections and WERLA joint coordinated work programme</li> <li>• Work with the Department of Agriculture and Teagasc on farm inspections and cross compliance.</li> <li>• Co-operation and consultation with WERLA, to embed their role into our activities including priority areas and use of templates.</li> <li>• On-going work with Northern Ireland Environment Agency on cross border pollution.</li> <li>• Work with Lough's Agency on pollution complaints, licences and referrals.</li> <li>• On-going work with Inland Fisheries on catchment monitoring, pollution complaints and referrals.</li> <li>• On-going work and co-operation with EPA on septic tanks, compliance with licences for landfills, historic landfills, farm surveys and other areas in relation to water and air.</li> <li>• Continue to take part in Working Groups for knowledge sharing.</li> <li>• Cross-border collaboration with Newry Mourne &amp; Down District Council, with particular focus on fly-tipping.</li> <li>• Liaise with OPW where work is being carried out on surface water bodies such as drainage and channel clearance, to prevent pollution.</li> <li>• Liaise with Coillte on forestry areas and make submissions as appropriate</li> <li>• Consultation with the EPA and the Department of Environment, Climate &amp; Communications on historic landfill sites.</li> </ul>

### 3. Risk Assessment

**Table 5 Selection of Sites for Assessment in the Year Ahead**

Type of Regulated Installation (i.e. Discharge Licences/ Waste Permit Facilities / Certificate of Registration)	Total No. of Installations in your functional area	Total No. of Installations in your functional area Per Risk Category			No. Of Inspections Planned Per Risk Category <sup>1</sup>			Total No. Of Inspections Planned	Additional Comment (e.g. include rationale for selection of sites to be inspected and/or indicate whether any of the inspections planned include installations that have been recommended for inspected by Lead Authorities)
		A	B	C	A	B	C		
<b>Waste Facility Permit</b>	25	0	18	7	0	18	7	25	All waste facility permitted sites to be continually assessed in 2023
<b>Certificate of Registration</b>	6	0	1	5	0	1	5	6	All CoR sites to be continually assessed in 2023
<b>Section 4 licences</b>	30	0	4	26	0	4	13	17	No Category A risk sites in Co. Louth, all Category B risk sites will be inspected in 2023 and 50% of Category C risk sites will be inspected. The selection of the Category C sites for inspection is based on their location in priority areas for action within "at risk" catchments.
<b>Total No. Of Inspections Planned</b>								<b>48</b>	

### **3.1 Notes on additional risk assessments**

The standard template documents for the risk assessment of section 4 discharge licences under the Local Government (Water Pollution) Act 1977 as amended, Waste Permits issued under the Waste Management Act 1996 and Certificates of Registration issued under the Waste Management Act 1996 as amended are issued by the EPA and utilised by Louth County Council.

Details of all other risk assessments and how inspections are prioritised are contained in Appendix D of this report.

## 4. Resource Assessment for the Year Ahead

### 4.1 Review of the Achievement of the Previous Years Inspection Targets

Table 6 Review of Previous Years Inspections

<b>Inspection Type</b>	<b>No. of Planned Inspections set out at the start of the Previous Year</b>	<b>No. of Completed Inspections at the end of the Previous Year</b>	<b>Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)</b>	<b>Please provide a brief narrative to demonstrate that the previous year's completed inspections have been considered when planning the inspections for the year ahead</b>
Routine Waste Inspections	254	279	+9.8%	The number of completed inspections exceeded the number of planned inspections for 2022.
Non-Routine Waste Inspections	79	67	-15.19%	Figures for complaints can vary from year to year. The number of planned non-routine waste inspections was overestimated for 2022.
Routine Litter Patrols/Investigations	282	396		There was an underestimation of the number of 2 and 5 hour foot patrols, as COVID 19 restrictions were still in place at the start of 2022 when the RMCEI plan was being compiled.
Routine Water/Wastewater Inspections	523	479	-8.5%	The number of planned inspections slightly exceeded the number of completed inspections for 2022.
Non-Routine Water/Wastewater Inspections	65	62		
Routine Air/Noise Inspections	45	56	+24%	This increase is associated with a specific solid fuel information campaign and engagement with retail

<b>Inspection Type</b> <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	<b>No. of Planned Inspections set out at the start of the Previous Year</b>	<b>No. of Completed Inspections at the end of the Previous Year</b>	<b>Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)</b>	<b>Please provide a brief narrative to demonstrate that the previous year's completed inspections have been considered when planning the inspections for the year ahead</b>
				premises in the county.
Non-Routine Air/Noise Inspections	75	47	-37.33%	Figures for complaints received can vary from year to year.
Routine producer Responsibility Inspections	41	40	-2%	The number of planned inspections slightly exceeded the number of completed inspections for 2022.
Planning inspections	690	620	-10.15%	The number of planned inspections slightly exceeded the number of completed inspections for 2022 in this category. The number of completed planning inspections is dependent primarily on received planning applications by the Environment Department.

## 4.2 Number of Staff Days Available

**Table 7 Resources Available to undertake required Work for the Year Ahead**

<b>Department</b>	<b>Available Resources</b>	<b>Name</b>	<b>Focus Area for this Resource</b>	<b>Available days for RMCEI (both routine and non-routine)</b>	<b>Basis of calculating Resource Available days</b>
Environment, Litter & Waste	0.5 Full Time Equivalent (FTE)	Senior Engineer	Oversee activities of Environment Department	84.5 days per year	See narrative on this calculation below this table
Environment, Litter & Waste	1 FTE	Senior Executive Engineer	Management of staff and team work plans in Environment, Waste & Litter, engagement with regional committees and agencies, provision of assistance on all matters relating to Environment, Litter and Waste Investigation and Enforcement	169 days per year	See narrative on this calculation below this table
Environment, Litter & Waste	1 FTE	Executive Scientist	Multiagency sites of interest, septic tanks, sections 4's, engage with regional WFD committees, water quality complaints, referrals, assist with public	169 days per year	See narrative on this calculation below this table

<b>Department</b>	<b>Available Resources</b>	<b>Name</b>	<b>Focus Area for this Resource</b>	<b>Available days for RMCEI (both routine and non-routine)</b>	<b>Basis of calculating Resource Available days</b>
			consultation, planning, landfills		
Environment, Litter & Waste	1 FTE	Assistant Scientist	Tackling illegal waste activity, end of life vehicles, bathing waters, waste permits, operational monitoring, support air monitoring programme, comply with noise directive, air enforcement work	169 days per year	See narrative on this calculation below this table
Environment, Litter & Waste	1 FTE	Assistant Scientist	Multiagency sites of interest, construction and demolition activity, waste collection, PRI's, ELV's	169 days per year	See narrative on this calculation below this table
Environment, Litter & Waste	1 FTE	Assistant Scientist	WFD monitoring, investigative monitoring, litter management of septic tanks, complaints, solid fuels, air enforcement work, referrals, planning	169 days per year	See narrative on this calculation below this table
Environment, Litter &	0.58 FTE	Executive Technician	Farm inspections,	30 days	See text below this table

<b>Department</b>	<b>Available Resources</b>	<b>Name</b>	<b>Focus Area for this Resource</b>	<b>Available days for RMCEI (both routine and non-routine)</b>	<b>Basis of calculating Resource Available days</b>
Waste			complaints, septic tanks, WFD monitoring, referrals, Planning		
Environment, Litter & Waste	1 FTE	Assistant Staff Officer	Administration support	169 days per year	See narrative on this calculation below this table
Environment, Litter & Waste	2.5 FTE	Clerical Officers	Administration support	422.5 days per year	See narrative on this calculation below this table
Environment, Litter & Waste	6 FTE	Litter Wardens	Litter complaints, litter pollution and quantification surveys, 2 hour and 5 hour foot patrols	1,014 days per year	See narrative on this calculation below this table
Environment, Litter & Waste	1 FTE	Landfill General Operative	General Operative Duties relating to landfill sites	169 days per year	See narrative on this calculation below this table
Community & Housing Department	0.28 FTE	Administration Staff Support	Additional allowance for green schools campaigns/ Tidy Towns competitions and support to Community Groups (Administration Staff support from the Community &	47	See narrative on this calculation below this table

<i>Department</i>	<i>Available Resources</i>	<i>Name</i>	<i>Focus Area for this Resource</i>	<i>Available days for RMCEI (both routine and non-routine)</i>	<i>Basis of calculating Resource Available days</i>
			Housing Department of Louth County Council) = 47 days		
<b>TOTAL DAYS AVAILABLE</b>				<b><u>2,781</u></b> <b><u>days</u></b>	

### Calculation of Resources (available days) For Carrying Out Environmental Inspections

The following resources are available within the relevant sections for undertaking environmental inspections and are dependent on economic factors and availability of resources. The total number of days available for routine, non-routine, planned and unplanned inspections per person is based on the following rationale:

- Total number of weeks per year = (52), 260 working days
- Less annual leave/flexi leave= 40 working days
- Less public/bank holidays= 11 days
- Less average sick days = 10 days
- Less attendance at training courses, seminars =10 days
- Less attendance at meetings/ court cases = 10 days
- Less cover of other duties = 10 days
- Total available days = 169 days on average for staff listed below

The following resources in days are available for planned, unplanned inspections, administration and other duties in the areas of Waste, Water, Air, Noise and Litter.

### Staff and Days available

- The area of Environment, Waste and Litter is one third of the portfolio of the Senior Engineer -  $0.5 \times 169 \text{ days} = 84.5 \text{ days per year}$
- 1 x Senior Executive Engineer: 169 days per year
- 1 x Executive Scientists: 169 days = 169 days per year
- 3 x Assistant Scientists:  $3 \times 169 \text{ days} = 507 \text{ days per year}$

- 1 x Assistant Staff Officer (Administrative): 169 days per year
- 2.5 x Clerical Officers (Administrative): 2.5 x 169 days = 422.5 days
- 1 x Executive Technician (position became vacant in Q1 2023): 30 days
- 1 x Environmental Technician Grade 1 (position is currently vacant): 0 days
- 6 x Litter Wardens: 6 x 169 days = 1,014 days
- 1 x Landfill General Operative: 169 days per year
- Additional allowance for green schools campaigns/ Tidy Towns competitions and support to Community Groups (Administration Staff support from the Community & Housing Department of Louth County Council) = 47 days

**Total = 2,781 days**

**Note:** A Senior Executive Engineer has been recruited in February 2023. A vacancy still exists at Environmental Technician Grade 1 level and a vacancy has been created at the Executive Technician grade in Q1 2023.

#### 4.3 Training Requirements

All training requirements are completed through the Training Department of Louth County Council. Previous training completed by the team includes the following:

- mandatory and non-mandatory health and safety training
- procurement training,
- training on septic tank inspections
- catchment management surveys and assessments
- Site suitability assessment training
- Small Streams Risk Score (SSRS)
- Water quality and protection
- Farm Surveys
- Environmental Inspections
- Court and legal training
- Coastal oil Pollution
- Local Government Studies
- Deco/Solvents training
- seminars/network meetings on air, noise, water and waste

Looking ahead for 2023 training requirements will include appropriate assessment training, catchment survey training to mirror LAWPRO assessments, further procurement training and Farm inspections training. During 2022, there was a reduction in staff numbers of 28%. A Senior Executive Engineer has been recruited in February 2023 however training must be undertaken by this individual in numerous environmental functions.

### **Health and Safety**

Louth County Council Training Department organises all Health & safety related training for the Environment, Litter and Waste team. Louth County Council has a Safety Statement document and management system in place and all work activities within the organisation have associated risk assessments and Standard Operating Guidance/ Procedures (SOPs) in place which are communicated to all staff. These risk assessments and SOPs are continually updated to take into account changing work activities and situations. All safety statements, risk assessments and SOPs are readily available on the staff intranet system.

## 5. PLANNED INSPECTIONS/OTHER ACTIVITIES FOR THE YEAR AHEAD

### 5.1 Planned Routine & Non-Routine Inspections

Table 8 Summary of Planned Routine & Non-Routine Inspections for the Year Ahead

Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Waste</b>				
Total Routine Inspections end of year	176		144.5	
Total Non-Routine Inspections end of year	107		490	Administration function relating to all non-routine waste inspections included (i.e. 1.5 Full Time Equivalent Administration Team)
Total Inspections end of year	283		634.5	
<b>Litter</b>				
Total Routine Inspections end of year	2,037		1,410.50	Administration of all litter investigations (1.5 FTE staff = 253.5 days) included. An estimated 1,500 litter complaints are received by the Department every year and each complaint requires an average of 0.5 days to inspect and close out (1500 x 0.5days = 750 working days).
Total Inspections end of year	2,037		1,410.50	
<b>Water/Wastewater</b>				
Total Routine Inspections end of year	474		158	

Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Total Non-Routine Inspections end of year</b>	64		94	
Total Inspections end of year	538		252	
<b>Air/Noise Inspections</b>				
<b>Total Routine Inspections end of year</b>	119		76	
<b>Total Non-Routine Inspections end of year</b>	80		164.5	Administration function relating to all non-routine air/noise complaints included (i.e. 0.5 Full Time Equivalent Administration Team)
<b>Total Inspections end of year</b>	199		240.5	
<b>Producer Responsibility Inspections</b>				
<b>Total Routine Inspections end of year</b>	37		36.5	
<b>Total Inspections end of year</b>	37		36.5	
<b>Planning (Environmental) Inspections</b>				
<b>Total Routine Inspections end of year</b>	590		103	
<b>Total Inspections end of year</b>	590		103	

## 5.2 Outstanding Enforcement Actions & Complaints Requiring Resources for the Year Ahead

**Table 9 Outstanding Enforcement Actions & Complaints to be closed out**

<i>Inspection Type</i>	<i>No. of Inspections to close out in the Year Ahead</i>	<i>Estimate time per inspection+ write up (days)</i>	<i>Time for all Inspections (days)</i>
Outstanding Complaints			
4.1.1 Litter (excluding fly tipping and illegal dumping)	0	0	0
4.1.2 Waste, non C&D. Includes fly tipping and illegal dumping	30	0.5	15
4.1.3 Waste, C&D.	14	0.5	7
4.2 Water/Wastewater	1	0.5	0.5
4.3 Air/Odour	0	0	0
4.4 Noise	0	0	0.
Outstanding enforcement Actions			
Warning Letters	9	0.111	1
Section Notices	9	0.111	1
Complaints	0	0	0
Court Cases	11	0.5	5.5
Etc.			
<b>Total</b>	<b>76</b>		<b>30</b>

## 5.3 Summary of Resource Requirements

**Table 10: Summary of Inspections to Complete and Resources Required for the Year Ahead**

<b>Inspection Type</b>	<b>No. of Inspections Planned for the Year Ahead</b>	<b>Total Time for all Inspections (days)</b>
<b>Total Routine Inspections – (See breakdown in Table 1 Appendix B of this report)</b>	3,433	1,928.5
<b>Total Non-Routine Inspections end of year – (See breakdown in Table 1 Appendix B of this report)</b>	251	748.5
<b>Outstanding Enforcement Action &amp; Complaints to be Closed out – (outlined in Table 9, Section 5.2 of this report)</b>	76	30
<b>Landfills, Oil Plan, noise action (outlined in tables 2 &amp; 3 in Appendix B of this report)</b>	99	74
<b>Contingency resource days for emergency works, unforeseen work</b>	-	-
<b>Totals</b>	<b>3,859</b>	<b>2,781 days</b>
<b>Total Available Resources (Days) – (outlined in Table 7)</b> <b><u>2,781 days</u></b>		


## 6. PLAN REVIEW MECHANISMS

Table 11 Summary checklist of plan review mechanism

Question	Yes	No
Q1 Have progress implementation meetings been planned to be undertaken to assess Plan progress through the year?	✓	
Q2 Will the Director of Services, Senior Engineer, Senior Management be informed of Plan progress (on a monthly or quarterly basis).	✓	
Q3 Are objectives for the delivery of the RMCEI Plan incorporated within staff PMDS Team Development Plans?	✓	
Q4 If aspects of the Plan need to change (i.e. achieved good progress in some areas and are behind in other areas), as a result of a quarterly review, is there a mechanism in place to implement the change?	✓	
Q5 Will monitoring of the progress of the Plan be documented (i.e. monthly/quarterly monitoring reports, preparation of minutes and circulation of same in relation to any progress meetings)?	✓	

## Appendix A National Priorities For 2022


### A.1 NATIONAL PRIORITY 1.1

<ul style="list-style-type: none"> <li>National Priority:</li> <li>Local Priorities and Water Quality monitoring (Rivers and Bathing)</li> </ul>	
	Activities
<p>Looking forward to the year ahead </p>	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>For authorised sites, a compliance rate and context/analysis;</li> <li>Appropriate site selection methodology, and/or early interventions;</li> <li>Detection of non-compliances/unauthorised activities and follow up;</li> <li>Progress in the NEP;</li> <li>Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul> <p>Outcome-The monitoring data is available for characterisation and to support targeting of local authority inspections and enforcement actions.</p> <p>Activities for focus in 2022</p> <p>Complete statutory monitoring for water framework directive monitoring, investigative monitoring and bathing water monitoring.</p> <p>Inspect and follow up any local issues (not covered by the other NEPs).</p>	<p><b><u>Bathing Water Monitoring:</u></b></p> <p>There are four designated beaches in Co. Louth, namely Templetown, Port Clogherhead and Seapoint and all of these beaches will be regularly sampled throughout the bathing season of 2023 (the bathing water season runs from 1<sup>st</sup> June to 15<sup>th</sup> September annually). Of the 4nr. designated beaches, 3 of these have Blue Flag status, namely Templetown, Port and Clogherhead. There is no sampling of the non-designated bathing water locations in the county. The sampling programme for the designated beaches is outlined as follows:</p> <ul style="list-style-type: none"> <li>3nr. Blue Flag Beaches – in addition to the bathing water sample at the beach, an adjacent stream is also sampled at these locations and sampling is repeated 20 times throughout the bathing season (total of 120 samples)</li> <li>1nr. Beach – bathing water sample repeated 20 times throughout the bathing season (total of 20 samples).</li> </ul> <p>A minimum of 140 individual samples will be undertaken in 2023 and all sampling is completed in accordance with the Bathing Water Regulations 2008. The Environment, Litter &amp; Waste team will submit details of the proposed monitoring calendar to the EPA before the 24<sup>th</sup> March 2023. The sampling results are issued to the Blue Flag Beach Manager (based in the Community Section of Louth County Council) which in turn, are used to determine whether the bathing water has maintained its blue flag status. Sampling consists of tests for the presence of E-coli and Entrecocci and additional pH and salinity testing. All samples are sent to the accredited laboratory in Dublin City Council. As part of the ongoing compliance with the Bathing Water Regulations 2008, a Bathing Water Management Plan will be developed in 2023. This Bathing Water Management Plan will detail an Emergency Response Procedure which will outline what steps are to be undertaken in the event of a pollution incident at any of the designated beaches in the county. This plan will assist in Louth County Council's reporting obligations in the event of such an emergency event. Once a pollution incident has been identified the relevant notice must be placed at the beach. This incident must also be reported to the EPA through the EDEN website and information on the event is then uploaded onto the public website "<a href="http://www.beaches.ie">www.beaches.ie</a>" where the incident details can be viewed by members of the public. Louth County Council endeavours to ensure that all sampling results are reported in a timely manner to ensure that beach users have as much information as possible about the bathing waters that they wish to use. The Environment, Litter &amp; Waste team in Louth County Council will continue to work in collaboration with all the relevant sections within the local Authority namely the Blue Flag Manager, the Water Safety Officer and the Lifeguards and also with external agencies such as the HSE, EPA and Irish Water to ensure that all appropriate management and control measures are used to ensure that the general public can safely use the bathing waters at these designated beaches.</p>

<p>Address any climate related water inspection issues e.g. issues arising due to extreme weather events.</p> <p>Enforcement of private drinking water standards.</p> <p>Investigate sources of any non-compliance with water quality standards including follow up of LAWPRO referrals.</p> <p>Engage with LAWPRO and other WFD on RBMP.</p>	<p><b><u>Water Framework Directive Monitoring:</u></b></p> <p><b><i>Operational Monitoring:</i></b></p> <p>The annual river sampling plan is agreed with the EPA and a sampling calendar is produced by the Environment, Litter and waste team which will be adhered to for the coming year. A total of 124 planned samples will be undertaken in 2023 at 20nr. individual sample locations. There is an increase of 6nr. sampling locations from the total number of sampling locations in 2022. All samples are collected by Louth County Council staff and couriered to the EPA accredited laboratory in Monaghan Town. A shared management function between Louth County Council and Meath and Monaghan County Councils will continue into 2023 regarding a two water bodies that cross county boundaries. It should be noted that there are no lakes in the operational monitoring programme in Co. Louth.</p> <p><b><i>Investigative Monitoring:</i></b></p> <p>The River Dee catchment is the local authority priority area for action for the upcoming River Basin Management Plan. The Council will be predominantly confining proposed investigative monitoring within this catchment area following desktop studies, identification of areas from the PIP maps, shared local knowledge, known licensed discharges and in conjunction with identification of farms that will also be prioritised for inspection in this area. Louth County Council will also continue to actively engage with the LAWPRO team on possible additional actions for this priority area as well as engaging with farmers in the locality at a local level.</p>
<p>Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></p>	<p>Yes</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>Achieve Good Ecological Status of Waterbodies</p>


**Overall concluding remarks for the reporting year:** Completion of planned sampling for Bathing Waters and Water Framework Directive Monitoring, completion of investigative monitoring and compilation of the Bathing Water Management Plan in 2023.

## A.2 NATIONAL PRIORITY 1.2

• National Priority: Pressures from Agriculture (Slurry/soiled water collection and storage)	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance. Outcome - Adequate slurry storage capacity at farms. Adequate soiled water collection and storage</p> <p>Focus for 2023: Inspections of farmyards in areas where agriculture is identified as a significant pressure, with a small percentage in areas not at risk. Follow up and close out non-compliances and LAWPRO referrals. Cross reporting of non-compliances to DAFM</p>	<p>Louth County Council will continue to carry out farmyard inspections adhering to the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017 as amended. The priority for the selection of farms to inspect in 2023 will be those farms located within the River Dee, River Glyde and River Flurry catchments which have been identified as action areas under the new River Basin Management Plan. Due to the reduction in staff resources within the team however, the number of proposed farmyard inspections in 2023 is estimated at 12. This proposed number of farm inspections is a reduction when compared to previous years due to an additional staff vacancy has been created through retirement in the team. <b>A greater amount of time is now also required per farm inspection due an increase in information to be compiled both at desktop stage and on site stage. In addition, it is expected that a certain number of “follow-up” inspections may be required with the planned 12nr. farm inspections and a small number of “complaint related” farm inspections may also be undertaken throughout the year.</b> Louth County Council will continue to investigate agricultural related complaints that are received and where required provide for inspections in other catchments. It should be noted that all farm yards in Co. Louth have been inspected at least once since 2005 and a file is in place for each of these farmyards in the Environment Section of Louth County Council.</p> <p>Louth County Council will continue to actively engage with LAWPRO, Inland Fisheries &amp; DAFM where farmyards are found to be negatively impacting on a waterbody and will follow-up with referrals to these agencies.</p> <p>Engagement with the public will continue by actively updating our website, distributing information leaflets to farmers in areas planned for inspection and answering queries received from members of the public.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes – resources are in place to complete the planned 12nr. inspections and to cover any additional queries/ re-inspections/ complaints/ referrals that may be associated with these inspections.
The Final Environmental Outcome to be achieved?	Achieve Good Ecological Status of Waterbodies


**Overall concluding remarks for the reporting year:** Complete the planned 12nr. inspections and resolve any additional queries/ re-inspections/ complaints/ referrals that may be associated with these inspections.

### A.3 NATIONAL PRIORITY 1.3

• National Priority: Pressures from Agriculture (Slurry and fertiliser spreading)	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance. Outcome- Spreading of slurry and fertilisers must not take place in the closed season or under unsuitable weather and/or soil conditions.</p> <p>Focus for 2023: Inspections of slurry and fertiliser spreading in areas where agriculture is identified as a significant pressure, with a small percentage in areas not at risk. Follow up and close out non-compliances and LAWPRO referrals. Cross reporting of non-compliances to DAFM</p>	<p>Louth County Council will continue to carry out slurry &amp; fertiliser spreading inspections in 2023 adhering to the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017 as amended.</p> <p>Louth County Council will continue to carry out slurry spreading inspections in 2023 predominantly during the closed period but will also respond to complaints throughout the year. These complaints may relate to the storage of dung in a field, spreading of slurry too close to water bodies and wells, storage of silage bales too close to surface water bodies and spreading of soiled water too close to wells and surface water bodies. The Council will also respond to complaints regarding slurry spreading being carried out when ground conditions are not suitable or during rainfall events. <b>A minimum of 12 planned inspections over the entire county during the closed period (15 October to 15 January) will be carried out in 2023.</b> The areas chosen for the planned inspections will be the River Dee, River Glyde and River Flurry catchments which have been identified as action areas under the new River Basin Management Plan. The majority of intensive agriculture in the county is located in the River Glyde and River Dee catchments. The Dee catchment which also includes the Whiteriver catchment has a predominance of heavy soils and therefore at risk of phosphorus overland flow during the closed period.</p> <p>Louth County Council will continue to actively engage with LAWPRO, Inland Fisheries &amp; DAFM where spreading of slurry &amp; soiled water are found to be negatively impacting on a waterbody. Engagement with the public will continue by actively updating our website, distributing information leaflets to farmers in areas planned for inspection and answering queries received from members of the public.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes – resources are in place to complete the planned 12nr. inspections and to cover any additional queries/ re-inspections/ complaints/ referrals that may be associated with these inspections.
The Final Environmental Outcome to be achieved?	Achieve Good Ecological Status of Waterbodies

**Overall concluding remarks for the reporting year:** Complete the planned 12nr. inspections and resolve any additional queries/ re-inspections/ complaints/ referrals that may be associated with these inspections.

## A.4 NATIONAL PRIORITY 1.4

• National Priority: DWWTS/Septic tanks	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcome: Non-compliant systems are identified via risk-based inspections, and subsequently followed up and resolved</p> <p>Focus for 2023: Take all necessary steps to ensure advisory notices are closed out. Follow up and close out non-compliances and LAWPRO referrals.</p>	<p>As per the EPA's National Inspection Plan 2022 – 2026 Louth County Council will carry out duties inspecting DWWTS under the Water Services Act 2012. This is the fourth iteration of the NIP which builds on previous versions of the river basin management plans whilst also considering previous experience of inspections and submissions made during the consultation period. Sites selected for inspection will be located within the 3nr. risk zones. A minimum of 55 DWWTs inspections must take place within the lifetime of the plan with 30 for Zone 2 and 25 for Zone 3. Sites in Zone 2 will be selected based on the criteria of being outside areas served by group water schemes, close to downstream wells, in cluster/ribbon development and older type systems. Within Zone 3, sites will be selected based on their proximity to high objective/ at risk waterbodies, in zones of GW contribution, in clusters and older type systems. Priority will be given to areas/ waterbodies that are failing to achieve good status and areas where particular problems exist. <b>12nr. inspections (minimum) are required in 2023 spread across Zone 2 &amp; 3.</b></p> <p>LAWPRO will be liaised with during the selection of sites and inspections will be carried out in pairs for health &amp; safety reasons. Staff will be fully trained in the inspection process and certificates of appointment as an inspector will be checked to ensure they are within date and fully compliant. Engagement with the houses selected will, as in previous years, involve a pre-inspection meeting with the owners to ensure they are aware of the inspection process followed by a full on-site inspection. Louth County Council will proactively engage with any household which fail to rectify any problems identified and close out advisory notices.</p> <p>Planning files will continue to be assessed within the environment office to ensure compliance with the EPA Code of Practice Domestic Waste Water Treatment Systems (Population Equivalent ≤10) by personnel that have completed training for Site Suitability. A percentage of these will have supervised tests to ensure the accuracy of the percolation values submitted to the planning authority.</p> <p>Engagement with the general public upon receiving queries about DWWTS will be directed to our website. Social media posts will also be posted to the official Twitter channel encouraging the de-sludging and maintenance of DWWTS. Leaflets will also be distributed at pre-inspection meetings. An internal register will be maintained of all waste collection permit holders who can empty septic tanks within the county. No advisory notices are open from previous years and priority will be given to closing out any advisory notices upon DWWTS failing in 2023.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes
The Final Environmental Outcome to be achieved?	Achieve Good Ecological Status of Waterbodies


**Overall concluding remarks for the reporting year:** Complete the planned 12nr. inspections and resolve any additional queries/ re-inspections/ complaints/ referrals that may be associated with these inspections.

## A.5 NATIONAL PRIORITY 1.5

• National Priority: Discharge licences/misconnections	
	Activities
<b>Looking forward to the year ahead</b>	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- All Section 4 licenses associated with significant pressures are compliant with emission values.</p> <p>Focus for 2023:</p> <p>All Section 4 licences discharging into water bodies at risk to be monitored and non-compliances resolved. Licence discharges subject to Section 4 licences. Follow up and close out non-compliances and LAWPRO referrals</p>	<p>For 2023, Louth will have 30nr. active discharge licences in place. There are an additional 4nr. licences that are still valid but the premises remain since COVID 19 restrictions. These premises have been contacted periodically to request an update and no such update has been provided to date. Louth County Council intends to carry out audits at 15 premises during 2023. The premises that will be chosen are based on the EPA section risk assessment tool. For 2023 there are no ‘A’ rated sites, five ‘B’ rated sites and twenty nine “C” rated sites. (Note: 4nr. “C” rated premises are still closed as described above) Inspections will therefore be conducted at 5nr. ‘B’ rated and 10nr. ‘C’ rated premises. The selected premises due for inspection may change as the year progresses based on compliance with licence limits and regular submission of monitoring results.</p> <p>The full inspection will include an audit of sample results submitted by applicant, a review of the results of sampling carried out by the local authority, an assessment of flow records, a review of desludging records, an overview of the running of treatment plants, confirmation of fee payment and a review of all maintenance records. Each premises will be issued with an inspection report which will detail compliances/ non-compliances and any other observations. The licence holder will be required to rectify the non compliance and/or submit records within closed out in a timely manner.</p> <p>Further follow-up inspections will be conducted with licensees with a low compliance rate as a result of the inspections completed in 2022. One such premises is located in the River Dee catchment which is a Local Authority Area for Action in 2023. An additional licensee is located in the Glyde catchment which is a LAWPRO identified Area for Action and the final premises in located in the River Big catchment which was a previously identified area for action. The local authority sampling programme of licences will continue at a frequency of 1 to 4 times per annum per licence. The frequency is based on the size of premises, scale of discharge and catchment to which it discharges. The local authority monitoring programme will ensure that there is a separate and independent check of the effluent discharge. It will also ensure the validity of the sampling and monitoring carried out by the licence holder and also to be used to determine the quality of effluent discharging from premises that are not submitting results and which may be the subject of further enforcement.</p> <p>Misconnections are dealt with mainly through the receipt of complaints. In rural locations, misconnections are addressed through the Septic Tank inspection process and water pollution complaints. In urban areas, misconnections are addressed through the investigation of complaints, through the investigation of unauthorised discharges, referrals from the Operations section of the Council and referrals from Irish Water. These type of incidents can tend to be complex and on occasions, can become a collaborative multi-agency approach between the Council and Irish Water.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	yes
The Final Environmental Outcome to be achieved?	Achieve Good Ecological Status of Waterbodies


**Overall concluding remarks for the reporting year:** Completion of planned audits, the full sampling programme and non-routine investigations in 2023.

## A.6 NATIONAL PRIORITY 2.1

• National Priority: Solid Fuel	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects; Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance. Outcomes- Fuel products used by the end-user comply with standards Focus for 2023:</li> </ul> <p>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 media platforms to market solid 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>	<p>Louth County Council will continue to conduct inspections across the county implementing and enforcing the Air Pollution Act 1987 (Solid Fuels) Regulations 2022, in 2023. Smaller towns and villages will be targeted in 2023 due to the national ban of smoky fuels.</p> <p>Louth County Council will continue to promote and raise awareness about the health implications of burning smoky fuels. This will be achieved by posting videos and displaying information on the official council website and social media outlets. Any additional information/resources received from the Department of the Environment, Climate and Communications (DECC) will also be displayed. Louth County Council will attend the solid fuel workshop run by the DECC on the 1<sup>st</sup> of March to upskill on implementing and enforcing the regulations.</p> <p>Distributors as well as commercial premises will be targeted for inspection in 2023. Vehicles will also be inspected upon making deliveries to ensure only the correct fuel is on board and they are maintaining a register. Pending additional staff resources, online retailers can be investigated further also.</p> <p>The proximity of Louth to the border with Northern Ireland where different legislation is in place, continues to provide complications with enforcement. Smoky fuels continue to be sold in Northern Ireland which are more cost effective than the smokeless fuels available in the Republic of Ireland. Couriers delivering fuel from Northern Ireland in bulk is also recognised as a significant problem and this issue has been raised by numerous local authorities at various working group meetings.</p> <p>A total of 5nr. multi agency checkpoints are planned for 2023. The purpose of these will be to inspect both waste vehicles and any vehicles with solid fuels onboard to check compliance with the Solid Fuel Regulations. Louth County Council will collaborate with the Gardai, RSA, Revenue, TFS etc at these roadside checkpoints to ensure they are carried out safely and appropriately.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes – additional staff resources also required to ensure full objectives are achieved
The Final Environmental Outcome to be achieved?	Cleaner air


**Overall concluding remarks for the reporting year:** Completion of planned inspections of fuel distributors and commercial premises within the county.

## A.7 NATIONAL PRIORITY 2.2

• National Priority: Air quality monitoring data use	
	Activities
<p><b>Looking forward to the year ahead</b> </p> <p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- Air quality data to be used to identify priority sites/areas for action. All Local Authorities to display real-time data on local air quality via their website.</p> <p>Focus for 2022</p> <p>Work with the EPA to complete the expansion of the <b>Ambient Air Monitoring Programme</b> network including:</p> <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 siting of air quality monitoring stations.</li> <li>3. Assist EPA to troubleshoot issues at existing air quality monitoring station 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> <li>5. Review local air quality data to identify hotspots and to prioritise sites/areas for action. Ensure <b>local</b> 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</li> </ol>	<p>There are air monitoring units located in both Dundalk and Drogheda as part of the overall air monitoring network. Each of these sites continues to show compliance with the ambient air quality standards and this is expected to continue in 2023.</p> <p>The EPA will continue to monitor the ambient air Quality in Dundalk and Drogheda as part of their Ambient Air Monitoring Network in 2023. Louth County Council will continue to liaise and provide all the required supports to the EPA as required. All real-time air quality results will continue to be reported by the EPA on their website and a link is currently available on the Louth County Council website to this information. In the event of any issues with air quality in the county, appropriate action will be taken by both Louth County Council and the EPA in accordance with the legislation.</p> <p>Following extensive discussion in 2022 with the EPA, the air monitoring unit based in the Dundalk area will be moved to a new location in 2023. The relocation of the unit is required to support the “Varsities Project” which is being overseen by the Energy Section of Louth County Council. Additional infrastructure works are required to allow this relocation to occur and these works are being organised and completed through the Energy section of Louth County Council. The re-location of the air monitoring unit to this location has been assessed and agreed with the EPA. It is hoped that more accurate real-time ambient air monitoring will be generated here that will inform the public on air quality and assist with the assessment of the effect of cleaner air on the promotion of health and well-being. The relocation of the air monitor to this new location will also hopefully raise awareness among the community in terms of the work the EPA and the local authority undertake in relation to monitoring ambient air quality in the region.</p>
<p>Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</p>	<p>Yes</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>Cleaner air</p>


**Overall concluding remarks for the reporting year:** Continual liaison with the EPA in monitoring air quality in the county and provision of assistance where necessary

## A.8 NATIONAL PRIORITY 2.3

• National Priority: Environmental Noise Directive	
	Activities
<b>Looking forward to the year ahead</b> 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance. Outcome- Regulatory compliance Focus for 2022 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 the 28th of February. Annual Noise Action Plan Progress Report should demonstrate progress on the key issues and priority areas for action.</p>	<p>The fourth round of the Noise Action Plan (2023-2028) will be developed in 2023 based on the strategic noise maps that are currently being developed by the Transport Infrastructure Ireland. Louth County Council collated numerous datasets in 2022 which in turn, informed this new Noise Action Plan and this information was shared with Transport Infrastructure Ireland and Louth County Council’s Road Design team. Appropriate actions will be put in place by Louth County Council that will support the overall objectives of the plan which consist of</p> <ol style="list-style-type: none"> <li>1. The avoidance of overall health impacts, and</li> <li>2. Preserve noise levels in areas where they are good.</li> </ol> <p>The plan will last for a 5 year period. The actions outlined in the plan will include mitigation and control measures in areas that have been identified in the strategic noise maps that appear to be impacted by traffic noise. Louth County Council will therefore undertake site visits, investigations and possible feasibility studies were appropriate. In order to mitigate any further deterioration of appropriate noise levels, the Environment, Litter &amp; waste team will liaise with the Climate Action team as well as our infrastructure department regarding any proposed road works or projects that would cause any increase in nuisance noise levels but also, on the implementation of noise reduction barriers in any ongoing scheme proposals.</p> <p>Under the current Noise Action Plan (to be replaced by the 2023-2028 Plan), the Environment, Litter &amp; Waste team we will also continue to examine existing areas that have been identified as being impacted from traffic noise. Unfortunately, due to the COVID-19 pandemic, many of the planned actions could not be progressed and this has had a negative effect on the implementation of these overall actions. Areas that will be examined will be hotspots where the onset noise thresholds of 55 Lnight and 70 Lden have been exceeded. These areas will require further investigation that would include site visits and visual assessments We will examine the possibility of noise mitigation following these studies. It should be noted that implementation of a number of mitigation measures examined will be dependent on other departments and agencies such as the Road Design team in Louth County Council, Transport Infrastructure Ireland and the Department of Transport, Tourism and Sport.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes
The Final Environmental Outcome to be achieved?	Reduction and elimination of inappropriate noise levels


**Overall concluding remarks for the reporting year:** Examination, review and implementation of mitigation measures for areas identified as being impacted from traffic noise in the Noise Action Plan 2023-2028 and close out of any outstanding issues from the previous Noise Action Plan 2018-2023.

## A.9 NATIONAL PRIORITY 2.4

• National Priority: Air/Noise control including planning	
	Activities
<b>Looking forward to the year ahead</b> 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- Environment staff assessing environmental impacts from air and noise emissions and liaising with planning staff on appropriate air and noise controls.</p> <p>Focus for 2023: Preplanning assessments of air and noise impacts. Environment staff to assist in follow up of air and noise issues including use of Section 107 and 108 of the EPA, the Air Pollution Act and liaising with planners where planning enforcement is more appropriate. Increased public awareness of noise induced health impacts.</p>	<p>All planning referrals received are reviewed under their potential to affect air, noise, waste and water impacts in the County. Resources have been made available to ensure that all of referrals are dealt with within the statutory deadlines however due to a staff retirement, additional staff resources are required.</p> <p>Planning applications will be assessed for any potential noise and air impacts and template planning conditions have been developed to ensure controls on air and noise emissions with limits set on day and night-time noise, dust and other controls based on licences under the Air Pollution Act, Solvent Regulations, DECO Regulations and Petroleum Vapour Regulations.</p> <p>Large scale developments and more complex developments are assessed firstly using pre-planning meetings, site visits, desktop assessments and setting conditions for applications during construction and when developments it complete. More complex developments will require a multi-disciplinary team including the environment section, planning section, external consultants and other stakeholders. More complex applications may require nature impact statements, Environmental impact statements and requirement for further information and clarification. All waste authorisations require compliance with Planning whether it is a full planning permission or exemptions. All these waste permits/ certificates of registration further examine the environmental impacts associated with any proposed developments in regard to air and noise. All these details will be considered during assessment of new application or review applications. Any investigations into breaches in noise and air specific conditions will be investigated by the Environment Section. Any additional works that require a change to the infrastructure at these sites to improve noise and/or air impacts will be communicated to planning prior to any work commencing on site.</p> <p>Planning reports are reviewed and signed off by the Senior Executive Engineer in the Environment, Litter and Waste team and by the appropriate Planner assigned to the case. Developers may be required to submit dust monitoring results, noise monitoring reports on vibration monitoring as part of their planning compliance. This will be assessed by environment department and planning department to ensure the development is compliant in these areas.</p> <p>In 2022, a total of 579 Planning Referrals were received for review and report by the Environment, Litter &amp; Waste Team and it is expected that the same number again is received for review in 2023.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes – additional staff resources will be required to replace a staff member retirement.
The Final Environmental Outcome to be achieved	Cleaner air and reduction and elimination of inappropriate noise levels


**Overall concluding remarks for the reporting year:** Completion of all planning referrals

## A.10 NATIONAL PRIORITY 2.5

• National Priority: On-going air and noise enforcement work	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- Regulatory compliance.</p> <p>Focus for 2023:</p> <p>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.</p> <p>Make available on their websites, the EPA Vehicle Refinishers video and use appropriate channels to promote it.</p> <p>Inspect and carry out any required enforcement actions under Sections 107 and 108 of the Environmental Protection Agency Act, 1992 in order to limit noise nuisance.</p> <p>Build capacity through engaging, collaborating and sharing with colleagues in other Local Authorities via networks and working groups and participating in training events</p>	<p>Louth County Council will respond to and investigate all commercial noise &amp; air complaints as they arise including the use of section 107 and 108 of the Environmental Protection Agency Act 1992 &amp; Air pollution Act 1987. The Local Authority will issue information leaflets in response to any queries in relation to domestic noise complaints and it will also conduct site visits relating to complaints that are made in relation to commercial noise. Planning permissions will be conditioned with specific control measures to minimise air and noise pollution where necessary. Louth County Council Environmental staff officers will liaise with the Planning Department where planning enforcement measures are more appropriate such of the event where breaches of conditions are occurring.</p> <p>Louth County Council maintains a register of premises regulated under the following EU regulations and will continue to inspect these premises according to the RMCEI inspection plan and premises which are due certificate renewals:</p> <p><b>European Union (Paints, Varnishes, Vehicle Refinishing Products and Activities) Regulations 2012 (SI 564 of 2012);</b></p> <p><b>The Air Pollution Act, 1987 (Petroleum Vapour Emissions) Regulations, 1997 (S.I. No. 375 of 1997);</b></p> <p><b>European Union (Installations and Activities using Organic Solvents) Regulations 2012. (SI 565 of 2012);</b></p> <p>Businesses that have an expiry date in the forthcoming year will be sent reminder letters to ensure they are aware of their expiry, etc. Key information with regard to businesses licensed by Louth County Council under the above legislation is available on our website with explanatory leaflets and videos. Within the reminder letters operators will be directed towards our website to ensure compliance with the regulations.</p> <p>Louth County Council will continue to participate in working groups, training events and conferences relating to air &amp; noise to increase knowledge and adapt more appropriate inspection methods if needed.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes
The Final Environmental Outcome to be achieved?	Cleaner air and reduction and elimination of inappropriate noise levels


**Overall concluding remarks for the reporting year:** Completion of planned inspections and promotion of relevant information on the Louth County Council website

## A.11 NATIONAL PRIORITY 3.1

• National Priority: Effective and authorised management, movement and disposal of C and D Waste	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <b>FOR THE YEAR AHEAD</b> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- Authorised waste treatment facilities accepting waste from authorised collectors/sources only. Compliance of construction sites with inspection templates checks including waste classification, segregation, waste movement, Art 27, Accurate waste classification and quantification of waste data in AERs from WCP/WFP and licenced operators</p> <p>Focus for 2023: 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/licenced sites. Inspection of soil recovery sites to ensure only appropriate materials accepted. Validation and inspection of WFP/WCP and licenced sites dealing with C/D waste. Take all necessary steps to resolve non-compliant issues including the selling of crushed concrete from WFPs/Licensed sites without EoW decision. Incorporate proposed improvements to the Article 27 notification system. Tracking of waste delivered to Licensed Sites. Based on researched data and local knowledge, identify authorised operators for further investigation and/or enforcement action. Focused monitoring of the resources and systems available for gathering and reporting waste data to be carried out as part of site audits at waste facilities/waste collectors.</p>	<p>The management, movement and disposal of Construction and Demolition waste will continue to be a priority for the Environment Team in Louth County Council. Our focus for the coming year will be on the C&amp;D waste that is generated within the county and the utilisation of Regulation 27 of the European Communities (Waste Directive) Regulations 2011.</p> <p><b>All construction and demolition waste related authorised sites will be inspected and audited at least once in 2023.</b> Any anomalies will be followed up, queried and subsequently closed out where appropriate. Historically, there has been a good compliance rate for construction and demolition waste sites within the county and it is expected this will be maintained in 2023.</p> <p>All Construction and Demolition Waste Management Plans submitted to the Waste Management and Environment Section will continue to be assessed and reported on. On receipt of non-compliant documentation, the developer will be requested to review and amend their submission. Site inspections will be carried out at a number of sites following the receipt of a Construction and Demolition Waste Management Plan through the Planning process.</p> <p>All Article 27 notifications will be reviewed and source and destination site inspections will be carried out where appropriate. Comments will be communicated through the new EPA portal for Article 27 Notifications. Any by-product notifications identified as waste will be notified to the following email address: <a href="mailto:article27@epa.ie">article27@epa.ie</a>. Louth County Council officials will consult with supporting document, maps, etc in making their decisions.</p> <p>In 2023, the following planning condition will be issued by the Environment Department as standard with all works proposals with the potential for any construction or demolition waste to be associated with them: <i>“Prior to the commencement of development, the developer shall submit a formal Project Construction and Demolition Waste Management Plan to the local authority for written agreement prior to Commencement Notice stage. This plan shall, inter alia, include the information recommended in sections 3.2, 3.3 and 3.4 of the document titled “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects” published by the Department of the Environment, Heritage and Local Government”</i>.</p> <p>This requirement will ensure that planning applicants develop a waste management plan that identifies quantities and types of waste and the waste destinations of any waste produced on a development site. <b>All waste management plans will be assessed by the Environment Team to ensure they comply with the above condition. Spot checks will also be conducted at a number of sites to ensure that they are complying with their waste management plan.</b></p>
Have appropriate resources being assigned to carry out the work associated with this activity <b>FOR THE YEAR AHEAD</b> ?	Yes
The Final Environmental Outcome to be achieved?	The protection of human health and environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste


**Overall concluding remarks for the reporting year:** Completion of planned inspections and audits and continual engagement with the planning process.

## A.12 NATIONAL PRIORITY 3.2

• National Priority: ELV and Metals	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- Authorised (permitted &amp; licensed) waste treatment facilities to accept waste from authorised collectors/sources only.</p> <p>Accurate waste classification and quantification of waste data in AERs from WCP/WFP and licenced operators.</p> <p>Hazardous components and WEEE are adequately segregated and transferred to appropriate recycling/treatment facility.</p> <p>Focus for 2023: 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>	<p><b>All Authorised Treatment Facilities (ATFs) will continue to be inspected as per RMCEI requirements throughout 2023 as part of the Waste Facility Permit inspections.</b> The Annual Environmental returns from these facilities will continue to be validated in 2023. All facilities will be checked to ensure that all aspects of their Waste facility Permit are being complied with. Compliance with SI 314 of 2014 (Traceability Requirements) will be focused on during the inspections of the ATF sites. In relation to WEEE, checks will be conducted on each of the permitted facilities to ensure that all components are adequately segregated and that they are transferred to the appropriately authorised facilities.</p> <p>Desktop surveys will be conducted at each of these sites along with onsite inspections of these sites to ensure that the most accurate annual environmental return data is being reported such as accurate waste classification, and quantities.</p> <p>Planned checkpoints will also assist in the auditing process and these will also assist with the resolution of any non-compliant findings from audits. Louth County Council will also work collaboratively with WERLA, LAWPRO, the EPA and any additional agencies in relation to any permitted sites or in relation to any concerns that may be identified in this category. Inspection and enforcement action will continue against unauthorised sites. All waste complaints will be investigated and where necessary Louth County Council will liaise with other local authorities and other relevant agencies as part of our investigations.</p> <p>In relation to unauthorised ELVs, appropriate enforcement action will be undertaken at each of these sites. Prolonged investigations will determine whether or not a multiagency approach is necessary.</p> <p>There is an ongoing case in relation to un-authorised car dismantlers in the county. 3nr. convictions have been secured under the Waste Management Act and there have been ongoing discussions with the site operator. Some waste has been removed from the lands but the site has not been cleared of all waste. Further enforcement action may be required in 2023 in relation to the activities on the lands.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes
The Final Environmental Outcome to be achieved?	The protection of human health and environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste


**Overall concluding remarks for the reporting year:** Completion of planned inspections and audits and continual engagement with other agencies.

### A.13 NATIONAL PRIORITY 3.3

• National Priority: Household and Commercial Waste	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes - 3 bin systems are in place and being utilised i.e. separation of dry recyclables and organic materials at all commercial sites.</p> <p>Accurate waste classification and quantification of waste data in AERs from WCP and WFP operators of municipal waste.</p> <p>High level of compliance amongst households availing of a door-to-door waste collection service or a suitable alternative.</p> <p>Focus for 2022 - 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.</p> <p>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>	<p><b><u>Commercial Food Waste:</u></b></p> <p>In late 2022, WERLA provided a spreadsheet of all commercial waste collectors in Co. Louth. <b><i>In 2023, Louth County Council Waste Enforcement Team will issue a template letter to all commercial waste collectors in Co. Louth with a request to arrange a full audit and inspection of their records and premises.</i></b> A spreadsheet will also be issued to each waste collector which will allow the collector to input information on their commercial customer’s residual waste, mixed dry recyclables, and corresponding food waste collection in all areas. The information provided will be used by Louth County Council to determine if a commercial waste collector is complying with their obligations and will be used to identify commercial customers that are not using a 3 bin system with a focus on food waste collection. Commercial businesses not using a food waste collection service will be further inspected and enforcement action taken where necessary. Food inspections will continue to be carried out on commercial businesses to check how the food waste generated at a particular premises is being managed.</p> <p>Louth County Council’s website and twitter account will be utilised to raise awareness on waste segregation in the commercial business sector. The promotional material will be taken from mywaste.ie including signage, information brochure and animation material.</p> <p>Information obtained during office inspections at waste collectors relating to other local authorities will be circulated to WERLA for their review.</p> <p>Surveys of retail, hospitality and industrial sectors will also be undertaken in 2023 to ensure the proper use of a 3-bin system, segregation and use of authorised collectors.</p> <p><b><u>Household Food Waste:</u></b></p> <p>Louth County Council Environment Department will request a list from all licensed waste collectors in the county of all households with a waste collection service. This list will be maintained on an annual basis and targeted inspections in areas with low compliance will be undertaken. <b><i>A minimum of 5 areas, if applicable, will be targeted in 2023.</i></b></p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	Yes
The Final Environmental Outcome to be achieved?	The protection of human health and environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste

**Overall concluding remarks for the reporting year:** Completion of planned inspections and audits and continual engagement with the planning process.


## A.14 NATIONAL PRIORITY 3.4

• National Priority: Producer responsibility initiatives and local priorities	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- All suspected producers under WEEE, Packaging, Farm Plastics, Tyres, Batteries and ELV Regulations, including vehicle importers, requiring registration to be registered.</p> <p>Consistent approach to enforcement of Extended Producer Responsibility requirements.</p> <p>All local authority owned waste facilities in compliance with authorisations</p> <p>Focus for 2022</p> <p>Identification and inspection of all suspected producers who require Registration.</p> <p>Examination of potential for information exchange between Local Government Sector and other Agencies, where appropriate</p>	<p><b><u>Packaging producers</u></b></p> <p>From Jan 2023, an amendment has been made to the European Union (Packaging) Regulation 2014 which has removed the option for major producers to self-comply with their local authority. They will now be obligated to become a member of an approved body - Repak. Repak have made contact with all major producers who were registered with local authorities notifying them that at the end of Q1 2023 is the deadline to transition to the approved body. Those outstanding after this period, will form part of the 2023 enforcement co-operation project by Louth County Council. The work involved with Louth County Council to maintain self-complier cases has now ceased. The Covid-19 pandemic had a significant impact on business throughout the state and in particular businesses associated with the hospitality sector i.e. restaurant, pubs and hotels. In light of this, the WERLA notified Louth County Council that SMPs identified on previous enforcement co-operation programmes (2017-2020) which were involved in the hospitality sector and required follow up enforcement were suspected until further notice from WERLA. These legacy cases still exist and will require progression in 2023.</p> <p><b><u>Farm Plastics</u></b></p> <p>Farm plastic inspections will be conducted in 2023 in collaboration with IFFPG compliance officer. It will be anticipated that these inspections will be held ahead of silage season in 2023. Suppliers of farm plastics must register with IFFPG and therefore sites will be selected by IFFPG compliance officer. In conjunction with this, Louth County Council Waste Enforcement Office will attend the IFFPG farm plastics bring centre collection points in 2023 to ensure that operators collecting waste have a Waste Collection Permit. We will also encompass a surveillance check to ensure that only clean uncontaminated plastics are collected. Waste management information obtained from mywaste.ie will be provided to farmers where required.</p> <p><b><u>Tyre Regulations</u></b></p> <p>The Circol ELT LA enforcement portal will be used to check tyre operators which are flagged as having their membership revoked. These operators will be followed up with an inspection and warning letters where required. A tyre inspection form prepared by WERLA will be utilised by Louth County Council when performing premise inspections. Local knowledge and complaint database will be used to identify non-compliant tyre operators for further inspections and enforcement. Car sales companies will also be inspected. Warning letter and enforcement action will be taken where required.</p> <p>In Sept 2022, we were notified that Circol ELT has commenced an arrangement with Applus (NCT services) regarding the collection of EMC's relating to imported used vehicles at NCT centres. Under the Tyre regulations, all imported used car and motorcycles placed on the Irish market for the first time incur a charge to cover the EMC on tyres associated with the vehicle including any spare tyres. It is proposed that this charge will be collected at 27 NCT centres in Ireland which means that any Circol ELT members whose obligations arose from imported vehicles will no longer be required to be a producer of the scheme. However, the obligation to report on replacement tyres to Circol ELT will remain for premises who import used vehicles and also trade in replacement tyres. We are pending confirmation that this arrangement has commenced.</p>

	<p><b><u>WEEE &amp; Battery Regulations</u></b></p> <p>The EPA organises annual programs of inspections at retail and wholesale outlets across the country. The EPA is the main authority for these inspections although Louth County Council also assists with these inspections. As the EPA and local authorities have shared responsibilities for enforcement of many retail obligations, Louth County Council Waste Enforcement Office will continue to engage in joint inspections with the contractor working on behalf of the EPA. The producers selected for inspection will be determined by the contractor. Registration of premises with compliance schemes will be checked against the licences website prior to inspection been performed. By conducting inspections in conjunction with EPA allows an opportunity for retail inspection training.</p> <p><b><u>ELV Regulations</u></b></p> <p>The ELVES portal will be utilised for information. Louth County Council Waste Enforcement Office will liaise with the ELVES Inspector regarding updates on non-compliant operators including motor dealers of new, used cars or light commercial vehicles which are obligated under the ELV Regulation. Inspections will be planned on ELVES members who have been identified as not been up to date with their membership fees. Un-authorized operators will be served with Directions, Notices and failing to comply will instigate legal proceedings. Depending on staff resources, routine inspections will be carried out according to RMCEI inspection plan. If staffing allows, multi-agency inspections with WERLA on ELV's facilities will be scheduled within our regional area. WEO will attend Regulatory meetings and regional meetings where the topic of ELV's in included in the Agenda. Report on inspections and carry out a regular review of operators throughout the year.</p>
<p>Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></p>	<p>Yes</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>The protection of human health and environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste</p>

**Overall concluding remarks for the reporting year:** continued supervision and monitoring by Louth County Council

### A.15 NATIONAL PRIORITY 3.5

• National Priority: Tackling illegal waste activities and multiagency sites of concern	
	Activities
Looking forward to the year ahead 	
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> </ul> <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p> <p>Outcomes- Unauthorised collectors investigated and closed down. Active list of unauthorised sites/operators in place. Consistent policy agreed and implemented for dealing with illegal waste deposits in the ground. Authorised facilities should not facilitate the unauthorised treatment of waste.</p> <p>Focus for 2023: Targeted inspections and follow up enforcement actions unauthorised collectors and site operators using intelligence from waste data flows, complaints and other available data. Coordination and input from Revenue/Social Protection/AGS in relation to unauthorised activity and identified sites of concern. Multiagency investigations for sites of concern. Roadside checkpoints, relevant anti-dumping initiatives implemented, traceability requirements to be enforced at permitted/licenced sites and focus on those who facilitate the unauthorised treatment of waste</p>	<p>Louth County Council is currently investigating a large unauthorised site, subsequent to an investigation that was carried out initially with AGS and Revenue. A case initiated by AGS is due to be heard on the matter in the District Court in 2023. Additional action is being taken by Louth County Council under sections 56 and 57 of the Waste Management Act 1996 via the High Court. Due to circumstances over the previous number of years such as the COVID 19 pandemic, this has had a number of delays but should progress in 2023. Due to health and Safety issues Louth County Council have faced challenges in conducting a thorough investigation of this site. Louth County Council will continue to liaise with AGS regarding this case in 2023.</p> <p>Louth County Council will carry out multi-agency inspections where required at unauthorised sites. Louth County Council will continue to take advice and guidance from WERLA in relation to any priorities that they identify in relation to the identification of sites where illegal activity is taking place. Ongoing audits of authorised waste operators will continue to take place in 2023 to ensure that no illegal waste movements are facilitated within the county. Louth County Council will progress enforcement actions on illegal sites throughout 2023.</p> <p>Louth County Council deals with a substantial amount of hazardous, laundered diesel sludge that is dumped throughout the county. The Department of Environment, Heritage and Local Government fund the cleanup of any dumped sludge via the environment fund. There has been an increase in the number of IBCs that have been dumped within the county in 2022 when compared to 2021. The total approximate cost of cleanup of dumped sludge in 2022 was circa. €300,000 and it is expected that this cost will be replicated in 2023. Louth County Council have engaged an external contractor to clean up all sites where illegal dumping of this sludge has occurred and this engagement will continue for 2023. Once a complaint is received by Louth County Council advising of an incidence of illegal dumping of laundered diesel sludge, generally from the public or the Gardai, the contractor is immediately notified to remove the waste and transport to a dedicated storage compound in the Louth County Council machinery yard. The waste is then subsequently repackaged and sent for export to mainland Europe for incineration. The Council also notifies the Customs in relation to the various dumpsites around the county and Louth County Council will continue to liaise with Customs in relation to the ongoing removal of this waste.</p> <p>Louth County Council will assist in joint inspections when requested with AGS and Revenue at known sites that may result in pollution. Logging of diesel sludge disposed at roadside will continue in 2023 and Louth County Council will endeavour to collect any such waste in order to prevent pollution.</p>
Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u> ?	yes
The Final Environmental Outcome to be achieved?	The protection of human health and environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste

**Overall concluding remarks for the reporting year:** Continued inspections and associated investigations and enforcement activities in 2023.

## Appendix B Planned Routine & Non-Routine Inspections for the Year Ahead

Inspection Types		Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Waste</b>					
<b>6.1</b>	<b><u>Routine Waste Inspections</u></b> <b>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</b>				
6.1.1	Waste Permitted Facilities	25	2	50	All permitted facilities to be inspected
6.1.2	Joint inspections with TFS	1	1	1	1nr. inspection planned for 2023
6.1.3	Inspections of Cert of Registration sites (private)	5	3	15	
6.1.4	Inspections of LA Cert of Registration sites	0	0	0	1nr. site of this type is in place in Co. Louth (i.e. machinery yard at Louth County Council)
6.1.5	Multi-agency inspections, including vehicle inspections and multi agency site inspections	5	2	10	4nr. planned road checkpoints and 1 planned site inspection
6.1.6	Hazardous waste sectoral inspections (e.g. Mercury Regulations, WTF, garages, mini-labs, industrial, healthcare & others)	0	0	0	
6.1.7	Inspections in relation to segregation, recovery and disposal of C&D waste at construction/development sites to include major public projects (e.g. Waste Mgt. Plans, Gypsum handling, etc.)	6	2	12	6nr. inspections planned for 2023
6.1.8	Inspections of notifications under Prohibition of Waste Disposal by Burning Inspections	100	0.1	10	A large volume of notifications are expected on an annual basis
6.1.9	Registration of Sewage Sludge Facility inspections	0	0	0	
6.1.10	Household Waste Surveys	10	2	20	Targeted areas within urban locations will be inspected by Litter Wardens subject to litter complaints received by the Environment Department
6.1.11	Inspections in relation to the household and commercial kerbside waste collection regime (including brown bin)	0	0	0	
6.1.12	Other inspections of waste collection permit holders to include, for example, data validation audits (onsite) but not included above in 6.1.12	10	1	10	Approx. 60nr waste collection permit holders registered in Co. Louth - These will consist of site inspections and AER desktop validations

Inspection Types		Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
6.1.13	Commercial Food Waste Inspections (original waste producers, e.g. hotels, nursing homes, restaurants, etc.)	7	1	7	
6.1.14	Inspections in relation to authorised ELV facilities (ATFs) with an emphasis on traceability requirements (SI 320 of 2014)	4	2	8	
6.1.15	Other routine inspections (not included in above numbers) - please specify -Mercury	3	0.5	1.5	
Subtotal Routine Waste Inspections		176		144.5	
<b>6.2</b>	<b><u>Non-Routine Waste Inspections</u></b> <b>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</b>				
6.2.1	Investigative inspections of fly tipping or illegal dumping, excluding unauthorised C&D, ELVs & Tyres	55	1.5	82.5	This figure will vary based on the received number of complaints
6.2.2	Investigative Inspections in relation to unauthorised C&D sites (sites with no permit)	10	2	20	
6.2.3	Investigative Inspections in relation to unauthorised ELV sites and suspected sites of origin as notified by the TFS (sites with no permit)	2	1	2	
6.2.4	Investigative Inspections in relation to unauthorised Tyre dumps (no permit in place)	2	1	2	
6.2.5	Inspections in relation to unauthorised waste collectors (collectors with no permit), e.g. MAN IN VAN, scrap collection, unauthorised C&D collection, etc.	4	1	4	
6.2.6	Inspections in relation to other Unauthorised Waste sites excluding those mentioned above - incl. crashed vehicle inspections, PTUs, etc Diesel laundering waste complaints.	20	0.5	110	Diesel laundering complaints, waste pick up and disposal
6.2.7	Inspections in relation to Waste Facility Permits continuing to operate after their permit has expired	2	2	4	
6.2.8	Inspections in relation to extractive industries	0	0	0	

Inspection Types		Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
6.2.9	Household Waste/waste presentation Inspections arising from complaints, including backyard burning	0	0	0	
6.2.10	Inspections of sites notified under Article 27	12	1	12	
6.2.11	Other non-routine inspections			253.5	Administration function relating to all non-routine waste inspections (1.5 Full Time Equivalent)
	<b>Subtotal Non-routine Waste Inspections</b>	107		490	
<b>6.3</b>	<b><u>Litter Patrols/Investigations</u></b> <b>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</b>				
6.3.1	Litter Patrols/Investigations	180	1	180	130nr. 2 hour patrols and 50nr. 5 hour patrols planned for 2023
6.3.2	Litter pollution monitoring surveys	60	1	60	
6.3.3	Litter pollution quantification surveys	240	0.5	120	Each Litter Warden completes 10nr. surveys every month for 4nr. months of the year
6.3.4	Visits in relation to Green Schools programme	12	1	12	
6.3.5	Providing support to community groups during litter clean ups	20	0.5	10	Each litter warden is tasked with providing support to community groups within the county
6.3.6	Judging Tidy Towns/Villages competitions	25	1	25	
6.3.7	Other routine litter patrols/investigations	1,500		1,003.5	Administration of all litter investigations (1.5 Full Time Equivalent Staff = 253.5days) An estimated 1,500 litter complaints are received by the Department every year and each complaint requires an average of 0.5 days to inspect and close out (1500 x 0.5 days = 750 working days)
	<b>Subtotal Routine Litter Patrols/Investigations</b>	2,037		1,410.5	
<b><u>Water/Wastewater</u></b>					
<b>6.4</b>	<b><u>Routine Water/Wastewater Inspections</u></b> <b>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</b>				
6.4.1	Discharges licenses to waters (Section 4)	15	2	30	The time allocation per individual licence consists of desktop work, the inspection of the site, compilation of the report and any follow up site visits/ liaison.

Inspection Types		Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
	Assessment of results	120	0.15	18	Results submitted by licence holder to Louth County Council; additional sampling conducted by Louth County Council also
6.4.2	Audits of private water supplies	0	0	0	This is currently completed by Irish Water
6.4.3	Monitoring samples from private water supplies	0	0	0	This is currently completed by Irish Water
6.4.4	Farm Inspections under GAP Regulations conducted by Local Authority (not including farm inspections by DAFM)	12	1.5	18	The number of planned Farm Inspections in 2023 is reduced from the number planned in 2022 due to a staff member retirement.
6.4.5	Farm Inspections conducted by DAFM	0	0	0	These are completed separate to Louth County Council.
6.4.6	Farm Inspections Other e.g. routine farm inspection but not GAP inspection	7	2	14	These include inspection of areas for slurry spreading during closed period
6.4.7	Monitoring programmes, Operational and Surveillance samples taken	120 samples approx. are collected within a 12 month period	0.15	18	Annual sampling programme
6.4.8	No. of days of locally lead investigative assessments (including SSRS, sampling, river walks, etc.)	2 catchments	2 x 5 days	10	Desktop surveys, site investigations and completion of reports
6.4.9	WFD investigative monitoring samples and analysis by Local Authorities.	25	0.2	5	Additional river sampling for investigative purposes
6.4.10	No of days of engagement with LAWPRO and Communities Programme	8	0.5	4	Meetings and site visits with LAWPRO personnel
6.4.11	Bathing Waters	140 samples are collected within a 12 month period	0.2	28	This includes sampling and regular inspections of the bathing waters within the county
6.4.12	DWWTS inspections under National Inspection Plan	12	0.75	9	This includes desktop surveys, the actual site inspection and any follow up activities relating to the inspection
6.4.13	DWWTS Engagement Activities	12	0.25	3	This covers the initial engagement with the household and exchange of information relating to the treatment system
6.4.14	DWWTS inspections of referrals from LAWPRO	1	1	1	Potential referral from LAWPRO

Inspection Types		Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
6.4.15	Other Surface & Groundwater Protection Inspections [e.g. drinking water source protection, zone of contribution monitoring, etc]	0	0	0	Any referrals are logged a non-routine water/ wastewater inspections
6.4.16	Misconnection Surveys	0	0	0	Any referrals are logged a non-routine water/ wastewater inspections
Subtotal Routine Water/Wastewater Inspections		474		158	
<b>6.5</b>	<b><u>Non-Routine Water/Wastewater Inspections</u></b> <b>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</b>				
6.5.1	Inspections relating to water pollution incidents/complaints, excluding non-routine farm inspections.	50	1.5	75	These are incidents that involve a site visit and associated report
6.5.2	Non-routine farm inspections, e.g. on foot of pollution incident or complaint.	10	1	10	These are incidents that involve a site visit and associated report
6.5.3	Unauthorised Discharges Investigated	3	2	6	These are incidents that involve a site visit and associated report
6.5.4	Inspections in relation to Water Pollution Licence applications	1	3	3	
	Other non routine	0	0	0	
Subtotal non-routine Water/Wastewater Inspections		64		94	
<b><u>Air/Noise Inspections</u></b>					
<b>6.6</b>	<b><u>Routine Air/Noise Inspections</u></b> <b>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</b>				
6.6.1	Inspections of Air Pollution Licenced sites	1	1	1	1nr. licensed sites in Co. Louth
6.6.2	Total number of inspections carried out under the solid fuel regulations (S.I. 326 of 2012 and as amended).	45	1	45	45 premises at 0.5 days each, inspecting vehicles, an allowance of 5 days in total for the year for this activity
6.6.3	Number of multi-agency inspections carried out under the solid fuel regulations (S.I. 326 of 2012 and as amended), e.g. in conjunction with other local authorities, EPA, DCCA, etc.	0	0	0	None planned in 2023

Inspection Types		Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
6.6.4	Number of days involved in the carrying out of inspections under the solid fuel regulations (SI 326 of 2012 and as amended) i.e. 6.6.2, 6.6.3 and 6.6.5				See 6.6.2 above
6.6.5	Total number of fuel samples collected and analysed	0	0	0	None planned in 2023
6.6.6	Solid fuel information & public awareness	2	1	2	
6.6.7	Inspections of sites under 2012 Deco Paints Regulations (S.I. 564 of 2012) – Vehicle Refinishers	14	1	14	
6.6.8	Inspections of sites under 2012 Solvents Regulations (S.I. 565 of 2012) –e.g. Dry cleaners, surface cleaning etc.	2	2	4	
6.6.9	Inspections of sites under Petroleum Vapours Regulations	10	1	10	
6.6.10	Ambient Air Monitoring Programme inspections	0	0	0	None planned in 2023
6.6.11	Other routine air/noise inspections	0	0	0	None planned in 2023
	<b>Subtotal Routine Air/Noise Inspections</b>	119		76	
<b>6.7</b>	<b><u>Non-Routine Air/Noise Inspections</u></b> <b><u>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</u></b>				
6.7.1	Incident/complaint related inspections	80	1	80	
	Other			84.5	Administration of all non-routine air/noise complaints (0.5 Full Time Equivalent)
	<b>Subtotal Non-Routine Air/Noise Inspections</b>	80		164.5	
	<b><u>6.8 Producer Responsibility Inspections (Routine)</u></b> <b><u>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</u></b>				
6.8.1	WEEE Inspections	5	1	5	
6.8.2	Battery Inspections	5	0.5	2.5	
6.8.3	Inspections on suspected vehicle importers (ELV Regulations 2016)	10	1	10	
6.8.4	Farm Plastics	3	0.5	1.5	

Inspection Types		Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
6.8.5	Plastic Bag Levy	3	0.5	1.5	
6.8.6	Inspections under the Packaging regulations – Suspected Major Producers	5	2	10	
6.8.7	Inspections under the Packaging regulations – Registered Self-compliers	0	0	0	
6.8.8	Inspections under the Tyre Regulations – Tyre Retailers	6	1	6	
	<b>Subtotal (Routine) Producer Responsibility Inspections</b>	<b>37</b>		<b>36.5</b>	
<b>6.9 Planning (Environmental) Inspections (Routine)</b> <b>(Note: Section 6 numbering refers to the NEMIS statistical Return datasheet)</b>					
6.9.1	Inspections (environmental) of existing planning permissions	10	0.5	5	Inspection of submitted compliance material/ reports
6.9.2	Inspections (environmental) in advance of grant/refusal of planning permission	30	0.5	15	Inspections of sites and supervised percolation tests
6.9.3	Quarry Inspections (e.g. relating to noise, dust, surface/groundwater emissions, vibration etc.)	0	0	0	None planned in 2023
6.9.4	Other planning inspections relating to environmental issues	550	0.151	83	Desktop surveys and reporting on planning referrals
	<b>Subtotal Planning Inspections (Routine)</b>	<b>590</b>		<b>103</b>	
	<b>Total Routine Inspections end of year</b>	<b>3,433</b>		<b>1,928.5 inspection days</b>	
	<b>Total Non-Routine Inspections end of year</b>	<b>251</b>		<b>748.5 inspection days</b>	
	<b>Total Inspections end of year</b>	<b>3,684</b>		<b>2,677 inspection days</b>	

Appendix B Table 1

**Additional Landfill Inspections and Sampling:**

<b><u>Landfill inspections and sampling</u></b>	<b><u>Planned for year</u></b>	<b><u>Time per inspection and follow up (days)</u></b>	<b><u>Number of inspection days</u></b>
Monitoring of Whiteriver landfill(GW. Leachate and SW)	4	1	4
Monitoring of Dundalk Landfill(GW, Leachate and SW)	12	1	12
Monitoring of Drogheda Landfill(GW, Leachate and SW)	12	1	12
Gas balancing Whiteriver	12	0.5	6
Pz monitoring at Whiteriver	12	0.5	6
Gas balancing Drogheda	4	0.5	2
Pz monitoring at Drogheda	12	0.5	6
Gas balancing Dundalk	4	0.5	2
Pz monitoring at Dundalk	12	0.5	6
Dundalk VOC's	1	0.25	0.25
Drogheda VOC's	1	0.25	0.25
Whiteriver VOC's	1	0.25	0.25
Dundalk Flare emissions	1	0.25	0.25
Drogheda Flare emissions	1	0.25	0.25
Whiteriver flare emissions	1	0.25	0.25
Whiteriver stream biological monitoring	1	0.25	0.25
Drogheda lake biological monitoring	1	0.25	0.25
Dundalk Noise monitoring	1	0.25	0.25
Drogheda Noise monitoring	1	0.25	0.25
Whiteriver noise monitoring	1	0.25	0.25
General landfill management	1	0.25	0.25
<b>Sub-total landfill inspections (ROUTINE)</b>	<b>96</b>		<b>60 days</b>

**Appendix B Table 2**

**Additional Relevant Duties:**

<b><u>OTHER RELEVANT ROUTINE DUTIES</u></b>	<b><u>Quantity</u></b>	<b><u>Number of inspection days</u></b>
Coastal Oil Pollution Plan	1	5
Noise Action Plan	1	5
Implementation of Health & Safety standard operating procedures for roll out of RMCEI Plan for team	1	4
<b>Sub-total Other Relevant Duties (ROUTINE)</b>	<b>3 items</b>	<b>14</b>

**Appendix B Table 3**

In Section 4.2 of this report, the number of “Staff Days Available” for the Environment, Litter and Waste Team of Louth County Council was confirmed as 2,781 days.

The planned inspections for 2023 are summarised as follows:

<b><u>Appendix B – Table</u></b>	<b><u>Total Number of Inspections (Routine &amp; Non-Routine)</u></b>	<b><u>Total Number of Inspection Days Planned for 2023:</u></b>
<b>1</b>	3,684	2,677
<b>2</b>	96	60
<b>3</b>	3	14
<b>4 (Table 5.2)</b>	76	30
<b>Total:</b>	<b>3,859</b>	<b>2,781</b>

**Appendix B Table 4**

## Appendix C : Suggested Review Template for Implementation of Plan

### RMCEI/Enforcement Plan Implementation Review Report

Meeting Date:

Meeting Time:

Attendee Name	Title

Reason for the Meeting:

Monthly Implementation Review:	
Quarterly Implementation Review:	
Other Reasons:	

Important Notes/Actions from Previous Meeting:

**Appendix C Table 1 – Progress Against Priorities**

<b><i>National Priority Review: May include examination of (i) Collaborative work with WELRA, LAWPRO, EPA, etc. (ii) Compliance promotion &amp; awareness raising activities, (iii) Cross organisations activities on data validation, data analysis, guidance development or multiagency investigations, (iv) Case studies, (v) Early interventions and (vi) Significant enforcement actions/prosecutions</i></b>			
<b><u>National Priority</u></b>	<b><u>Progress to Date</u></b>	<b><u>Further Work Required</u></b>	<b><u>Person Responsible</u></b>
<b>1.1 Local Priorities and Water Quality Monitoring (Rivers and bathing)</b>			
<b>1.2 Pressures from Agriculture (slurry/ soiled water collection and storage)</b>			
<b>1.3 Pressures from Agriculture (Slurry and fertiliser spreading)</b>			
<b>1.4 DWWTS/ Septic tanks</b>			
<b>1.5 Discharge Licences/ misconnections</b>			
<b>2.1 Solid Fuel</b>			
<b>2.2 Air Quality Monitoring and Data Use</b>			
<b>2.3 Environmental Noise Directive</b>			
<b>2.4 Air/ Noise Control including Planning</b>			
<b>2.5 Ongoing air and noise enforcement work</b>			
<b>3.1 Effective and authorised</b>			

management, movement and disposal of C&D waste			
3.2 ELVs and metals			
3.3 Household and commercial waste			
3.4 Producer responsibility initiatives and local priorities			
3.5 Tackling illegal waste activities and multiagency sites of concern			

**Appendix C Table 2 – Progress against Inspection Targets**

<b><i>Review of Planned Inspections for 2023</i></b>				
	<b><u>Inspection Type:</u></b>	<b><u>Planned Inspections for 2023:</u></b>	<b><u>Planned Inspections Completed to Date:</u></b>	<b><u>Person Responsible:</u></b>
1	<b>Routine Waste Inspections</b>			
2	<b>Non-Routine Waste Inspections</b>			
3	<b>Litter Patrols &amp; Investigations</b>			
4	<b>Routine Water/ Wastewater Inspections</b>			
5	<b>Non-routine Water/ Wastewater Inspections</b>			

6	Air/ Noise Inspections			
7	Non-routine Air/ Noise Inspections			
8	Producer Responsibility Inspections (Routine)			
9	Planning (Environmental) Inspections (Routine)			
10	Landfill Inspections			

**Appendix C Table 3 – Progress against Additional Committed Targets**

<b><i>Additional Targets for Environment, Litter &amp; Waste team in 2023</i></b>				
	<b><u>Description:</u></b>	<b><u>Proposal for 2023:</u></b>	<b><u>Update:</u></b>	<b><u>Person Responsible:</u></b>
1	Oil Pollution Plan			
2	Compilation of Register of all households that have waste collection service			
3	Noise Action Plan			

## Appendix D Risk Assessments

### Risk Assessment and Prioritisation of Inspections Licensed/Permitted Sites

The EPA risk assessment spreadsheet has been used for the risk assessment of Waste Permits, Certificates of Registration and Section 4 discharge licence sites. Copies will be submitted in a separate document

### Waste Collection Permits

The categorisation and prioritisation of site inspections is based on a number of factors including:

- Sites that have been previously audited
- Risk level associated with the site
- Knowledge and previous dealings with the waste collector.

The number of inspections at the facility will depend on the following:

- Compliance history
- Corrective action taken by permit holder
- Number of complaints
- Results of initial audit
- Co-operation of permit holder
- Enforcement policy
- Resource availability
- Waste separation
- AER Submission

### Producer Responsibility

Sites are prioritised based on national priorities in particular food waste and tyres. Sites are selected for inspection based on previous levels of compliance, unregistered sites and complaints. Resources are also being assigned to the inspections of other PRI's such as Elves and Packaging in order to comply with WERLA work programme for 2023.

### Checkpoints

Sites are chosen based on consultation with An Garda Síochána, WERLA, TFS office and other agencies where a multiagency response is required.

### **C& D waste management**

Sites are chosen for inspection based on Construction & Demolition plans submitted as part of Planning Permission compliance. Site selection for inspection is also dependent on complaints and notifications from WERLA.

### **Brown Bin and Household waste**

Areas for further investigation will be based on consultation with WERLA and local knowledge.

### **Solvents/Petroleum Vapours/Deco**

Sites selected for inspection will be based on previous compliance, late registrations and those sites not registered.

### **Bathing Waters**

Sites are sampled based on the priority to keep blue flag status and to comply with regulations.

### **Air/Noise Complaints**

Complaints are investigated according to level of non-compliance and contravention of relevant regulations.

### **WFD monitoring**

Operational and investigative monitoring is pre-determined at the start of the year and any additional sampling will be completed in response to complaints or environmental incidents.

### **Water complaints**

Complaints are investigated according to level of non-compliance and contravention of relevant regulations.

### **Planning Reports for Air and Noise**

Each application is reviewed and reported on.

### **Inspection of Septic Tanks**

Louth County Council is obliged to carry out a minimum number of inspections on an annual basis. Areas where sites are selected for investigation are based on the National Inspection Plan. Individual sites are selected based on water bodies that are at risk, ribbon development that has taken place in an area and locations where there is a high density of rural housing.

### **LAWPRO and local catchment assessment**

In addition to engagement at meetings and workshops, Louth County Council Environment Department will continue to Liaise with LAWPRO and catchment assessment teams to identify priority areas for action.

### Litter Inspections

The concentration of inspections/patrols is based primarily on the level of complaints received, known litter black spots throughout the county and information from planned foot patrols that are carried out in the county.

### Solid Fuels-Air Pollution Inspection

The premises, depots and vehicles for inspection are selected based on the following:

- Complaints
- Local Authorities obligation to carry out inspections
- Liaison with the Department of Environment
- Liaison with the solid fuel trade group.
- Level of compliance

The level of compliance in retail premises and coal depots is generally good within the county and inspections of these locations are carried out once a year and when complaints are received.

The inspection of vehicles can be a random process, but efforts are concentrated in certain locations within Drogheda and Dundalk where distribution of unauthorised fuels has previously taken place in known areas. Inspections are also carried out on the basis of previous enforcement actions. These locations within Drogheda and Dundalk are designated as being high risk, while other locations are designated as being medium to low risk. In the medium to low risk areas, only periodic inspections are carried out.

### Inspection of farm Holdings and Rivers

Farm surveys, investigative monitoring and catchment monitoring and re-inspections will be carried out in 2023 in the areas which have been identified by LAWPRO and the new RBMP as being high risk locations.

Farm holdings chosen for inspection and re-inspection are based on the following:

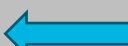
- Pollution Impact Potential maps
- Water abstraction points in catchments
- Current Q values of various rivers
- Status of river catchments
- Whether at risk, probably at risk or not at risk
- Trends for Nitrogen and Phosphorus

The current local authority priority area for inspection for 2023 is the River Dee catchment.


## Appendix E Look back and review of activities in 2022


### 2022 National Enforcement Priorities Progress Report


NEP Assessment Criteria		
<b>A</b>	For regulated / authorised sites, a compliance rate documented and compared over the previous years, and analysed or explained;	CORE
<b>B</b>	Demonstrate appropriate site selection methodology and inspection implementation and/or early interventions;	
<b>C</b>	Demonstration that non-compliances/unauthorised activities are being detected and are being followed up – and some progress in the NEP is shown;	
<b>D</b>	Clear example(s) of a positive environmental outcome(s) – something was achieved to improve the environment (not simply reached a target of inspections);	
<b>E</b>	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
<b>F</b>	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;	
<b>G</b>	Demonstration of a proactive approach, or innovation in dealing with a problem or demonstration of an enforcement curiosity;	
<b>H</b>	Compliance promotion and awareness raising activities;	
<b>I</b>	Activities on data validation, data analysis, systems development, website development;	
<b>J</b>	Significant enforcement actions/prosecutions and the outcomes such as remediation, sharing of lessons learnt to aid national consistency of enforcement;	
<b>K</b>	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><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 though 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>Inspections of farmyards in areas where agriculture is identified as a significant pressure, with a small percentage in areas not at risk.</li> <li>Follow up and close out non-compliances and LAWPRO referrals.</li> <li>Cross reporting of non-compliances to DAFM.</li> </ul>	<p>To address pressures from agriculture on water (surface and ground), it was decided to carry out farmyard inspections in two catchments in 2022. The River Dee Catchment area is the local authority identified priority area for action and the River Flurry catchment area is the LAWPRO identified area for action for the next cycle of the River Basin Management Plan. Both catchments are at poor status and at risk</p> <p><u>River Flurry</u></p> <p>The River Flurry has three sub-catchments and two of the sub-catchments were designated at risk at the end of 2021 and one sub-catchment was deemed not at risk. Overall the catchment designation is poor. The pressures include urban run-off from roads, agriculture and section 4 licences in the locality. The main contributing factor however is from agriculture. Agriculture in this catchment consists of low to medium intensity farming activities mainly beef. The potential risks in this catchment include overland flow from slurry spreading (hilly topography), cattle having direct access to water-bodies (large number of tributary streams from hills and mountains) and direct discharge from farmyards. Farmyards in this catchment were previously visited in 2011 where 7 out of a total of 14 farms were designated at high risk (based on in house risk assessment) due to infrastructural deficiencies at the farm-yard. As part of the visits in 2022, desktop analysis was completed, a farm inspection was conducted and discussions were held with the farmer and the local IFA representatives. .</p> <p>An initial call was made with the farmer by telephone to explain the purpose of the visit, the areas the Council would be inspecting, reason for inspections, explanation of the status of water quality in the catchment and transfer of knowledge of best practices under the Nitrate Regulations. Following consultation, inspections of 14 no. farmyards were carried out in the catchment. The inspection included the examination of the farmyard, tanks, silage storage, soiled water management, pesticides, immediate periphery area around the farmyard and visual inspection of drains and streams in the vicinity. For this series of inspections in 2022, no issues were identified at the farmyards that would contribute to poor water quality in the catchment. All farms in this catchment are therefore designated as less than high risk using our own in house assessment.</p> <p><u>River Dee</u></p> <p>The River Dee consists of a number of catchments namely the Dee 070, D080 and Dee 090. All the Dee catchments within the county are designated at risk and are deemed to be at poor status. There are also two public surface water abstraction points and one private surface water abstraction point within the overall catchment area. The principle pressures in this catchment include hydromorphology due to channelisation, urban waste water and storm overflows at Ardee, Tinure and Dunleer and agriculture. This catchment would have a large number of farms predominantly dairy farming and to a lesser extent beef farming and tillage farming. All of the catchments are at risk with ortho-phosphate and ammonia levels trending upwards. Large parts of the catchment consist of heavy soils and therefore there is an increased risk of overland flow of Phosphorus. For the visits carried out in 2022, desktop analysis was conducted on the farmyard locations, analysis of PIP maps was completed and Louth County Council conducted ongoing liaison with local IFA representatives. An initial call was made with the farmer to explain the purpose of the inspection, to identify the areas of their farm that the Council would be inspecting, the purpose of the inspections, outline a general explanation of the status of water quality in the catchment and to highlight best farming practices under the Nitrate Regulations. A total of 145 farmyard inspections were carried out in the catchment in 2022. The inspection included the examination of the farmyard, tanks, silage storage, soiled water management, pesticides , immediate periphery area around the farmyard and visual</p>

	<p>inspection of drains and streams in the vicinity. 145nr. farmyards out of a total 309 farms in the catchment were inspected in 2022. Of the 145 farmyards inspected, 10 nr. farmyards were found to have potential water pollution problems which needed to be addressed. Warning letters were sent to these farmers highlighting the deficiencies in their farmyard and outlining corrective actions that were required. Following the issuing of these warning letters, a follow-up inspection was carried out to ensure corrective action measures were undertaken. Corrective actions were completed at 9nr. farms that were re-inspected due to non-compliance issues however 1nr. farm still has outstanding issues and Louth County Council is working with this farmer and the IFA to address these outstanding issues. This farm will be re-inspected in 2023 and enforcement action taken if the issues are not resolved. The issues identified during the farmyard inspections conducted in 2022 included a combination of (a) soiled yard with no effluent tank , (b) farmyard manure stored in the wrong location with the effluent run off flowing to the adjacent field, (c) roof water flowing into a slurry tank, (d) sections of a silage pit needing replacement and (e) effluent from a dairy yard flowing to adjacent field.</p> <p><u>Other inspections</u></p> <p>Following a request from Meath County Council (because of a possible pollution problem identified in the Mattock River), unannounced inspections were carried out on 6 no. farmyards in County Louth however no issues were identified.</p> <p>Following a complaint from a member of the public regarding possible pollution in the Fane River, an additional 4nr. unannounced farmyard inspections also carried out and again, no issues were identified during these inspections.</p>
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National Enforcement Priority: WATER – Pressures from Agriculture (slurry and fertiliser spreading)	
Local Authority:	Activities
 <p>Looking back at the year</p>	<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 though 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>Inspections of farmyards in areas where agriculture is identified as a significant pressure, with a small percentage in areas not at risk.</li> <li>Follow up and close out non-compliances and LAWPRO referrals.</li> <li>Cross reporting of non-compliances to DAFM.</li> </ul>	<p>Louth County Council completed 6nr. inspections in 2022 during the closed period where the purpose of these inspections was to investigate if slurry was being spread during the closed period. The areas chosen for inspection would have been determined following a desktop review of the locality examining soil types and topography, local knowledge and previous complaints received during the closed period. A majority of intensive agriculture in the county is located in the Glyde, Dee and Fane river catchments. The Dee catchment which also includes the Whiteriver catchment has a predominance of heavy soils and is therefore at risk of phosphorus overland flow during the closed period.</p> <p>Over the closed period and following the six days of inspection, there were no instances of farmers spreading slurry or other agricultural animal waste.</p> <p>Throughout 2022, including the open and closed periods, Louth County Council received 14nr. complaints in relation to agriculture activities and possible contamination of local well water or discharges to streams and rivers. 4nr. complaints related to storage of poultry manure in fields prior to spreading. All incidents were investigated and resolved. 7nr. complaints related to the spreading of slurry in a manner not complaint with the regulations. All complaints were investigated and closed out. For the above complaints, all the requirements of the Regulations were being met with adequate separation distances. The remainder of the complaints related to cattle walkways and access. All of these complaints were also closed out.</p> <p>During 2022 the Council also received 5 Air Pollution complaints in relation to the spreading of slurry and poultry manure. All cases were investigated and resolved and all incidences were deemed to be compliant with the regulations. In all of the complaints for air and water, Louth County Council did not detect any instances where slurry was being spread near surface water bodies, public water boreholes or private boreholes. There were a number of instances where the complainant believed that slurry was being spread during the closed period but upon further investigation the material was determined to be soiled water and not slurry. In one instance, a complaint was received by the Environment department which related to slurry being discharged directly to surface waters. However on investigation, this was found to not be the case as the landowner was drawing water from the surface water body.</p> <p>Louth County Council Environment Department will continue to actively engage with LAWPRO, Inland Fisheries, Teagasc &amp; the Department of Agriculture, Food and the Marine where farmyards are found to be negatively impacting on a water-body in the county.</p>

National Enforcement Priority: WATER – Domestic Waste Water Treatment Systems / Septic Tanks	
Local Authority:	Activities
 <p>Looking back at the year</p>	<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>Take all necessary steps to ensure advisory notices are closed out.</li> <li>Follow up and close out non-compliances and LAWPRO referrals.</li> </ul>	<p>In accordance with the National Inspection Plan for DWWTS 2022-2026, Louth County Council carried out the required number of inspections within its functional area in 2022. Inspections were selected based on the 3 risk zone approach which came into operation in 2022 - Zone 1: Environment; Zone 2: Human Health and Zone 3: low risk to surface water. Louth County Council were required to select sites in Zone 2 &amp; 3, therefore the Environment team selected sites using the mapping function on the Eden Portal with priority given to sites within the respective zones and those based in clusters, systems associated with older houses and systems located near to any water bodies. LAWPRO were contacted to ensure they were aware of the area that Louth County Council intended to complete inspections within and LAWPRO were in agreement with the selected sites for 2022. The first step of the inspection process consisted of a desktop based study using tools such as the Eircode finder, Louth County Council planning apps and land registry. Site characterisation forms were also viewed if possible to inform the soil/subsoil characteristics, type of system, to determine if a water main was in the area and also to determine any potential sensitive receptors in the vicinity. A check on the registration status of the system is also carried out.</p> <p>The next stage of the inspection consisted of pre-inspection meetings with each of the households selected. This approach proved to be very beneficial to the owners of the various houses and the Local Authority to confirm details of the homeowner and their system but also, this is used to explain the full inspection process and what is required on the day of the official inspection. This is also an opportunity to issue leaflets to the homeowners which explains how the systems work and what they can do to ensure that their system runs effectively. The next stage of the inspection process consisted of the issuing of letter from Louth County Council to the homeowners which outlined the date and time of the formal inspection. Under the standard operation procedure for Louth County Council for the inspection of domestic wastewater treatment systems, two people from the Environment Department completed each inspection. This also ensured that a full and in-depth inspection is carried out to include checking drains, roof downpipes, dye testing etc. A hardcopy of the inspection form was completed with each homeowner on-site on the day of the inspection, and again, this is used as an opportunity by Louth County Council to inform homeowners of what they can do to ensure that their system runs effectively. Receipts for any desludging works were also examined to ensure the system was maintained correctly but also to ensure that the collection contractor had a valid waste collection permit. Each homeowner was subsequently informed on the day of the inspection if their domestic wastewater treatment system passed/ failed. In the event of a failure the owners were told the reason(s) for the failure and what remedial actions were required. An advisory letter was then issued to these homeowners within 21 days of the inspection advising of the same and requesting a timeframe for remediation. All inspections from 2022 were uploaded onto the EDEN system and any advisory notices were issued.</p> <p>A total of 11 inspections were completed in 2022 with the majority of these inspections located in Zone 2. A total of 2 out of the 11 systems failed both for having roof water entering the foul system and additionally having a septic tank with a broken outlet manhole cover. Louth County Council engaged with the respective homeowners after the issue of the advisory notices to ensure they were aware of the corrective actions that were required. Once the work was completed, Louth County Council Environment Department completed a re-inspection to ensure the work was carried out satisfactorily. On confirmation that all remedial works were completed, the certificate of compliance was issued and the EDEN portal was updated accordingly. Both advisory notices were closed within a month of the initial inspection having been undertaken. Louth County Council has no advisory notices open from any other previous inspections that were completed.</p>

National Enforcement Priority: WATER – Discharge Licences / Misconnections	
Local Authority:	Activities
 <p>Looking back at the year</p>	<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>  <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>• All Section 4 licences discharging into water bodies at risk to be monitored and non-compliances resolved.</li> <li>• Licence discharges subject to Section 4 licences.</li> <li>• Follow up and close out non-compliances and LAWPRO referrals.</li> </ul>	<p><u>Discharge Licences:</u></p> <p>In 2022, Louth had 34nr. active Section 4 Discharge Licences of which 4 sites were still temporarily closed as a result of the COVID 19 pandemic. The proposal inspection schedule for 2022 included for the completion of 15nr. inspections. This number was chosen based on the following:</p> <ul style="list-style-type: none"> <li>• available resources,</li> <li>• risk assessment score,</li> <li>• previous experience with sites,</li> <li>• compliance with the licence limits,</li> <li>• track record for submitting monitoring results,</li> <li>• local authority compliance monitoring,</li> <li>• referrals from Lawpro, and</li> <li>• the location of site within a river catchment area for action.</li> </ul> <p>These audits consisted of an examination of effluent sample records, sludge records, confirmation that the collector of sludge has a registered permit, a review of flow records of effluent and review of all maintenance and servicing records of all plant and machinery at the premises. The sites chosen for the inspection were also risk assessed using the EPA standard risk assessment template for permits, licences and certificates of authorisation. In 2022, no sites were rated as “A” using the risk assessment template, however 5nr. sites were rated as “B” sites, and 29nr. sites were rated as “C” sites. Of the twenty-nine rated at “C”, 4 premises were still closed during 2022.</p> <p>An inspection was scheduled at a particular establishment that was referred to Louth County Council by LAWPRO as it is located in an area of priority (Big River catchment). This site consisted of a public house with a licensed discharge to surface waters. The public house had gone into receivership and had closed however part of the site was operating as a takeaway. Correspondence was subsequently issued to the Receiver to regularise the licence as the quality of effluent was deemed non-compliant. Advice and guidance was supplied to the operator of the takeaway also. At the time, the licence holder was not submitting any monitoring results for the site however the Receiver, in the interim, had arranged for a maintenance company to carry out a full refurbishment of the premises. Follow up monitoring undertaken by Louth County Council indicated an improvement in the effluent discharge. Louth County Council will continue to review this premises as it will likely be sold off and further action may still be required. Louth County Council have advised the Receiver to notify the council if the premises is sold off and to ensure that the local authority can engage with the new potential owners and advise them of their obligations under the licence.</p> <p>All premises are required to carry out monitoring on a regular basis. This can vary from once per month to once per quarter depending on the size of premises, previous compliance rate and scale of discharge. The local authority also carry out check monitoring varying from 1 to 4 times per annum which again depends on the size of premises, the nature of the discharge, the quality of the receiving waters and the compliance history. Inspections consist of the</p>

following:

- review of monitoring results,
- the comparison of monitoring results with the licence limits,
- the comparison of flow records with flow limits set out in the licence,
- sludge records being held on site,
- whether sludge is being collected by a permitted contractor,
- whether results are being submitted in accordance with the licence frequency requirements,
- maintenance records and details of the maintenance contractor
- monitoring fee payment,
- any complaints received and
- the occurrence of any incidents.

Ongoing review of each licence is completed throughout the year also through assessment of monitoring results and compliance monitoring carried out by the Council.

Of the 15nr. audits completed in 2022, 9nr. establishments were deemed to be compliant and one of these sites has since closed. 3nr. non-complaint sites discharge directly to surface waters and 2nr. non-compliant sites discharge to groundwaters. Warning/advisory letters were issued to the non-compliant establishments with a request to regularise their discharges otherwise enforcement proceedings would be taken. 3nr. non-compliant licensees subsequently undertook major refurbishment on their treatment plants following the inspection by Louth County Council.


The remaining 5nr. non compliant Section 4 licensees are detailed as follows:

- Licensee No. 1 - discharging to groundwaters in River Glyde catchment. Deemed to be non-compliant as they hadn't been submitting results, also sample taken by Council showed exceedance of licence limits. Louth County Council will continue to engage with this licensee in 2023.
- Licensee No. 2 - discharging to surface waters in River Dee catchment. Deemed to be non-compliant as they hadn't been submitting results, also sample taken by Council showed exceedance of licence limits. Refurbishment at the premises planned to be carried out in 2022/2023. Louth County Council will continue to engage with this licensee in 2023.
- Licensee No. 3 - discharging to surface waters in Big River catchment, in receivership, part of premises closed, part operating as a takeaway. Deemed to be non-compliant as they hadn't been submitting results, also sample taken by Council showed exceedance of licence limits. Further sample taken showed compliance however results are still not being submitted by licence holder. Refurbishment was completed. Louth County Council will continue to engage with this licensee in 2023.
- Licensee No. 4 - discharging to groundwaters in the River Flurry catchment. Deemed to be non-compliant as they hadn't been submitting results on a regular basis and results that were submitted by licence holder showed exceedances. Louth County Council will continue to engage with this licensee in 2023.
- Licensee No. 5 - discharging to groundwaters in the Castletown Catchment. Deemed to be non-compliant as they hadn't been submitting results and the results of testing carried out by Council showed exceedances. Refurbishment was carried out. Louth County Council will continue to engage with this licensee in 2023.

Misconnections:

Of the water complaints received by the Environment Department in 2022, one complaint related to a misconnection. This was located at a housing estate in Dromiskin whereby foul effluent was being discharged directly to a local stream. A desktop study was conducted to determine the wastewater infrastructure within the estate and older mapping was examined to identify the location of older surface water drains in the area. As a result of the inspection of the site, Louth County Council staff identified an outlet from the foul sewer which was overflowing into the stream. The Environment Department liaised with Irish Water and the matter was subsequently rectified.

A site at Tullyallen was investigated due to sewage overflow from a pumping station. The Environment department investigated the occurrence and determined the water quality of the stream was being affected by the raw sewage. Irish Water was consulted and IFI were also notified. The pump chamber was subsequently rectified by Irish Water and the discharge ceased and within two weeks of the remedial work, the stream quality had improved.

National Enforcement Priority: WATER – Local Priorities and Water Quality Monitoring	
Local Authority:	Activities
 <p>Looking back at the year</p>	<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>  <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>• Complete statutory monitoring for Water Framework Directive monitoring, investigative monitoring and bathing water monitoring.</li> <li>• Inspect and follow up any local issues (not covered by the other NEPs).</li> <li>• Address any climate related water inspection issues, e.g. impacts due to extreme weather events.</li> <li>• Enforcement of private drinking water standards.</li> <li>• Investigate sources of any non-compliances with water quality standards including follow up of LAWPRO referrals.</li> <li>• Engage with LAWPRO and other WFD fora on RBMP.</li> </ul>	<p><u><i>Bathing Water Monitoring:</i></u></p> <p>The monitoring of the 4nr. designated beaches within Co. Louth was completed in full and in compliance with the set monitoring calendar in 2022. (Note: the designated beaches are Templetown, Port, Clogherhead and Seapoint). Three of these beaches have maintained their blue flag status. The summer season 2022 had mixed weather with some of our planned bathing water dates postponed due to unsafe sea conditions. Some of the water results reflected these mixed weather conditions with elevated readings at some beaches at times.</p> <p>There was a Prohibition Notice issued for the Seapoint beach on the 25<sup>th</sup> July 2022 due to a non-compliant water sample which was attributed to heavy rainfall and associated runoff. Subsequent sampling confirmed that the parameters returned to within their limits after the weather event had occurred. This non-compliance was investigated in line with the bathing Water Protocol, the EDEN portal was continually updated, notices were placed on the beach and all relevant agencies were notified.</p> <p>Public Participation for the identification of new bathing waters was conducted over Summer 2022. A notice was placed in the Irish Times newspaper which encouraged members of the public to make submissions to this request. Three submissions were received in total and these were examined in line with the guidance available. Louth County Council will continue to see submissions from the public for the identification of new bathing water sites.</p> <p><u><i>WFD Monitoring:</i></u></p> <p>In 2022, Louth County Council maintained a 100% completion rate for taking and delivering river samples to the EPA laboratory in Monaghan Town. No lake sampling occurs in County Louth for WFD purposes. A total of 120 river samples were taken in 2022 and all samples were preserved correctly and transported to the laboratory as per procedures outlined in the “WFD sampling manual”.</p> <p>There is some crossover and collaboration with Monaghan County Council as their Environment Department undertake river sampling on the Fane river in County Louth and in turn, Louth County Council undertake sampling on the River Glyde on the Cavan/Monaghan border. This is in order to achieve efficient sampling on a river which spans cross borders so all analysis can be complete on a single day taking into account the particular environmental conditions on the sampling day. The additional sampling of the Glyde along the Cava/Monaghan border is as a result of mining activity in Magheraclone Co Monaghan where a company discharges into the river under an EPA license.</p> <p>There were no issues with access for any of the sampling sites in 2022. On 2 occasions WFD results regarding elevated specific nutrients resulted in investigative monitoring of the River Dee &amp; the River Mattock. Skills learned from completing the catchment course were put into action on these occasions to characterise the catchment and detail the relevant flow paths for nutrients of concern. This resulted in additional farm surveys in these areas to identify sources of pollution.</p> <p><u><i>Investigative Monitoring:</i></u></p> <p>In 2022, 2nr. sites were selected for investigative monitoring and these sites were chosen as the catchments were deemed to be at risk and listed as being of poor status. The River Dee catchment which includes the Dee 070, 080 and 090 catchments was subject to numerous farm inspections in 2022 as a result.</p>

The catchment contains the source for two public supplies which cater for the towns of Ardee and Dunleer and there were a number of complaints in late 2021 and in 2022 of elevated ammonia levels in at the Water Intake at both supplies. As a result of these elevated levels of ammonia, the water intake at one of the supplies had to be switched off for a period in order for Louth County Council to investigate and to allow Irish Water to carry out remedial works on their infrastructure. Elevated ammonia levels were detected upstream of Ardee near the county boundary with Meath. Louth County Council requested the assistance of Inland Fisheries Ireland and Meath County Council who carried out some additional investigations. LAWPRO were also consulted who provided technical and scientific advice. Following all investigations, the source of the ammonia could not be detected and after a period of a number of days the elevated ammonia levels dropped to normal levels. It has to be noted that this incident occurred during the closed period however there was no evidence of land spreading in the vicinity. A number of spot checks of local farms in the area were conducted but no evidence of a discharge was found. It is a possibility that the elevated levels could be due to the run-off from Ardee Bog during heavy rain events that had occurred in the area although this cannot be conclusively proven.

The second site that was chosen for investigative inspections was the River Mattock. Louth County Council received notification from Meath County Council there was evidence of sewage fungus in the river. Louth County Council carried out a river walk of the river channel for a distance of 2.4km from Boyd's Bridge to Collon Village when water levels were low in an attempt to locate any discharge pipes. The only discharge point that was noted was from Collon WWTP which is licensed by the EPA. Louth County Council consulted with Irish Water who confirmed that there hadn't been any incidents at the WWTP at that time. 6nr. farms are located along this stretch of the river channel and spot checks were carried out which didn't identify any issues. It should be noted however that there is wide scale cattle access in this catchment.

#### Water Complaints:

In 2022, Louth County Council received 62 Water Pollution complaints.

All complaints are logged by the Customer Services team via the CRM system (Customer Relations Management) and each complaint is given a case number and assigned to the Environment Department. The Environment administration team reassign each case to the relevant staff member and investigations commence immediately. Complaints received are categorised as being domestic waste-water or storm overflows, Section 4's, Municipal Waste Water plants, oil, agriculture and miscellaneous.

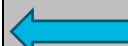
A total of 77 complaints were received in 2022 compared to 58 received complaints in 2021 with a closure rate of 96 percent. 38 warning letters were sent in 2022 of which 10 related to general water pollution complaints and 28 related to licensed discharges. A further 11 warning letters were sent in relation to potential agricultural pollution. No legal actions were initiated in 2022.

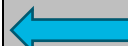
#### Engage with Regional WFD Committees, referrals from LAWPRO and Public Consultation:

In 2022 the local authority engaged with the regional WFD committees through a series of zoom meetings at operational and management level, where updates, information sharing and networking was completed. Louth County Council also engaged with LAWPRO in priority areas for action in the county.


Louth County Council also collaborated with LAWPRO on the Big River catchment where 2nr. sites of concern were identified and further investigations were carried out. One site has now been closed off and enforcement action is being taken by the Louth County Council regarding the other site.

From a training perspective, 3nr. staff members from the Environment Team completed the Catchment Management training course.

National Enforcement Priority : WATER - Monitor and enforce the drinking water standards in private water supplies	
Local Authority:	Activities
 Looking back at the year	<p><b>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'.</b></p> <p><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>Describe what was carried out under this activity <u>IN THE PREVIOUS REPORTING YEAR</u> – e.g.</b></p> <ul style="list-style-type: none"> <li>For authorised sites, a compliance rate and context/analysis;</li> <li>Appropriate site selection methodology, and/or early interventions;</li> <li>Detection of non-compliances/unauthorised activities and follow up;</li> <li>Progress in the NEP shown;</li> <li>A positive environmental outcome – not simply reaching a target of inspections;</li> <li>Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>The monitoring and enforcement of Private water Supplies in 2022 was undertaken by the Water Services Section of Louth County Council. The EU (Drinking Water (Amendments)) Regulations 2017 created amendments to the 2014 Drinking Water Regulations which resulted in changes to the number and type of samples to be taken from Private Supplies. There may be changes arising from the new regulations to affect the re-cast Drinking Water Directive. These regulations are expected Q1 2023. In devising the sampling plan for the year, these changes were taken into account and the number and type of samples required were reviewed for all supplies. The population served by the supply, type of treatment in place and volume of water supplied were taken into consideration when putting the plan together. The type of supplies sampled included group water schemes and small private supplies operating public/commercial activity. Once it was determined the number of Group A (Check) and Group B (Audit) for each supply, the plan was collated and sampling began in early January 2022. Samples were analysed by Fitz Scientific, Boyne Business Park, Drogheda, Co. Louth who promptly informed Louth County Council of any exceedances detected.</p> <p>Exceedances were communicated directly to the operators/owners of the supplies. Operators upon receipt of exceedance notification carried out a review of treatment process and any remedial works on their supply in order to bring the supply back into compliance. Remedial works in 2022 generally involved servicing of their existing treatment system &amp; reviewing dose rates. Once the work was carried out further sampling took place until the no exceedances of parameters were detected.</p> <p>The vast majority of samples taken in 2022 have been compliant, with 3nr. exceedance types detected. Exceedances consisted of the presence of low chlorine, excessive colony counts &amp; E Coli and instances of exceedances related to low chlorine. No exceedances in metals were detected in 2022.</p>

National Enforcement Priority: <b>WASTE - Tackling significant illegal waste activities &amp; Multi-Agency Sites/Operators of Concern</b>	
Local Authority:	Activities
 <p>Looking back at the year</p>	<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’. Note that Criteria A (to provide a compliance rate and comparison with previous years) is not specifically applicable under this NEP.</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>• 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>	<p><b><u>Illegal Waste Activity</u></b></p> <p>Louth County Council continued to deal with a number of illegal waste sites in 2022.</p> <p>One site in particular relates to the importation of significant quantities of soil and stone which is being used as backfill. Surveillance of site activities was undertaken at this location as part of the investigation which confirmed that significant quantities were being transported to the site. A Section 14 direction was issued to the site operator which was followed by a Section 55 notice. The operator however did not respond or engage with Louth County Council. The operator has therefore been referred for prosecution under Section 32, 39 and 55 of the Waste Management Act, 1996 and the haulier has been referred for legal proceedings under Section 32 and Section 34 of the Waste management Act, 1996.</p> <p>Louth County Council are also investigating a large, unauthorised waste site subsequent to an investigation that was initially conducted by AGS and the Revenue. A legal case was initiated by AGS and due before the Courts in 2022 which has now been deferred to 2023. Additional action has been taken by Louth County Council under Section 56 and 57 of the Waste Management Act, 1996 via the High Court. Again, there have been a number of delays to this case however it is scheduled to proceed in 2023. From a Health &amp; Safety perspective, Louth County Council employees have faced difficulties in conducting investigations of this site.</p> <p>Louth County Council Environment Department also deals with hazardous laundered diesel sludge that is dumped throughout the county. The Department of Environment, Heritage and Local Government (Duel) fund the clean up via the environment fund. There has been an increase in the number of IBCs that have been dumped around the county compared to 2021(247 incidents in 2022 compared to 187 incidents in 2023). The total cost of the management of this waste is approximately €300,000 for the year 2022. Louth County Council Environment Department completed a tender process in 2022 to procure the contract of the specialist contracted to clean up dump sites. In addition to this, the council machinery yard where this waste is processed by the specialist contractor is operated in accordance with a Certificate of Registration. This certificate was renewed in 2022 for another 5 years. Complaints as before have been received by the Council, generally from the public or the Gardai, the contractor is notified and responds to remove the waste to the dedicated storage compound in the machinery yard. The waste is then repackaged prior to export for incineration. The Council also continued to notify the Customs in relation to the various dumping incidents around the county.</p> <p>Louth County Council continued to liaise with Customs in relation to the ongoing removal of the diesel sludge waste throughout 2022. Multiagency meetings have taken place in 2022 with WERLA, Customs and Northern Ireland Environment Agency to discuss a cross border preventative approach to this ongoing issue. These efforts will continue in 2023. Louth County Council will carry out multi agency inspections where required at unauthorised sites when safe to do so. The Environment Department will take advice and guidance from WERLA in relation to any priorities they identify in organising /focusing our identification of sites where illegal activity is taking place and Louth County Council will progress enforcement actions on illegal sites throughout 2023 as required.</p> <p>In 2022 under the “Anti-Dumping Initiative”, four projects were completed to combat illegal dumping activity in the County. These included:</p> <ul style="list-style-type: none"> <li>• Two mattress and sofa amnesty events held in Drogheda and Dundalk local civic amenity centres</li> </ul>

	<ul style="list-style-type: none"><li>• A Community Summer clean up event</li><li>• A site clean-up of a garden allotment</li></ul> <p>The issues surrounding each project related to significant illegal dumping across the county. By holding a mattress and sofa amnesty event ahead of the Halloween bonfire period, we were able to substantially eliminate the illegal dumping of these items in our rivers and roadsides etc. By allowing the public to freely dispose of these items in a safe and legal manner raised the awareness of recycling among the local community. The two amnesty events held in 2022 were very successful which resulted in 1890 mattress and 1795 couches been recycled at both centres on the day.</p> <p>A community clean up event and site clean-up of a garden allotment raised awareness among the community of the illegal dumping issues which faced the</p>
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National Enforcement Priority: <b>WASTE - Construction and Demolition Activity</b>	
Local Authority:	Activities
 <p>Looking back at the year</p>	<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>• 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>Risk based inspection of construction sites</u></b></p> <p>In July 2022, the Department of the Environment, Climate &amp; Communications issued notice by Circular WP05.22 regarding replacement guidelines issued by the EPA (Titled: Best Practice Guidelines for the preparation of Resource and Waste Management Plans for Construction and Demolition Projects). This was followed by WERLA issuing a procedure and inspection form for use by Local Authorities when carrying out inspections of construction sites.</p> <p>As part of the planning process, standard planning conditions request that a construction and demolition waste management plan is provided for approval prior to commencement of projects. Planning applications submitted to Louth County Council planning section were reviewed and comments submitted to developers as appropriate, to require that the waste management plans be updated with sufficient additional information in line with project type. The content of C&amp;D waste management plan is dependable on project type i.e. Tier 1 or 2 projects as described in Appendix B &amp; C of the updated guidelines.</p> <p>In 2022, a total of 13 C&amp;D waste management plans were submitted to the Environment Section LCC for review. The focus of the review was ensuring the developers had the necessary disposal, recovery or by-product outcomes required for site exports. 46% of the WMP's submitted for reviews were compliant with the updated guidelines. 54% of the WMP'S reviewed were returned to the developer for further information to be included in WMP's. In 2022, 3 sites were inspected. The remaining 10 sites could not be inspected as development work had not commenced. The number of sites inspected in 2022 is a 333% increase on 2021.</p> <p>The introduction of new best practice guidelines and the requirements to have a waste management plan for all developments has facilitated the increase. In late 2022, the planning section began entering an environmental condition on all planning permissions requiring the developer to submit a waste management plan in line with updated best practice guidelines. The site inspections and introduction of new guidelines has provided a useful opportunity to increase compliance awareness with the developers.</p> <p><b><u>Validation and inspection of Waste Collection Permit (WCP)/Waste Facility Permit (WFP) (including Soil Recovery Sites)</u></b></p> <p>All the authorised facilities were inspected in 2022. There are 13 Waste Facilities and 2 certificates of registration sites in County Louth which process construction and demolition waste. These are categorised as follows:</p> <ul style="list-style-type: none"> <li>• 8nr. sites with backfill material</li> <li>• 4 Skip operators</li> <li>• 1 Storage</li> <li>• 2 Certs of Registration</li> </ul> <p>All of the Waste Facility Sites were subject to a desktop validation under the EDEN portal with 8 sites having had their Annual Returns reversed back to them. Most of these sites were generally compliant with their Permit /Certificate of registration conditions. There is an open investigation ongoing into one of the Class 5 and 6 backfilling sites which will form part of our ongoing investigations into 2023.</p> <p>Desktop and back office inspections were also conducted following the identification by WERLA which targeted skip companies and unauthorised C and D</p>

activity in the county. WERLA identified 2nr. Waste Facility Sites and 3nr. Waste Collection permitted sites. Both Waste Facility Permit sites were inspected and the annual return data was verified successfully on both sites. The Waste Facility Permit operator was identified as one of the waste collectors so this inspection was included in their overall inspection.

Three Checkpoints were conducted in 2022 with two of these being multiagency. These checkpoints will continue in 2023.

There are 67 waste collectors in Co Louth and 51 of these were subject to a desktop audit in 2022. Of these 51 collectors, 6nr. companies had their returns reversed through the EDEN portal, 4nr. companies had not started and 3nr. companies had submitted their information which had not been validated. Many of the Waste collectors in County Louth also operate a Waste facility. During the Waste facility permit checks that were conducted on site, waste collection data for the site operator was also cross checked.


There were a total of 22 Waste complaints relating to Soil and Stone / Construction and Demolition received by Louth County Council in 2022. Most of the complaints were received from members of the public and through other Departments of Louth County Council. Out of the 22 complaints received that related to C&D waste, 15 of these have been closed with 7 remaining open. Of these 7 that remain open, 1 case has been referred for legal proceedings under Sections 32, 39 and 55 of the Waste Management Act 1996 as amended. The remaining open cases are being subject to enforcement actions.


Article 27 Notifications Activity (Sites of Origin and destination)

Louth County Council proposed 13 inspections of sites notified under the Article 27 process for 2022. The EPA notified Louth County Council of a total of 11 Article 27 declarations involving source and destination site inspections. The policy is to promptly inspect every Article 27 site in Co. Louth. In 2022, a total of 9 inspections were carried by Louth County Council Waste Enforcement Officers on source or destination sites with the aim of verifying that the site and material was consistent with the declaration submitted by the economic operator to the EPA. Prior to any site inspection taken place, a desktop study of source location and destination site was undertaken. Supporting documentation and maps from the EPA are also examined. All 11 notifications reported to Louth County Council were compliant with the conditions and had appropriate planning permission in place for site activity. In all site investigations, the material inspected was compliant with Article 27 conditions and was deemed acceptable by-product material.

Two out of the 11nr. Article 27 notifications received from the EPA related to road planing materials. The road planings were generated during road resurfacing works which had been undertaken on the M1 Motorway along the Meath-Louth Border. An inspection of material was not feasible at source site as the material was already moved to destination site during surface works.

In April 2022, the EPA released a new by-product register to allow Local Authorities to make submissions regarding notifications received. The timeframe allowed to make submissions is within 3 weeks from date of notification to allow appropriate time for the EPA to consult on submissions received. It was advised by the EPA that any Article 27 notification which was inspected by Local Authorities and did not raise concerns would no longer need to make submissions to the EPA. The EPA's default position is that if no submissions are received, then the local authority is unlikely to have any concerns in relation to the notification. Of the 11 notifications received by the EPA and investigated by LCC, only one notification has been determined as a by-product by the EPA. The remaining 10 notifications are still under review by the EPA and pending a final decision.

National Enforcement Priority: WASTE - End-of Life Vehicles (ELV) & the Waste Metal sector	
Local Authority:	Activities
 Looking back at the year	<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 <u>in the previous reporting year</u> – 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><u>Unauthorised Sites ELVS:</u></p> <p>2nr. unauthorised treatment facilities were identified during inspections in 2022. One of these sites was taking in vehicles and breaking them down for parts. The other had a small number of old vehicles on the premises.</p> <p>Following written correspondence between Louth County Council and the site operators and a number of site visits, one of these sites was vacated and cleared of all vehicles. No evidence of environmental pollution from oil was discovered at this site. With regards to the second site, there was a small number of ELVS stored on site. This site was reported to us from a member of the public complaining about back yard burning - the elvs on this site were noted during the site inspection by the waste enforcement officer. The owner of this site was written to and this case is currently ongoing.</p> <p>The majority of sites of this type are reported to Louth County Council by members of the public. Occasionally some of these sites are noted by officials in the course of doing other investigations. There were no multiagency inspections conducted in 2022.</p> <p><u>Authorised Treatment Facilities / Waste Facilities:</u></p> <p>There are 5 ATFs operating in Louth. Each of these facilities are inspected on an annual basis by Louth County Council. Facilities are required to report ELV numbers on a quarterly basis and those facilities that fail to do this, are issued reminders to do so. The facilities have been found to be in general compliance and any issue that is detected in a facility during an inspection is acted on by Louth County Council immediately. The operator is engaged with and letters are issued to them requesting a timeframe to achieve compliance. Louth County Council continues to work with all operators to ensure ongoing compliance.</p> <p>All ATFs had their Annual Environmental returns inspected as part of the AER validation process. The sites were visited and any anomalies were investigated during this process. The validation process comprised of a desktop survey followed by onsite inspection of records. Some minor anomalies were discovered during this process. When anomalies were discovered these returns were reversed for the site operator to amend.</p>

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 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 <u>in the previous reporting year</u> – 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><u>Household Waste</u></p> <p>One residential area in the Dundalk area was identified as a priority area as there was a severe problem with dumping of household waste and over flowing domestic bins. The litter wardens were getting numerous complaints weekly from residents and elected representatives and each complaint was investigated and followed up with litter fines where appropriate. A survey was carried out to determine what residents had a waste provider in place and as a result of the survey and investigations, Louth County Council issued 12 “My Waste” letters to the residents in the area who had not a proper waste collection service in place. The letter provided them with information on how to dispose of their waste and also a full list of permitted waste collectors in the area. The letter also explained how it was a legal requirement under the Segregation, Storage and Presentation of Household and Commercial Waste Bye-laws, 2019 to be able to provide receipts for the disposal of domestic waste if the Council carried out further inspections. As a result of these actions the complaints from this area have now ceased and illegal disposal of waste material is no longer a problem.</p> <p><u>Commercial Waste</u></p> <p>Louth County Council Waste Enforcement Officers carried out 7nr. commercial food waste inspections in Co. Louth which is an increase of 5 inspections compared to 2021 inspections. A review of inspections conducted over previous years was carried out and premises were selected randomly across a number of villages and towns in Co. Louth which had not been inspected previously. Premises inspected included supermarkets, hotels, restaurants, butchers, service stations and delicatessens. The purpose of the inspection is to determine compliance with the Food Waste Regulations (SI 508 of 2009). The inspection focuses on the management of food waste segregation, correct use of a 3 bin system and the collection of food waste by an authorised collector. Overall, good compliance with the regulations was noted with only one establishment identified as not operating a food waste bin. A close out meeting was held and non-compliance was discussed. A warning letter was issued to the establishment and subsequently, good co-operation from business owner was achieved after this. Compliance was noted after subsequent re-inspection.</p>

National Enforcement Priority: WASTE - Producer Responsibility Initiatives and additional local priorities	
Local Authority:	Activities
 <p>Looking back at the year</p>	<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 <u>in the previous reporting year</u> – 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> </ul>	<p><u>Packaging Producers</u></p> <p>In mid 2022, WERLA notified Louth County Council of 3 suspected major producers. The 3 companies listed were checked against the Repak membership list and were not listed. Louth County Council then initiated contact with these companies. The 3 companies contacted were deemed “not obligated”. In general, there is hesitation from premises to fully engage with Louth County Council Waste Enforcement Officers once contacted, and obtaining the relevant information in determining their obligations can be difficult. There is also some legacy SMPs which require follow up due to the backlog of Covid-19. The Covid-19 pandemic had a significant impact on business throughout the state and in particular businesses associated with the hospitality sector i.e. restaurant, pubs and hotels. In light of this, WERLA notified Louth County Council that SMPs identified on previous enforcement co-operation programmes (2017-2020) which were involved in the hospitality sector and required follow up enforcement were suspected until further notice from WERLA.</p> <p>One hotel business which was inspected in 2022 as part of the Waste Management (Food Waste) Regulations 2009 was identified as being obligated under the packaging regulations. A warning letter was issued. No further enforcement action could be taken by Louth County Council until suspension issued by WERLA has been lifted.</p> <p>There are a total of five registered self-compliers in Co. Louth and these companies submit quarterly figures and annual reports to Louth County Council. Annual returns were submitted for all five SMPs and had demonstrated a high level of compliance with the regulations.</p> <p><u>Mercury Producers</u></p> <p>Local authorities were appointed to ensure the safe storage, handling and environmentally sound disposal of amalgam waste by dental facilities under Regulation 4. (1) and 4. (2) of S.I. No. 533/2018- European Union (Mercury) Regulations 2018. The regulation imposes an obligation on dental practices to ensure that amalgam separators are installed and maintained in accordance with the guidance. A search of the Irish Dental Association website didn't identify any new dental practices for inspection. An online search of new dental practices in Co. Louth functional area was also conducted and didn't highlight any new premises or dental practitioners. All existing dental practices identified returned a declaration form and were compliant with EU mercury regulations.</p> <p>Louth County Council Waste Enforcement Officers attended a training day in Sept 2022 at Ballycoolin Training Centre on the enforcement of EU Mercury Regulations which was an informative training session on how to conduct dental practice inspections and identify non-compliant practices.</p> <p><u>WEEE and Batteries Producers</u></p> <p>In 2022, a Waste Enforcement Officer from Louth County Council carried out a joint inspection with a contractor working on behalf of the Environmental Protection Agency (EPA). The producers selected for inspection in Co. Louth were selected by the EPA contractor with a total of 4 potential producers selected for inspection. All 4 premises inspected showed evidence of non-compliances with both the WEEE and battery regulations. 2 out of the 4 premises inspected were not registered with ERP Ireland and were not compliant with the regulations. A</p>

WEO explained the non-compliances identified and agreed a timeline by which the producer must meet their statutory obligations. Letters were subsequently submitted to all premises inspected outlining the actions to be taken and by a target date. Good response was received from all suppliers with all non-compliances resolved ahead of the target date assigned. 2 premises inspected which were not registered with ERP Ireland subsequently provided a copy of their registration to Louth County Council.

#### Farm plastics

The enforcement of the farm plastic regulations is the responsibility of local authorities. IFFPG have a role of assisting and supporting enforcement through the activities of an IFFPG compliance officer. Therefore in 2022, farm plastic inspections in Co. Louth were arranged in collaboration with a compliance officer from IFFPG. A total of 6 sites were identified for inspection and agreed with the Waste Enforcement Officer of Louth County Council. The premises agreed for inspection included local agricultural suppliers based in the areas of Dundalk, Ardee, Dunleer, Togher and Tullyallen who were potentially supplying farm plastics to local farmers. The inspections were carried out unannounced and involved both a visual inspection of store areas and inspection of farm plastic label code traceability systems. This system involves IFFPG members placing a unique label codes on all product placed on the Irish market. These codes pass down through the supply chain and ultimately are provided to farmers at the point of purchase which can be later used by farmers to avail of reduced changes. This system is beneficial in easily identifying whether product sold is compliant or not. All pallet wrap and sheating was inspected and were stocked from a common brand. IFFPG label codes were recorded and checked for compliance. 3 out of the 6 sites visited were compliant with farm plastic regulations. The remaining 3 sites were no longer in business of supplying farm plastics. No discrepancies were noted during our inspections which required enforcement action.

#### Tyre Retailers

Any business selling tyres, whether importers, wholesalers, suppliers, traders or retailers must register with Circol ELT (previously Repak ELT). In 2022, WERLA circulated a list to Louth County Council of retailers who have had their memberships revoked. This list was also checked against the members listed on Circol ELT LA enforcement portal. Circol ELT notified Louth County Council of 6 sites which required a inspection. A total of 6 premise inspections were carried out of tyre retailers identified on list provided. 1 of the sites inspected was no longer supplying tyres and was considered "not obligated". Circol ELT were notified to remove premise from their members list. Two of the sites inspected were compliant with the tyre regulations but were late submitting their returns and payment of fees and therefore had membership revoked. Reminders letter were sent to submit outstanding items. Two of the sites inspected were not complying with their tyre obligations and warning letters were sent. Circol ELT was notified of status of all inspections conducted. Louth County Council will be carrying out follow-up inspections of non-compliant premises to ensure compliance.

One of the premises listed for inspection by Louth County Council was an obligated retailer of tyres. The owner was an existing member but had their membership revoked following failure to submit documentation. Circol ELT had tried to facilitate an inspection and following hostile behaviour from owner, was given a failed audit by Circol ELT inspector. Following subsequent site visits by a Louth County Council WEO, it was deemed necessary to engage with the lead inspector of Circol ELT. Monitoring of site in on-going to ensure compliance with scheme and reporting requirements.

#### Plastic Bag Levy

In 2022, a total of 2 premise inspections were conducted under The Waste Management (Environmental Levy) (Plastic Bag) Regulation


2001. This is an increase on 2021 when no plastic bag inspections were carried out. Both premises inspected were compliant with the regulations. There is generally good compliance observed year on year with premise owners.


Vehicle Importers


A total of 8 sites were targeted for inspection in 2022 based on previous WERLA lists of suspected importers. The inspected premises identified 3 operators which were importing vehicles from the UK. All premises were notified of their obligations to register with ELVES and were sent reminders letters with further details. In general, a poor response was received from these operators inspected, with only one operator registering with ELVES. Follow up inspections and engagement with these premises is ongoing. A Louth County Council Waste Enforcement Officer is also engaging with the inspector of ELVES to monitor status of operators.

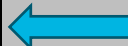
A desktop study was carried out by a Louth County Council Waste Enforcement Officer on possible garages in Co. Louth who could have obligations under the European Union (End-of-Life Vehicles) Regulations 2014 as amended. A total of 32 operators were identified and were sent letters outlining their responsibilities and obligations if importing or selling vehicles from the UK. General feedback from some of these operators acknowledged that they had dealt in importing second hand vehicles from the UK in the past, but the additional costs imposed following BREXIT associated VAT made the practice no longer commercially viable. Due to staff resourcing follow up inspections with the outstanding garages was not feasible in 2022 and have been targeted for follow-up inspections in 2023.

The ELVES portal is also been reviewed to identify any of these operators which have registered with ELVES in the meantime.

National Enforcement Priority: AIR - Solid Fuel Inspections	
Local Authority:	Activities
<p> Looking back at the year</p>	<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>  <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>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>New regulations were introduced by Minister Eamon Ryan for solid fuels namely the Air Pollution Act 1987 (Solid Fuels) Regulations 2022 coming into operation on the 31<sup>st</sup> October 2022. These regulations have replaced the older Sale, Marketing, Distribution and Burning of Specified Fuels Regulations 2012 (SI 326 of 2012). The primary aim of these regulations is to improve air quality by combating the sale of smoky fuels such as turf, coal and wet wood. Studies have proven these are a major contributor to air pollution and subsequently a threat to the greater public's health.</p> <p>Previously the two urban centres Dundalk &amp; Drogheda where designated as low smoke zones. With the introduction of the new regulations the county as a whole is a low smoke zone. Louth County Council Environment Department staff attended the workshop in October 2022 run by the Department of the Environment, Climate &amp; Communications in Portlaoise. This was to up skill about implementing and enforcing the new solid fuel regulations with speakers from Department describing how this would happen. Emphasis was placed on the fact that Ireland was in a cost of living crisis and focus should be on promotion and awareness. A significant change from the previous regulations was the removal of FPNs for offences under the act.</p> <p>The Department issued guidance and FAQs for a number of stakeholders in the solid fuel industry. Louth County Council implemented an awareness campaign targeting retail outlets, producers and haulage/vehicles distributors sending copies of the above to promote awareness. An FAQ for households was also posted onto official council social media platforms. The environment section also dealt with a large number of enquiries from the public on the change in regulations providing information and clarity.</p> <p>Online retailers were monitored to ensure advertising of only approved fuels. Retail outlets were inspected during December in the larger urban centres and smaller towns. December was chosen as the winter weather meant the greater supply of fuels for domestic heating. The purpose of the inspections was to determine what fuel products were being offered for sale and if these complied with the new regulations. Compliance was good with the vast majority of retailers aware of the new regulations. Coal merchants were also stopped in Drogheda to inspect their fuel products and on-board register.</p> <p>No samples of solid fuel were taken in 2022 for a sulphur content check due to the fact that no laboratory in Ireland is capable of analysing the product. The cost and logistics of getting a sample to the UK are prohibitive. The Department of Environment is aware of this issue after numerous submissions from Local Authorities and is working on getting a national lab established.</p> <p>A number of domestic houses where visited around the county on receipt of complaints about smoky fuel being used. Louth County Council employees engaged with the home owners highlighting the new regulations, distributing information and raising awareness on the health benefits of choosing low smoke fuel.</p>

National Enforcement Priority: AIR - Air Quality Monitoring Activities and Data Use	
Local Authority:	Activities
 Looking back at the year	<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>• 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>Louth County Council noted that the Ambient Air Monitoring Programme is a priority area for continued work in 2022. There are two sites in Co Louth - one in Dundalk and the other in Drogheda. The Air monitoring unit in Dundalk measures for Sulphur Dioxide, nitrogen oxides, Carbon Monoxide and PM10. In Drogheda this new unit was put into operation at the end of 2021 following extensive consultations with EPA at this time.</p> <p>Both units have been operational throughout 2022 and have been analysing the air quality and logging the results which have been automatically submitted to the EPA for display on the website for the public to view. Louth County Council also has a link on their website to these results. All the results for air quality monitoring carried out in both towns have shown to comply with the Air Quality Standards.</p> <p>In 2022 Louth County Council were approached by the Energy Section in Louth County Council to become involved in a project called the “Varsities” Project. The project will be based in Dundalk and will develop open space to improve its use and to make it more accessible for all. The aim of this project is to implement real, visionary ideas and add value to urban areas increasing Health &amp; Well Being of all citizens (children, young people, middle age, elderly) exposed to diverse climatic conditions and other challenges. The Environment team wanted to explore the opportunities to use this air quality data in collaboration with this project as the team believe that the relocation of this unit will bring an increased awareness of ambient air monitoring and the real-time data thus giving a better understanding of this function to the public. Extensive discussions were had with the EPA to move the Air Monitoring unit in Dundalk to the proposed location within the town. Following a number of site assessments the area was deemed to be suitable. The infrastructure for this to happen has to be put in place at this location , hopefully the removal of the air monitoring unit will take place later in 2023</p>

National Enforcement Priority: AIR - Environmental Noise Directive (END) Activities/ Noise Plans	
Local Authority:	Activities
 Looking back at the year	<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>• 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>Louth County Council submitted their Local Authority Noise Action Plan (NAP) Progress Report by the 28th of February 2022. The current Noise Action Plan aims to:</p> <ul style="list-style-type: none"> <li>• Avoid significant adverse health impacts from noise.</li> <li>• Preserve environmental noise quality where good.</li> </ul> <p>The current plan is due to expire in 2023.</p> <p>Much of the work regarding the Noise Action Plan was in the preparation and identification of routes that exceed 3 million vehicle movements per year in Co Louth. This work was required as part of the development of strategic noise maps for Round 4 of the Noise Action Plan which is due in 2023. Strategic noise maps were under development in 2022 from the data that each local authority had gathered under ARC GIS and map road as part of the RMO requirements in 2021.</p> <p>Unfortunately, due to the pandemic a number of measures that were previously planned were not conducted. In the 2022 a review of the plan was carried out and areas were identified on the Strategic noise maps that were considered to be locations that suffered from the impacts of noise. Onsite inspections will take place which may include noise monitoring to further assess these sites in question. The majority of the roads identified are in urban locations. Louth County Council will continue to align with other strategies that support the aims of the noise action plan to help us in achieving the goals</p>

National Enforcement Priority: AIR - Air & Noise Controls in Planning Assessments	
Local Authority:	Activities
<p> Looking back at the year</p>	<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>  <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>Planning applications can be divided into the following category of domestic dwellings, clustered developments, urban housing developments, agricultural, commercial, industrial facilities, educational and others (CIGI phone masts, ESB substations and gas facilities). Within the section, templates have been developed broadly to cover each type of development. All applications are desktop reviewed to assess air and noise impacts. For air and noise impacts the following elements are considered: air emissions, dust emissions, odours, solvent regulations, deco regulations, petroleum vapour regulations, day-time noise levels, night-time noise levels pure or tonal noise levels and vibrations. Each planning report from the Environment Section will outline where necessary, conditions depending on the facility assessed and standards that are required to ensure that there will be no air and noise emissions impacts and that appropriate restrictions are put in place during construction and when development has been completed.</p> <p>In relation to noise, both construction and operation elements are taken into account in determining the appropriate controls/conditions to be put in place. Noise limits are considered specifically for machinery/devices at industrial sites. Operational hours are also used to help in controlling potential noise emissions. If required, further information would be requested of the applicant to conduct a noise survey. A number of planning applications assessed by Environment in 2022 were required to provide further information which included noise assessments. It should be noted that dust and noise monitoring is requested as part of some waste facility permit compliance operations.</p> <p>Emission limits are specified for dust levels, day and night time noise. Specific air emissions are dealt with under licences and certificates. Planning reports are signed off by both the employee carrying out the review and each report is countersigned by the Senior Executive Engineer in the Department. More complex developments including large scale housing developments, commercial and industrial sites, depending on scale and location, will require appropriate assessments, environment impacts statements and liaising with environment, planning and other teams in the local authority.</p>

National Enforcement Priority: AIR – Local Enforcement Issues	
Local Authority:	Activities
<p>← Looking back at the year</p>	<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> [Guideline of 500 words per priority area]</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><i>Deco Paints Regulations:</i></p> <p>In accordance with the European Union (Paints, Varnishes, Vehicle Refinishing Products and Activities) Regulations 2012, a total of 20 vehicle refinishers are currently certified by Louth County Council. Five businesses had their certificates updated following submission of their approved assessors report. A total of 8 establishments were identified as having their certificate expired in 2022. The Waste Enforcement Team carried out premise inspections of premises which had lapsed expiry dates. In general, premise owners were unaware that their certificates had expired. Reminder letters were subsequently sent. Engagement with enviroguide is ongoing for each of these premises and pending final inspection report. No enforcement action has been taken against any non-compliant premise in 2022. No new premises have registered with Louth County Council in 2022. The Waste Enforcement Team from Louth County Council engaged in a solvent and deco paint training workshop held in April 2022 which is discussed below under solvent regulations. In order to improve compliance, a vehicle refinisher information leaflet prepared by the EPA was circulated by Louth County Council to all vehicle refinishers in Co. Louth to inform them of their compliance obligations.</p> <p><i>Solvents Regulations:</i></p> <p>In order to manage air quality emissions from dry cleaners, Louth County Council issues a certificate of compliance to dry cleaners when a process they undertake requires the use of products which contain volatile organic compounds. In accordance with the solvent regulations, Louth County Council maintains a register of 4 operational dry cleaners which have certificates issued by the local authority. At the end of 2022, one premise had its certificate due expiry and was submitted a reminder letter. Subsequent follow up is due in Jan 2023 to ensure premise has engaged the service of Enviroguide and is operating in compliance with the regulations. It is evident that in 2022, the impacts of Covid-19 resulted in a number of dry cleaners ceasing trading. This has resulted in decreased inspections required by Louth County Council. Also, some dry cleaners who are currently certified by Louth County Council have starting researching the move to “wet cleaning systems” which is an alternative method to the use of the harmful solvent Perchloroethylene. Wet cleaning systems offers a good alternative for existing dry cleaners and removes their requirements to engage the services of enviroguide and certification from Louth County Council. No enforcement action has been taken in 2022. The Waste Enforcement Team from Louth County Council engaged in a solvent and deco paint training workshop held in April 2022. The workshop held provided refresher training in relation to the legislation and the guidance and reporting requirements; they also had the opportunity of meeting the appointed Approved Assessors, and receive training on the various paint products in use and their appropriate labelling and training in relation to the inspection process. The workshop was held over two days with a site visit to a local vehicle refinisher operation where training was provided by enviroguide staff on carrying out inspections. It was an informative workshop held with experiences shared and issues surrounding enforcement discussed. In 2022, a dry cleaners info leaflet prepared by the EPA was circulated by Louth County Council to all dry cleaners in Co. Louth to inform them of their compliance obligations.</p> <p><i>Petroleum Vapour Regulations:</i></p> <p>Operators of petrol stations are legally required to obtain a Certificate of Testing from the Louth County Council relating to vapour emissions from their premises, in accordance with the Petroleum Vapour Emissions Regulation 1997. In order to apply for a certificate, operators of petrol stations are required to</p>

engage an approved assessor to carry out relevant tests and submit a report along with a fee to Louth County Council. In 2022, Louth County Council maintained a register of 27 service stations operating a stage I recovery system. Two premises are certified for stage II recovery system. In 2022, 3 reminder letters were submitted to stations which had their certificates approaching expiry. Due to staff resourcing in the section in 2022, follow up inspections could not be conducted on all sites which had certificates approaching expiry. These will be scheduled for inspection in 2023 as part of RMCEI inspection plan.

In Sept 2022, Louth County Council Waste Enforcement Team attended training at Ballycoolin Regional Training Centre on the Implementation and Enforcement of Air Pollution Act 1987 (Petroleum Vapour Emissions) Regulations, 1997. The training was an informative section explaining the processing of applications and issuing of certificates, in addition the promoting more effective enforcement.

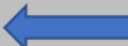
Licensed sites under the Air Pollution Act:


There is one site in Co Louth with an Air Emissions licence. The licence is assessed in accordance with Air Pollution Act 1987 (licencing of Industrial Plant Regulations 1988 as amended by the EPA act 1992. The plant in question has been being licensed in accordance with the industrial process listed at number 26 of the third schedule of the Air Pollution Act 1987; “*The production of tar and bitumen and the manufacture of products containing them*”. The facility supplies monthly reports of stack monitoring of Sulphur Dioxide and Nitrogen oxides. There has been no issues noted following the inspection in 2022

Local air and noise issues:

An investigation was undertaken by Louth County Council following ongoing complaints alleging dust nuisances from the operations at a port. The issue centred around the handling storage and transportation of dusty cargo from the ports activities. Louth County Council as a result of this has engaged an external consultant to undertake dust monitoring in the vicinity of the port. This has been in place since the beginning of 2022. This aim of this is to investigate the extent of the alleged nuisance. Also to build up a base of results. This will be continued into 2023.

## 2022 National Enforcement Priorities Progress Report

National Enforcement Priority: <b>GOVERNANCE - RMCEI Review &amp; Reporting</b>	
Local Authority:	Activities
 <p>Looking back at the year</p>	<p><b>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'.</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>• 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>Louth County Council Environment Department has a specific staff member appointed into the role of RMCEI coordinator who is responsible for the roll out of the plan, collection of statistical data and organisation of plan reviews.</p> <p>Reviews of the plan are undertaken along with the regular meetings held through PMDS (Performance management Development System). A meeting was held in Q1 of 2022 between the RMCEI coordinator and the Senior Engineer of the Environment Team where the plan was reviewed and the progression of the plan against the identified targets was assessed. A final meeting was held in Q4 2022, which is the final review of the plan for the year and a measurement is taken of how many targets have been met and where targets have not been met, these are outlined and further discussed. The results of these meetings are communicated to the management team through the Senior Engineer and further discussions on any issues can then also occur. Two additional meetings were held during the year also (Q2 and Q3) where the progression of the plan is reviewed and any issues meeting projected targets are identified and resolved. Prior to all meetings, an excel document is issued to all team members where they input data relating to the number of completed inspections, enforcements, complaints resolved and prosecutions that are ongoing. Any particular information of note relating to any specific case or inspection is also included within this spreadsheet. At these meetings, particularly the meeting held at Q3 2022, any targets that required additional resources were identified and a plan was put in place to ensure that these targets were met. It is essential that the RMCEI plan links closely to the team development Plan and the Personal Development plans of team members within the environment department and regular meetings on these plans throughout the year are essential for RMCEI success. The progress of the plan is continuously communicated to the Director of Services for the Environment Department and with the roll out of the NEMIS reporting tool in mid-2022, the planned targets can always be examined now in real-time.</p> <p>The staff resources within the Department have changed throughout 2022 – namely the resignation of an Executive Scientist and the promotion of a Technician Grade 1 within the organisation, which left both posts vacant. These vacant staff resources have had a direct effect on the roll out of the plan however inspections have been prioritised in 2022 to ensure that targets are met in specific high risk priorities.</p>

National Enforcement Priority: GOVERNANCE - Environmental Complaint Handling	
Local Authority:	Activities
 <p>Looking back at the year</p>	<p><b>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'.</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>• 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>Complaints received by the Louth County Council Environment, Litter &amp; waste team are received through as follows:</p> <ul style="list-style-type: none"> <li>• Local Authority CRM (Customer Relations Management) system (i.e. logs details of all customer complaints)</li> <li>• via the EPA National Environmental Complaints System and</li> <li>• directly to the Environment office by phone/ email etc</li> </ul> <p>To ensure that complaints are logged electronically, Louth County Council CRM system is used to record all complaint details from 2022 onwards (detail such as the time of complaint, location of complaint, complaint content etc) and each complaint is issued a case number. Customer services is the first point of contact for complaints and they create the CRM case and issue to the Environmental compliance team. The administration team examine the complaint and each case must be assigned to an individual person immediately who in turn, has a defined time period to respond to each complaint and close the case out. All complaints are categorised into Water, Waste non-C&amp;D, Waste C&amp;D, Litter, Air &amp; Noise categories and a staff member is assigned to each of these categories of complaint to ensure that all complaint types are addressed. There are 2nr. assigned personnel to coordinate complaints within the administration team and these staff members ensure that all complaints are assigned to the relevant person and closed out where possible. The CRM system stores all information relating to every complaint electronically and this information is held indefinitely. All complaints can be searched by address, name, case number, date or case status hence all information relating to complaints from any time period can be collated and examined. Once a case is assigned to a staff member, the onus is on the staff member to examine the complaint content on the same day that they receive the complaint or the next day that they return to the office (if they are on leave). If an individual who manages a particular category of complaint is on leave, the administration team reassign the case to another member of the environmental technical team. No complaint will go unopened by the Environment on the same working day that it is received (unless it is received after 4pm, hence it may be the following morning that the case is reviewed by the Administration team).</p> <p>All EPA referred complaints were received by the RMCEO coordinator who in turn maintains a file on each complaint to ensure timely investigation and close out of the issue. For the period January to December 2022, Louth County Council received 72 Air related complaints compared to 54 in 2021 and all of these cases were closed out in 2022. Regarding noise complaints, 56 complaints were received in 2022 compared to 35 in 2021 and again, all cases were closed out in 2022. Regarding water quality, 75 complaints were received in 2022 compared to 58 in 2021 with a closure rate of 96% in 2022. Regarding Waste non-C&amp;D, 82 complaints were received compared to 23 in 2021 with a closure rate of 71% in 2022. 1560 Litter complaints were received in 2022 compared to 2071 in 2021 and all of these complaints were closed out in 2022. Finally 22 Waste C&amp;D complaints were received in 2022 compared to 9 in 2021 with a percentage closure rate of 76% in 2022.</p> <p>Older historical complaints were also reviewed in 2022 in order to close out these legacy issues. The waste non C/D waste complaints number was a total of 34 open complaints from pre-2022 plus an additional 15 cases were opened in 2022 giving a total of 49 open cases. The number of waste C/D open complaints from pre-2022 is 7 plus an additional 7 open complaints for 2022 giving a total of 14 open complaints cases.</p> <p>All complaints from mid-2022 are recorded electronically and reported in the annual RMCEI data Returns.</p>

