



**Comhairle Contae
Dhún na nGall**
Donegal County Council

Donegal 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:

Approved by Directors of Services

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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;

DCC – Donegal Co. Council

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	The county of Donegal
Population	159,192
Calendar Year	2022
RMCEI Coordinator Name and Position	Dr. Joe Ferry, A/Senior 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

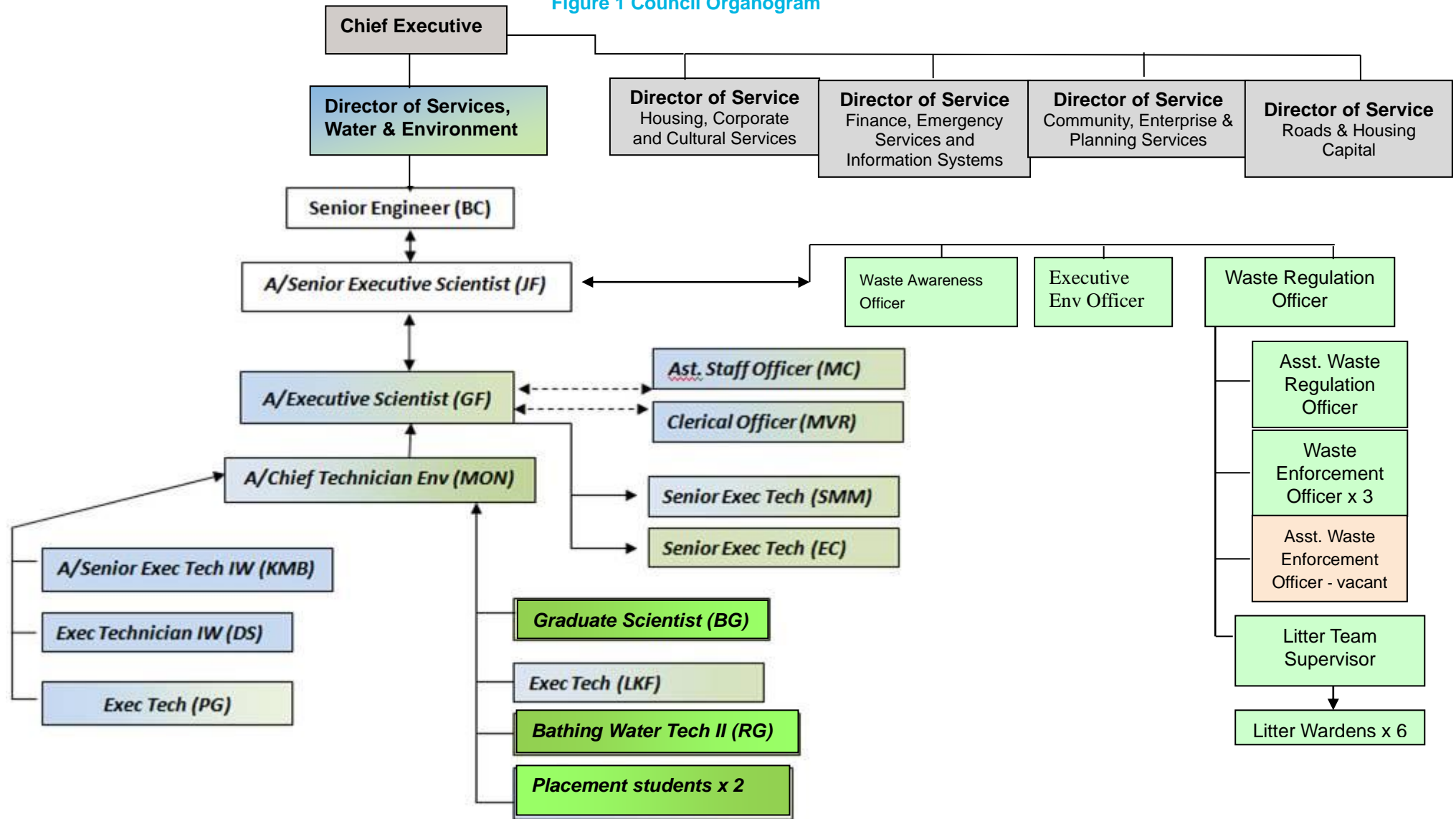
Description of known challenge and outline of how these will be addressed
1. Covid-19 restrictions – more emphasis placed on written communication, warning letters and advice if inspections are curtailed for long periods
2. Staff absence due to Covid- priorities may have to be adjusted through regular review
3. Staff retirements during the year & uncertainty about replacement & SLA status - priorities may have to be adjusted through regular review
4.
5.

1.3 Staff Structure

Figure 1 below provides a brief overview of the Department, (Water & Environment Directorate) responsible for the development and implementation of this plan.

Further detail on available staff resources are provided in section 5.

Figure 1 Council Organogram



Blue = 100% IW, Green = Environmental

2. Priorities for Environmental Enforcement for the Year Ahead

2.1 National Environmental Enforcement Priorities for the Year Ahead

Table 1: National Enforcement Priorities 2022 – 2024.

Water	Waste	Air/Noise
<ul style="list-style-type: none"> • Pressures from Agriculture (slurry/soiled water collection and storage) • Pressures from Agriculture (slurry and fertiliser spreading) • DWWTS/Septic Tanks • Discharge Licences/Misconnections • Local Priorities and Water Quality Monitoring 	<ul style="list-style-type: none"> • Tackling Illegal Waste and Multi-Agency Sites of Concern • Construction and Demolition Waste • End of Life Vehicles and Metals • Household and Commercial Waste • PRIs and Local Priorities 	<ul style="list-style-type: none"> • Solid Fuel • Air Quality Monitoring and Data Use • Environmental Noise Directive (ENDs) • Air and Noise Control (including Planning) • Ongoing Air and Noise Enforcement Work

Further details on the above National Enforcement Priorities, (NEP's) are provided in the following tables:

National Water Enforcement Priorities 2022 – 2024			
National Enforcement Priority (2022-2024)	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
<i>Pressures from Agriculture (slurry/soiled water collection and storage)</i>	Issues at farm level are identified and resolved through farm inspections both in areas identified with agriculture as a significant pressure with a small percentage in areas not at risk.	<ul style="list-style-type: none"> • Adequate slurry storage capacity at farms. • Adequate soiled water collection and storage. 	<ul style="list-style-type: none"> – 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.
<i>Pressures from Agriculture (slurry and fertiliser spreading)</i>	Issues at farm level are identified and resolved through farm inspections in areas identified with agriculture as a significant pressure with a small percentage in areas not at risk.	<ul style="list-style-type: none"> • Spreading of slurry and fertilisers must not take place in the closed season or under unsuitable weather and/or soil conditions. 	<ul style="list-style-type: none"> – 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.

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
<i>DWWTS/Septic Tanks</i>	The National Inspection Plan is implemented.	<ul style="list-style-type: none"> Non-compliant systems are identified via risk-based inspections, and subsequently followed up and resolved. 	<ul style="list-style-type: none"> Take all necessary steps to ensure advisory notices are closed out. Follow up and close out non-compliances and LAWPRO referrals.
<i>Discharge licences/Misconnections</i>	All wastewater discharges that are a pressure on water bodies are compliant.	<ul style="list-style-type: none"> All Section 4 licences associated with significant pressures are compliant with emission values. 	<ul style="list-style-type: none"> 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.
<i>Local Priorities and water quality monitoring</i>	<p>Undertake statutory WFD and bathing water sampling and monitoring.</p> <p>Inspect and enforce any local water quality issues (not covered by other National Enforcement Priorities), including any climate related enforcement issues, private drinking water supplies and RBMPs.</p>	<ul style="list-style-type: none"> The monitoring data is available for characterisation and to support targeting of local authority inspections and enforcement actions. 	<ul style="list-style-type: none"> Complete statutory monitoring for water framework directive monitoring, investigative monitoring and bathing water monitoring. Inspect and follow up any local issues (not covered by the other NEPs). Address any climate related water inspection issues e.g. issues arising due to extreme weather events. Enforcement of private drinking water standards. Investigate sources of any non-compliances with water quality standards including follow up of LAWPRO referrals. Engage with LAWPRO and other WFD fora on RBMP.

National Air and Noise Enforcement Priorities 2022 – 2024

National Enforcement Priority (2022-2024)	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
Solid Fuel	Only compliant fuel products are available for purchase by the end-user.	<ul style="list-style-type: none"> Fuel products used by the end-user comply with standards. 	<ul style="list-style-type: none"> Tackle the sale of non-compliant fuel and its use via compliance promotion, inspection and enforcement of fuel merchants and retailers. Participate in multi-agency operations investigating the sale of non-compliant fuels. Develop and implement a programme for the sampling and analysis of fuel types (this can be carried out per individual Local Authority or a joint approach can be adopted with other Local Authorities). Carry out awareness programme to promote compliance by increasing the awareness of how the choices people make in heating their homes impacts on their air quality and health and legal obligations. Establish and/or maintain a list including the number and profile of solid-fuel merchants operating in each local authority area including those using social media platforms to market solid fuels.
			<ul style="list-style-type: none"> Build capacity through engaging, collaborating and sharing with colleagues in other Local Authorities via networks and working groups and participating in training events.

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
Air Quality Monitoring and Data Use	<p>Deliver enhanced real-time information to improve air quality forecasting and identification of priority sites/areas for action</p> <p>Encourage greater understanding and involvement of the public in air quality issues.</p>	<ul style="list-style-type: none"> • 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 websites. 	<ul style="list-style-type: none"> - Work with the EPA to complete the expansion of the Ambient Air Monitoring Programme network including: <ol style="list-style-type: none"> 1. Assist EPA to determine viable locations for air quality monitoring stations. 2. Assist EPA to progress siting of air quality monitoring stations. 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. 4. Assist (where possible, to the best extent possible) EPA to maintain existing and new air quality monitoring stations. - Review local air quality data to identify hotspots and to prioritise sites/areas for action. - Ensure local air quality data including a map is made available to the general public as soon as technically possible for each local authority. As a minimum, a link to the relevant page(s) of the EPA site should be placed on each Local Authority website.

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
Environmental Noise Directive (ENDs)	Reduce the share of people chronically disturbed by transport noise as well as preserve environmental noise quality where it is good.	<ul style="list-style-type: none"> • Regulatory compliance. 	<ul style="list-style-type: none"> - Deliver the Round 4 Noise Mapping requirements as set out in the Environmental Noise Regulations of 2018. This includes the timely submission of any relevant datasets and information in the required format as requested by the RMO /Urban Agglomeration Project Team and/or any other specified body. - Prepare and submit the Annual Noise Action Plan Progress Report to the EPA by the 28th of February. - Annual Noise Action Plan Progress Report should demonstrate progress on the key issues and priority areas for action.
Air and Noise Control (including Planning)	Appropriate Air and Noise controls are in place.	<ul style="list-style-type: none"> • Environment staff assessing environmental impacts from air and noise emissions and liaising with planning staff on appropriate air and noise controls. 	<ul style="list-style-type: none"> - Preplanning assessments of air and noise impacts. - Environment staff assist in follow up of air and noise issues including use of Section 107 and 108 of the EPA, the Air Pollution Act and liaising with planners where planning enforcement is more appropriate. - Increased public awareness of noise induced health impacts.

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
Ongoing Air and Noise Enforcement Work	Appropriate controls in place to minimise, reduce or prevent air and noise emissions that may be harmful to the environment or to human health.	<ul style="list-style-type: none"> • Regulatory compliance. 	<ul style="list-style-type: none"> – Inspect and carry out any required enforcement actions of facilities/activities as specified in the RMCEI template and/or as otherwise determined by the Local Authority. – Make available on their websites, the EPA Vehicle Refinishers video and use appropriate channels to promote it. – Inspect and carry out any required enforcement actions under Sections 107 and 108 of the Environmental Protection Agency Act, 1992 in order to limit noise nuisance. – Build capacity through engaging, collaborating and sharing with colleagues in other Local Authorities via networks and working groups and participating in training events

National Waste Enforcement Priorities 2022 – 2024

National Enforcement Priority (2022-2024)	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
<i>Tackling illegal waste activities and Multi-Agency Sites of Concern</i>	Detection and cessation of unauthorised collection and dumping activities and remediation of polluted sites.	<ul style="list-style-type: none"> • Unauthorised collectors detected 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 (permitted & licensed) facilities should not facilitate the unauthorised treatment of waste. 	<ul style="list-style-type: none"> – Targeted inspections and follow up enforcement actions of unauthorised collectors and site operators using intelligence from waste data flows, complaints and other available data. – Co-ordination with, and input from Revenue/Social Protection/An Garda Síochána in relation to unauthorised activity and identified sites of concern. – Multi-agency investigations for sites of concern. – Roadside check points. – Relevant Anti-Dumping Initiatives implemented. – Traceability requirements to be enforced at Permitted/Licensed sites. – Focus on those who are facilitating the unauthorised treatment of waste.

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
<i>Construction and Demolition Waste</i>	Effective and authorised management, movement and disposal of C&D waste.	<ul style="list-style-type: none"> • Authorised waste treatment facilities accepting waste from authorised collectors/sources only. • Compliance of construction sites with inspection template checks including waste classification, 	<ul style="list-style-type: none"> – Risk based inspections of construction sites using WERLA intelligence and inspection templates. – Inspection of Article 27 sites of origin and destination to include material notified under Article 27 being accepted at WFP/Licensed sites.
		<p>segregation and waste movement, Art 27.</p> <ul style="list-style-type: none"> • Accurate waste classification and quantification of waste data in AERs from WCP/WFP and licensed operators. 	<ul style="list-style-type: none"> – Inspection of soil recovery sites to ensure only appropriate materials accepted. – Validation and inspection of WCP/WFP and licensed sites dealing with C&D waste. – Take all necessary steps to resolve non-compliant issues including the selling of crushed concrete from WFPs/Licensed sites without EoW decision. – Incorporate proposed improvements to the Article 27 notification system. – Tracking of waste delivered to Licensed sites. – Based on researched data and local knowledge, identify authorised operators for further investigation and/or enforcement action. – Focused monitoring of the resources and systems available for gathering and reporting waste data to be carried out as part of site audits at waste facilities/waste collectors.

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
<i>ELV and Metals</i>	All relevant ELV facilities are authorised and maintain a high level of compliance for acceptance, classification, segregation, recycling and disposal of ELVs.	<ul style="list-style-type: none"> • Authorised (permitted & licensed) waste treatment facilities to accept waste from authorised collectors/sources only • Accurate waste classification and quantification of waste data in AERs from WCP/WFP and licensed operators 	<ul style="list-style-type: none"> – Risk based inspections of Authorised Treatment Facilities and other ELV sites using WERLA intelligence and inspection templates (at least one inspection per annum of permitted sites). – Validation and inspection of records for WCP/WFP and licensed operators dealing with ELV and metal waste. – Take all necessary steps to resolve non-compliant issues.
		<ul style="list-style-type: none"> • Hazardous components and WEEE are adequately segregated and transferred to appropriate recycling/treatment facility. 	

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
<i>Household and Commercial Waste</i>	Maximise segregation, and recycling of municipal waste	<ul style="list-style-type: none"> • 3 bin systems are in place and being utilised i.e. separation of dry recyclables and organic materials at all commercial sites. • Accurate waste classification and quantification of waste data in AERs from WCP and WFP operators of municipal waste. • High level of compliance amongst households availing of a door-to-door waste collection service or a suitable alternative. 	<ul style="list-style-type: none"> – Inspection of WCP operators for provision of 3 bin system. – Surveys of retail, hospitality and industrial sectors to ensure proper use of 3 bin system, segregation and use of authorised collectors. – Sampling/analysis of treated waste outputs – AER Validations on WCP and WFP priority lists. – Maintenance of register of households with/without a waste collection service and targeted inspections in areas with low compliance. – Focused monitoring of the resources and systems available for gathering and reporting waste data to be carried out as part of site audits at waste facilities/waste collectors. – Monitoring of waste acceptance criteria at authorised sites e.g. WFP, Waste Transfer Sites, Landfills and Waste to Energy Plant.

National Enforcement Priority	Objective (2022-2024)	Outcome (2022-2024)	Activities for Focus in <u>2022</u>
<i>Producer Responsibility Initiatives and additional local priorities</i>	<p>All operators subject to producer responsibility initiatives registered with appropriate organisation(s).</p> <p>Good regulatory compliance at all waste facilities including those owned by local authorities.</p>	<ul style="list-style-type: none"> • All suspected producers under WEEE, Packaging, Farm Plastics, Tyres, Batteries and ELV Regulations, including vehicle importers, requiring registration to be registered. • Consistent approach to enforcement of Extended 	<ul style="list-style-type: none"> – Identification and inspection of all suspected producers who require registration. – Examination of potential for information exchange between Local Government Sector and other Agencies, where appropriate.
		<p>Producer Responsibility requirements.</p> <ul style="list-style-type: none"> • All local authority owned waste facilities in compliance with authorisations. 	

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 & storage)	✓		
1.2	Pressures from Agriculture (slurry & fertiliser spreading)	✓		
1.3	DWWTS / Septic tanks	✓		
1.4	Discharge Licences / Misconnections	✓		
1.5	Local Priorities & Water Quality Monitoring	✓		
2.0	Air - Protecting public health and to improve and maintain air quality			
2.1	Solid Fuels	✓		
2.2	Air Quality Monitoring & Data use	✓		
2.3	Environmental Noise Directive (END's)	✓		
2.4	Air & Noise Control (including Planning)	✓		
2.5	Ongoing Air & Noise Enforcement Work	✓		
3.0	Waste - Improving waste management and protecting our environment			
3.1	Tackling illegal waste & multi-Agency sites	✓		
3.2	C&D Waste	✓		
3.3	End of Life vehicles & Metals	✓		
3.4	Household and Commercial waste	✓		
3.5	PRI's and local priorities	✓		

2.2 Ongoing RMCEI/Local Priorities

Table 4 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?	✓		

Table 5 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>Donegal County Council staff will continue to work collaboratively with the many different agencies including CUWERLA. Refer to attached document prepared by WERLA, in particular the section titled</p> <p>1. EPR Compliance 2. Waste Data and Waste Flows</p> <p>Donegal Co. Council will work with all stakeholders involved in addressing the impact of the November 2020 peat slide at Meenbog Wind Farm, including the EPA, Loughs Agency, NPWS, NIEA, Derry & Strabane District Council. This work will include enforcement and restoration of habitat & water-courses.</p> <p>Work with LAWPRO, IFI, Loughs Agency, DAFM, IFA, INHFA, Teagasc, on water quality issues, eg- sheep dip, Nitrates</p> <p>Work with Department of the Environment, Climate and Communications on air quality, low smoke zones & smoky coal as well as areas which cross-cut with climate change</p>

3. Risk Assessment

In order to determine an appropriate risk-based plan for regulated installation inspections, to be undertaken in the functional area covered by this plan, and to estimate the resource time needed to carry out the inspections, a risk assessment has been undertaken of all regulated sites and/or operators including sites with Section 4 Discharge Licences, Waste Permit Facilities and Certificate of Registration sites and Waste Collection Permit operators.

The RMCEI Resource and Risk Rating tool was utilised in order to categorise the regulated installations according to risk. This completed excel sheet has been provided for confidential reasons as a separate submission to the EPA.

Where regulated installations are assessed using the risk rating tool they can be placed into the following categories:

Category A: Large installations with significant associated environmental risk or those with poor compliance histories.

Category B: Medium sized installations with lesser risk of environmental pollution.

Category C: Small Installations with good compliance record.

This risk rating has been reflected in Table 5 identifying:

- the number of total regulated installations
- the total number of installations per assigned risk category, and,
- the number of inspections to be undertaken, assigned per risk category.

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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		
Waste Facility Permit	29	14	10	5	56	20	5	81	
Certificate of Registration	8	0	0	8	0	0	8	8	
ATF	8	3	5	0	12	10	0	22	
Section 4 Licences	82	3	12	69	11	28	84	123	See Risk Rating Tool Spreadsheet, (includes unlicensed)
Septic Tanks (NIP)	118				94	21	25	140	See Risk Rating Tool Spreadsheet, (22 open Adv Notices)
Private Water Supplies & GWS	52	7	11	34	22	26	68	116	See Risk Rating Tool Spreadsheet
Bathing Water	31	12	9	10	132	69	100	301	A= Blue Flag, B= Designated Bathing Area, C= Stream
Waste Facility Permit, COR and ATF(Water)	45	17	15	13	17	10	0	27	See Risk Rating Tool Spreadsheet
Total No. Of Inspections Planned								735	

4. Resource Assessment for the Year Ahead

4.1 Review of the Achievement of the Previous Years Inspection Targets

The table below provides a brief high-level explanation of any significant differences in the number of inspections planned in the previous year versus what was completed in the previous year. The Plan for the year ahead identifies and addresses last year's under/over estimation in planned (routine and non-routine) inspections.

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	677	2494	Huge focus on AR validation see- end of year report	Yes, please refer to Outcome plan below
Non-Routine Waste Inspections	1149	1272	Increased in number of complaints plus lot of follow up at some of the sites	Yes, please refer to Outcome plan below
Routine Litter Patrols/Investigations	2740	4613	Additional staff carrying out more patrols and investigations	Yes, slight increase on previous inspection levels
Routine Water/Wastewater Inspections	2086	1065	EPA sourcing data for rivers & lakes data (959) & DAFM inspections (50) & Priv DW 106	Inspections planned at usual levels
Non-Routine Water/Wastewater Inspections	95	171	More complaints received due to lockdown (17%)	Similar level of activity projected
Routine Air/Noise Inspections	294	175	50% drop in Solid fuels inspections due to Covid	Due to current Covid restrictions, no plan to make up inspection shortfall
Non-Routine Air/Noise Inspections	10	23	1 persistent complainant	
Routine producer Responsibility Inspections	82	250	Additional work associated with 1 applicant	Plan to return to normal levels if vacant post filled
Planning inspections	67	93		Similar level of activity projected

4.2 Number of Staff Days Available

Table 7 identifies the available resources to undertake the work mapped out for the year ahead, identifying what National Priority the resource will be assigned to and the days available for each resource to complete all work required under RMCEI.

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

Department	Available Resources* (*217 working days in a year)	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)
Water, Air & Noise	217	Joe Ferry	All National Priorities	12	1 day per month
	217	Eddie Carr	WFD sampling	184	4 days per week for 46 weeks
	170	Shirley McMenamin	Section 4 Licence monitoring, ST	138	3 days/week, ██████████
	124	Lucia Friel	Septic Tank Inspections & Section 16/Food	92	2 days/week, ██████████
	217	Placement student	Bathing water, catchment	92	1 -day per week, (bal in lab)
	180	Bernie Gault	Septic Tank Inspections & Bathing water	92	2 days per week
	180	Ricky Gallagher	Complaints, Landfill, Bathing water, Farm Inspections	138	3 days per week
	217	Patrick Gallagher	Catchment/LAWPRO	46	1 day per week
Waste & Litter	217	Matthew Byrne	All waste areas	40	2 days per month
	217	Rose Roarty	Permits	69	3 days per month
	217	Brian Mc Brearty	Site of interest	165	3.5 days per week
	0	Vacant	PRIs	30	Assumes post filled
	217	Luke O'Connell	C&D ELV	165	3.5 days per week
	217	Donna Maskery	Household waste	165	3.5 days per week
	217	Martin Roarty	Air – Smoky coal	165	3.5 days per week
	217	Owen McCallion	Litter & Waste	165	3.5 days per week
	217	Pearse McCrory	Litter & Waste	165	3.5 days per week
	217	Martin Burke	Litter & Waste	165	3.5 days per week
	217	Caroline Meehan	Litter & Waste	165	3.5 days per week
	217	Brendan McBride	Litter & Waste	165	3.5 days per week
TOTAL DAYS AVAILABLE				2418	

4.3 Training Requirements

The implementation of the Plan requires the development and maintenance of certain competencies within the team. The box below indicates the training which has been provided and is planned to ensure that Council staff, including new staff, who may join during the reporting year, have the appropriate knowledge and competencies to implement the Plan. This includes training provided by the Environmental Service Training Group and is linked to PMDS Personal Development Plans.

Training Course	Provider if known
Inspection of Domestic Waste Water Treatment Systems	Environmental Service Training Group
Catchment Investigations	LAWPRO/LASNTG
Site Suitability Assessment Programme For On-Site Wastewater Treatment Systems	Environmental Service Training Group
Licensing of Discharges to Surface Waters and to Sewers	Environmental Service Training Group
Fats Oils & Grease (FOG Programme)	Environmental Service Training Group
Waste Enforcement – Investigation & Prosecution	WERLA /IT Sligo
Waste Management Training Programme: Policy & Legislation (Module 1)	WERLA /IT Sligo
Waste Management Training Programme: Regulation of Waste Activities (Module 2)	WERLA /IT Sligo
Waste Management Training Programme: Prevention, Re-Use & Recycling (Module 3)	WERLA /IT Sligo
Waste Management Training Programme: Biological & Thermal Treatments (Module 4)	WERLA /IT Sligo
Waste Management Training Programme: Landfill Operation & Management (Module 5)	WERLA /IT Sligo
Waste Management Training Programme: Facility Management, Compliance & Reporting (Module 6)	WERLA/ IT Sligo
Managing Difficult and Aggressive Behaviour	Environmental Service Training Group
Appropriate Assessment Screening Training	Environmental Service Training Group
Environmental Inspection Skills Training	Environmental Service Training Group
Hazardous Goods Awareness	
Garda Level 1 Interview Training	Gardaí
Garda Level 2 Interview Training	Gardaí
Manual Handling	Environmental Service Training Group
Safe Pass	Environmental Service Training Group
Asbestos Awareness & Handling	Environmental Service Training Group
Managing Serious Incidents where there is a risk of Criminal Investigation	IPB Insurance
Expert Witness	Private Training group
Cre Certificate in Compost Facility Operation	Cre
Soil and Water Sampling	
Local Authority Solvent and Deco Paints Training	EPA workshop
Effective Public Participation Planning & Techniques	LASNTG

Training Course	Provider if known
Monitoring and Enforcement of Construction and Demolition Waste Activities	
Enforcement of Waste Management Packaging Regulations	
Formal Interview Training and Techniques	
OPRC IMO Level 2	Irish Coastguard
Training regarding EPA CoP Environmental Risk Assessment for Unregulated Waste Disposal Sites	WERLA

4.4 Health and Safety

The Health and Safety measures adopted when carrying out inspections are based on the following;

- DCC Safety Statement & Safety Management System (Blue Folder)
- DCC SOP's for Investigation of Environmental Complaints, Sampling
- Remote inspections are carried out as per CU WERLA template
- SSWP developed for carrying out inspections during Covid-19
- Document 4.2P1 Quality Manual
- High Level Local Authority Transitional Good Practice Guidance for Continuing to Prevent the Spread of COVID-19 – (LGMA)

5. PLANNED INSPECTIONS/OTHER ACTIVITIES FOR THE YEAR AHEAD

5.1 Planned Routine & Non-Routine Inspections

Table 8 below (and Appendix B) details all inspections planned (both routine and non-routine) to be carried out for the year ahead, estimated time (days) per inspection (all time associated with carrying out each inspections has been considered including time to write up the inspection report) and time (days) for all inspections under each inspection type.

Table 9 Summary of Planned Routine & Non-Routine Inspections for the Year Ahead

2022	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	1850	0.51	545.5	
	Total Non-Routine Inspections end of year	825	0.41	384.5	Based on previous complaint history
	Total Inspections end of year	2675	0.45	930	
Litter					
	Total Routine Inspections end of year	2950	0.26	745	
	Total Inspections end of year	2950			Litter inspections recorded in 6.2.1
Water/Wastewater					
	Total Routine Inspections end of year	1024	0.26	348	Time for inspections vary, avg given
	Total Non-Routine Inspections end of year	120	0.47	48	
	Total Inspections end of year	1144		395	
Air/Noise Inspections					
	Total Routine Inspections end of year	144	0.71	54	294
	Total Non-Routine Inspections end of year	10	0.25	3	10
	Total Inspections end of year	154		57	304
Producer Responsibility Inspections					
	Total Routine Inspections end of year	21	0.43	8	
	Total Non-Routine Inspections end of year	0		0	All PRI work is planned
	Total Inspections end of year	21		8	
Planning (Environmental) Inspections					
	Total Routine Inspections end of year	109	0.3	23	45 -Waste only
	Total Non-Routine Inspections end of year	0		0	
	Total Inspections end of year	109		23	

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

In addition to the inspections outlined in section 6.1, the Council need to close out on issues outstanding from the previous year, including outstanding complaints and enforcement actions and therefore an assessment of resources required to close them out is given below.

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 (excl. fly tipping and illegal dumping)	0	0	0
4.1.2 Waste, non C&D. Includes fly tipping and illegal dumping	38	0.5	19
4.1.3 Waste, C&D.	35	1	35
4.2 Water/Wastewater	11	0.1 - 0.5	5.6
4.3 Air/Odour	3	0.5	1.5
4.4 Noise	2	0	0
Outstanding enforcement Actions			
Warning Letters	9	0.5	4.5
Section Notices	20	0.1 - 0.5	7.6
Section 14	13	2.0	26.0
Section 55	2	5.0	10.0
Open investigations - outcomes from returns			
Open Investigations 6.2.1 Fly tipping	16	0.5	8.0
Open Investigations 6.2.2 C&D	33	0.8	24.8
Open Investigations 6.2.3 ELV	9	1.0	9.0
Open Investigations 6.2.4 Tyre Dumps	1	2.0	2.0
Open Investigations 6.2.6 Other Unauthorised sites	60	0.5	30.0
Open Investigations 6.2.7 Expired permits	1	1.0	1.0
Open Investigations 6.2.9 Household	5	0.2	1.0
Court Cases	15	5.0	75.0
Total	273		260

5.3 Summary of Resource Requirements

On determination of the number of inspections and other activities planned for the Year ahead and calculation of the days that will be required to complete the work, the Council can now demonstrate that they have sufficient resources available in the organisation to complete all planned work.

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)	6098	1723
Total Non-Routine Inspections end of year – (obtained from completed rows A-F of Section 6 of the RMCEI Return)	955	435
Outstanding Enforcement Action & Complaints to be Closed out – (outlined in Table 9)	273	260
Totals	7326	2418
Total Available Resources (Days) – (outlined in section 5 Table 8 of the Plan)		2418

6. PLAN REVIEW MECHANISMS

Ongoing monitoring of the implementation of this plan will be carried out to:

- see if the targets for inspections have been met
- check to see if enforcement actions are being followed through
- confirm the current level of staff resources
- examine resource requirements where a major compliance issue has arisen
- document emerging situations that need to be deemed a priority, eg- Section 63 Notices
- determine if a re-assignment of priorities & resources is required to ensure fulfilment of (a) statutory obligations, (b) specific national enforcement priorities and (c) any local priorities & other inspection types.

This information will be discussed at Environment team meetings so that any related inspections being done by various team members can be considered if the plan targets are to be changed.

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?	✓	
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).	✓	
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 PRIORITY TEMPLATE

A.1 NATIONAL PRIORITY 1.1

National Priority: 1.1 Pressures from Agriculture (slurry/soiled water collection & storage)
Activities
<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>A small number of farm inspections will be carried out in areas where agriculture has been identified as a significant pressure and the remainder will be focusing on follow-up to previous complaints and enforcement notices. These inspections will focus on ensuring adequate storage capacity is in place for slurry and soiled water.</p> <p>A specific project is planned for this year looking at dairy farms who have put in place an integrated constructed wetland for the purpose of dealing with soiled water and dairy washings, with a view to assessing & optimizing performance and expanding the implementation of this measure through the IFA, local Agricultural consultants and a specialist consultant on ICW's, as an alternative to storage capacity. Where not already licenced, these systems will be considered for the granting of a discharge licence under Section 4 of the Water Pollution Act, which will then provide structured & routine monitoring.</p> <p>Donegal Co. Council will be liaising & collaborating with the 2 fisheries bodies – Inland Fisheries Ireland and the Lough's Agency, as well as LAWPRO in identifying areas where agricultural pressures of this nature are having the most impact. Follow-up with farmers will be in the form of written reports, warning letters, enforcement notices as required and Cross-reporting where the issue is deemed to warrant it.</p>
<p>Resources assigned - One Grade 2 Technician is assigned to Agricultural Inspections including complaints, A/Senior Executive Scientist and a Placement student</p>
<p>Final Environmental Outcome – Adequate storage or treatment capacity for slurry & soiled water</p>

National Priority: 1.2 Pressures from Agriculture (slurry & fertiliser spreading)
Activities
<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>A number of inspections of spread lands will be carried out in areas where agriculture has been identified as a significant pressure when the slurry spreading season is open. In addition, any reports of slurry or digestate spreading received during the closed period or in unsuitable weather during the open period will be investigated as complaints. Follow-up with farmers will be in the form of written reports, warning letters, enforcement notices as required and Cross-reporting where the issue is deemed to warrant it.</p> <p>Donegal Co. Council will issue 2 Public Service Announcements (PSA's) on local radio stations in February and in October advising farmers of the opening and closing of the spreading season and the importance of adhering to the GAP Regulations</p>
<p>Resources assigned - One Grade 2 Technician is assigned to Agricultural Inspections including complaints</p>
<p>Final Environmental Outcome – Spreading of slurry, digestate and fertilisers is carried out in accordance with the GAP Regulations</p>

National Priority: 1.3 DWWTs/Septic tanks
Activities
<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 250-400 words per priority area]</i></p>
<p>Over the course of the National Inspection Plan (2022-26), Donegal Co. Council is required to carry out 518 inspections, of which 94 will be conducted in the current year. A local inspection plan has been drafted identifying areas for inspection within the 3 Risk Zones, primarily in Zones 1. The areas selected are</p> <ul style="list-style-type: none"> • located in water bodies designated “At Risk”, Zone 1 = within 100m of water bodies where DWWTs have been identified as a pressure on water quality under the national river basin management plan, and Zone 2 = areas where there is higher groundwater susceptibility to percolation of waste water pathogens into groundwater, i.e. areas with 1m or less of soil or nearby karst features over bedrock aquifers • in or upstream of LAWPRO’s Areas for Action • catchments assigned to Donegal Council for Protect or Restore in the 3rd Cycle. • Follow-up inspections to close out existing Advisory Notices via the enforcement model • Referrals from LAWPRO’s field work in 2021 & 2022 will also form part of the inspection programme. • Referrals from high-status objective catchment water bodies, under the HSOC grant scheme <p>In addition, complaints relating to septic tanks form a significant proportion of environmental complaints and the investigation and resolution of these will also form an important part of this work.</p>
<p>Resources assigned – a team of 6 trained & experienced Septic Tank Inspectors is available to undertake this work when assigned</p>
<p>Final Environmental Outcome – Non-compliant systems are identified via risk-based NIP inspections and complaints, and resolved through appropriate enforcement notices</p>

National Priority: 1.4 Discharge Licences / Misconnections
Activities
<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 250-400 words per priority area]</i></p>
<p>A programme of monitoring of Section 4 licences has been prepared, with the frequency of monitoring and inspections based on a risk rating. Risk has been estimated through consideration of historical compliance, impact on receiving waters and their status. In the event that compliance is not at the level required, additional monitoring visits will be used in an effort to achieve compliance with licence conditions and enforcement action up to and including prosecution, if not achieved. The focus will be on:</p> <ul style="list-style-type: none"> • Facilities with persistent non-compliance with licence conditions in 2021 (12 licences are scheduled for additional inspections) • Catchments which are designated as AFA’s, At Risk or have been assigned to the Council for restoration or protection. • Unauthorised discharges may also be identified through complaints or referrals by LAWPRO and the process of regularising these will be initiated and progressed. <p>Misconnections are generally identified through complaints or catchment surveys and are addressed through the Water Pollution Act, including Section 4, where appropriate. The Council’s Taking-in-charge team are working on the take-over of orphan/abandoned private wastewater treatment systems and technical assistance will be provided where necessary.</p>
<p>Resources assigned – 1 x experienced Senior Executive Technician, A/Executive Scientist</p>
<p>Final Environmental Outcome – All Section 4 licences associated with significant pressures are compliant with emission values</p>

National Priority: 1.5 Local Priorities & Water Quality - Bathing Water, WFD Monitoring & Investigative Monitoring
Activities

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 250-400 words per priority area]

The 2022 Bathing Water Monitoring Programme is similar to other years and the priority is to retain all 12 existing Blue Flag Awards, all Green Coast Awards and to work towards restoring any awards which have been lost in previous years. In the case of one bathing water, which has dropped in quality status from Sufficient to Poor, *Management Plan for Improving the Water Quality of Poor bathing Water status at Lady's Bay* has been drafted and submitted to the EPA. This plan outlines pressures within the catchment and proposes measures aimed at improving the water quality status.

A significant number of water bodies have dropped in water quality status to Red Dot + in the 2021 round of EPA Biological monitoring and catchment investigative assessment work has been ongoing and will be progressed for these catchments. Engagement with the sheep farming community and dipping contractors will form an important part of this work.

In addition, the Shruhingarve and Mourne Beg river catchments which had been impacted by a catastrophic peat slide in November 2020 and will require continued monitoring and participation in a multi-agency task forces set up to look at enforcement and restoration works.

The WFD Rivers & Lakes sampling programme will continue at a slightly lower number of samples in 2022, compared to the previous year and arising from Organics Monitoring, in particular, a number of catchments will require further investigation and engagement with farmers & landowners to try to prevent repeat detections of MCPA, cypermethryn & other Pesticides.

Resources assigned – One Senior Exec Technician is engaged full-time on WFD sampling & follow-up work, and a contractor is engaged for open water lake sampling at 8 lakes. An Executive Technician will co-ordinate all other catchment work. A Graduate Scientist and Grade 2 technician are assigned to bathing water monitoring

Final Environmental Outcome – Monitoring data is available for characterisation & to support targeting of LA inspections and enforcement, while Blue Flag & Green Coast awards will be retained

National Priority: 1.5 Local Priorities & Water Quality - Monitor and enforce the drinking water standards in private water supplies
Activities

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 250-400 words per priority area]

A sampling plan was agreed with the HSE for Private Water Supplies, including 8 no. Private Group Water Supplies, 2 no. Public GWS and 41 Small Private Supplies, in line with the requirements of the current Drinking Water regulations. 3 no. of the private GWS being sampled are below the reporting threshold in terms of size but have poor water quality. Such analysis will assist Rural Water Section in devising solutions to water quality issues with these supplies. Sampling and analysis of compliance samples are sub-contracted through an inter-agency agreement with the HSE. 116 no. samples are planned including 29 no. operational/investigative samples planned as part of follow up action to exceedances in 2021, which may be carried out by the local authority. Certain Group B parameters (primarily pesticides) are carried out on a 3-yearly cycle with approximately 17 no. supplies selected for each year including those with full Group B requirement due to size. Consultation with the HSE will be carried out where significant exceedances occur and investigative samples taken, where appropriate. Communications will be issued to the promoters of GWS, by the Rural Water Department, where significant microbiological failures arise.

4 no. audits of private supplies (1 no. GWS and 3 no. small private supplies – 2 caravan parks in Downings area, 1 National School and 1 small private GWS) are scheduled and have been selected based on significant microbiological failures in previous samples. It is envisaged that required remedial works can be recommended to the operators of these schemes, possibly through additional treatment or connection to mains water supply, and improvements to the water quality can be made to ensure a safe drinking water. This will be done in conjunction with the Rural Water Section for the Private GWS and through consultation with the HSE, where relevant. Follow up audit is scheduled for 2022 for 1 no. supply which was audited in 2021 and a direction issued.

Resources assigned – Compliance Sampling sub-contracted and already awarded. Assessment and reporting of results will be carried out by the local authority by 3 no. staff (A/Exec Scientist, Executive Technician & Clerical Officer).

Final Environmental Outcome – Enforcement of private drinking water standards

National Priority: 1.5 Local Priorities & Water Quality - Local Authorities Waters Programme
Activities
<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 250-400 words per priority area]</i></p>
<p>Investigative work will be carried out subsequent to a referral from LAWPRO's field work, particularly in the area of septic tank inspections, including grant application assessments, or an unauthorised discharge (eg- from an unlicensed quarry). In the event that agriculture is identified as a pressure emanating from a water-body adjoining an AFA, inspections may also be carried out to identify point or diffuse sources.</p> <p>Donegal Co. Council will facilitate public consultation on the draft (3rd Cycle) River Basin Management Plan through presentations to the elected members and members of the public. Input and feedback will be sought, recorded and collated for feeding back to LAWPRO and BROCC.</p> <p>Attend Border Region Operational Committee meetings and engage with colleagues on an ongoing basis, sharing information and advice on best practice and novel approaches to problematic areas and issues.</p> <p>Convene 2 meetings of the North West Water Forum including local state agency representatives – IFI, Lough's Agency, NWPS, LAWPRO, NIEA, Catchment Care Project, Teagasc, IFA, INHFA, to discuss local water quality priorities and issues.</p>
<p>Resources assigned – Executive Technician and other technical staff as required, A/Senior Executive Scientist, A/Executive Scientist</p>
<p>Final Environmental Outcome - Contribute to meeting LAWPRO's objectives in AFA's and in preparation of the 3rd Cycle River Basin Management Plan which meets the needs of all stakeholders</p>

National Priority: 1.5 Local Priorities & Water Quality - Respond to water quality complaints and incidents
Activities
<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 250-400 words per priority area]</i></p>
<p>All complaints received by the Council will be dealt with as follows:</p> <ul style="list-style-type: none"> • logged on the CRM Environmental Complaints database by the Council's Call Centre or staff recipient and assigned to a particular staff member for investigation. • The Council's policy is to evaluate the nature, extent and impact of the issue being reported in order to assign a priority and timescale to the investigation of it. • In some cases, it may be appropriate to issue a letter advising a homeowner of an issue as a first step, although most complaints will require and on-site inspection. • If possible, the person whose actions have given rise to the complaint will be met with and advised of the reason for the inspection, the inspection findings and remedial action required. • Any water samples required will be lifted and tested and an inspection report will be compiled and issued with a warning letter to the person whose premises or farm has been inspected. • Appropriate advice will be issued in the form of leaflets, extracts from the EPA Code of Practice, Building Regs etc • Depending on the nature of the complaint, an enforcement notice may be issued under Section 12 of the Water Pollution Act or Section 110 of the Public Health Act • A follow-up inspection will be carried out and the file will be closed or remain open pending further enforcement action. • The Complaints database will be examined on a weekly and monthly basis to make sure complaints are addressed in a timely manner
<p>Resources assigned – Technician Grade 2 & other technical staff are assigned to complaints as they arise</p>
<p>Final Environmental Outcome - Elimination of point and diffuse sources of pollution, address climate related issues, eg – due to extreme weather events</p>

Overall concluding remarks for the reporting year: Completion of inspections & complaint investigations is dependent in some cases on access to farms, businesses/commercial & private properties and may be impacted by Covid-19 or other such restrictions

National Priority: 2.1 Solid Fuels
Activities
<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 250-400 words per priority area]</i></p>
<p>Complete sampling and analysis of low smoke products through an accredited laboratory with a view to enforcing the regulations with regard to product specifications for sulphur & volatile ash content, to ensure that consumers are not inadvertently using non-compliant products. It is also planned to continue with :</p> <ul style="list-style-type: none"> (a) routine inspection of retailers and merchants in low smoke zones (b) out-of-hours patrols to identify non-compliant product deliveries by mobile operators from outside the low smoke zone, in some cases through multi-agency operations (c) compliance promotion through social media and local press, including both local & national awareness campaigns <p>Enforcement actions will include the use of Fixed Penalty Notices and warning letters.</p> <p>Engage further with EPA and Department of the Environment, Climate and Communications on regulation of coal bagging plants, through working groups and the <i>Local authority Group for the Implementation of the Solid Fuels Regulations</i></p>
<p>Resources assigned: Waste Awareness Officer & Litter Warden assigned to this area, with input from Waste Regulation Officer and A/Senior Executive Scientist</p>
<p>Final Environmental Outcome – Fuel products used by the end-user compliant with standards</p>

National Priority: 2.2 Air Quality Monitoring and Data Use
Activities
<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 250-400 words per priority area]</i></p>
<p>Provide support to EPA for</p> <ol style="list-style-type: none"> 1. existing air quality monitoring stations by facilitating servicing and trouble shooting work and carrying out certain assigned routine servicing work, and 2. additional monitoring programmes, such as the SO2 diffusion tube monitoring. 3. <p>Investigate opportunities to install further air monitoring stations and IOT sensors in other areas of the county to monitor air quality in all municipal districts</p>
<p>Resources assigned: Technician Grade 2 and A/Senior Executive Scientist</p>
<p>Final Environmental Outcome – provide real-time air quality data to be used to inform the public and identify areas for action</p>

National Priority: 2.3 Environmental Noise Directive (END's)
Activities
<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 250-400 words per priority area]</i></p>
<p>With some assistance from the RMO, the Roads section are currently in the process of completing Phase 1 & 2 of the Data Capture Process for Round 4, the traffic counts have been completed for the majority of the Major Roads, with the remainder to be completed by end Q1. When all the information has been gathered, Roads will then have to upload this info through MapRoad and Arc GIS portals. Roads have been in contact with Tony Dolan from the EPA and informed him that this will be completed by the end of February.</p> <p>The Annual Noise Action Plan progress report will be issued to the EPA by the 28th February. Roads have identified the priority areas for Round 3 through the Scoring Matrix and the next step in the process is to:</p> <ol style="list-style-type: none"> 1. carry out Noise Monitoring at these locations to confirm that the threshold levels have been exceeded, 2. identify mitigation measures that Roads can put in place in order to reduce the noise levels, 3. identify any funding streams available to carry out the works. 4. Identify a consultant to complete the noise monitoring after funding is identified for same.
<p>Resources assigned: Roads section</p>
<p>Final Environmental Outcome – Regulatory compliance for Donegal Co. Council</p>

National Priority: 2.4 Air & Noise Control (including Planning)
Activities
<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 250-400 words per priority area]</i></p>
<p>Planning files will be assessed by the Environment Section, particularly where Environmental Noise Surveys, Environmental Management Plans, Dust Monitoring Reports are submitted, and appropriate conditions or responses will be recommended. Regular engagement will be undertaken with the Planning section with regard to key sectors such as quarrying, wind farms and certain agricultural activities where air and noise impacts may be problematic if suitable mitigation measures are not put in place.</p> <p>Air Pollution Licences (3) will be monitored to ensure licence compliance</p> <p>Air pollution and odour complaints will be logged on the Council's CRM Environmental Complaints database and will be dealt with at the earliest opportunity using the appropriate measure – warning letters , enforcement notices or prosecution</p> <p>Engage and collaborate with colleagues in other Local Authorities to develop capacity and consistency in air & noise enforcement via networks and working groups (e.g. Local Authority Air Implementation Group, Petroleum Vapours Working Group and Air Pollution Act Working Group).</p>
<p>Resources assigned: Technician Grade 2 and A/Senior Executive Scientist</p>
<p>Final Environmental Outcome – provide real-time air quality data to be used to inform the public and identify areas for action</p>

National Priority: 2.5 Ongoing Air & Noise Enforcement Work	
Activities	
<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 250-400 words per priority area]</i></p>	
<p>Ongoing work in this area will include the following :</p> <ul style="list-style-type: none"> • Planned Inspections of facilities/activities as specified in the RMCEI Inspection Programme and/or as otherwise determined by the Council, with appropriate follow-up using the enforcement tools at the disposal of the LA as required. • Issuing of Certs of Compliance to Vehicle Refinishers, Dry Cleaners and Petrol stations under the Petroleum Vapour Regulations • Inspection of Vehicle Refinishers who are not certified or have allowed their Cert to elapse and publication of an up to date list of Certified Operators on the Council's website • Public Service Announcement on local radio stations to promote the use of certified operators, (in early spring when weather & road conditions are most likely to lead to collisions) • Posting of the EPA Vehicle Refinishers video on the Council's website and social media channels to promote it. • Inspection, noise monitoring surveys and required enforcement actions under Sections 107 and 108 of the Environmental Protection Agency Act, 1992 in order to limit noise nuisance. Noise complaints of a domestic nature will be addressed through warning letters with appropriate advice & guidance provided. • Engagement with other state agencies, such as DAFM, Teagasc, IFA, EPA in relation to problematic air pollution cases, eg- odours from pig farms below the IED threshold • Build capacity through engaging, collaborating and sharing with colleagues in other Local Authorities via networks and working groups and participating in training events 	
<p>Resources assigned: Technician Grade 2 and A/Senior Executive Scientist, Clerical & technical staff are available to issue warning letters & enforcement notices as required and external noise consultants/acoustic engineers will be engaged on a case-by-case basis as required</p>	
<p>Final Environmental Outcome – resolve complaints to the satisfaction of the public and ensure regulatory compliance in terms of air quality and noise climate</p>	

Overall concluding remarks for the reporting year: Completion of inspections & complaint investigations is dependent in some cases on access to farms, businesses/commercial & private properties and may be impacted by Covid-19 or other such restrictions

National Priority: 3.1 Tackling significant illegal waste activity in 2022 and multi agency sites of interest	
	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 250-400 words per priority area]</i></p>
<ul style="list-style-type: none"> • Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including: <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 2022 work will build on the experience gained in the last number of years. An internal surveillance system has been established in order to maximise resources on the ground through more targeted inspections. This intelligence is gained from AR validation, waste facility cross compliance and traceability checks and local knowledge. This targeted approach and response to complaints has allowed us to identify particular sites and operators that require more focused attention. This is of particular importance in a large rural county given the geographical spread of the sites. Environment staff routinely check sites and report changes where appropriate. This information is captured, reported and studied through monthly RMCEI reports and weekly enforcement meetings resulting in us progressing through the list of unauthorised sites.</p> <p>The targeted multi-agency approach adopted in 2021 will continue in 2022 with regular communications and operation group meetings, vehicle checkpoints, intelligence sharing etc. External advice, guidance and support will be sought as appropriate. We will continue to engage with all the relevant stakeholders and agencies in 2022 in order to tackle significant illegal waste activity and will particulate in multi-agency operations throughout the year.</p> <p>Enforcement actions will continue to be targeted as appropriate in 2022 by utilising the enforcement tools available in particular section 57 and 58. We have a number of sites and operators who we have identified as facilitating the unauthorised treatment of waste, these will be pursued in 2022.</p> <p>A number of court dates are set for 2022 involving 22 separate offences and the LA envisage a considerable amount of time and resources will be required to take these cases through the legal process. We will be utilising all the enforcement powers available and in particular section 57 and 58. Section 55 Notices will require for assessments to be carried out in accordance with the relevant Codes of Practice.</p> <p>Information and experiences gained through work undertaken to tackle significant illegal waste activity will be captured and shared through the relevant platforms such as the CU WERLA, the Dept. Environment, Climate and Communications and EPA through reporting.</p>
<ul style="list-style-type: none"> • Have appropriate resources being assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>? 	<p>The LA will endeavour to allocate adequate resources however there may be externalities that impact on the local authorities ability to progress effectively such as large numbers of complaints, complex investigational and enforcement work.</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>Land remediated and waste removed in line with EPA code of practice. Unauthorised collectors detected and closed down, Successful outcomes in court A message to the wider community around the importance of appropriate waste management.</p>

National Priority: 3.2 Construction and Demolition Activity	
	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 250-400 words per priority area]</i></p>
<p>Describe the work to be carried out to address this National/Additional Local priority FOR THE YEAR AHEAD – including:</p> <ul style="list-style-type: none"> • Collaborative work with WERLA to ensure a targeted enforcement approach by looking at Annual Return Data – Waste In Vs Waste Out Vs Waste Onsite and compared to previous years Annual Return Data to ensure no recovery sites are exceeding their capacity (on paper). • Working “In House” to promote green procurement and tendering for public jobs, working to get buy in from SMT on this subject. Trying to stick in line with the document issued by the CCMA. • Raising awareness around C&D Waste and “Hard Fill” – to include Article 27 and the requirement for Waste Authorisation. <p>Collaborative working with the WERLA to pinpoint public jobs and large scale private jobs and carrying out C&D Waste Management Handling inspections. Raising awareness during same inspections. Recommending improvements to already existing procedures where possible and reviewing C&D Waste Management Plans.</p>	<p><u>Annual Return Approach</u> In 2022 there will be approx. 8 Authorised Recovery sites (combination of WFP and COR sites) annual returns for validation (for 2021 figures) by Donegal County Council. Donegal County Council intend on thoroughly assessing these AR’s with a particular emphasis on capacity (to ensure capacities have not been exceeded). Where “General Public” have been declared for bringing C&D waste or Soil & Stone into authorised recovery sites Donegal County Council will look at records to see if certain individuals/companies may require Waste Collection Permits and will follow up on same.</p> <p><u>MICA/MICA Redress Scheme</u> Donegal County Council will be working very hard in relation to the MICA Redress Scheme. The Environment/Waste Enforcement office will be liaising with the MICA Redress Scheme office to try and ensure that environmental factors are taken into consideration when rolling out the Redress Scheme. Donegal County Council’s Environment Office drafted conditions that they would like to see as being mandatory as part of the scheme which include the lawful disposal of waste concrete blocks and provision of receipts of same before being able to draw down grant payment, Donegal County Council hope to follow up on this in 2022 to ensure its’ implementation. Donegal County Council will also be working to try and have a range of blocks containing MICA tested for a suite of environmental parameters to determine if they are suitable for recovery at Authorised recovery sites. Donegal County Council anticipate that the remaining capacity within Donegal’s authorised recovery sites will not be able to cope with the projected volumes of concrete blocks that will arise as part of the MICA Redress Scheme and the Council will be working closely with the NIEA to see if there may be a cross-border solution to this potential problem. This work is ongoing.</p> <p><u>Routine WFP/ATF Inspections</u> Donegal County Council will inspect each authorised recovery site a number of times (as per the EPA’s Risk Rating Tool) to monitor compliance with their WFP/COR. The emphasis on these inspections will be to ensure capacity is not being exceeded, that only authorised wastes are being accepted, permitted boundaries/levels are adhered to and that appropriate monitoring of incoming waste is being carried out. Where non permitted waste is observed at authorised recovery sites Donegal County Council intend on taking enforcement action to have authorisation holders carry out environmental risk assessments and subsequently remediate the sites.</p> <p><u>Construction & Demolition Jobs</u> Donegal County Council intend to continue to review C&D Waste Management Plans as they are submitted and make comments on same.</p> <p>Donegal County Council intend to continue to review planning permission applications relating to Construction & Demolition jobs as they are submitted and make comments on same.</p> <p>Donegal County Council intend on carrying out C&D waste handling inspections/audits at Construction and Demolition sites including those identified via the Article 27 process and giving advice/raising awareness where possible.</p>
<ul style="list-style-type: none"> • Have appropriate resources being assigned to carry out the work associated with this activity FOR THE YEAR AHEAD? 	<p>Significant resources are being dedicated to Annual Return validations in 2022; this will help with this National Priority in tracking C&D Waste Flows as well as monitoring capacity for C&D and Soil & Stone within the county. Other areas of work to do with this National Priority will be focussed on during routine facility inspections, where significant resources have also been dedicated.</p>
<p>The Final Environmental Outcome to be achieved?</p>	<ul style="list-style-type: none"> • No unauthorised fill sites appearing from MICA Redress scheme. • Authorised sites complying with conditions. • Authorised sites insisting on analysis in accordance with EPA CoP for recovery sites on all incoming waste. • More people applying for WCP’s to transport C&D Waste and continued increase in the amount of C&D waste reported through the ARs

National Priority: 3.3 ELV Directive & the Waste Metal Industry	
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 250-400 words per priority area]</i></p>
<ul style="list-style-type: none"> • Describe the work to be carried out to address this National/Additional Local priority FOR THE YEAR AHEAD – including: <ul style="list-style-type: none"> • Collaborative work with WERLA to ensure a targeted enforcement approach by looking at Annual Return Data. • Using the findings of AR Data to do targeted WFP inspections. • Where potential data is gathered during WFP inspections follow on enforcement site visits/interviews will take place. • Raising awareness during WFP Inspections of obligations under the ELV Directive and record keeping. • Targetting unauthorised ELV sites/satellite sites. 	<p><u>Annual Return Approach</u></p> <p>In 2022 there will be approx. 9 Authorised Treatment Facility (ATF) annual returns for validation by Donegal County Council. Donegal County Council intend on picking the top 3 ATF's and following the CU WERLA's guidance for validation of waste metal facilities. Donegal County Council will prioritise the top 3 ATF's by following the CU WERLA's guidance.</p> <p>Prioritisation will be based on those ATF's that are showing large amounts of waste metals being supplied by "general public". The waste metals that will be looked at in making this determination will be ELV's, Lead Acid Batteries and Catalytic Converters (Spent Catalysts).</p> <p>Once the top 3 ATF's have been prioritised, thorough, focussed/targeted Annual Return validations will take place (possibly in the presence of CU WERLA). This will likely involve looking at the top 10 suppliers (non permit holder/General Public) for each of the waste streams mentioned above.</p> <p>Once the top suppliers have been identified and details of these suppliers have been provided to Donegal County Council it is envisaged that a number of site investigations (possibly Multi Agency – WERLA, Revenue, AGS etc) will take place to determine if there are individuals operating unauthorised ELV sites in County Donegal.</p> <p>Where unauthorised ELV sites are identified appropriate enforcement action will be taken to close such sites and other enforcement actions may include legal proceedings and serving notices to carry out environmental risk assessments to identify any pollution that may have arisen/be arising as a result of the unauthorised activity. Where pollution has occurred/is occurring, necessary enforcement action will be taken to ensure sites are remediated.</p> <p><u>Routine WFP/ATF Inspections</u></p> <p>Donegal County Council will inspect each ATF a number of times (as per the EPA's Risk Rating Tool) to monitor compliance with their WFP. Where non-compliances are noted enforcement action will be taken which will direct the WFP holder to take specified measures in order to comply with the WFP in order to prevent or limit the risk of environmental pollution.</p> <p><u>Monitoring</u></p> <p>Donegal County Council's laboratory staff will continue to monitor the quality of oil interceptor discharges coming from the 9 No. ATF's along with the quality of upstream and downstream of same discharges (where applicable). Where water quality is shown to be less than satisfactory direction will be given to WFP holders to take action to remedy the situation. Where discharge/water quality is not improved after direction has been given, enforcement action will be taken.</p> <p>Donegal County Council will also be raising awareness with WFP holders who also have a Waste Collection Permit (WCP) to ensure compliance with WCP conditions and ensure they are not collecting ELV's/Waste Metal from any potential unauthorised sites (e.g. sites that appear to have large numbers of ELV's/Waste Metal – or repeat collections at particular sites etc, unless that site can show the Waste Collector that they have been instructed by the Council (either by Section 14 Direction or Section 55 Notice) to remove the waste).</p> <p>Work in this area will also involve checking records kept at ELV/Waste Metal WFP's – particularly for those that declare large quantities of ELV's/Waste Metals supplied by "General Public". if particular suppliers of ELV's/Waste Metals are bringing in large quantities of ELV's/Waste Metal they will be investigated thoroughly. This may involve locating satellite ELV/Waste Metal sites and taking enforcement actions.</p> <p>-Where complaints are received about unauthorised sites, or unauthorised sites are observed during routine patrols, enforcement actions will be taken where necessary.</p>
<ul style="list-style-type: none"> • Have appropriate resources being assigned 	<p>Significant resources are being dedicated to Annual Return validations in 2022; this will help with this National Priority in tracking ELV and Waste Metal Flows within the county. Other areas of work to do with this National Priority will be focussed on during routine facility inspections, where significant resources have also been dedicated.</p>
<p>The Final Environmental Outcome to be achieved?</p>	<ul style="list-style-type: none"> • The identification, closure and remediation of unauthorised ELV sites as well as legal proceedings of same (where necessary). • More people applying to authorise sites in order to dismantle ELV's. • Higher compliance rates with WFP conditions and accurate waste classification and quantification. WEEE adequately segregated and transferred to appropriate facility.

National Priority: 3.4 Household and 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><i>[Guideline of 250-400 words per priority area]</i></p>
<ul style="list-style-type: none"> Describe the work to be carried out to address this National/Additional Local priority FOR THE YEAR AHEAD – including: <p>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. AER Validations on WCP and WFP priority lists. 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>Household waste</p> <ul style="list-style-type: none"> - Advisory letters will be issued early in 2022 to each of the collectors permitted and collecting household kerbside waste in Donegal. - Targeted enforcement actions are planned for non compliance with the European Union (Household Food Waste and Bio Waste) Regulations 2015 by some waste collectors. It is envisaged this will require a significant amount of time and effort in 2022. - Section 18 information will continue to be captured on a monthly basis from household waste collectors for analysis and monitoring in relation to compliance and actions will be taken where necessary. - Discussions are ongoing with another local authority within the CU region regarding a potential joint project in 2022 to target food waste agglomerations with low levels of participation and increase the number of households using the household food waste service and the quantity of food waste being captured/ diverted from landfill. - Dialogue is ongoing with the local authority waste awareness office to maximise communications and awareness opportunities to share information about domestic waste management in 2022 and a number of platforms will be utilised including print, social media/online and radio. <p>The LA will seek opportunities to link with national campaigns and mywaste.ie.</p> <ul style="list-style-type: none"> - Further work will be undertaken in 2022 to progress the Household waste presentation Bye Laws and household waste surveys are to be carried out (Target of 50 in 2022) in conjunction with the introduction of the Bye laws. <p>Commercial waste</p> <ul style="list-style-type: none"> - A commercial waste project plan is being devised for 2022 that will involve environment staff visiting commercial premises to provide information and to signpost people to the suite of resources now available on the business section of mywaste.ie - Waste Enforcement Officers will be carrying out commercial food waste inspections in line with the CU WERLA work plan for 2022 (list of commercial premises for inspection to be given to the LA by the WERLA) - 50 commercial waste inspections to be carried out in 2022 plus follow up and/or enforcement where appropriate, <p>Targets are being set for Annual Return waste validation work as well as inspections. This will all link together to ensure compliance with commercial waste legislation. Information will be recorded, progress monitored and outcomes used to form the basis for future resource planning.</p>
<ul style="list-style-type: none"> Have appropriate resources being assigned 	<p>Funding will be sought to undertake some of the work for example ADI funding will be sought to carry out household waste surveys and the joint food waste project will be funding dependent. By linking with national campaigns there is an opportunity to maximise resources and results.</p>
<p>The Final Environmental Outcome to be achieved?</p>	<p>3 bin systems in place in the agglomerations over 500. Increased quantities of food waste captured for more sustainable waste management practices e.g. anaerobic digestion and production of renewable energy and potentially biogas in the future. Decreased food waste to landfill and increased potential for local energy security through a circular economy approach.</p>

National Priority: 3.5 PRI and Local Priority - Annual Returns Validations – data and waste data flows	
	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. <i>[Guideline of 250-400 words per priority area]</i>
<ul style="list-style-type: none"> Describe the work to be carried out to address this National/Additional Local priority FOR THE YEAR AHEAD – including: <ul style="list-style-type: none"> 	<p>In 2022 there will be approx. 140 waste annual returns for validation by Donegal County Council. This includes 90 WCP and 50 WF/CoRs.</p> <p>Information and experiences gained from validation work in 2021 will be factored into the plan for 2022 as well as consideration to the EPA top 100 facility list, returns to be validated by the RWMPO and returns that need to be prioritised from last year e.g. due to inconclusive status last year that needs to be considered in more detail in 2022 or in connection with ongoing enforcement work.</p> <p>Reminder emails will be sent after the 28th February 2022 to permit holders who have not started a return or who have failed to complete a final return.</p> <p>In April 2022 the LA will consider issuing Fixed Payment Notices for those waste collection permit holders that are still outstanding.</p> <p>The LA will aim to meet the deadlines as set out in the validation protocol for waste collection permit and local authority authorised facilities annual returns that was approved by the Wweep CCMA committee on the 13th January 2022.</p> <p>The LA made a huge effort to meet validation deadlines in 2021 and by the 31st October 2021 deadline 94% validation had been achieved for both WCP & WF/CoR's.</p> <p>The LA will aim to achieve a similar validation rate in 2022 however it is important to note that this will be resource dependent.</p> <p><u>Donegal's unique situation</u></p> <p>Of the 85 WCP annual returns for validation by Donegal County Council in 2021, 40% (34) declared waste to facilities that Donegal County Council validating officers don't have access to information about that would enable them to complete a desktop validation process. These include Waste Water Treatment Plants (WWTP's), EPA facilities and facilities in Northern Ireland. It is likely that this will be similar for validation work in 2022.</p> <p>The observations and experiences gained in 2022 will be used to develop the validation plan for 2023 and are shared with other local authorities through the waste data validation working group. It should also be noted that inspections and enforcement actions will be undertaken as a result of the validation process such as issuing warning letters and FPN's and legal proceedings.</p> <p>Local Authority Waste Data Validation Working Group</p> <p>Donegal County Council are an active member of the Working Group and will continue to a member of the group in 2022. Attending meetings, providing input, suggestions, comments and feedback, acting as a validation mentor and participating in subgroups as appropriate.</p> <p>PRI – Notwithstanding the vacant position it is intended to pursue another company under the packaging regulations through the courts and increase the number of registered tyre operators. In this regard a Regulation 25 Notice has been served.</p>
<ul style="list-style-type: none"> Have appropriate resources being assigned 	<p>The LA will endeavour to allocate adequate resources however there may be externalities that impact on the local authorities ability to meet validation deadlines such as large numbers of complaints, complex investigational and enforcement work. There is vacant position within the section and this position was responsible for PRIs, there was some great progress in this area in recent years and it is hoped that this can recommence when the position is filled.</p>
The Final Environmental Outcome to be achieved?	<p>Accurate information that can be used to identify where there may be issues that require further investigation and support targeted enforcement actions and can also be used to understand waste generation, flows and trends. This information is vital for planning and infrastructure considerations concerning capacity as well as local, national and international reporting.</p>

7. Overall concluding remarks for the reporting year:

Donegal County Council has and will continue to allocate significant resources to Operation Uniform in 2022 however, it must be considered that in order to address the barriers that have been identified the local authority will require the support and guidance of other agencies and organisations that are more centrally aligned and can support change in the respective areas including; work on pricing and ensuring good customer service is provided by waste collectors.

One approach could be where collectors are incentivised to implement measures that increase the diversion of food waste from landfill / thermal treatment. A scheme could be introduced similar to packing where a collector is paid a subsidy for every tonne of food waste that they divert. If collectors were incentivised, collectors should in turn incentivise households in such a way that it would be irrational for them to put food waste in the residual bin.

BARRIERS TO SUCCESS OF OPERATION UNIFORM

- i. Householder's unwillingness to engage positively with the household food waste receptacles as a result of a lack of information and awareness.
- ii. Lack of incentive for collectors to engage positively with the roll out of the household food waste bins and waste collectors reporting problems getting people to use the bins.
- iii. Lack of confidence in the waste sector in Donegal due to historical negative press.
- iv. Complaints from households about poor customer service and poor communications provided by waste collectors. This is a particular problem when there is only one waste collector offering a service in a particular geographical area.
- v. The difficulties for Donegal County Council in trying to address poor customer service and communications in the current legal framework e.g. there is no provision to issue a Fixed Payment Notice for not meeting the info outlined in customer charters.
- vi. Pricing and the difficulties associated with understanding the various pricing models.
- vii. Lack of local infrastructure and the negative press associated with some existing facilities e.g. Anaerobic Digestion.
- viii. Lack of support for the industry to help waste collectors meet their obligations.
- ix. Inappropriate bin size for pricing structures, collectors not providing adequate information and material such as bags and indoor kitchen caddies to households.
- x. Collectors continuing to collect residual bins from households that are not availing of the food bin collection.

KEY LESSONS LEARNED TO DATE

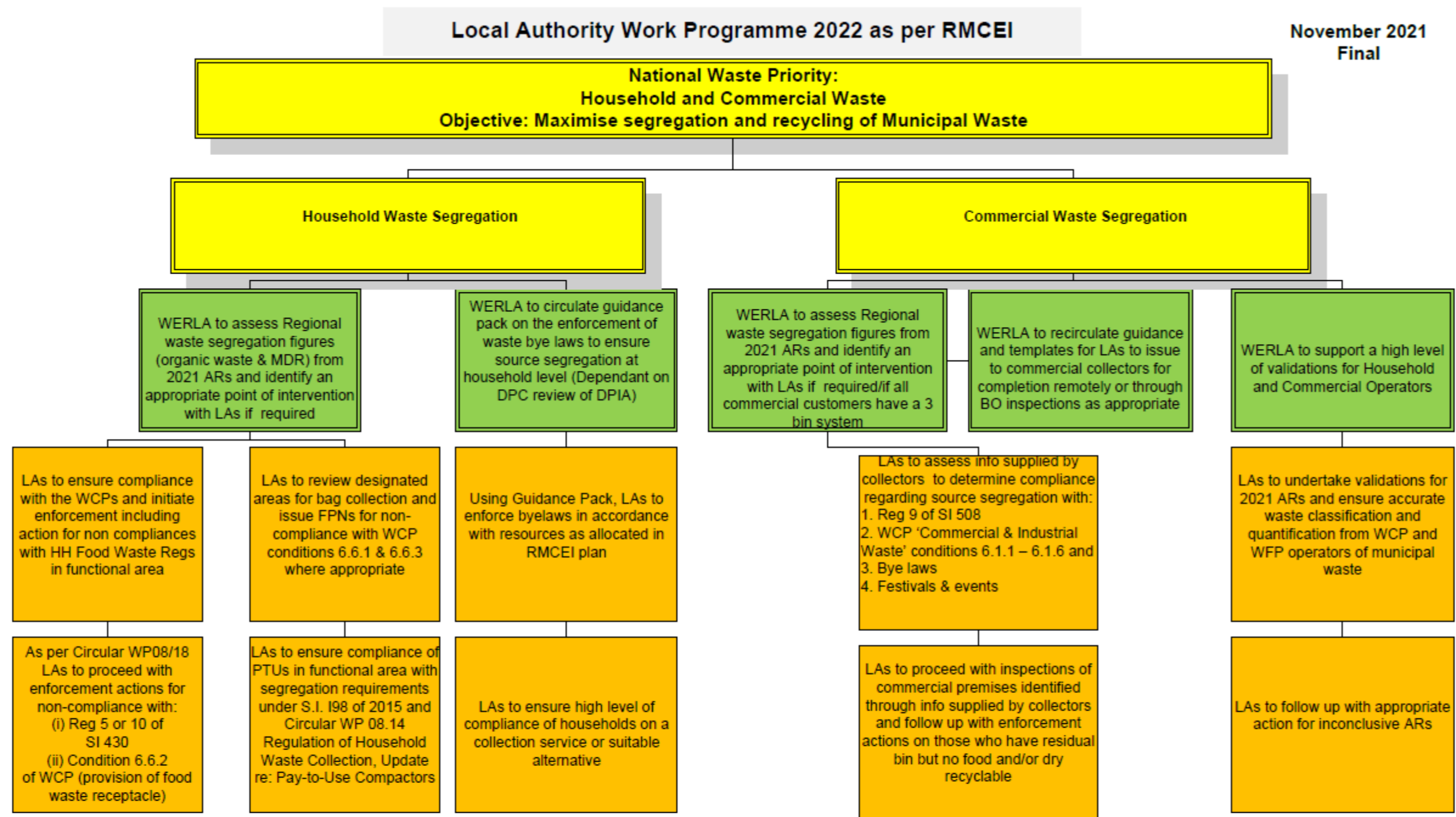
A designated resource and prioritisation as a key work area.

Allocation of a designated officer has a number of benefits including:

- Ability to continuously monitor /track progress.
- Address issues as they arise.
- Act as a point of contact.
- Report on progress and make recommendations.
- Apply a targeted and balanced approach to enforcement taking externalities into consideration.
- The work area receives a real focus which should be accounted for in RMCEI.

A massive amount has been achieved in 2021, unauthorised sites closed down, cases before the courts, standards at waste facilities have improved, sites remediated by using sound environmental rationale (EPA Codes of Practice). There is a lot of work associated with the number of open enforcement cases going through the courts. There is a continuing need to treat this document as a fluid document depending on the number of significant complaints that are received.

8. WERLA & National Enforcement Priorities

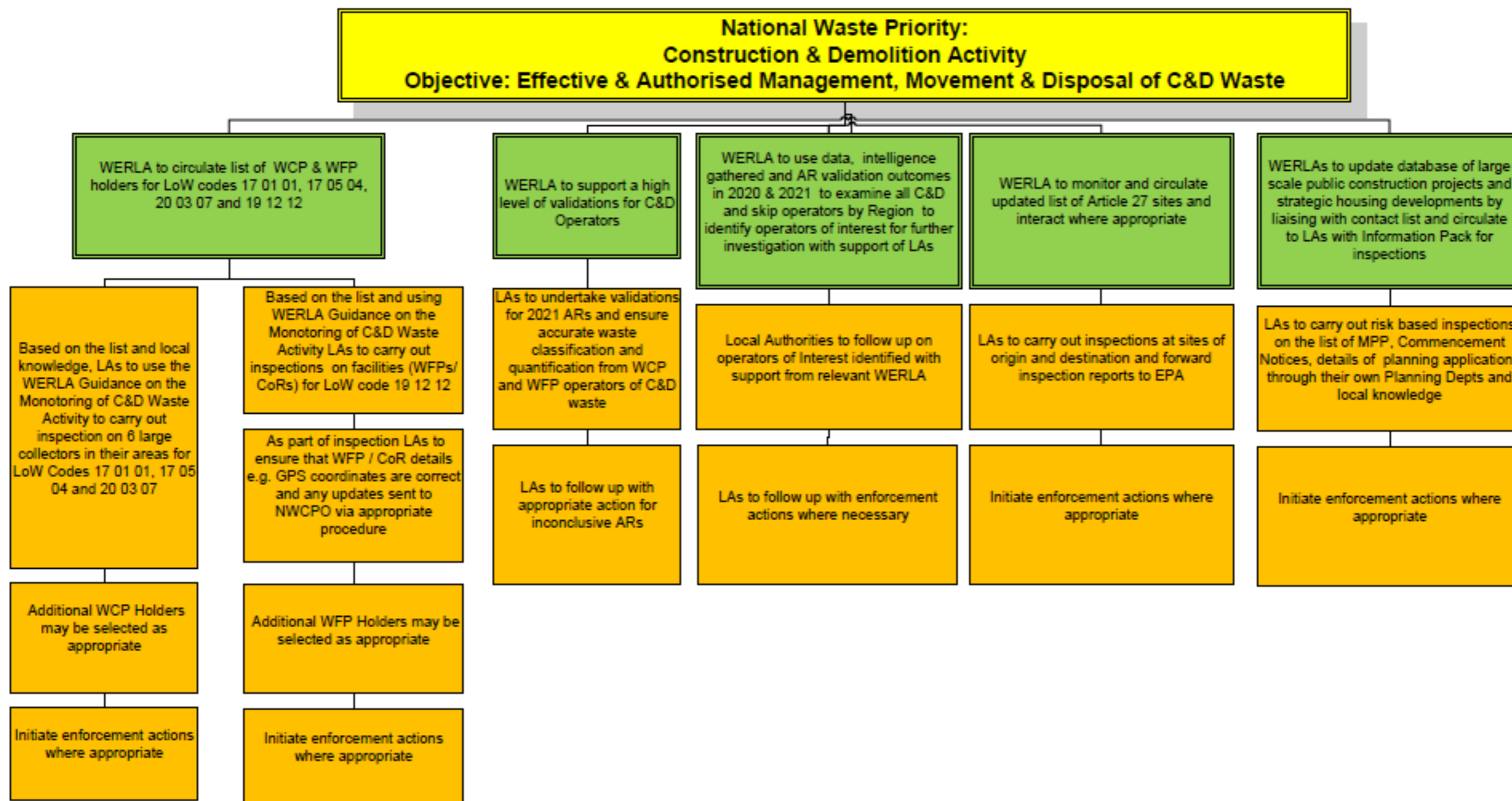


- WERLAs to develop strategy to tackle waste segregation in apartments – (dependency DECC working group)
- Following desk top validations, LAs to follow up on Inconclusive ARs, including conducting mass balance exercises, cradle to grave audits etc
- LAs to follow own H&S and carry out remote inspections if necessary



Local Authority Work Programme 2022 as per RMCEI

November 2021
Final

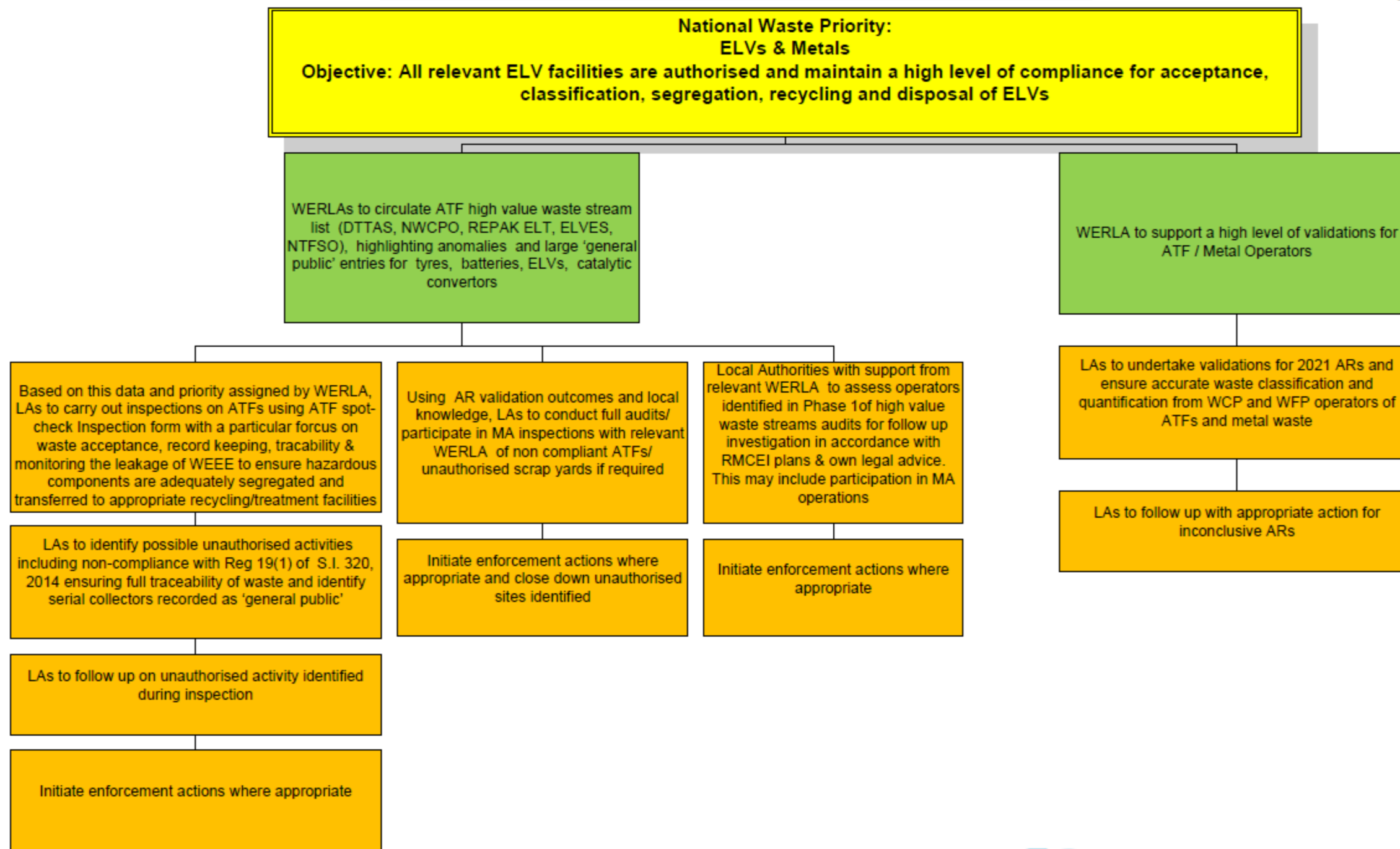


- LAs to follow own H&S and carry out remote inspections if necessary
- Following desk top validations, LAs to follow up on Inconclusive ARs, including conducting mass balance exercises, cradle to grave audits etc
- Ensure all waste facilities authorised by LAs are compliant including soil recovery sites
- LAs to engage with facilities to take all necessary steps to resolve non-compliant issues including the selling of crushed concrete from WFPs without EoW decision



Local Authority Work Programme 2022 as per RMCEI

November 2021
Final

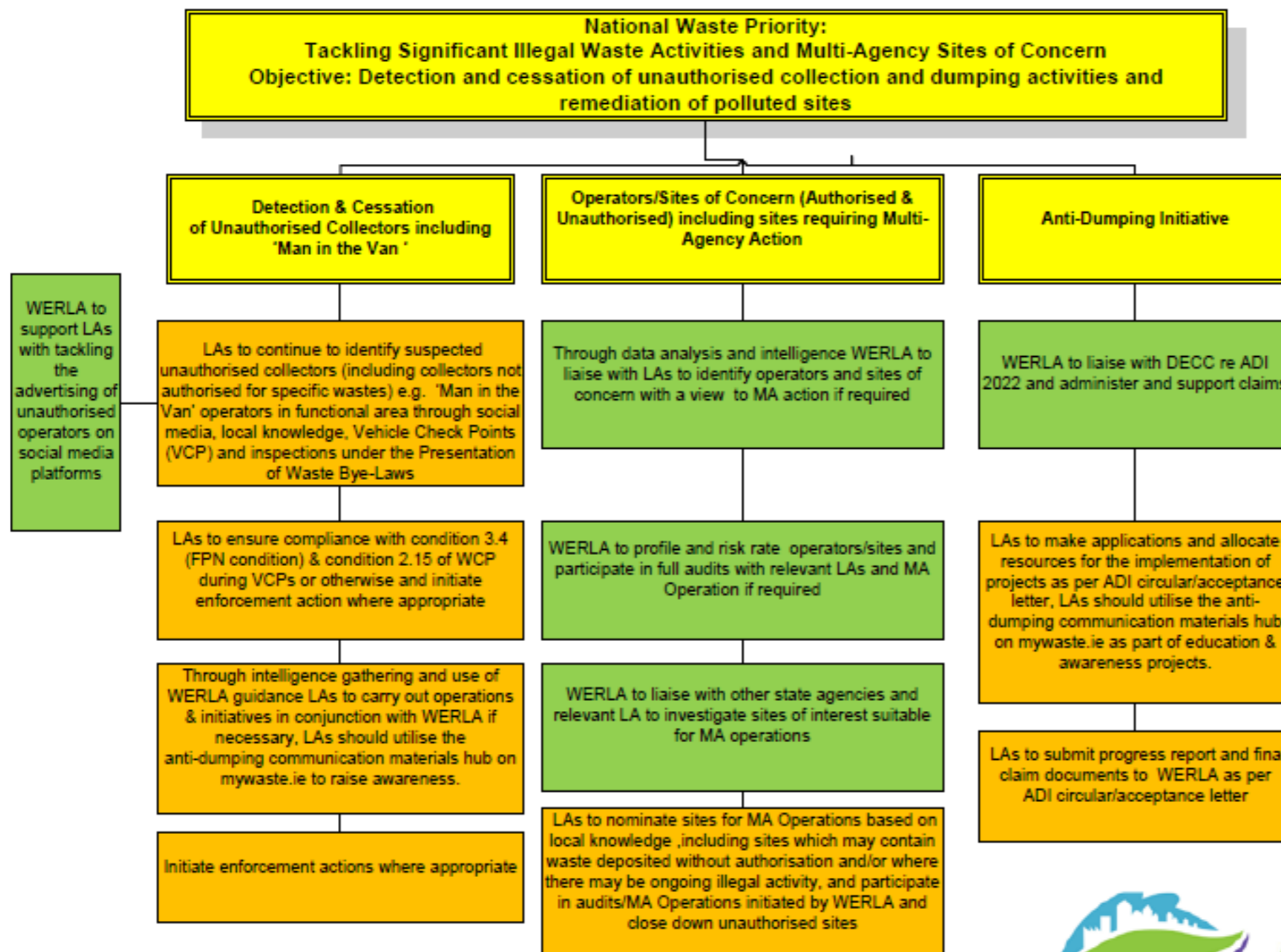


- LAs to follow own H&S and carry out remote inspections if necessary
- Risk based inspections of ATFs and other ELV sites (at least one inspection per annum of permitted sites)
- Following desk top validations, LAs to follow up on Inconclusive ARs, including conducting mass balance exercises, cradle to grave audits etc



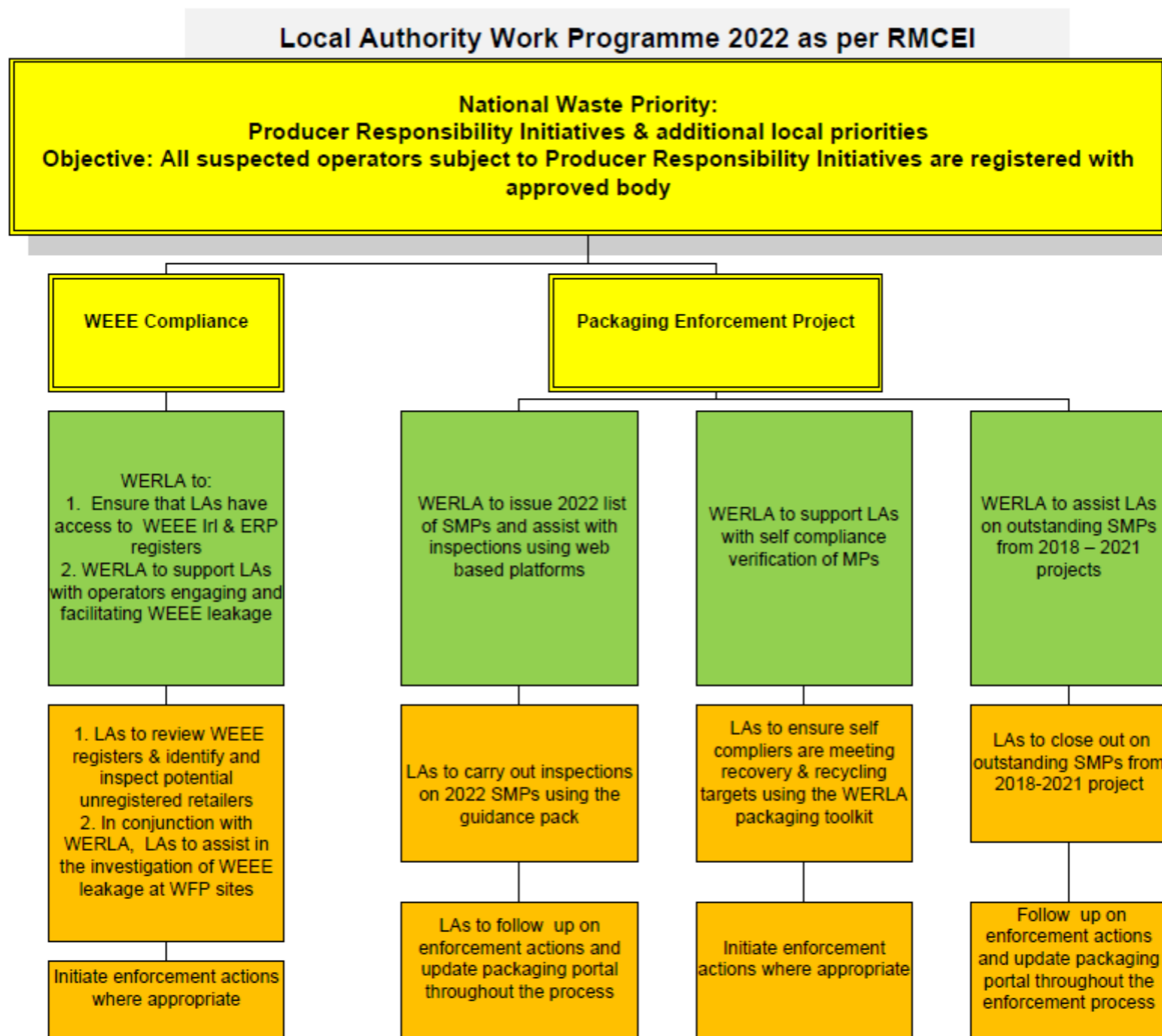
Local Authority Work Programme 2022 as per RMCEI

November 2021
Final



- LAs to follow own H&S and carry out remote inspections if necessary
- Traceability requirements to be enforced at Permitted sites
- Focus on those who are facilitating the unauthorised treatment of waste
- Co-ordination with, and input from Revenue/Social Protection/An Garda Síochána in relation to unauthorised activity and identified sites of concern



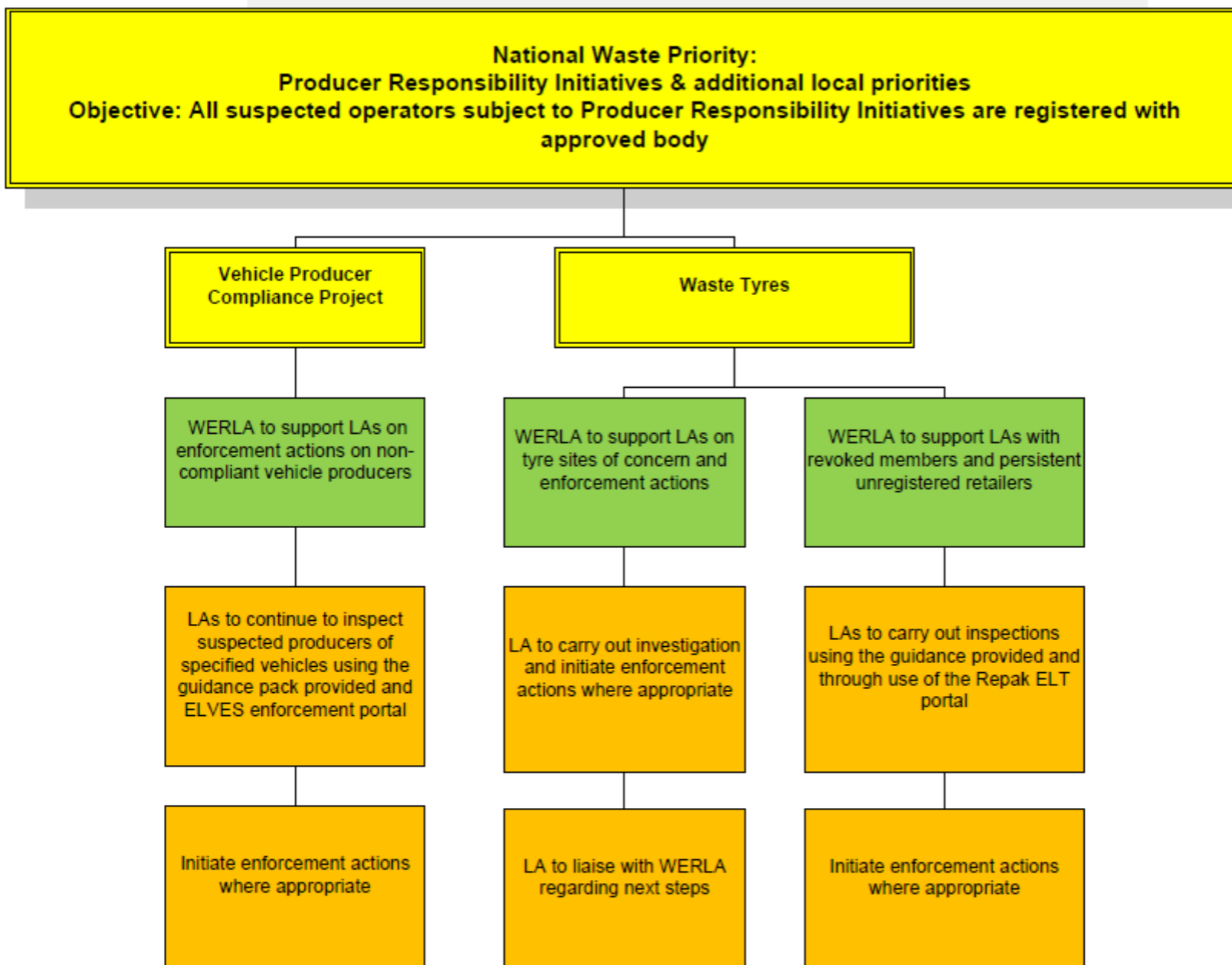


- **LAs to follow own H&S and carry out remote inspections if necessary**
- **Continue to liaise with PRI schemes on all aspects of compliance obligations & ensure a consistent approach in the enforcement for Extended Producer Responsibilities**
- **Ensure all waste facilities authorised by LAs are complying with EPR obligations**



Local Authority Work Programme 2022 as per RMCEI

November 2021
Final

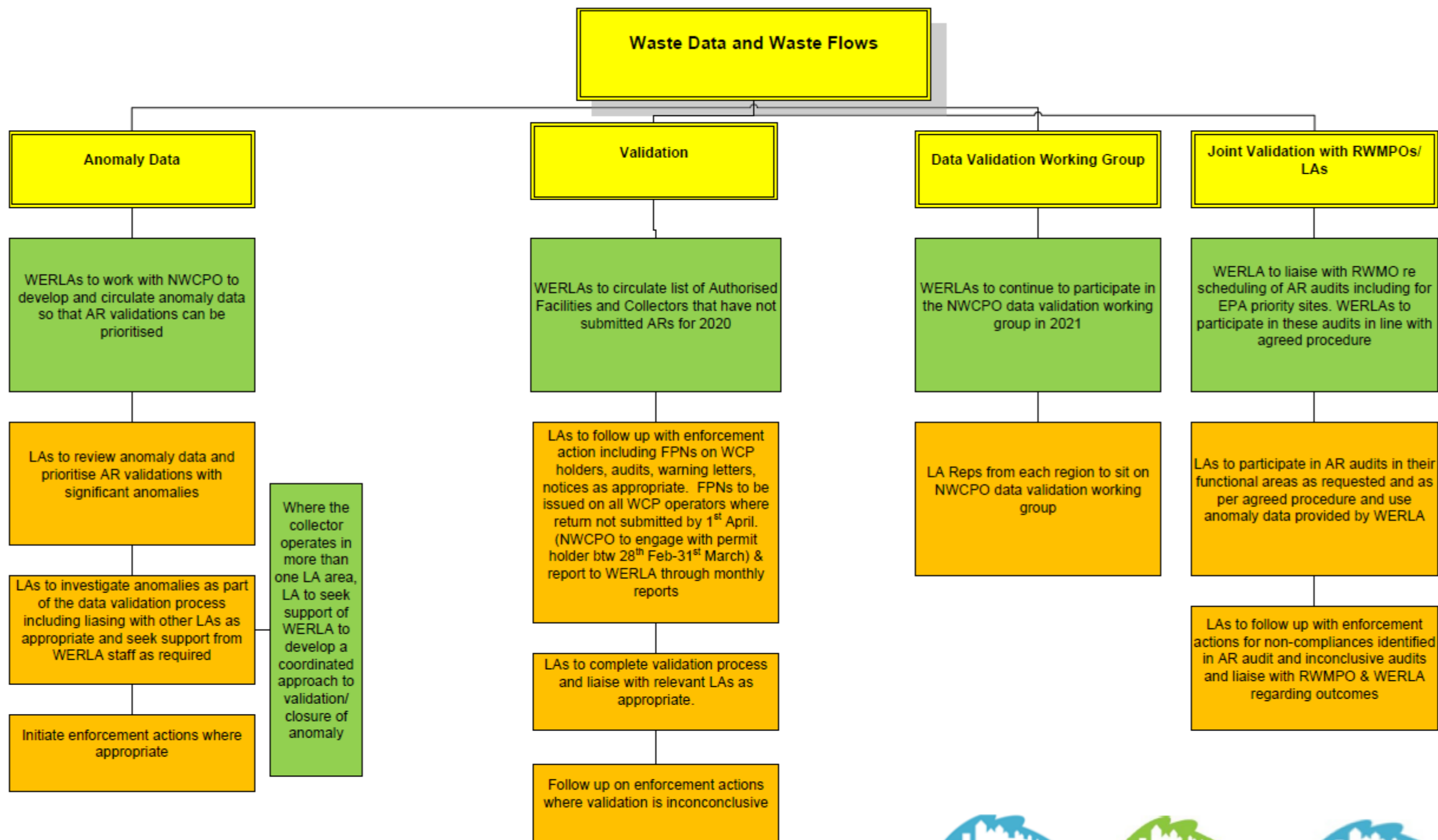


- LAs to follow own H&S and carry out remote inspections if necessary
- Continue to liaise with PRI schemes on all aspects of compliance obligations & ensure a consistent approach in the enforcement for Extended Producer Responsibilities
- Ensure all waste facilities authorised by LAs are complying with EPR obligations



November 2021
Final

Local Authority Work Programme 2022 as per RMCEI



- LAs to follow own H&S and carry out remote inspections if necessary
- WERLAs & LAs to work with LGMA on new Inspection reporting tool
- Following desk top validations, LAs to follow up on Inconclusive ARs, including conducting mass balance exercises, cradle to grave audits etc



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

2022	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	81	1	81.0	70 on site inspections, AR inspections recorded in 6.1.16
6.1.2	Joint inspections with NTFSO	5	0.5	2.5	
6.1.3	Inspections of Cert of Registration sites (private)	8	1	8	
6.1.4	Inspections of LA Cert of Registration sites	1000	0.1	100	
6.1.5	Multi-agency inspections, including vehicle inspections and multi agency site inspections	15	0.5	7.5	
6.1.6	Hazardous waste sectoral inspections (e.g. Mercury Regulations, WTF, garages, mini-labs, industrial, healthcare & others)	2	0.5	1	
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	0.5	5	
6.1.8	Inspections of notifications under Prohibition of Waste Disposal by Burning Inspections	5	0.5	2.5	
6.1.9	Registration of Sewage Sludge Facility inspections				
6.1.10	Household Waste Surveys	50	0.1	5	
6.1.11	Inspections in relation to the household and commercial kerbside waste collection regime (including brown bin)	50	0.5	25	
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	500	0.5	250	DM (60 for S18) (88 WCP, Review last years)
6.1.13	Commercial Food Waste Inspections (original waste producers, e.g. hotels, nursing homes, restaurants, etc.)	50	0.2	10	
6.1.14	Inspections in relation to authorised ELV facilities (ATFs) with an emphasis on traceability requirements (SI 320 of 2014)	22	1	22	
6.1.15	Inspection in relation to Mercury Regulation (S.I. No. 533/2018) **NEW for 2021**	2	0.5	1	
6.1.16	Other routine inspections (not included in above numbers) - please specify	50	0.5	25	Waste Permit AR
	Subtotal Routine Waste Inspections	1850		546	
6.2	Non-Routine Waste Inspections				
6.2.1	Investigative inspections of fly tipping or illegal dumping, excluding unauthorised C&D, ELVs & Tyres	300	0.4	120	
6.2.2	Investigative Inspections in relation to unauthorised C&D sites (sites with no permit)	30	0.5	15	
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)	20	0.5	10	
6.2.4	Investigative Inspections in relation to unauthorised Tyre dumps (no permit in place)	5	1	5	
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	1	10	
6.2.6	Inspections in relation to other Unauthorised Waste sites excluding those mentioned above - incl. crashed vehicle inspections, PTUs, etc.	100	1	100	
6.2.7	Inspections in relation to Waste Facility Permits continuing to operate after their permit has expired	5	0.3	1.5	
6.2.8	Inspections in relation to extractive industries	0	0	0	
6.2.9	Household Waste/waste presentation Inspections arising from complaints, including backyard burning	50		0	
6.2.10	Inspections of sites notified under Article 27	5	0.6	3	
6.2.11	Other non-routine inspections (not included in above numbers)	300	0.4	120	
	Subtotal Non-routine Waste Inspections	825		384.5	

6.3 Litter Patrols/Investigations				
6.3.1	Litter Patrols/Investigations	2000	0.3	600
6.3.2	Litter pollution Monitoring surveys	200	0.1	20
6.3.3	Litter pollution quantification surveys	50	0.1	5
6.3.4	Visits in relation to Green Schools programme		0.4	0
6.3.5	Providing support to community groups during litter clean ups	500	0.2	100
6.3.6	Judging Tidy Towns/Villages competitions			0
6.3.7	Other routine litter patrols/investigations (not included in above numbers)	200	0.1	20
	Subtotal Routine Litter Patrols/Investigations	2950		745
Water/Wastewater				
6.4 Routine Water/Wastewater Inspections				
6.4.1	Discharges licenses to waters (Section 4)	123	0.4	49.2
6.4.2	Audits of private water supplies	4	1	4.0
6.4.3	Monitoring samples from private water supplies			EPA source this data
6.4.4	Farm Inspections under GAP Regulations conducted by Local Authority (not including farm inspections by DAFM)	2	0.5	1.0
6.4.5	Farm Inspections conducted by DAFM			Limited resources EPA source this data
6.4.6	Farm Inspections Other e.g. routine farm inspection but not GAP inspection	30	0.5	15.0
6.4.7	Monitoring programmes, Operational and Surveillance samples taken			Complaint/S12 Follow-up EPA source this data
6.4.8	No. of days of locally lead investigative assessments (including SSRS, sampling, river walks, etc.)	25	2	50.0
6.4.9	WFD investigative monitoring samples and analysis by Local Authorities.	50	0.1	5.0
6.4.10	No of days of engagement with LAWPRO and Communities Programme	20	1	20.0
6.4.11	Bathing Waters	201	0.2	40.2
6.4.12	DWWTS inspections under National Inspection Plan	116	0.75	87.0
6.4.13	DWWTS Engagement Activities	118	0.25	29.5
6.4.14	DWWTS inspections of referrals from LAWPRO	10	0.75	7.5
6.4.15	Other Surface & Groundwater Protection Inspections [e.g. drinking water source protection, zone of contribution monitoring, etc]	320	0.2	64.0
6.4.16	Misconnection Surveys	5	0.5	0.5
	Subtotal Routine Water/Wastewater Inspections	1024		347.9
6.5 Non-Routine Water/Wastewater Inspections				
6.5.1	Inspections relating to water pollution incidents/complaints, excluding non-routine farm inspections.	100	0.4	40.0
6.5.2	Non-routine farm inspections, e.g. on foot of pollution incident or complaint.	10	0.5	5.0
6.5.3	Unauthorised Discharges Investigated	6	0.25	1.5
6.5.4	Inspections in relation to Water Pollution Licence applications	4	0.25	1.0
	Subtotal non-routine Water/Wastewater Inspections	120		47.5

Air/Noise Inspections					
6.6	Routine Air/Noise Inspections				
6.6.1	Inspections of Air Pollution Licenced sites	3	0.5	1.5	
6.6.2	Total number of inspections carried out under the solid fuel regulations (S.I. 326 of 2012 and as amended).	30	0.5	15.0	
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.	1	1	1.0	
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	40	0.5	20.0	
6.6.5	Total number of fuel samples collected and analysed	10	0.5	5.0	
6.6.6	Solid fuel information/ engagement/education campaigns to increase public knowledge and/or operator knowledge	20	0.15	3.0	
6.6.7	Inspections of sites under 2012 Deco Paints Regulations (S.I. 564 of 2012) – Vehicle Refinishers	21	0.25	5.3	Mostly Certs expired
6.6.8	Inspections of sites under 2012 Solvents Regulations (S.I. 565 of 2012) –e.g. Dry cleaners, surface cleaning etc.	0	0.25	0.0	
6.6.9	Inspections of sites under Petroleum Vapours Regulations	5	0.25	1.3	Uncertified operators
6.6.10	Ambient Air Monitoring Programme inspections	2	0.25	0.5	Filter changes
6.6.11	Other routine air/noise inspections	12	0.15	1.8	monthly SO2 diffusion tube changes
	Subtotal Routine Air/Noise Inspections	144		54.3	
6.7	Non-Routine Air/Noise Inspections				
6.7.1	Incident/complaint related inspections	10	0.25	2.5	
	Subtotal Non-Routine Air/Noise Inspections	10		2.5	
6.8 Producer Responsibility Inspections (Routine)					
6.8.1	WEEE Inspections	1	0.4	0.4	We have a vacant PRI post
6.8.2	Battery Inspections	1	0.4	0.4	
6.8.3	Inspections on suspected vehicle importers (ELV Regulations 2016)	0	0.5	0.0	This work will hopefully be taken on by Revenue / NCT
6.8.4	Farm Plastics	2	0.2	0.4	
6.8.5	Plastic Bag Levy	5	0.1	0.5	
6.8.6	Inspections under the Packaging regulations – Suspected Major Producers	2	0.5	1.0	
6.8.7	Inspections under the Packaging regulations – Registered Self-compliers	0	0.5	0.0	No self complier in Donegal
6.8.8	Inspections under the Tyre Regulations – Tyre Retailers	10	0.5	5.0	
	Subtotal (Routine) Producer Responsibility Inspections	21		8	
6.9 Planning (Environmental) Inspections (Routine)					
6.9.1	Inspections (environmental) of existing planning permissions	7	0.25	1.8	Orphan estates + 2 waste
6.9.2	Inspections (environmental) in advance of grant/refusal of planning permission	100	0.2	20.0	mainly desk top, water/waste
6.9.3	Quarry Inspections (e.g. relating to noise, dust, surface/groundwater emissions, vibration etc.)	2	0.5	1.0	complaints
6.9.4	Other planning inspections relating to environmental issues			0.0	
	Subtotal Planning Inspections (Routine)	109		23	
	Total Routine Inspections end of year	6098		1723	
	Total Non-Routine Inspections end of year	955		435	
	Total Inspections end of year	7053		2158	

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:



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"> • Collaborative work with WELRA, LAWPRO, EPA, etc. • Compliance promotion & awareness raising activities • Cross organisations activities on data validation, data analysis, guidance development or multiagency investigations • Case studies • Early interventions • Significant enforcement actions/prosecutions 			

Table B – Progress Against Inspection Targets

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