

DRAFT ISSUE

Clare County Council

Recommendation of the European Parliament and the
Council Providing for the Minimum Criteria for
Environmental Inspections in Member States (2001/331/EC)

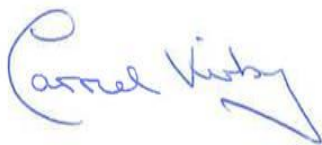
Inspection & Compliance plan under RMCEI 2022

Note from the Director:

Acknowledgments:

Brendan Flynn, Cathal Brodie, Karen Foley, Maria Carey, Marie O'Neill, Maura McNulty

Approved by Directors of Services



Name: Carmel Kirby

Position: Director of Service

Date of Approval: 13-04-2022

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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	Co.Clare
Population	119,000
Calendar Year	2022
RMCEI Coordinator Name and Position	Brendan Flynn, Senior Executive Engineer

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

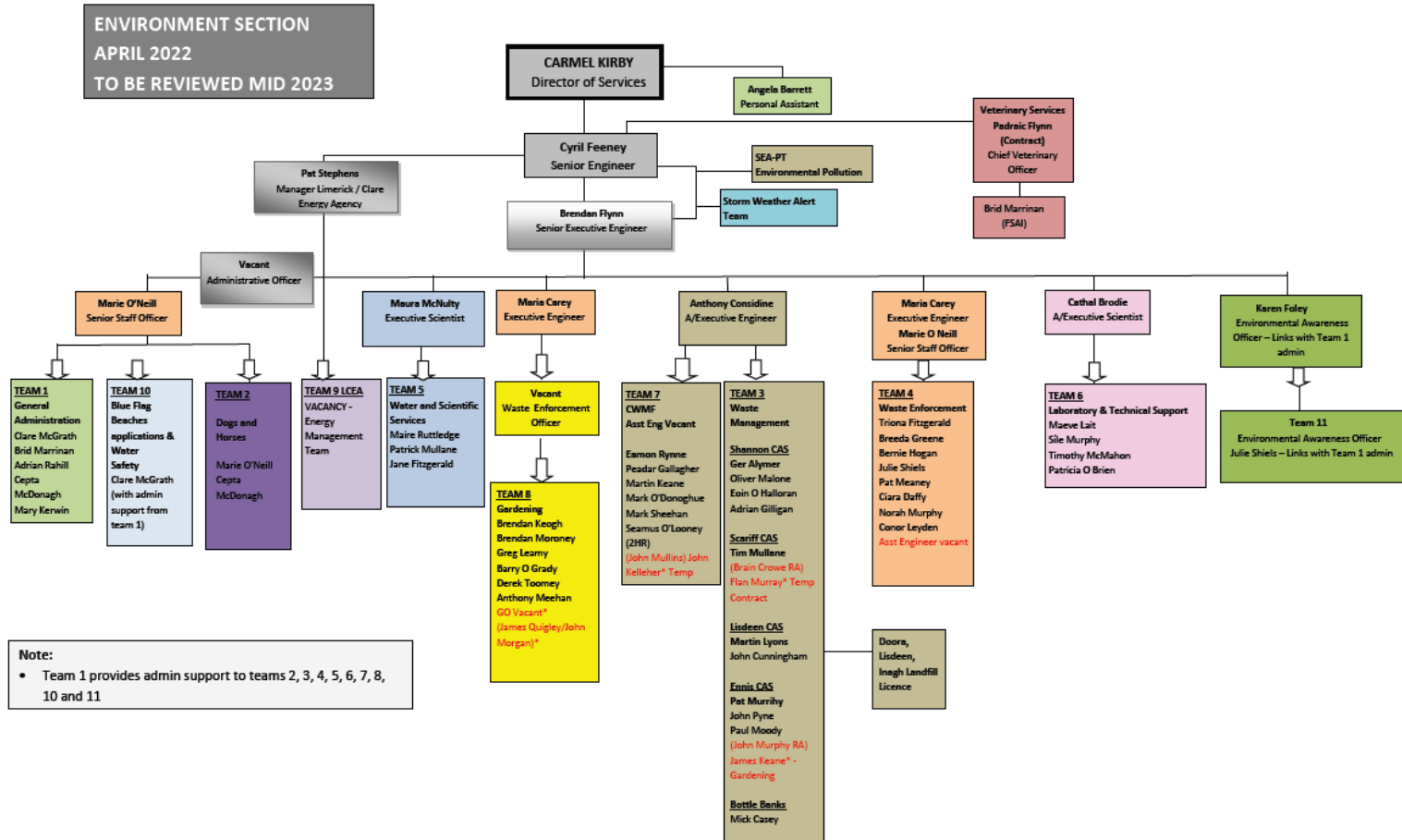
Table 2 Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan (if any) & how these will be Addressed

Description of known challenge and outline of how these will be addressed
<p>1. Staff Changes 2022. At the beginning of 2021 CCC employed a new Waste Enforcement Officer (WEO) as our previous WEO had taken up a different role in the Council. This impacted inspections as the new WEO was external to the Council. This has been repeated in 2022 as our new WEO has also left Clare County Council to take up a role in another LA. This will lead to the appointment of an external person with reduced knowledge in the specific field and the loss of 15 years of knowledge from the previous WEO. There will be a significant period where training will be required for the new WEO. Clare County Council are currently experiencing significant staff issue as a number of key scientific staff are on medium term leave. Possible return dates are in May which will mean all the work and inspection will have to be compressed in to the remainder of the year.</p>
<p>2. Covid -19. With current rising Covid 19 positive numbers a return to certain restrictions may limit inspections at certain premises. Increase number of Inspections post Covid restrictions to catch up on 2021 will have to be factored into 2022 numbers. This will add workload to the team. To proactively manage this we aim to prioritise inspections.</p>
<p>3. Waste Tyres. Following on from the successful prosecution of a Waste Facility Permit operator for non-compliance with a WFP licence, Clare County Council undertook a remediation of the site including removal of what was originally estimated as 4,000 tons of waste tyres. As the project advanced it became evident that there had been a conscious effort to conceal the extent of the quantity of waste tyres. It is now estimated that circa 7,000ton of waste tyres are in fact on site with some 4,000 tons buried. This has lead to a significant increase in site inspection and work on the tendering process. This work will continue well in to 2022. All relevant technical staff (Senior Executive Engineer, Executive Engineer and Waste enforcement officer) will invest significant days and weeks to resolve this matter to obtain a positive environmental outcome by way of removal of tyres and remediation of the site to a suitable condition post works.</p>
<p>4. The Opera development in Limerick has commenced and may bring increased levels of inspection if waste is hauled over the Limerick Clare border. Inspections will be of vehicles, sites and a potential rise in applications for Cert of Registration in Clare. We have already noted a significant number of complaints of waste ending up in Co Clare from Limerick development site which are currently being investigated.</p>
<p>5. Bathing water monitoring inspections are expected to increase due to a significant rise in media attention of some notices placed on Bathing water in 2021. This has been of particular interest due to the number of visitors to Co Clare as a results of Covid restrictions. It is fully expected that this trend will continue in 2022. The aim of the increased inspections an increased social media postings is to ensure the public are fully aware of the excellent water quality in Co Clare.</p>
<p>6. Planning applications increased by 466% for forestry applications in 2021 and increased by 38% for application requiring a DWWTS in 2021. Staff resources may be an issue to complete all reports as this trend has so far been maintained into the Q1 2022.</p>
<p>7. NIP Plan 2022-2027 CCC requirement for testing has increase from 39 inspections in 2021 to 77 inspections in 2022. Clare is the 5th highest county for inspections. This will directly affect other work</p>

elements and inspections, as this is a statutory requirement. Failure to do inspection will just mean they will have to be carried over into the following year therefore, we will try to achieve all inspections in 2022.

1.3 Staff Structure

Figure 1 Council Organogram



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 '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		
2.5	Ongoing Air and Noise Enforcement Work	Yes		
3.0	Waste - Improving waste management and protecting our environment			
3.1	Tackling illegal waste activities and Multi-Agency Sites of Concern	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	
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	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?		No	CCC will focus on NEP due to resources available

Table 5 (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 & Dept of Agriculture Food & the Marine (DAFM), EPA, DECC & DHPLG ro LAWPRO (including LAWCO)</p> <p>If all such work has already been referred to above leave this blank.</p>	<p>CCC will continue to work with WERLA in relation the compliance of an ELT site that was subject to prosecution in 2020 but has still continued in 2022. This will also be relevant to other multi agency sites of Interest. CCC will work with WERLA on improving compliance with the PRI schemes ELVES and Repak.</p> <p>The Council will also continue to carry out inter-agency roadside inspections with An <i>Garda Síochána</i> and the NTFSO under the Waste Management Act.</p> <p>As part of the requirements of the River Basin Management Plan CCC will continue to work in collaboration with LAWPRO on information sharing, referrals and training and also periodically work with DAFM/Teagasc in relation to agriculture inspections.</p>

3. Risk Assessment

Table 6 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 ¹			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		
Section 4 Discharge Licences	54	4	25	25	24	51	25	100	Compliance sampling monitoring visits are based on compliance history. Some premises are seasonal and can only be sampled in summer months.
Waste Facility Permits 2007-2008 Regulations: Waste Permit Facilities	17	4	13		8	26		34	All Waste Facility Permitted sites to be inspected twice every year
Waste Facility Permits 2007-2008 Regulations: Waste Permit Facilities (anticipated new applications, 2022)	3		3			6		6	Figure is based on previous years' applications
Certificates of Registration	34			34			34	34	All Certificate of Registration sites to be inspected once per year
Certificates of Registration (anticipated new applications, 2022)	6			6			6	6	Figure is based on previous years applications (with the exception of 2021 when 16 applications were submitted)
Total No. Of Inspections Planned								156	

¹ Unless directed otherwise

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4. Resource Assessment for the Year Ahead

4.1 Review of the Achievement of the Previous Years Inspection Targets

Table 7 Review of Previous Years Inspections

Inspection Type <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	No. of Planned Inspections set out at the start of the Previous Year	No. of Completed Inspections at the end of the Previous Year	Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)	Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead
Routine Waste Inspections	271	718	Carried out 117 Commercial Food Waste inspections, in line with re-opening after Covid restrictions, carried out 289 Household Waste surveys . (Both exceeded plan at start of year)	Both factors taken into account when planning 350 for 2022. Plan to continue HH surveys. Commercial Food Waste Inspections will be less than 2021.
Non-Routine Waste Inspections	Non-Routine Waste Inspections are reactive, therefore they are not set at start of the year	2228 completed in 2021	Cannot state in advance the number of Non-Routine inspection as most of these are generated from complaints/ discovery of unauthorised activity.	Non-Routine Waste Inspections are reactive, therefore they are not planned. We estimate that they will be in the region of 2000 in 2022.
Routine Litter Patrols/Investigations	3500	3260	There was a vacant community warden post for 6 months. This post has now been filled.	3,630 planned for 2022, taking account of available warden hours, and 2021 figures. Vacant Warden post now filled.
Routine Water/Wastewater Inspections	1040	357	Similar number of planned v completed. Private Water Supplies = 344 River and lake samples = 506	Inspections numbers submitted for 2021 do not include WFD surveillance and operational monitoring of river and lakes, Private Group Water Sampling (EPA to source that data).
Non-Routine Water/Wastewater Inspections	non-routine , cannot predict but estimated 120	253		Response to Complaints included.
Routine Air/Noise Inspections	15	77	We focused on Solid Fuel inspections of retailers, delivery vehicles and spot checks on households in 2021 due to commentary in media about air pollution.	Target exceeded due to number solid fuel inspections. We aim to focus on this again in Q1 and Q4 2022.
Non-Routine Air/Noise Inspections	cannot predict as non-routine response to	25	Complaints based on non routine activity	Cannot be predicted.

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Inspection Type <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	No. of Planned Inspections set out at the start of the Previous Year	No. of Completed Inspections at the end of the Previous Year	Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)	Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead
	complaints but estimated 10			
Routine producer Responsibility Inspections	101	70	Prosecutions initiated against 10 professional importers of specified vehicles in 2021, time spent preparing for court took from inspection time for ELT retailers	We anticipate a successful outcome to the ELVES legal cases. We intend to inspect the ELT retailers in 2022. ELT retailers not inspected in 2021 due to prioritising ELVES.
Planning inspections	Non-routine applications cannot predict	778	>25% variance	Significant rise of applications for DWWTS, Forestry, Agriculture, Large Developments from previous years. Environment Section assess application and make recommendations.

4.2 Number of Staff Days Available

Table 8 Resources Available to undertake required Work for the Year Ahead

Department	Available Resources	Name	Focus Area for this Resource (please ensure you outline which National Environmental Priority area this resource will be associated with)	Available days for RMCEI (both routine and non-routine)	Basis of calculating Resource Available days (take account of e.g. job-sharing, full/part-time working, expected leave, secondment to other work areas and therefore unavailable, basis for a standard working year e.g. 220 days)
Environment	Senior Executive Engineer	Brendan Flynn	All	55	Section Head so covers all aspects of Env and Climate, Beaches, Capital Projects, Waste management, Sea-pt, RMCEI and Non-RMCEI
Environment	Executive Engineer	Maria Carey	Waste, Air	200	Also works on non RMCEI work programmes (beach bye laws, Capital etc)
Environment	Executive Scientist	Maura McNulty	Water/Air/Noise	168	Planning Reports, Section 4 Licences, Pollution Complaints , DWWTS Inspections, Air and Noise.
Environment	Executive Scientist	Cathal Brodie	Water & Wastewater, Waste	120	GWS, Rivers, Bathing Waters. Non RMCEI include IW, internal projects and Historic Landfills
Environment	Assistant Scientist	Patrick Mullane	Waste, Air, Water	175	Section 4 licences, DWWTS Inspections, Planning

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					Reports, Pollution Complaints
Environment	Assistant Scientist	Maire Rutledge	Water, Air and Noise	180	Planning Reports, DWWTS Inspections, Pollution Complaints Also works on EPA waste licence compliance
Environment	Technician Gr 1	Jane Fitzgerald	Water, Air and Noise	168	Planning Reports, DWWTS Inspections, Pollution Complaints
Environment	Waste Enforcement Officer	TBC	Waste, Air	210	Full time on RMCEI, training ,meetings, Waste Enforcement, court, legal proceedings
Environment	Senior Executive Technician	Maeve Lait	Commercial supplies	35	Rest of time IW related
Environment	Technician Gr 1	Sile Murphy	Bathing Water , S4, GWS, Rivers	120	Rest of time IW related
Environment	Technician Gr 1	Tim McMahon	Bathing Water , S4, GWS, Rivers	180	Laboratory maintenance and non RMCEI
Environment	Technician Gr 1	Patricia O Brien	Bathing Water , S4, GWS, Rivers	160	Rest of time IW related wastewater plants.
Environment	Senior Staff Officer	Marie O Neill	All	142	Manages projects outside of RMCEI as well
Environment	Environmental Awareness Officer	Karen Foley	All	50	Env complaints, Awareness projects
Environment	Assistant Staff Officer	Breda Greene	Waste, Air	210	Covers general office duties across all disciplines with a focus on Waste Enforcement and Waste management's support work
Environment	Clerical Officer	Julie Shiels	Waste, Air	50	Works with EAO on awareness projects
Environment	Clerical Officer	Bernie Hogan	Waste, Air	210	Covers general office duties across all disciplines with a focus on Waste Enforcement
Environment	Assistant Staff Officer	Brid Marrinan	All	20	Covers general office duties and Non RMCEI works
Environment	Clerical Officer	Mary Kirwen	All	150	Covers general office duties with a focus on customer complaints
Environment	Staff Officer	Clare McGrath	All	110	Covers general office duties and Non RMCEI works
Environment	Clerical Officer	Adrian Rahill	All	150	Covers general office duties with a focus on customer complaints
Environment	Environmental Patrol Warden	Conor Leyden	All	190	Full time on RMCEI plus awareness activities
Environment	Community Warden	Norah Murphy	All	220	Full time on RMCEI
Environment	Community Warden	Pat Meaney	All	220	Full time on RMCEI
Environment	Environmental Warden	Ciara Daffy	All	220	Full time on RMCEI

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Municipal District	Litter Warden	Vacant	Waste	55	Cover other non Environment MD duties
TOTAL DAYS AVAILABLE				3,768	

4.3 Training Requirements

All training listed below is linked to the PMDS of Clare Co Co

Relevant staff within the Waste Enforcement team to complete Waste Management training.
Relevant staff within the Waste Enforcement team to complete Courtroom Skills and Interview Techniques training.
WEO on the job training/mentoring and courses provided by ESTG
Lab Team New entrant relevant training required
Local Catchment Assessment Investigative Training
Site Suitability assessment training course (Level 6)
Revised EPA Code of Practice for Single Houses <10 P.E. 2021
DWWTS Inspector Course for 2 staff

4.4 Health and Safety

Clare County Councils Health and Safety Management System will be complied with.

All activities covered under RMCEI have an associated Risk Assessment completed prior to inspections.
All Staff receive toolbox talks.
Appropriate PPE provided for all staff suitable for activities undertaken
General H&S Policy (Extract) below which is complimented by the above

4. Occupational Health and Safety Policy

Clare County Council are committed to safeguarding, as far as is reasonably practicable the safety, health and welfare of all employees, contractors and visitors. We, as employees of Clare County Council have an obligation to meet the requirements of the Safety, Health and Welfare at Work Act 2005 and all other applicable legislation as a minimum standard of performance.

Our objective is to continually improve our health and safety performance by taking a proactive approach to the management of occupational health and safety as an integral part of delivering our services and of doing business.

Where reasonably practicable, we endeavour to do this by:

- Ensuring that the applicable legal requirements are identified and adopted as our minimum acceptable performance standards.
- Ensuring that the necessary organisation structures and resources are provided so that health and safety can be properly managed.
- Setting occupational health and safety objectives and key performance indicators and periodically reviewing performance against them.
- Identifying through systematic risk assessment situations where accidents and ill health are likely to occur and implementing the necessary preventive measures.
- Defining the health and safety duties and responsibilities of Clare County Council employees.
- Ensuring that at all levels, training and appropriate information on safety and health is provided so that employees have the opportunity to be competent and safety conscious.
- Involving and consulting our employees safety representatives at regular safety meetings and as an integral part of the safety monitoring committee to identify their safety and health concerns and to gain their commitment to our policy.
- Report and investigate where accidents, dangerous occurrences and near misses have occurred or are likely to occur so as to prevent occurrence or recurrence.

To ensure that our policy is implemented and remains appropriate and effective, we carry out periodic audits and reviews of our occupational health and safety management system and performance. These audits and reviews are monitored on a regular basis by the safety management committee. Where the need for improvements to our policy, procedures or performance is identified, appropriate action is taken.

Overall responsibility for occupational health and safety lies with us, as the Chief Executive and the Management Team. We are supported in this by each employee of Clare County Council who must recognise that they each have a responsibility for their health and safety while at work.

I appreciate your co-operation to ensure successful implementation of the occupational health and safety management system in the workplace to ensure that all employees can work in a safe environment.



 Pat Dowling
 Chief Executive

Date: 1st March 2022


Directors of Services


 Anne Haugh


 Leonard Cleary


 Noeleen Fitzgerald


 Carmel Kirby


 Liam Conneally

5. PLANNED INSPECTIONS/OTHER ACTIVITIES FOR THE YEAR AHEAD

5.1 Planned Routine & Non-Routine Inspections

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Table 9 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
Waste				
Total Routine Inspections end of year	507	0.5	253.5	
Total Non-Routine Inspections end of year	1265	0.5	632.5	2228 Non-routine waste inspections carried out in 2021
Total Inspections end of year	1772		886	
Litter				
Total Routine Inspections end of year	3742	0.3	1122.6	Based on available warden hours factoring in a minimum number of inspections required by each per day
Total Inspections end of year	3742		1122.6	
Water/Wastewater				
Total Routine Inspections end of year	1122	0.5	561	Section 4's, DWWTS Inspection (NIP) , Farms Inspections, Bathing Waters. river, lakes and private water supply sampling (844)
Total Non-Routine Inspections end of year	92	1	92	Pollution Complaints, Lawpro Referrals, DAFM referrals, Red Dot Referrals.
Total Inspections end of year	1214		653	
Air/Noise Inspections				
Total Routine Inspections end of year	71	0.5	35.5	Voc and Deco Paints Inspections + Smoky Coal Inspections
Total Non-Routine Inspections end of year	20	0.5	10	Cannot predict number of Air and Noise Complaints
Total Inspections end of year	91		45.5	
Producer Responsibility Inspections				
Total Routine Inspections end of year	70	0.54	37.8	Successful outcome to the ELVES legal cases is anticipated in 2022. ELT retailers to be inspected in 2022. (Not done in 2021)

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	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
	Total Non-Routine Inspections end of year	26	0.5	13	Cannot predict number of non-routine inspections, dependant on results of first inspection and number of complaints received.
	Total Inspections end of year	96		50.8	
Planning (Environmental) Inspections					
	Total Routine Inspections end of year	0	0.5	0	None planned as resources are mainly required for non-routine applications.
	Total Non-Routine Inspections end of year	750	0.7	525	Cannot predict Planning reports (Single houses, Forestry, Commercial Developments, Agriculture) required with Environmental Input.
	Total Inspections end of year	750		525	

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

Table 10 Outstanding Enforcement Actions & Complaints to be Closed Out

Inspection Type	No. of Inspections to close out in the Year Ahead	Estimate time per inspection+ write up (days)	Time for all Inspections (days)
Outstanding Complaints			
4.1.1 Litter (excluding fly tipping and illegal dumping)	0	0.25	0
4.1.2 Waste, non C&D. Includes fly tipping and illegal dumping	9	0.5	4.5
4.1.3 Waste, C&D.	3	0.5	1.5
4.2 Water/Wastewater	30	0.5	15
4.3 Air/Odour	2	0.5	1
4.4 Noise	0	0.5	0
Sub-Total	44		22
Outstanding enforcement Actions			
Warning Letters	10 (8 waste enforcement)	0.5	5
Section Notices	15 (All Waste Enforcement)	0.3 (Waste enforcement)	5 (waste enforcement)
Complaints	44	0.5	22
Court Cases	13 (1 Section 4 licence + 12 Waste Enforcement)	10 days required as court case pending	20
Etc.			
Sub-Total	82		52
Total	126		74

5.3 Summary of Resource Requirements

Table 11 Summary of Inspections to Complete and Resources Required for the Year Ahead

Inspection Type	No. of Inspections Planned for the Year Ahead	Total Time for all Inspections (days)
Total Routine Inspections – (obtained from completed rows A-F of Section 6 of the RMCEI Return)	5512	2010.4
Total Non-Routine Inspections end of year – (obtained from completed rows A-F of Section 6 of the RMCEI Return)	2153	1272.5
Outstanding Enforcement Action & Complaints to be Closed out – (outlined in Table 9)	126	74
Totals	7,791	3,356.9
Total Available Resources (Days) – (outlined in section 5 Table 8 of the Plan)		3,768

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The 3,768 assumes we have a full complement of staff for the full year. However, the WEO position is currently Vacant .The impact of this will only be known in Clare when the Waste Enforcement Officer has been appointed. There is no panel in place for this post at the time of writing this plan.

We also have some staff on medium term sick leave and this takes account of the difference in the available days v planned inspection days.

We propose to monitor the impact and reflect on this at our RMCEI review meeting throughout the year.



6. PLAN REVIEW MECHANISMS

Table 12 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?	Yes, dates TBC but will be scheduled with regular Team meetings	
Q2 Will the Director of Services, Senior Engineer, Senior Management and Environment Strategic Policy Committee be informed of Plan progress (on a monthly or quarterly basis).	Quarterly for Senior Management	
Q3 Are objectives for the delivery of the RMCEI Plan incorporated within staff PMDS Team Development Plans?	Yes for Team plan and PDP	
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?	Yes, full review of implications at team meetings held monthly or as required if required more frequently	
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)?	Yes by way of minutes of meetings also in monthly management report to Elected Representatives	

Appendix A PRIORITY TEMPLATE

A.1 NATIONAL PRIORITY 1.1

National Priority 1.1 WATER : Pressures from Agriculture (<i>slurry/soiled water collection and storage</i>)	
Activities	
Looking forward to the year ahead	Tell the story of what you're council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan. <i>[Guideline of 250-400 words per priority area]</i>
Describe the work to be carried out to address this National/Additional Local Priority:	<p>The relevant legislation is the Good Agriculture Practice for the protection of water Regulations 2017 as amended commonly known as the Nitrate Regulations. Clare Co Co is responsible for enforcing the regulations. It aims to protect water quality from pollution from agricultural sources and to promote the use of good farming practice. All inspectors in Clare have been adequately trained to carry out inspections.</p> <p>The following steps will be taken in the inspection process:</p> <ul style="list-style-type: none"> • Farms for inspection will be identified in catchment areas where agriculture is considered a significant pressure e.g upstream of PAA in “at risk” water bodies – Focused approach. • Catchment maps and Water Quality Report 2015-2018 will be used to identify farms for inspection; • Farm owners will be identified on Land Direct and will be notified of inspection in advance; • Farms will be inspected to check compliance with the Good Agriculture Practice Regulations 2017as amended including slurry and soiled water storage capacity. • Farms are graded according to GAP compliance and calculations are carried out to see if adequate storage volume in place. • If non-compliances are detected they are identified to farm owner at time of inspection and corrective action is requested at the time of the inspection and also sent a letter; • All inspected farms are written to after inspection informing of compliance or non-compliance; • If non-compliances are identified re-inspections will be carried out and closed out to insure corrective action is taken. • LAWPRO referrals investigated. • Significant non-compliances cross- reported to DAFM
Have appropriate resources being assigned to carry out the work associated with this activity for 2022:	The team deals with non routine inspections such as planning referrals and pollution complaints, the number of farms that can be inspected will depend on level of non-routine inspections that is required to be carried out in 2022.


National Priority 1.2 WATER : Pressures from Agriculture (slurry and fertiliser spreading)	
	Activities
Looking forward to the year ahead	<p>Tell the story of what you're council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of 250-400 words per priority area]</i></p>
Describe the work to be carried out to address this National/Additional Local Priority:	<p>The relevant legislation is the Good Agriculture Practice for the protection of water Regulations 2017 as amended commonly known as the Nitrate Regulations. Clare Co Co is responsible for enforcing the regulations. It aims to protect water quality from pollution from agricultural sources and to promote the use of good farming practice. All inspectors in Clare have been adequately trained to carry out inspections.</p> <p>Spreading of slurry is not permitted in the closed season or under unsuitable weather and soil conditions.</p> <ul style="list-style-type: none"> Will respond to slurry spreading complaints in the closed season. After farm inspections all inspected farms are written to after inspection informing them if a non-compliance is detected. LAWPRO referrals investigated. Significant non-compliances of the GAP Regulations are reported to DAFM such as using slurry guns or spreading on waterlogged lands.
Have appropriate resources being assigned to carry out the work associated with this activity for 2022	<p>The team deals with non routine inspections such as planning referrals and pollution complaints, the number inspections for this priority in at risk catchments will depend on level of non-routine inspections that is required to be carried out in 2022.</p> <p>There are not adequate resources in place at all times to do a significant amount of planned inspections of slurry spreading in areas where agriculture is identified as a significant pressure.</p>
The Final Environmental Outcome to be achieved?	<p>Prevent deterioration of water quality due to spreading of slurry on water logged soils.</p>

National Priority 1.3 WATER : DWWTS (Septic Tanks)	
	Activities
Looking forward to the year ahead	<p>Tell the story of what you're council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of 250-400 words per priority area]</i></p>
Describe the work to be carried out to address this National/Additional Local Priority:	<p>The relevant legislation is the Water Services Act 2007 and amendment Act 2012 where Section 70 (2)(a) outlines duties of an owner of a domestic wastewater treatment system (DWWTS).</p> <p>CCC will comply with the EPA National Inspection Plan. All inspectors have completed inspector training course given by the WSNTG and must register as an inspector with the EPA.</p> <p>The total inspections required for 2022 is 93 (16 carried over from 2021). Due to expected failures the number is likely to be greater than 100.</p> <p>The following steps will be taken in the inspection process:</p> <ul style="list-style-type: none"> • We will identify sites to be inspected using EPA NIP maps and taking referrals from LAWPRO in PAA and HSOS catchments into consideration in the selection; • Identify homeowner on land direct and write to homeowner informing of planned inspection; • Carry out inspection as per LASNTG training and guidance manuals; • Inform home owner at time of inspection if non-compliances detected; • Inform homeowner eligibility of grant scheme if located in PAA and HSOS; • Issue non-compliance notification requesting corrective action if breaches of legislation detected; • Ensure compliance with notices issued. • Close advisory notices on completion of works by carrying out re-inspections to insure corrective action carried out. • All inspection data will be uploaded to EDEN to track inspections carried out, all notices issues and follow up actions. <p>The aim of the inspection programme is to target inspection in water body catchment that are more at risk of deterioration , if there is high pressure identified due to the density of on-site wastewater treatment systems, areas of poor draining soils.</p>
Have appropriate resources being assigned to carry out the work associated with this activity for 2022	Yes
The Final Environmental Outcome to be achieved?	<p>The aim is to identify non-compliance in management and maintenance of domestic on- site wastewater treatment systems, request corrective action in order to reduce water pollution and public health risk</p>

National Priority 1.4 WATER : Discharge licences/ Misconnections	
Activities	
Looking forward to the year ahead	<p>Tell the story of what you're council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of 250-400 words per priority area]</i></p>
Describe the work to be carried out to address this National/Additional Local Priority:	<p>The relevant legislation is the Water Pollution Act 1977/1990.</p> <p>Facilities are licensed under Section 4 of the Act and include such facilities as, hotels, restaurants, commercial businesses, housing estates. The licences contain conditions issued by Clare County Council in order to ensure that the licensee manages and operates wastewater treatment plant serving the facilities in such a manner that it does not cause water or air pollution. The sites monitored also include housing estates that were formerly licenced but have been taken over by Clare County Council ,they are housing estates in non-sewered rural areas not taken over by I.W.;</p> <p>The following steps are taken in the process:</p> <ul style="list-style-type: none"> • All relevant sites will be monitored (includes taking samples) throughout the year following an annual plan depending on site performance in management and maintenance of wastewater treatment plant (wwtp); • If LAWPRO identify sites causing significant pressure we will carry out a full audit of site to check compliance with the issued licence; • Some water pollution complaints refer to Section 4 sites; • If non-compliances are identified during inspections the licensee will be notified and advised to carry out corrective action; • Follow up inspections will then be carried out to insure compliance; • Licensees also submit self-monitoring data, which is examined for compliance with licence conditions. <p>The aim of the inspection programme is to insure that all licence holders comply with licence conditions.</p>
Have appropriate resources being assigned to carry out the work associated with this activity for 2022:	Yes
The Final Environmental Outcome to be achieved?	The aim is to identify non-compliance in management and maintenance of licensed wastewater treatment systems, request corrective action in order to reduce water pollution and public health risk. Unauthorised discharges controlled and regulated.

National Priority 1.5 WATER: Local Priorities and water quality monitoring	
Activities	
Looking forward to the year ahead	Tell the story of what you're council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan. <i>[Guideline of 250-400 words per priority area]</i>
Describe the work to be carried out to address this National/Additional Local Priority:	<p><u>WFD Monitoring:</u> The number of river sites sampled in the county is 44, the number of lakes sites is 56 .The total number of samples taken is 506 which includes all operational and surveillance sample sites. Clare County Council collaborates with the EPA on the annual monitoring programme submitted by the EPA to Local Authorities.</p> <p>All of the samples are sent for analysis to EPA laboratories on specific dates agreed at the beginning of each year with the EPA The objective of the monitoring programme is to provide a coherent and comprehensive national overview of physio- chemical status of surface waters (rivers, lakes.)</p> <p>Engage with LAWPRO and other bodies on RBMP.</p> <p><u>Bathing Water.</u> Clare County Council monitors 14 designated bathing areas under the Bathing Water Quality Regulations 2008 9 of these have blue flag status in 2021 and 4 have green coast flags. The bathing areas will be monitored ten times during the bathing season. Streams flowing into bathing areas are also monitored.</p> <p>Heavy rainfall can cause a deterioration in bathing water quality at some sites, in the case Short Term Pollution (STP) Notices are put in place to notify the public of the risk. After STP event extra sampling of bathing waters is required.</p> <p>The aim of the monitoring programme is to determine if the bathing water is safe and within HSE public health guidelines for bathing areas. We collaborate with the EPA/HSE/An Taisce on the bathing programme.</p> <p>All results are made available to the public EPA website on beaches.ie.</p> <p>Carry out any other monitoring required due to LAWPRO referrals and responding to pollution incidents.</p>
Have appropriate resources being assigned to carry out the work associated with this activity for 2022:	Yes
The Final Environmental Outcome to be achieved?	Bathing Water : To protect public health and to collect adequate data in order to classify bathing water WFD Monitoring: To comply with EPA Monitoring programme and provide physio-chemical data to determine status of rivers/lakes.

National Priority 2.1: Solid Fuel	
	Activities
<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan. <i>[Guideline of up to 500 words per priority area]</i></p>
<p>1. 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"> • For authorised sites, a compliance rate and context/analysis; • Appropriate site selection methodology, and/or early interventions; • Detection of non-compliances/unauthorised activities and follow up; • Progress in the NEP; • Positive environmental outcomes – not simply reaching a target of inspections; • Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects; <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p>	<p>Under the Air Pollution Act (Marketing, Sale, Distribution and Burning of Specified Fuels) Regulations 2012 (as Amended) Clare County Council will continue to monitor the burning of specified fuel within the designated Low Smoke Zones in the county.</p> <p>This monitoring program consists of inspections of fuel retailers and delivery trucks as well as patrols of residential areas, with resultant enforcement actions to be taken. Our Environmental Awareness Officer has collaborated with regional groups to produce literature, which continues to be used in our campaigns. The plan for 2022 is to write to householders in areas where the burning of specified fuels is suspected, to inform them of their obligations. Awareness campaigns in print and social media are ongoing to raise awareness of the requirement to burn low smoke fuel within the designated areas.</p> <p>The EPA monitoring station in Ennis recorded 10 PM10 exceedances in January and February 2021. This had dropped to 8 PM10 exceedances in January and February 2022, a reduction of 20%. We will continue to refer to this EPA data to track progress in this NEP.</p> <p>In Q1, 2022 Community Wardens dedicated 2 hours per week to patrolling and monitoring deliveries to households. Spot checks were carried out. 100% compliance was recorded. This exercise will be repeated in Q4 2021. Inspections of delivery trucks will be carried out in Q4 2022, as will further spot checks of retail premises for compliance with the regulations.</p> <p>WERLA will continue to be consulted for advice, as required. Samples of both specified fuel and low smoke fuel will be sent for laboratory analysis, if required.</p>
<p>2. Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</p>	
<p>The Final Environmental Outcome to be achieved?</p>	<p>Through the measures outlined above, it is envisaged that these actions shall result in;</p> <ul style="list-style-type: none"> – Improved compliance with the Air Pollution Act (Marketing, Sale, Distribution and Burning of Specified Fuels) Regulations 2012 (as Amended) – An improvement in air quality within the low smoke zones and a reduction in environmental pollution.


National Priority 2.2: Air Quality and Data Use	
	Activities
<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan. <i>[Guideline of up to 500 words per priority area]</i></p>
<p>3. 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"> • For authorised sites, a compliance rate and context/analysis; • Appropriate site selection methodology, and/or early interventions; • Detection of non-compliances/unauthorised activities and follow up; • Progress in the NEP; • Positive environmental outcomes – not simply reaching a target of inspections; • Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects; <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p>	<p>Clare County Council works with the EPA to complete the expansion of the Ambient Air Monitoring Programme network including:</p> <ul style="list-style-type: none"> • Assist EPA to determine viable locations for air quality monitoring stations; • Assist EPA to progress siting of air quality monitoring stations; • 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 • Assist (where possible, to the best extent possible) EPA to maintain existing and new air quality monitoring stations • Review local air quality data to identify hotspots and to prioritise sites/areas for action. <p>–Local air quality data including a map is made available to the general public as soon as technically possible on CCC website.</p>
<p>4. 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>Inform the public of real time air quality data in two urban areas (Ennis and Ennistymon)</p>

National Priority 2.3: Environmental Noise Directive	
	Activities
<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan. <i>[Guideline of up to 500 words per priority area]</i></p>
<p>5. 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"> • For authorised sites, a compliance rate and context/analysis; • Appropriate site selection methodology, and/or early interventions; • Detection of non-compliances/unauthorised activities and follow up; • Progress in the NEP; • Positive environmental outcomes – not simply reaching a target of inspections; • Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects; <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p>	<p>Roads Section Action The Council plan to Deliver the Round 4 Noise Mapping requirements as set out in the Environmental Noise Regulations of 2018. Round 4 of the noise mapping included Limerick as an Agglomeration i.e. an area with 100,000 inhabitants or more. Limerick Agglomeration includes parts of Clare. Agglomerations will produce separate Noise Mapping and Action Plans, the Council will provide relevant information for this such as traffic counts, and GIS data</p> <p>The Council have already submitted the Annual Noise Action Plan Progress Report to the EPA.</p> <p>Annual Noise Action Plan Progress Report demonstrates progress on the key issues and priority areas for action. 137 locations were identified using the prioritization decision support matrix, from the EPA Guidance Note for Noise Action Planning, July 2009.</p> <p>Major non-national roads i.e. regional and local roads with an AADT greater than 8,200 vehicles have been identified. Eight roads were identified using our own traffic counter. Data sets were subsequently uploaded relating to these roads onto two portals/systems created by the Roads Management Office (RMO) using their guidance notes, this was completed in February 2022.</p> <p>Transport Infrastructure Ireland (TII) then take this information along with all the information they have on national roads and create the Noise Maps. The Noise mapping & Noise Action Plan is developed every 5 years, it has to go through public consultation and be adopted by the Elected Members.</p>
<p>6. 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>Through the measures outlined above, it is envisaged that these actions shall result in;</p> <ul style="list-style-type: none"> – Improved compliance with. the Air Pollution Act (Marketing, Sale, Distribution and Burning of Specified Fuels) Regulations 2012 (as Amended) – An improvement in air quality within the low smoke zones and a reduction in environmental pollution.

National Priority 2.4: Air and Noise Control (incl Planning)	
	Activities
<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan. <i>[Guideline of up to 500 words per priority area]</i></p>
<p>7. 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"> • For authorised sites, a compliance rate and context/analysis; • Appropriate site selection methodology, and/or early interventions; • Detection of non-compliances/unauthorised activities and follow up; • Progress in the NEP; • Positive environmental outcomes – not simply reaching a target of inspections; • Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects; <p>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</p>	<p>Environment staff assess environmental impacts from air and noise emissions and liaise with planning staff on appropriate air and noise controls.</p> <ul style="list-style-type: none"> • Planning applications for developments, which may cause air or noise pollution, are examined by planners and scientists and conditioned appropriately. • Activities at the construction phase and the operational phase of developments, which will cause noise or air pollution, are identified. • All construction sites can cause air and noise pollution examples of developments are, wind farms, all wastewater treatment plants. • The environment section suggests site specific conditions and the Planning Authority are responsible for the enforcement of the conditions. • Conditions are developed to request mitigation measures to be in place. Conditions include noise limits and conditions to minimise odour on-site such as hold waste in closed containers. • Environment staff 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. • National and international Code of Practice and guidance are taken into consideration when assessing applications
<p>8. Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</p>	<p>The work is non-routine and the application numbers can vary from year to year.</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>Planning conditions must be put in place to minimise noise and air pollution at nearby residential and other sensitive locations</p>

National Priority 2.5 Ongoing Air and Noise Enforcement Work

Activities

Looking forward to the year ahead  **Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.**
[Guideline of up to 500 words per priority area]

9. Describe the work to be carried out to address this National/Additional Local priority FOR THE YEAR AHEAD – including:

- For authorised sites, a compliance rate and context/analysis;
- Appropriate site selection methodology, and/or early interventions;
- Detection of non-compliances/unauthorised activities and follow up;
- Progress in the NEP;
- Positive environmental outcomes – not simply reaching a target of inspections;
- 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.

Under the Air Pollution Act, 1987 and the Waste Management (Prohibition of Waste Disposal by Burning) Regulations, 2009 there is an exemption that allows farmers to dispose of agricultural waste (i.e. untreated/uncontaminated wood, trees, trimmings, leaves, bushes or similar materials generated by agricultural practices) by burning. Burning may only be undertaken as a final measure following the application of the following waste hierarchy:

1. Waste arising is reduced in accordance with best agricultural practice.
2. Waste is reused where practicable.
3. Waste is recycled through shredding and used as compost or wood chippings.
4. Waste is salvaged for use as fuel where practicable.

In accordance with the regulations, a farmer must notify the local authority in advance of the intention to burn agricultural green waste. In 2021, 132 notifications of disposal of Agricultural Waste by Burning were received by Clare County Council.

These sites are inspected by Clare County Council’s Waste Enforcement team, either in person or by the submission of photographs, to ensure suitability of the material being burned. There was almost 100% compliance rate in 2021. In cases where the material wasn’t suitable for burning, farmers were informed by Waste Enforcement staff. It is planned to run Awareness campaigns via social and print media in 2022 to further educate farmers on the criteria for this exemption.

Sites are selected for inspection from reviewing the permit applications, and farmers are informed if the material is suitable for burning.

Progress in the NEP can be tracked by the number of burning complaints received by Clare County Council, which have dropped from 86 in 2020 to 76 in 2021.

Positive environmental outcomes are an improvement in air quality and a greater rate of compliance with the Waste Management (Prohibition of Waste Disposal by Burning) Regulations, 2009.

10. Have appropriate resources being assigned to carry out the work associated with this activity FOR THE YEAR AHEAD?

Through the measures outlined above, it is envisaged that these actions shall result in;

- Improved compliance with the Waste Management (Prohibition of Waste Disposal by Burning) Regulations, 2009
- An improvement in air quality and a reduction in environmental pollution.

The Final Environmental Outcome to be achieved?

National Priority 3.1 : Tackling illegal waste activities and multi-agency sites of concern

Activities

Looking forward to the year ahead  **Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.**
[Guideline of up to 500 words per priority area]

11. Describe the work to be carried out to address this National/Additional Local priority FOR THE YEAR AHEAD – including:

The Waste Enforcement Team will continue to carry out routine monitoring of authorised sites, both WFP and COR sites to ensure compliance with the Waste Management (Facility Permit & Registration) Regulations 2007. The objective is to ensure a level playing field of compliant operators, and appropriate sanctions will be implemented where breaches of permits are detected.

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<ul style="list-style-type: none"> • For authorised sites, a compliance rate and context/analysis; • Appropriate site selection methodology, and/or early interventions; • Detection of non-compliances/unauthorised activities and follow up; • Progress in the NEP; • Positive environmental outcomes – not simply reaching a target of inspections; • 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. 	<p>Public Awareness campaigns will be carried out informing the public how to report unauthorised dumping. The Waste Enforcement team will investigate each complaint, and look for evidence in order to take appropriate enforcement action, i.e. a FPN under the Litter Pollution Act, 1997, warning letters, Notices and Directions under the Waste Management Act, 1996, as amended. If these sanctions do not resolve the matter legal proceedings will be initiated.</p> <p>Awareness campaigns highlighting a range of environmental issues and initiatives, will be delivered across print and social media. The focus will be the delivery of messaging consistent with that of the Waste Management Planning Office (WMPO) and WERLA.</p> <p>Where evidence of serious illegal waste activity is uncovered, such as illegal waste collectors, Clare County Council will investigate such matters as a priority, and liaise with the relevant agencies, such as An Garda Siochanna (AGS), WERLA, Dept. Social Protection, Revenue and other local authorities.</p> <p>Detection and deterrent actions such as high visibility roadside checkpoints with AGS shall be implemented in areas that are known to be dumping blackspots. Roadside checkpoints will also be carried out with the NTFSO at locations of mutual interest to both authorities.</p> <p>Clare County Council will continue to fulfil its reporting obligations by providing regular activity reports to WERLA and the EPA. Data gathered and learnings from investigations will be shared to lead to more focused planned inspections, and a consistent approach to waste enforcement.</p>
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<p>12. Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</p>	<p>The Waste Enforcement Team is a multi-disciplinary team comprised of four Community Wardens, a Waste Enforcement Officer, an Executive Engineer and administration support. These staff are assigned on a full time basis to waste enforcement and are trained and equipped to conduct the necessary investigations related to illegal waste operations. Clare County Council's Waste Enforcement Officer has recently left the organisation, leaving a vacant post, the time taken in backfilling this will impact on the work program for 2022.</p>
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<p>The Final Environmental Outcome to be achieved?</p>	<p>Through the measures outlined above, it is envisaged that these actions shall result in;</p> <ul style="list-style-type: none"> - The identification of persons engaged in significant illegal waste activity, resulting in the cessation of such activity, and appropriate sanctions for the offenders. - Improving compliance with Waste legislation and regulations by monitoring authorised sites and investigating complaints of illegal activity to ensure a level playing field. - Reducing environmental pollution.
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National Priority 3.2 : Construction and Demolition Waste

Activities

<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of up to 500 words per priority area]</i></p>
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<p>13. 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"> • For authorised sites, a compliance rate and context/analysis; • Appropriate site selection methodology, and/or early interventions; • Detection of non-compliances/unauthorised activities and follow up; • Progress in the NEP; • Positive environmental outcomes – not simply reaching a target of inspections; • 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. 	<p>There are currently 34 Certificate of Registration sites and 17 Waste Facility Permitted sites in County Clare. Each COR site will be routinely inspected once and each WFP site will be inspected twice in 2022. There is currently a 100% compliance rate among authorised sites.</p> <p>The C&D industry generates significant quantities of waste, in line with the current increase in construction activity. Complaints of unauthorised C&D waste activity, whether received from members of the public, received through Planning referrals, or discovered during routine warden patrols, will be investigated for evidence which may be used to identify the offender. Appropriate enforcement action will be taken.</p> <p>Clare County Council will continue to liaise with consultants prior to submission of WFP and COR applications for new sites. Particular emphasis shall be placed on any large scale or commercial development projects. Through monitoring the national register of commencement notices, as maintained by the Building Control Management System (www.localgov.ie/en/bcms/search) Clare County Council can maintain a proactive stance regarding the commencement of construction projects within the County.</p> <p>Awareness campaigns will be carried out relating to managing Construction and Demolition waste. Ongoing engagement with WERLA and other LA's shall ensure that information is shared between relevant stakeholders to help track the movement of C&D waste.</p>
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<p>14. Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></p>	<p>As stated in NEP 3.1, Clare County Council's Waste Enforcement Officer has recently left the organisation, leaving a vacant post, the time taken in backfilling this will impact on the work program for 2022</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>Through the identification and monitoring of unauthorised Construction and Demolition waste activity, Clare County Council shall ensure that the risk of environmental pollution shall be contained and ultimately eliminated.</p> <p>Individuals associated with such activities will be held accountable for their actions and prosecutions will be taken, where necessary to achieve a positive environmental outcome.</p>
<p>National Priority 3.3 : ELV's and Metals</p>	
<p style="text-align: right;">Activities</p>	
<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p>15. 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"> • For authorised sites, a compliance rate and context/analysis; • Appropriate site selection methodology, and/or early interventions; • Detection of non-compliances/unauthorised activities and follow up; • Progress in the NEP; • Positive environmental outcomes – not simply reaching a target of inspections; • 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. 	<p>In 2021 Clare County Council initiated prosecutions against 10 professional importers of second-hand vehicles for non-compliance with the European Union (End of Life Vehicles) Regulations 2014, As Amended. These legal cases will continue into 2022 with the aim of achieving compliance, by either getting the importers to register with the compliance scheme ELVES or alternatively to register with each local authority in the state.</p> <p>Also in 2021 Clare County Council initiated legal proceedings against an unauthorised ELV site, where over 60 suspected ELV's were stored without a permit. This case is due in court again in May 2022.</p> <p>In addition, there are four permitted ATF's in Co. Clare. These sites were inspected regularly in 2021 and this will continue into 2022. Clare County Council will liaise with WERLA, Revenue, An Garda Siochana, the NTFSO and other relevant stakeholders to exchange information about unauthorised ELV or scrap metal activity throughout the county.</p>
<p>16. Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></p>	<p>As stated in the previous two NEP's, the Waste Enforcement Team is a multi-disciplinary team with staff assigned on a full time basis to waste enforcement. However Clare County Council's Waste Enforcement Officer has recently left the organisation, leaving a vacant post, which will impact on the work program for 2022 in the short-term.</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>The Waste Enforcement team will continue to monitor and provide support to compliant operators within the industry.</p> <p>Through the various actions outlined above, one of the primary aims is to prevent unauthorised activities prior to them commencing.</p> <p>Unauthorised activity will be investigated and offenders will be held accountable for their actions Where necessary, prosecutions will be initiated in line with the Council's Policy on Unauthorised Waste Activities. The aim is to support the authorised and eliminate the unauthorised activity to ensure a level playing field.</p>

National Priority 3.4 : Household & Commercial Waste

Activities

<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
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<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <p>For authorised sites, a compliance rate and context/analysis; Appropriate site selection methodology, and/or early interventions; Detection of non-compliances/unauthorised activities and follow up; Progress in the NEP; Positive environmental outcomes – not simply reaching a target of inspections; 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.</p>	<p>Enforcement of the Waste Management Bye-Laws 2018, shall be integral to managing the household and commercial waste streams. Focused household surveys shall continue to be conducted countywide, with a particular emphasis on areas and properties where waste mismanagement and dumping/burning are reported. Householders will be written to and asked to provide evidence of how they manage their waste, either by means of a contract with a kerbside collector or by providing receipts for the Central Waste Management Facility.</p> <p>The Waste Management Bye-Laws 2018 have proven to be a valuable tool in achieving compliance and getting householders to sign up for a kerbside collection. Fixed Penalty Notices will continue to be issued under the Bye Laws for failure to provide information or for other breaches of the Bye Laws, such as not securing bins properly for collection, overflowing bins or not removing emptied bins from the public footpath in a timely manner.</p> <p>Waste management surveys of commercial properties will be increased in 2022, with the hospitality sector opening up more, in the wake of reduced activity in recent years due to Covid 19.</p> <p>Public Awareness campaigns will continue to be carried out in 2022 using the shared resource of mywaste.ie.</p>
<p>Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</p>	<p>Clare County Council’s Waste Enforcement Officer has recently left the organisation, leaving a vacant post, which will impact on the work program for 2022 in the short-term.</p>
<p>The Final Environmental Outcome to be achieved?</p>	
<p>National Priority 3.5: Producer Responsibility Initiatives and additional local priorities</p>	
<p style="text-align: right;">Activities</p>	
<p>Looking forward to the year ahead </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan. <i>[Guideline of up to 500 words per priority area]</i></p>
<p>Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</p> <p>For authorised sites, a compliance rate and context/analysis; Appropriate site selection methodology, and/or early interventions; Detection of non-compliances/unauthorised activities and follow up; Progress in the NEP; Positive environmental outcomes – not simply reaching a target of inspections; 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.</p>	<p>The Waste Enforcement Team monitors compliance with the various Producer Responsibility Initiatives set up to support recycling of the relevant waste streams i.e. WEEE, tyres, batteries, End-of Life Vehicles, farm plastics and packaging.</p> <p>The objective of this priority is to ensure operators subject to these PRIs are registered appropriately. This requires a consistent approach to enforcement by all local authorities and effective follow up of suspected PRI waste producers.</p> <p>In 2021 in Co. Clare, 10 premises were inspected jointly with WERLA to establish if they were major producers of packaging. These inspections have led to three retailers registering with Repak, one retailer was served a notice under Article 25, 4 retailers have proven that they come under the thresholds for registration, and engagement is ongoing with the remaining businesses. These actions will continue into 2022 to improve compliance rates and increase recycling rates.</p> <p>In 2021 14 professional importers of specified vehicles were inspected, written to, and eventually 10 of them were summonsed to appear in court to compel them to register with the compliance scheme, ELVES. 2 of the 14 have now registered, a further 6 have begun engagement with ELVES, whilst 4 more are no longer involved in importing vehicles and are not obligated. This body of work will be continued in 2022.</p> <p>Routine inspections are carried out to monitor compliance with Repak ELT, WEEE regulations and the battery takeback scheme. Compliance rates here are over 95%. These inspections will continue into 2022.</p> <p>Complaints of unauthorised disposal of these waste streams will continue to be investigated in 2022, and appropriate enforcement action will be taken to eliminate unauthorised activity, support authorised activity, improve compliance rates and achieve recycling targets</p>
<p>Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</p>	<p>The Waste Enforcement Team is a multi-disciplinary team comprised of a number of experienced staff. Staff within this team are assigned on a full time basis to waste enforcement matters and are trained and equipped to conduct the necessary investigations related to illegal waste operations. Clare County Council’s Waste Enforcement Officer has recently left the organisation, leaving a vacant post, which will impact on the work program for 2022 in the short-term.</p>

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The Final Environmental Outcome to be achieved?

Through the various actions outlined above, Clare County Council aims is to reduce unauthorised activity, support authorised activity, improve compliance rates and achieve recycling targets.

A regular inspection program will be adhered to, with appropriate follow-up actions being taken. Prompt investigations of complaints of unauthorised activity will ensure that environmental pollution does not be allowed to continue unabated, while also supporting compliant operators within the industry.

The final outcome of this NEP is to increase recycling rates, improve compliance with the PRI schemes, and eventually lead to a reduction in environmental pollution.

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
Waste					
6.1	Routine Waste Inspections				
6.1.1	Waste Permitted Facilities	40	0.25	10	(17 existing x 2 + 3 new x 2)
6.1.2	Joint inspections with NTFSO	1	0.5	0.5	No notifications as yet. Will reactively carry out inspections if requested to.
6.1.3	Inspections of Cert of Registration sites (private)	40	0.25	10	(34 x 1 + 6 new)
6.1.4	Inspections of LA Cert of Registration sites	0		0	
6.1.5	Multi-agency inspections, including vehicle inspections and multi agency site inspections	4	1.2	4.8	4 staff per inspection (3 hour duration)
6.1.6	Hazardous waste sectoral inspections (e.g. Mercury Regulations, WTF, garages, mini-labs, industrial, healthcare & others)	4	0.25	1	Mercury and industrial will be the focus
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.)	10	1	10	
6.1.8	Inspections of notifications under Prohibition of Waste Disposal by Burning Inspections	134	0.125	16.75	Similar numbers to last year expected
6.1.9	Registration of Sewage Sludge Facility inspections	0			
6.1.10	Household Waste Surveys	210	0.125	26.25	289 completed last year
6.1.11	Inspections in relation to the household and commercial kerbside waste collection regime (including brown bin)	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	40	0.125	5	These are additional inspections that we will carry out this year
6.1.13	Commercial Food Waste Inspections (original waste producers, e.g. hotels, nursing homes, restaurants, etc.)	20	.25	4	117 completed in 2021

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	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
6.1.14	Inspections in relation to authorised ELV facilities (ATFs) with an emphasis on traceability requirements (SI 320 of 2014)	4	0.5	2	This is a focus task for us in 2022
6.1.15	Other routine inspections (not included in above numbers) - please specify	0		0	
	Subtotal Routine Waste Inspections	507		90.3	
6.2	Non-Routine Waste Inspections				
6.2.1	Investigative inspections of fly tipping or illegal dumping, excluding unauthorised C&D, ELVs & Tyres	800	0.5	400	1693 completed in 2021
6.2.2	Investigative Inspections in relation to unauthorised C&D sites (sites with no permit)	40	1	40	56 completed last year
6.2.3	Investigative Inspections in relation to unauthorised ELV sites and suspected sites of origin as notified by the NTFSO (sites with no permit)	6	1.5	9	6 completed last year
6.2.4	Investigative Inspections in relation to unauthorised Tyre dumps (no permit in place)	1	0.5	0.5	72 completed last year
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.	10	0.5	5	6 completed last year
6.2.6	Inspections in relation to other Unauthorised Waste sites excluding those mentioned above - incl. crashed vehicle inspections, PTUs, etc.	0	1	0	0 completed last year
6.2.7	Inspections in relation to Waste Facility Permits continuing to operate after their permit has expired	2	0.5	1	2 completed last year
6.2.8	Inspections in relation to extractive industries	0	0.25	0	0 completed last year
6.2.9	Household Waste/waste presentation Inspections arising from complaints, including backyard burning	400	0.25	100	383 completed last year
6.2.10	Inspections of sites notified under Article 27	6	0.125	0.75	10 completed last year
6.2.11	Other non-routine inspections (not included in above numbers)	0		0	0 completed last year

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	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
	Subtotal Non-routine Waste Inspections	1265		556.25	
6.3	Litter Patrols/Investigations				
6.3.1	Litter Patrols/Investigations	3,500	0.25	875	Based on Warden availability and a set number of inspections per warden per day
6.3.2	Litter pollution Monitoring surveys	84	0.0625	5.25	These will be carried out by our wardens at pre-determined random dates
6.3.3	Litter pollution quantification surveys	28	0.0625	1.75	
6.3.4	Visits in relation to Green Schools programme	10	0.3	3	Not known at the beginning of the year. This is a voluntary programme led by An Taisce.
6.3.5	Providing support to community groups during litter clean ups	120	0.0625	7.5	Not known at the beginning of the year. It is expected to support 120 groups through National Spring Clean and Clean Coasts programmes but dependant on Covid restrictions.
6.3.6	Judging Tidy Towns/Villages competitions	0	0	0	Not done by the Environment Section
6.3.7	Other routine litter patrols/investigations (not included in above numbers)	0	0	0	Not known at the beginning of the year. This may evolve throughout the year and we aim to update accordingly
	Subtotal Routine Litter Patrols/Investigations	3742		892.5	
Water/Wastewater					
6.4	Routine Water/Wastewater Inspections				
6.4.1	Discharges licenses to waters (Section 4)	100	0.5	50	
6.4.2	Audits of private water supplies	2	2	4	
6.4.3	Monitoring samples from private water supplies	260	0.3	78	
6.4.4	Farm Inspections under GAP Regulations conducted by Local Authority (not including farm inspections by DAFM)	10	0.5	5	
6.4.5	Farm Inspections conducted by DAFM	NA			
6.4.6	Farm Inspections Other e.g. routine farm inspection but not GAP inspection	NA			
6.4.7	Monitoring programmes, Operational and Surveillance samples taken	500	0.3	150	
6.4.8	No. of days of locally lead investigative assessments (including SSRS, sampling, river walks, etc.)	0	0.5		
6.4.9	WFD investigative monitoring samples and analysis by Local Authorities.	0	0.5		

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	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
6.4.10	No of days of engagement with LAWPRO and Communities Programme	10	1	10	
6.4.11	Bathing Waters	140	0.45	63	
6.4.12	DWWTS inspections under National Inspection Plan	100	0.5	50	
6.4.13	DWWTS Engagement Activities		0.5		
6.4.14	DWWTS inspections of referrals from LAWPRO				
6.4.15	Other Surface & Groundwater Protection Inspections [e.g. drinking water source protection, zone of contribution monitoring, etc]	0			
6.4.16	Misconnection Surveys	0	3		
	Subtotal Routine Water/Wastewater Inspections	1122		410	
6.5	Non-Routine Water/Wastewater Inspections				
6.5.1	Inspections relating to water pollution incidents/complaints, excluding non-routine farm inspections.	50	0.5	25	
6.5.2	Non-routine farm inspections, e.g. on foot of pollution incident or complaint.	20	0.5	10	
6.5.3	Unauthorised Discharges Investigated	20	1	20	
6.5.4	Inspections in relation to Water Pollution Licence applications	2	1	2	
	Subtotal non-routine Water/Wastewater Inspections	92		57	
Air/Noise Inspections					
6.6	Routine Air/Noise Inspections				
6.6.1	Inspections of Air Pollution Licenced sites	1	0.5	0.5	
6.6.2	Total number of inspections carried out under the solid fuel regulations (S.I. 326 of 2012 and as amended).	40	0.6	24	
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, DCCAE, etc.	0	.5	0	

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	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	15	0.3	4.5	
6.6.5	Total number of fuel samples collected and analysed	0	0.5		
6.6.6	Inspections of sites under 2012 Deco Paints Regulations (S.I. 564 of 2012) – Vehicle Refinishers	5	0.5	2.5	
6.6.7	Inspections of sites under 2012 Solvents Regulations (S.I. 565 of 2012) –e.g. Dry cleaners, surface cleaning etc.	6	0.5	3	
6.6.8	Inspections of sites under Petroleum Vapours Regulations	2	0.5	1	
6.6.9	Ambient Air Monitoring Programme inspections	2	0.5	1	
6.6.10	Other routine air/noise inspections		0.5		
	Subtotal Routine Air/Noise Inspections	71		36.5	
6.7	Non-Routine Air/Noise Inspections				
6.7.1	Incident/complaint related inspections	20	.25	5	
	Subtotal Non-Routine Air/Noise Inspections	20		5	
6.8 Producer Responsibility Inspections (Routine)					
6.8.1	WEEE Inspections	8	0.25	2	
6.8.2	Battery Inspections	20	0.25	5	
6.8.3	Inspections on suspected vehicle importers (ELV Regulations 2016)	13	2	26	
6.8.4	Farm Plastics	3	0.25	0.75	
6.8.5	Plastic Bag Levy	3	0.0625	0.1875	
6.8.6	Inspections under the Packaging regulations – Suspected Major Producers	22	1	22	
6.8.7	Inspections under the Packaging regulations – Registered Self-compliers	1	0.5	.5	
6.8.8	Inspections under the Tyre Regulations – Tyre Retailers	0	0.25		
	Subtotal (Routine) Producer Responsibility Inspections	70		56.4375	
6.9 Planning (Environmental) Inspections (Routine)					

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	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
6.9.1	Inspections (environmental) of existing planning permissions				
6.9.2	Inspections (environmental) in advance of grant/refusal of planning permission	750	0.5	375	
6.9.3	Quarry Inspections (e.g. relating to noise, dust, surface/groundwater emissions, vibration etc.)				
6.9.4	Other planning inspections relating to environmental issues				
Subtotal Planning Inspections (Routine)		200		375	
Total Routine Inspections end of year		5,712		1,860.7375	
Total Non-Routine Inspections end of year		1,377		618.25	
Total Inspections end of year		7,089		2,478.9875	

Appendix C Suggested plan implementation review template

RMCEI/Enforcement Plan Implementation Review Report

Meeting Date:

Meeting Time:

Attendees:

Name	Title

Reason for the Meeting:

Monthly Implementation Review:	
Quarterly Implementation Review:	
Other Reasons:	

Important Notes/Actions from Previous Meeting:



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Table A – Progress Against Priorities

National Priority:			
Areas Requiring Review for this Priority - for example:	Progress to Date	Further Work Required	Responsibility Assigned
<ul style="list-style-type: none"> • For authorised sites- compliance rates; • Site selection methodology, and/or early interventions; • Detection of non-compliances/follow up; • Progress in the NEP shown; • Positive environmental outcomes – not just inspections targets; • 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. 			

Table B – Progress Against Inspection Targets

Inspection Plan Review				
	Areas	Progress to Date	Further Work Required	Responsibility Assigned
1				
2				
3				