



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City 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:**

The last two years have provided Dublin City Council with one of the most difficult challenges we have ever faced. The pandemic has profoundly changed the way we work and deliver customer service as a Local Authority, requiring resilience and willingness to adapt to the ebb and flow of continually changing circumstances.

Dublin City Council welcomes the introduction of the set National Enforcement Priorities for 2022-2024, while we will continue to emphasise the importance of local priorities. We are also acutely aware that the environmental inspections that we have planned for are subject to continuous review.

We propose to fulfil our commitments to the RMCEI Plan for 2022 by increasing our re-engagement with society, mirrored with our ability to be highly flexible and innovative.

## **Acknowledgments:**

I would like to express my gratitude to the following Sections and Staff members from our Environment and Transportation Department, who have been indefatigable in their approach to planning environmental inspections in the Dublin City Council functional area for 2022:

- Waste Enforcement/Waste Regulation (Waste) – Darren Quinn, Philip Caird, Padraic Lalor and All Staff from Waste
- Protection of Water Bodies Division (Water) – Emma Finlay, Roy O'Connor and All Staff from Water & Drainage
- Air Quality Monitoring & Noise Control Unit (Air & Noise) – Martin Fitzpatrick, the Project Support Unit and All Staff from Air & Noise
- Waste Management (Litter) – Richard Whelan and All Staff from Litter

I'd also like to thank the following Staff members from the Eastern Midlands Regional Waste Management Planning Office (RWMPO) for coordinating and compiling the RMCEI Plan for 2022:

- Hugh Coughlan and Martin O'Gorman

**Approved by Directors of Services**



**Name: Liam Bergin.**

**Position: Executive Manager.**

**Date of Approval: 25<sup>th</sup> February 2022.**

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## Glossary/Definitions

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

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

ATF – Authorised Treatment Facility (processing of ELVs);

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

C&D – Construction & Demolition (Waste);

CCMA – County & City Management Association;

CoR – Certificate of Registration;

DAFM – Department of Agriculture Food & Marine;

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

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

DWWTS – Domestic Wastewater Treatment System;

EMWERLA – Eastern Midlands Waste Enforcement Regional Lead Authority

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;

HSE – Health Service Executive

HSA – Health & Safety Authority

LAIG – Local Authority Implementation Group

LAWPRO – Local Authority Waters Programme;

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

NEP – National Enforcement Priority;

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;

PR/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;

WEU – Waste Enforcement Unit

WFD – Water Framework Directive;

WFP – Waste Facility Permit.

# 1. Introduction

## 1.1 Plan Details

**Table 1 Plan Details**

<b>Geographic Area</b>	115 km <sup>2</sup>
<b>Population</b>	554,554
<b>Calendar Year</b>	2022
<b>RMCEI Coordinator Name and Position</b>	Martin O’Gorman, Technical Support Officer, EMRWMO

## 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**

<b>Description of known challenge and outline of how these will be addressed</b>
1. In Dublin City Council there are ongoing Staff vacancies, therefore recruitment is required within some Sections during 2022.
2. Loss of knowledge via retirements, promotions and resignations are also a challenge within Dublin City Council i.e. Critical vacancy highlighted to Human Resources for Water.
3. Working with evolving COVID-19 restrictions in the context of the RMCEI Plan may also be challenging i.e. the number of events/businesses/activities that will operate during 2022. However, the increase in such numbers may further Dublin City Council’s ability to engage with communities, and ‘re-create’ awareness. Sections such as Waste Management will carry out enforcement of provisions of the Litter Pollution Act, Waste and Litter Bye Laws, that are permitted in line with COVID-19 and health and safety guidelines, as restrictions are removed. Furthermore, Dublin City Council has taken into account any associated Sick Leave with COVID-19, by ensuring resources reflect any such staffing absences and that the RMCEI Plan will be amended - through Reviews - accordingly, if required as circumstances change.

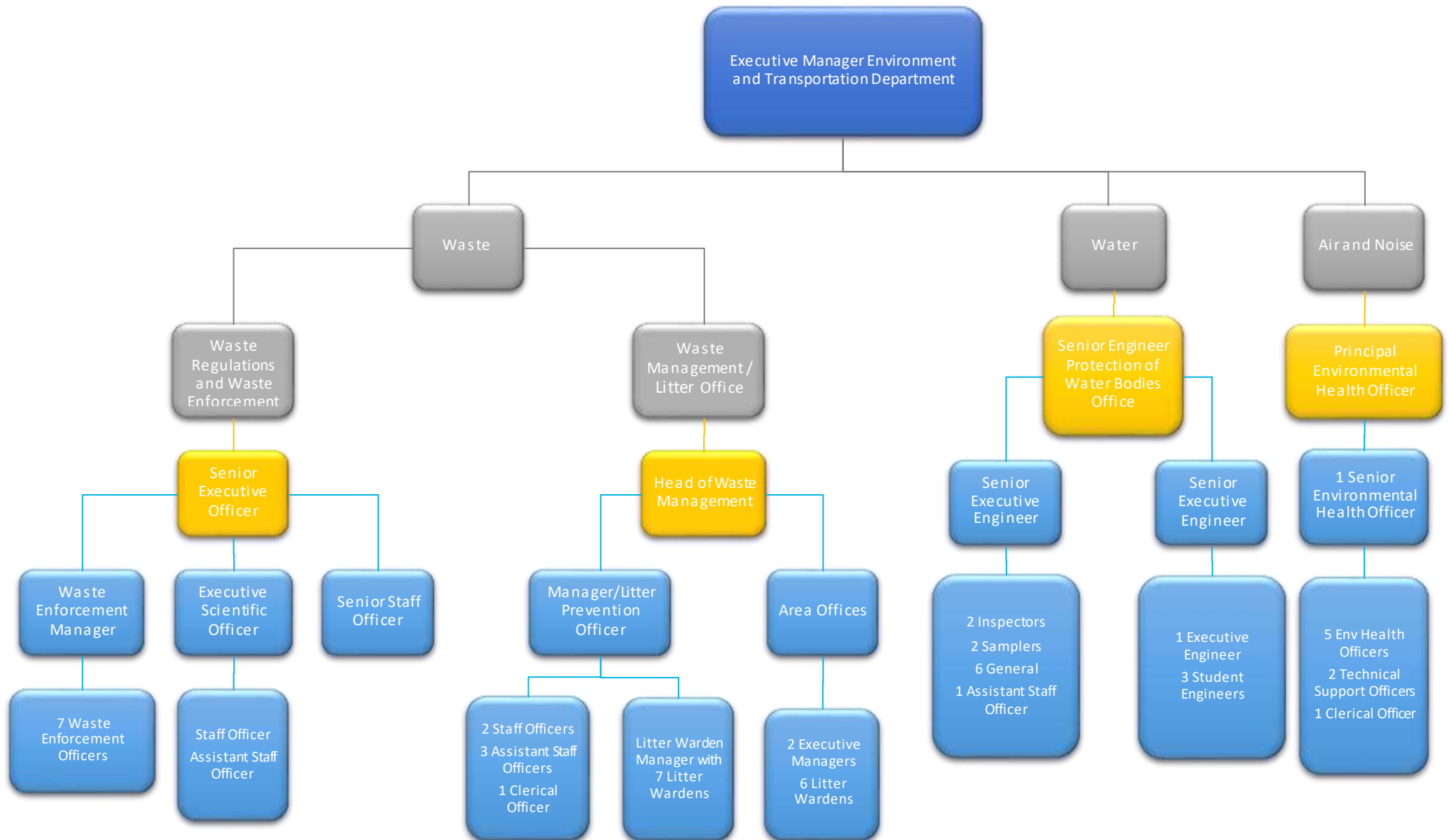
## 1.3 Staff Structure

The Environment and Transportation Department is responsible for the development and implementation of the RMCEI Plan for 2022. The Environment and Transportation Department comprises of administrative and regulatory functions and includes the following Sections:

- Waste Enforcement/Waste Regulation (Waste)
- Protection of Water Bodies Division (Water & Drainage)
- Air Quality Monitoring and Noise Control Unit (Air & Noise)
- Waste Management (Litter)

The organisational chart for the Environment and Transportation Department is realised in Figure 1 below. Staff numbers and duties i.e. National Enforcement Priority Areas assigned, are detailed in Table 7 of Section 4.2. The RMCEI Resource & Risk Rating Tool has been used to focus on National Enforcement Priorities (NEPs) - and/or Additional Local Priorities - and assign the required resources for the implementation of these resources within the 2022 Plan. The RMCEI Resource & Risk Rating Tool has been submitted separately to the EPA, although this is not a requirement under the reporting procedure.

1.4 Figure 1 Dublin City Council Council Organogram



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

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

**Table 3 National Environmental Enforcement Priorities Checklist**

Ref. No	National Enforcement Priorities (NEPs)	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	
<b>1.0</b>	<b>Water - Improving Water Status in all waterbodies</b>			
1.1	Pressures from Agriculture (slurry/soiled water collection and storage)		✓	Not applicable to Dublin City Council
1.2	Pressures from Agriculture (slurry and fertiliser spreading)		✓	Not applicable to Dublin City Council
1.3	Domestic Waste Water Treatment Systems (DWWTS) and Septic Tanks		✓	Not applicable to Dublin City Council
1.4	Discharge Licences/Misconnections	✓		
1.5	Local Priorities and Water Quality Monitoring	✓		
<b>2.0</b>	<b>Air &amp; Noise - Protecting public health and to improve and maintain air quality</b>			
2.1	Solid Fuel	✓		
2.2	Air Quality Monitoring and Data Use	✓		
2.3	Environmental Noise Directive (ENDs)	✓		
2.4	Air and Noise Control (including Planning)	✓		
2.5	Ongoing Air and Noise Enforcement Work	✓		

Ref. No	National Enforcement Priorities (NEPs)	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	
<b>3.0</b>	<b>Waste - Improving waste management and protecting our environment</b>			
3.1	Tackling Illegal Waste Activities and Multi-Agency Sites of Concern)	✓		
3.2	Construction & Demolition Waste Activity	✓		
3.3	End-of Life Vehicles (ELV) Directive & the Waste Metal Industry	✓		
3.4	Waste Collection - Household & Commercial Waste	✓		
3.5	Producer Responsibility Initiatives (PRIs) and Local Priorities	✓		

## 2.2 Ongoing RMCEI/Local Priorities

### Table 4 (i) Additional Local Priorities

Local Priorities	Yes	No	Where you have answered 'No' please provide a reason why
Are additional local priorities included in the Plan for the year ahead?	✓	✓ ✓	<p><b>Water:</b> '1.6 Respond to complaints and incidents' in Appendix A</p> <p><b>Air &amp; Noise:</b> No further Additional Local Priorities included, due to ongoing staff vacancies</p> <p><b>Waste:</b> All DCC Additional Local Priorities are captured within the National Enforcement Priorities</p> <p><b>Litter:</b> N/A</p>

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

Authority	Plans for the Year ahead
<p>This may include work with some of the following bodies not referred to above:</p> <p>e.g. WERLA, Teagasc &amp; Dept of Agriculture Food &amp; the Marine (DAFM), EPA, DECC &amp; DHPLG ro LAWPRO (including LAWCO)</p> <p>If all such work has already been referred to above leave this blank.</p>	<p><b>Water:</b> Dublin City Council plans to continue to support the Water Advisory Unit of the Department of Housing, Local Government and Heritage by being a member of the National Bathing Water Expert Group. Dublin City Council also plans to continue to chair the Dublin Bay Bathing Water Taskforce, where the Department attend monthly progress meeting</p> <p><b>Air &amp; Noise:</b> N/A</p> <p><b>Waste:</b> Dublin City Council works closely with the WERLA and cooperate on all requested multi-agency operations in line with the National Enforcement Priorities. In 2022 Dublin City Council will continue to engage with the EMWERLA, DECC and EPA on dealing with a site of major concern on lands adjacent to the R139</p> <p><b>Litter:</b> N/A</p>

### 3. Risk Assessment

Regulated Installations within Dublin City Council's functional area are prioritised for inspection based on the 2022 RMCEI Resource & Risk Rating Tool and associated Categories A, B and C where applicable. The completed RMCEI Resource & Risk Rating Tool will be submitted with Dublin City Council's overall submission, although this is not a requirement.

While the actual numbers of Category A Facilities in the Dublin City Council functional area is zero, similar to last year, there are Category B and C Facilities and enforcement resources are weighted to focus on the higher risk installations. The number of inspections carried out in the year reflects such risk rating and are detailed in Table 5 below. Waste installation figures include WFPs (including Mobile Crusher Permits, therefore physical inspections are dependent on the location of Mobile Crusher), ATFs and CoRs. The objective in each year is to reduce the number of Category A facilities - or Category B in the case of Dublin City Council - by prioritisation of these.

While there were no Category A Facilities identified for the Water & Drainage Division using the RMCEI Risk & Rating Tool, historically all such facilities have been given the highest priority and will continue to be subjected to an extensive inspection regime as per figures detailed in Table 5 below, where relevant inspections will be carried out in line with 2022's NEPs.

Table 5 Selection of Sites for Assessment in the Year Ahead

Type of Regulated Installation (i.e. Discharge Licences/ Waste Permit Facilities / Certificate of Registration)	Total No. of Installations in your functional area	Total No. of Installations in your functional area Per Risk Category			No. Of Inspections Planned Per Risk Category <sup>1</sup>			Total No. Of Inspections Planned	Additional Comment (e.g. include rationale for selection of sites to be inspected and/or indicate whether any of the inspections planned include installations that have been recommended for inspected by Lead Authorities)
		A	B	C	A	B	C		
Waste	32	0	5	27	0	9	29	<b>38</b>	32 installations - 2 Cat C installations which require 2 inspections following amendments made to their WFP conditions. There are 4 Cat B requiring 2 inspections. Remaining Cat B relates to a mobile plant and only requires 1 inspection
Air & Noise	60	X	X	60	X	X	25	<b>25</b>	VOC and Deco Paints facilities only included
Drainage/Water		0	6	3	0	133	67	<b>200</b>	<p>The number of facilities licenced under Section 4 and Section 16 of the Water Pollution Act 1977, as amended is unpredictable and varies from year to year. However, at the start of 2022 Dublin City Council had 9 discharge licences in force. Namely, 8 Section 4 discharge to waters and 1 Section 16 discharge to storm sewer licences. The number of planned inspections in any one year varies depending on the number of live licences in force.</p> <p>The majority of discharge licences granted by Dublin City Council are to the construction sector. These licences are temporary and of short duration typically lasting &lt;1year. Thus, some licences may be granted following this 2022 assessment and cease prior to 2023 assessment. All Section 4 and Section 16 licences regardless of risk category have been given the same high priority in terms of inspections mostly in the form of compliance monitoring samples.</p>

									Weekly sampling of construction sites is scheduled until consistent compliance is demonstrated. 3 of the 9 facilities licenced are permanent and the target number for samples will match that set in their licence conditions or as required.
Litter (N/A)	X	X	X	X	X	X	X	X	N/A
<b>Total No. Of Inspections Planned</b>								<b>263</b>	

## 4. Resource Assessment for the Year Ahead

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

**Table 6 Review of Previous Years Inspections**

<b>Inspection Type</b> <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	<b>No. of Planned Inspections set out at the start of the Previous Year</b>	<b>No. of Completed Inspections at the end of the Previous Year</b>	<b>Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)</b>	<b>Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead</b>
Routine Waste Inspections	1122	1412	Increase in inspections due to increased field-based monitoring (due to COVID-19 restrictions) i.e. WCP C & D Spot Checks, General WCP, Spot checks, Checkpoints etc.	Routine Waste Inspections for 2022 have been planned based on 2021 end of year figures.
Non-Routine Waste Inspections	48	40		
Routine Litter Patrols/Investigations	11365	8673	The overall number of patrols carried out was reduced due to events being curtailed and reduction in reports of abandoned vehicles as society opened	A contingency for days lost of 7% is built into the planned inspections. It is not anticipated that there will be a return to shorter working due to COVID-19. Long term sick limiting some aspects of resourcing
Routine Water/Wastewater Inspections	556	1142	WFD investigative monitoring samples and analysis accounted for 586 of the 1142 inspections or 51% of completed inspections. Resources previously allocated to misconnection surveys were redeployed to WFD sampling duties. This proved successful, providing higher than anticipated forecasts in investigative monitoring. This type of sampling is not statutory, however it provides Dublin City Council with significant insights into catchment pressures and prompts	While it is still uncertain whether misconnection surveys will resume in 2022, a conservative approach has been taken by Dublin City Council. Inspection forecasts are calculated using best estimates taking past experience, current staffing resources, planned monitoring schedules and public health advice into consideration

<b>Inspection Type</b> <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	<b>No. of Planned Inspections set out at the start of the Previous Year</b>	<b>No. of Completed Inspections at the end of the Previous Year</b>	<b>Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)</b>	<b>Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead</b>
			<p>direction of pollution investigations</p> <p>Furthermore, following clarification during the EPA NIECE event in January 2022, Dublin City Council have now included all bathing water sampling results in the 2021 returns rather than limiting it to designated bathing water samples previously submitted.</p>	
Non-Routine Water/Wastewater Inspections	692	900	<p>A significant increase in water pollution complaints was experienced in 2021. This may have been prompted by an increase in use of local amenities during the various lockdowns experienced. Inspections carried out following receipt of water pollution complaints made up 744 of the 900 inspections completed or 83% of completed inspections.</p>	<p>The majority of non-routine inspections are made up of complaints received. This number fluctuates from year to year and is not possible for the council to predict. 2022 forecasts are based on previous years' experience and are a best estimate.</p>
Routine Air/Noise Inspections	631	1305 (19 inspections relate to 6.6.9 Petroleum Vapour Regulations)	<p>Significant increase in ambient noise monitoring network and intensified work on ambient noise monitoring network</p>	<p>An additional Technical Support Officer was deployed to the Unit from mid-2021</p>
Non-Routine Air/Noise Inspections	450	223	<p>The ability to carry out site inspections was severely curtailed in 2021 and there was a reduction in the overall number of complaints received</p>	<p>No implications for resources in 2022</p>
Routine producer Responsibility Inspections	91	93		

<b>Inspection Type</b> <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	<b>No. of Planned Inspections set out at the start of the Previous Year</b>	<b>No. of Completed Inspections at the end of the Previous Year</b>	<b>Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)</b>	<b>Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead</b>
Planning inspections	250	427	This is a demand led activity and there was a significant increase in planning applications in 2021	This will require ongoing consideration in light of continuing staff vacancies

## 4.2 Number of Staff Days Available

The available staff resources have been calculated on the basis of the number of days each officer will be available for enforcement duties taking into account their individual annual leave entitlements and public holidays i.e. upcoming extra public holiday on 18<sup>th</sup> March 2022. A contingency has been incorporated into the figures to allow for issues such as loss of staff due to sick leave, meetings, court appearances and ongoing training. An estimate for days lost due to staff vacancies arising and subsequent training of new staff has also been taken into account, when calculating available operational resources. An estimated loss of available days has been subtracted from the total available days detailed below and factored into the resources available for achieving the 2022 planned inspections/targets. Contingency has also been included based on potential increased absenteeism due to the ongoing COVID-19 pandemic, although this is difficult to estimate due to re-opening of society and relaxation of measures. The loss of operational days will be kept under review throughout the year at quarterly management reviews. A full list of staff numbers and duties have been calculated and detailed in the RMCEI Resource & Risk Rating Tool and a copy of this Tool has been submitted separately. The RMCEI Resource & Risk Rating Tool has been used to focus on National Enforcement Priorities and assign the required resources for the implementation of these within the 2022 Plan.

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

<b>Department</b>	<b>Available Resources</b>	<b>Name</b>	<b>Focus Area for this Resource (please ensure you outline which National Environmental Priority area this resource will be associated with)</b>	<b>Available days for RMCEI (both routine and non-routine)</b>	<b>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)</b>
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<b>Water</b>					
Environment and Transport - Protection of Water Bodies Division	Senior Engineer	ROC	Oversee completion of National Priorities	64.5	30% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	A/Senior Executive Engineer	EF	Monitor and enforce Section 4 and 16 licences Manage Bathing water sampling, WFD monitoring, investigative monitoring, Respond to water quality complaints and incidents. National Priorities 2.1, 2.5 and 2.9	138.6	66% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	Inspector	RG	Assist in the management of bathing water sampling, WFD monitoring, investigative monitoring, Respond to water quality complaints and incidents. National Priorities 2.1, 2.5 and 2.9	173.6	80% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	Assistant Inspector	KG	Assist in the management of bathing water sampling, WFD monitoring, investigative monitoring, Respond to water quality complaints and incidents. National Priorities 2.1, 2.5 and 2.9	173.6	80% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	Sampler (2)	TG, SF	Taking bathing water samples, WFD samples, River samples, Grand Canal samples, trade effluent samples, investigative samples National Priorities 2.1, 2.5 and 2.9	88.4	80% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	General Operatives (6)	SG, JMG, PW, BOC, GH, SH	Taking bathing water samples, WFD samples, River samples,	1193.4	70% of tasks RMCEI related

			Grand Canal samples, trade effluent samples, investigative samples. National Priorities 2.1, 2.5 and 2.9		
Environment and Transport – Central Laboratory	Chemist	COL	Analysis of samples received. National Priority 2.1.	21.5	10% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	Senior Executive Engineer	JS	Engagement with LAWPRO and Communities Programme, WFD monitoring and reporting	10	5% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	Executive Engineer	PI	Engagement with LAWPRO and Communities Programme, WFD monitoring and reporting	20	10% of tasks RMCEI related
Environment and Transport - Protection of Water Bodies Division	Student engineers (3)	JP, SD, SR	Locally-led investigative monitoring (SSRS, Load assessment, LCA, URS), engagement with LAWPRO and Communities Programme	223.50	40% of tasks RMCEI related
<b>Air and Noise</b>					
E&T Air Quality Monitoring and Noise Control Unit	PEHO	Martin Fitzpatrick	National Priorities 2.1 – 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	SEHO	Paul Rutherford	National Priorities 2.1 – 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	EHO	Heather O'Hanlon	National Priorities 2.1, 2.2, 2.4, 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	EHO	Roisin Ni Chlaonadh	National Priorities 2.1, 2.2, 2.4, 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	EHO	Jason McCann	National Priorities 2.1, 2.2, 2.4, 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency

E&T Air Quality Monitoring and Noise Control Unit	EHO	Kevin Daly	National Priorities 2.1, 2.2, 2.4, 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	EHO	Meg Balfe	National Priorities 2.1, 2.2, 2.4, 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	TSO	Paddy Douglas	National Priorities 2.1, 2.2, ,2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	TSO	Thomas Byrne	National Priorities 2.1, 2.2, 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
E&T Air Quality Monitoring and Noise Control Unit	Grade 3	Denise Whyte	National Priorities 2.1, 2.2, 2.4, 2.5	200	1 WTE (200 days) for RMCEI Duties, excluding training days and contingency
<b>Waste</b>					
Environment & Transportation (Waste)	Waste Enforcement Officer [REDACTED]	Michael O'Connor	National Priorities 3.1 – 3.5	120	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allowance/estimate for sick leave i.e. extra allowance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer [REDACTED]	Eamonn Boland	National Priorities 3.1 – 3.5	120	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allowance/estimate for sick leave i.e. extra allowance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer [REDACTED]	Billy Kinlough	National Priorities 3.1 – 3.5	120	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allowance/estimate for sick leave i.e. extra allowance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer [REDACTED]	Jarlath Keogh	National Priorities 3.1 – 3.5	120	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allowance/estimate for sick leave i.e. extra allowance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer [REDACTED]	Brendan Walsh	National Priorities 3.1 – 3.5	120	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an

					allow ance/estimate for sick leave i.e. extra allow ance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer	Will Mitchell	National Priorities 3.1 – 3.5	200	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allow ance/estimate for sick leave i.e. extra allow ance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer	Karl McEaney	National Priorities 3.1 – 3.5	200	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allow ance/estimate for sick leave i.e. extra allow ance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer	Kevin French	National Priorities 3.1 – 3.5	200	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allow ance/estimate for sick leave i.e. extra allow ance due to COVID-19
Environment & Transportation (Waste)	Waste Enforcement Officer	Darren Quinn	National Priorities 3.1 – 3.5	100	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allow ance/estimate for sick leave i.e. extra allow ance due to COVID-19
Environment & Transportation (Waste)	Waste Regulations Technical Officer	Kevin Barron	Mainly National Priority 3.2	100	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allow ance/estimate for sick leave i.e. extra allow ance due to COVID-19
Environment & Transportation (Waste)	Staff Officers Waste Regulations Support	Padraic Lalor/Louise McKenna	Mainly National Priority 3.2, 3.3 & 3.5	75	Excludes days for training, Annual Leave, other duties not related to inspections or Enforcement, plus an allow ance/estimate for sick leave i.e. extra allow ance due to COVID-19
<b>Litter</b>					
Litter Office	Litter Prevention Officer	Bernie Lillis	Illegal Dumping	80	Estimated total time is assigned to Litter / Clean Up event support is carried out on the basis of estimating number of events at w hich the litter prevention officer is in attendance
Litter Office	Litter Warden	Paul Dunne	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to

					special leave / sick / training
Litter Office	Litter Warden	Mark Farrell	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Gerard McCabe	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Kenneth Gorman	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Michael Murphy	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	David Cullen	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Darren Hendrick	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Christopher Donegan	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training

Litter Office	Litter Warden	George Brophy	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Desmond Malone	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Jonathon Moules	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Martin Lee	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Litter Warden	Francis Murray	Illegal Dumping	205	Full allocation of time to carrying out litter patrols and associated follow up actions – overall availability includes 7% contingency for unavailability due to special leave / sick / training
Litter Office	Green Schools Officer	Audrey Duff	Green Schools Officer	30	25 days assigned to task of carrying out green schools visits at an estimate of 50 school visits to be completed – this has been reduced from 80 in previous years due to decrease in potential visits due to school closures and COVID-19 related restrictions
Litter Office	Abandoned Vehicles Officer	Patricia O'Toole	Abandoned Vehicles	170	Full allocation of time to carrying out abandoned vehicle inspections and associated follow up actions – overall availability includes 7% contingency for unavailability due to

					special leave / sick / training
<b>TOTAL DAYS AVAILABLE</b>				<b>8527.1</b> <b>(8527)</b>	

### 4.3 Training Requirements

#### **Water & Drainage:**

All Dublin City Council officials carrying out environmental inspections shall have completed and passed the RMCEI training course or the relevant sections of it or have received relevant internal training. They shall also have Safe Pass training and be Authorised Persons under the Local Government (Water Pollution) Act, 1977.

#### **Air:**

All staff have Safe Pass, Working at Height and Manual Handling Training. Individual training needs are also assessed as part of PMDS. Ongoing training is also carried out internally and externally through the LAIG Air Group – including the EPA National Air Event.

#### **Waste:**

Waste Enforcement Officers/Staff complete ongoing internal and external training to carry out all aspects of their roles. This includes technical training such as Asbestos Awareness and Waste Legislation Modules, in addition to report-writing and customer relations courses. 50% of the Officers require safe pass training in Q1 2022 as well as a completion of a course in dealing with aggressive persons. The standard and consistency of enforcement actions carried out by all members of the Waste Enforcement Unit (WEU) undergoes further monitoring by routine external audits and independent certification of the WEU's "Implementation Procedures for the Regional Waste Enforcement Unit", which have been certified by the National Standards Authority of Ireland (NSAI) to the international standards ISO 9001:2015 and OHSAS 18001:2007.

#### **Litter:**

All Dublin City Council officials carrying out litter patrols and inspections shall have completed training in the enforcement of the litter pollution act and bye laws or have received relevant internal training. They shall also have Safe Pass training and be authorised persons under the Litter Pollution Act 1997 and Dublin City Waste and Litter Bye Laws.

## 4.4 Health and Safety

The tasks carried out in relation to “Water” inspections are managed and performed in accordance with Dublin City Council’s Ancillary Statement and more specifically the Protection of Water Bodies Office Local Safety Statement. Each inspection or sampling task is risk assessed and a method statement drawn up as required. Where trade effluent sampling is carried out at commercial premises, staff are typically required to carry out a site induction prior to entry. Lone sampling of waterbodies is not permitted, thus a buddy system is operated by the department.

An Ancillary Health and Safety Statement for Litter Warden Service is in operation, to cover specific activity risk assessments for carrying out litter patrols, inspections and enforcement activity.

In relation to Waste Enforcement, COVID-19 inspection/operational procedural guidelines were drafted in April 2020, and these have been reviewed and updated on an ongoing basis, streamlined with changing Government guidelines and DCC procedures.

From the beginning of the pandemic, Dublin City Council has followed the guidance from the government, HSE, HSA and other appropriate bodies, and this remains the case for 2022. Reviewed procedures and protocols in relation to COVID-19 related measures will be issued Council wide and will be made available on the COVID-19 Work Safety Hub on Dublin City Council’s Dubnet (Intranet). DCC employees continue to follow sign-in procedures for ease of contact tracing. Numbers on office floors will continue to be monitored in Q1 2022, with a phased return to maximum capacity. Additional fleet vehicles - in some instances - will remain in place for the foreseeable to help alleviate the fears of high risk staff. This ensures close contacts are kept to a minimum. These measures remain essential tools in preventing and reducing the spread of COVID-19 in our workplaces.

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

### **5.1 Planned Routine & Non-Routine Inspections**

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

Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Waste (including Litter)</b>				
Total Routine Inspections end of year	8160 (Litter)	0.36 (Litter)	2945 (Litter)	Litter: Abandoned vehicle reports subject to public volume, estimated time per inspection on abandoned vehicles increased 0.04 to 0.08
	1101 (Waste)	Variable (Waste)	672.75 (Waste)	Waste: Does not include Outstanding Waste Enforcement Actions from 2021 (82), detailed in Table 9 below
Total Non-Routine Inspections end of year	44	Variable	118	Waste Enforcement Non-Routine Inspections Only, Litter N/A
Total Inspections end of year	Variable	Variable	3735.75	
<b>Water/Wastewater</b>				
Total Routine Inspections end of year	2755	Variable	1617	See risk and resource tool for detailed breakdown. In 2022, the Protection of Water Bodies Office was established, which amalgamated the Water Pollution Control Section and the Water Framework Directive Office. This has allowed for the alignment of both sections duties to assist Dublin City Council achieving WFD objectives whilst implementing the Water Pollution Act and the Bathing Water Regulations. It is difficult to estimate unpredictable <i>routine</i> samples such as investigative bathing water samples, inspections of discharge licenced sites temporary in nature and misconnection surveys in the current climate
Total Non-Routine Inspections end of year	608	Variable	490	It is difficult to estimate non-routine inspections as they depend on number of complaints and discharge licence applications received by the section. These figures fluctuate year on year. The forecast provided is based on best estimates from 2021 returns
Total Inspections end of year	3363	Variable	2107	

	Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Air/Noise Inspections</b>					
<b>Total Routine Inspections end of year</b>	1235	0.39	492.5	Estimate time per inspection is overall average as inspection types vary	
<b>Total Non-Routine Inspections end of year</b>	300 (Approximate)	Variable	801.5		
<b>Total Inspections end of year</b>	1535 (Approximate)	Variable	1294		
<b>Producer Responsibility Inspections</b>					
<b>Total Routine Inspections end of year</b>	81	Variable	40.5	These 81 Inspections are not included in the Total Routine Inspections above	
<b>Total Non-Routine Inspections end of year</b>	N/A	N/A	N/A		
<b>Total Inspections end of year</b>	81	Variable	40.5		
<b>Planning (Environmental) Inspections</b>					
<b>Total Routine Inspections end of year</b>	390	1.7	690	Estimate time per inspection is overall average as inspection types vary	
<b>Total Non-Routine Inspections end of year</b>	N/A	N/A	N/A		
<b>Total Inspections end of year</b>	390	1.7	690		

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

**Table 9 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)
<b>Outstanding Complaints</b>			
4.1.1 Litter (excluding fly tipping and illegal dumping)	730	0.1	73
4.1.2 Waste, non C&D. Includes fly tipping and illegal dumping	68	0.75	51
4.1.3 Waste, C&D.	0	0	0
4.2 Water/Wastewater	0	0	0
4.3 Air/Odour	19	1	19
4.4 Noise	69	1	69
<b>Outstanding Enforcement Actions</b>			
Warning Letters	0	0	0
Section Notices - Air & Noise	8	2	16
Court Cases - Waste	14	1	14
Court Cases - Litter	107	0	0
Etc.	0	0	0
<b>Total</b>	<b>1002</b>	<b>Variable</b>	<b>242</b>
<b>Total requiring Resources for 2022 (from RMCEI Resource &amp; Risk Rating Tool)</b>	<b>90</b>	<b>Variable</b>	<b>81</b>

## 5.3 Summary of Resource Requirements

**Table 10 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 columns A-F of Section 6 of the RMCEI Return)	14464	7146.28
Total Non-Routine Inspections end of year – (obtained from completed rows A-F of Section 6 of the RMCEI Resource & Risk Planning Tool)	Variable	1380.83
Outstanding Enforcement Action & Complaints to be Closed out – (outlined in Table 9)	90 (already included in Total Routine Inspections)	81 (already included in Total Routine Inspections)

<b>Totals</b>	<b>14464 (excluding variable Non-Routine Inspections)</b>	<b>8527.1</b>
<b>Total Available Resources (Days) – (outlined in section 5 Table 8 of the Plan)</b>		<b>8527.1</b>

## 6. PLAN REVIEW MECHANISMS

**Table 11 Summary checklist of plan review mechanism**

Question	Yes	No
<b>Q1 Have progress implementation meetings been planned to be undertaken to assess Plan progress through the year?</b>	✓	
<b>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).</b>	✓	
<b>Q3 Are objectives for the delivery of the RMCEI Plan incorporated within staff PMDS Team Development Plans?</b>	✓	
<b>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?</b>	✓	
<b>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)?</b>	✓	

DCC realises the importance of an appropriate monitoring regime to ensure the efficient delivery of the RMCEI Plan. The RMCEI outcomes detailed in this plan will be achieved by:

- Implementing Quarterly RMCEI Plan Meetings and Reviews in line with the EPA's Review Mechanism
- Environment and Transportation staff being assigned targets based on their actual days at work minus a contingency for sick leave, while allowing time for non-routine inspections as detailed in Section 5. Targets are allocated based on National Enforcement Priorities and Additional Local Priorities and are incorporated into work plans such as Performance Management Development Systems (PMDS)

Ongoing monitoring and reviewing includes:

- Ongoing monitoring of staff activities and performance with line managers
- Quarterly case review on a one to one basis with team members to assess progress on cases and complaint resolution.
- Monthly management meetings to monitor performance and discuss operational issues and to review the cumulative performance against the RMCEI Plan
- Monthly team meetings to monitor monthly and cumulative performance and discuss operational issues
- Measurement of completion of the objectives of the DCC Litter Management Plan


In 2021 the RMCEI Plan Review – involving the Director of Services and Senior Management from each Section – took place in November. The intention of Dublin City Council in 2022 is to have the first RMCEI/Enforcement Plan Implementation Review meeting and corresponding Report in Q1. DCC will then be better placed to decide if further quarterly Reviews are necessitated.

Furthermore, Dublin City Council will use the RMCEI Plan Review as a 'forum' to discuss RMCEI planning and any such RMCEI Plan Reviews and discussions will be formally documented - similar to last year - using the EPAs suggested Plan Implementation Review Template. Any '*action points*' or changes/amendments are to be agreed by Senior Management and Director of Services with sign-off from each party. The RMCEI/Enforcement Plan Implementation Review Report will be circulated by the RMCEI Coordinator to all attendees.


A copy of November's RMCEI/Enforcement Plan Implementation Review Report is provided as part of the overall RMCEI reporting submission, although this is not a requirement under the reporting procedure.

## **Appendix A NATIONAL ENFORCEMENT PRIORITIES & ADDITIONAL LOCAL PRIORITIES**


## A.1 Water - Pressures from Agriculture (slurry/soiled water collection and storage)

National Enforcement Priority: 1.1 Water - Pressures from Agriculture (slurry/soiled water collection and storage)	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Not applicable, Dublin City Council does not have any farms in its jurisdiction.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Not applicable, Dublin City Council does not have any farms in its jurisdiction.</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p>Not applicable, Dublin City Council does not have any farms in its jurisdiction</p>


## A.2 Water - Pressures from Agriculture (slurry and fertiliser spreading)

National Enforcement Priority: 1.2 Water - Pressures from Agriculture (slurry and fertiliser spreading)	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Not applicable, Dublin City Council does not have any farms in its jurisdiction.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Not applicable, Dublin City Council does not have any farms in its jurisdiction.</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p>Not applicable, Dublin City Council does not have any farms in its jurisdiction</p>

## A.3 Water - DWWTs/Septic Tanks


National Enforcement Priority: 1.3 Water – DWWTs/Septic Tanks	
	Activities
<b>Looking forward to the year ahead</b> 	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Not applicable, Dublin City Council does not have any registered septic tanks in its jurisdiction.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Not applicable, Dublin City Council does not have any registered septic tanks in its jurisdiction.</p>
<b>The Final Environmental Outcome to be achieved?</b>	<b>Not applicable, Dublin City Council does not have any registered septic tanks in its jurisdiction</b>

## A.4 Water - Discharge Licences/Misconnections

National Enforcement Priority: 1.4 Water – Discharge Licences/Misconnections	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Looking forward to 2022, Dublin City Council has nine discharge licences in force. Eight licences granted in accordance with Section 4 and one granted in accordance with Section 16 of the Water Pollution Act, as amended. Five Section 4 licences and one Section 16 licence in force were granted to construction sites, where the discharge of groundwater was required to facilitate the installation of basements, lift shafts and attenuation tanks. The remaining 3 licences are on-going and licence activities from a water sports club, golf club and national roads project. The number of licences granted to the construction industry will fluctuate throughout 2022 due to the temporary nature of the discharge. Thus, it is difficult to forecast inspections for unpredictable number of applications Dublin City Council may receive. However, the section will continue to process every discharge licence received in accordance with the Water Pollution Act 1977, as amended. The site will be risk assessed based on volume, compliance history (where applicable), type of discharge and downstream receptors. It should be noted that sites which have legacy contamination issues or pose a serious risk to the environmental are not permitted to discharge to waters or storm, rather the foul or combined sewer.</p> <p>Upon receipt of a licence application, a site visit will be conducted where particulars of the licence application validated and reviewed. Where applicable, proposed treatment options will be assessed. Where improvements can be made to ensure compliance with proposed licence conditions, the applicant must demonstrate such prior to obtaining a licence. This is typically achieved via a request for further information and a follow up site visit.</p> <p>All 9 discharge licenced sites and any others that are granted during 2022 will be monitored as per licence frequency. Licences granted to the construction industry shall be monitored on a weekly basis in the first instance, until consistent compliance with licence conditions is demonstrated. This approach will facilitate early intervention of any non-compliances with licence conditions. All samples taken will be analysed in the Central Laboratory, which will issue weekly trade effluent results. These results will be reviewed by a competent technical staff member and any non-</p>


	<p>compliances with licence conditions highlighted for further action and resolve. A total number of 200 trade effluent samples are forecast to be taken at licenced sites in 2022. Progress of inspections will be reviewed on a quarterly basis where any anomalies will be rectified.</p> <p>A total number of 1000 misconnection inspections has been forecast to be carried out by Dublin City Council in 2022. A risk assessment is due to be drawn up following the <i>return to work advice</i> issued by the Government in February 2022. The inspections will be primarily be targeted along the River Santry to align with the Santry River Restoration Project. The purpose of the inspections is ultimately reduce foul contamination and to improve the status of the waterbody to meet WFD objectives. Dublin City Council will continue to collaborate with LAWPRO on the project and share its learnings.</p> <p>It is envisaged the learnings from this project will define future projects within Dublin City Council. Further inspections will be carried out as complaints, evidence of misconnections arise elsewhere in the jurisdiction. The number of inspections proposed to be carried out is conservative compared to previous years taking new health and safety risks into consideration. Dublin City Council will continue to liaise with its counterparts in Dun Laoghaire Rathdown County Council to share knowledge and how to improve success rates of such inspections.</p> <p>Dublin City Council has not received any referrals from LAWPRO to date, however the council will continue to liaise and engage with the LAWPRO on relevant desktop studies carried out on the Santry and Dodder.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></b></p>	<p>Appropriate resources have been assigned to continue trade effluent monitoring, review compliance and action any requires enforcement action.</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p><b>All wastewater discharges that are a pressure on water bodies are compliant. Reduce foul contamination caused by misconnections into Dublin City Council waterbodies</b></p>

## A.5 Water - Water quality monitoring


National Enforcement Priority: 1.5 Water – Local Priorities & Water Quality Monitoring	
	Activities
<b>Looking forward to the year ahead</b> 	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Dublin City Council plans to continue to fulfil the statutory surveillance and operational monitoring schedule for the Dodder, Liffey, Santry, Tolka and Camac rivers. Monthly sampling will be carried out at designated locations on the Dodder, Liffey and Tolka while the Santry and the Camac will be monitored on five different occasions throughout 2022. This will provide the Environmental Protection Agency with the chemical status of the rivers required for WFD classification. Dublin City Council plans to continue its investigative sampling programme of priority and at risk rivers, to pinpoint hotspots of contamination which will determine the course of misconnection inspections (COVID-19 dependent), unauthorised discharge and compliance investigations. This type of sampling will facilitate early intervention and investigation of diffuse pollution. This additional non statutory/investigative sampling has proved extremely beneficial to Dublin City Council in the past. For example in 2021, sampling results of a downstream outfall to Tolka River identified a spike in contamination. Following investigation, a private blockage at a large food processing plant was identified and immediately resolved. 400 investigative samples are planned for in 2022 to continue detecting unauthorised activities.</p> <p>Bathing water sampling will require a significant input of both technical and operative staff for the duration of the 2022 bathing season. A total number of 20 sampling occasions is planned for the bathing season across 8 bathing water locations, irrespective of designation. This far exceeds the minimum number of samples (4) required to be taken in accordance with the regulations. Investigative or repeat samples shall be required where unsatisfactory results are obtained, or there is reason to suspect bathing water contamination. Where there is a confirmed failure, a prohibition must be raised. Furthermore, where a temporary deterioration in bathing water quality is expected, a prior warning must be raised. The administration required to raise a warning is significant, requiring prior consultation with the Health Service Executive, incident notification to the Environmental Protection Agency, issuing of softcopy warnings to the councils website and erecting hardcopy notices at every entrance to the affected beach/s. Each time a warning is required, it places significant strain on limited resources. This process is repeated when the warning is</p>

	<p>removed. Dublin City Council plan to continue to sample on a fortnightly basis outside of the bathing season. A total number of 275 bathing water sampling events have been planned for 2022, this number was guided by the 2021 returns and is a best estimate.</p> <p>Furthermore, Dublin City Council will continue to carry out investigative PCR analysis on qualifying bathing water samples. This additional information will greatly assist the council in investigating and identifying sources of faecal contamination impacting bathing water quality. It is Dublin City Councils goal to continue to improve bathing water quality and classification at its designated waterbodies. However, given current classification procedures which takes the previous four bathing seasons into consideration, the change or improvement in status may take a number of years.</p> <p>Dublin City Council will continue to chair the Bathing Water taskforce which facilitates monthly meetings with other pertinent stakeholders. Collaboration on catchment pressures is organised, knowledge shared and objectives to improve water quality actioned. Dublin City Council will continue to be a contributing member of the Bathing Water Expert Group in 2022 and support the Department of Local Government and Housing.</p> <p>Where the section is notified of unauthorised discharges, an investigation shall be immediately conducted. If upon investigation the discharge is found to be a trade effluent, the site shall be instructed to cease immediately until the applicable licence is obtained by either Dublin City Council or Irish Water. Most premises are aware of the requirement for a licence, and apply via the correct procedures. Water pollution has set up a dedicated email address which makes the reporting of unauthorised discharges quick and easy.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></b></p>	<p>Yes the appropriate resources have been assigned to continue scheduled sampling for bathing waters and Water Framework Directive. While investigative monitoring is difficult to predict, and puts a strain on limited resources, Dublin City Council can meet the forecast targets.</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p><b>Complete statutory monitoring and provide data to the Environmental Protection Agency who characterise and classify the various rivers and coastal waterbodies. Investigative monitoring will continue to assist the council on the identification of pressure hotspots and highlight if any new issues arise</b></p>

## A.6 Water – Respond to complaints and incidents


Additional Local Priority: 1.6 Water – Respond to complaints and incidents	
	Activities
Looking forward to the year ahead 	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of up to 500 words per priority area]</i></p>
<p>1. Describe the work to be carried out to address this National/Additional Local priority <b>FOR THE YEAR AHEAD</b> – including:</p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Dublin City Council regularly receives complaints directly from members of the public, customer services, Irish Water, the EPA, Inland Fisheries Ireland, action groups and Councillors. Complaints/Incident notifications are typically received via e-mail, telecommunication or via social media platforms. Water Pollution Control recently established a dedicated email address <a href="mailto:waterpollution@dublincity.ie">waterpollution@dublincity.ie</a> which receipts all reports of water pollution incidents &amp; complaints. The email address is actively disseminated across all Dublin City Council social media platforms to encourage the prompt reporting of water pollution incidents. Dublin City Council maintains records of all complaints received and documents pertinent details in a dedicated complaints database.</p> <p>Dublin City Council will continue to acknowledge, investigate and act on 100% of water pollution complaints received in 2022. The section will endeavour to respond to complaints within 3 working days upon receipt.</p>
2. Have appropriate resources been assigned to carry out the work associated with this activity <b>FOR THE YEAR AHEAD</b> ?	It is difficult to forecast the total number of complaints the section may receive in any one year, however a best estimate using the previous year's figures as a guide is used.
The Final Environmental Outcome to be achieved?	Excellent customer care, rapid response to incident notifications and complaints

## A.7 Air and Noise - Solid Fuel


National Enforcement Priority: 2.1 Air and Noise – Solid Fuel	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Dublin City Council will carry out its customary inspection programme during Quarter 1 and Quarter 4 during 2022.</p> <p>2022 will mark a watershed in this area of enforcement as new Regulations are due to be introduced that effectively ban the sale, marketing and distribution of bituminous coal on a national level. These regulations will also introduce for the first time standards for wood fuel. As the full and final text of these Regulations has yet to be issued, there will need to be a degree of flexibility in the approach adopted.</p> <p>Given the historically high level of compliance built up in Dublin City since the introduction of the Solid Fuel Regulations in 1990 it is not envisaged these new Regulations will entail additional work in respect of bituminous coal. However there will be engagement with suppliers in respect of wood fuel sales. The first round of inspections in Q1 of solid fuel depots in the city, will involve both physical inspection of stock as well as getting updates on which operators are drawing stocks from that particular depot.</p> <p>The second round of inspections in Q4 will concentrate on wood fuel and on site checks on moisture content of these fuels. There will also be surveillance to identify wood fuel suppliers who may not have had engagement with the local authority to date.</p> <p>Inspection of fuel vehicles in housing estates will continue to be an important aspect of the work carried out and this is largely based on information provided.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Yes</p>

<b>The Final Environmental Outcome to be achieved?</b>	<b>Continued compliance with all fuel operators inspected (100%)</b>
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## A.8 Air and Noise - Air Quality Monitoring and Data Use

National Enforcement Priority: 2.2 Air and Noise – Air Quality Monitoring and Data Use	
	Activities
<b>Looking forward to the year ahead</b> 	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>In 2022 Dublin City Council will continue to expand the local ambient air quality monitoring network in conjunction with maintaining the national air quality national stations under its remit.</p> <ul style="list-style-type: none"> <li>• The commissioning of two local area network stations at Cabra Community College and Ballsbridge will be completed in early 2022.</li> <li>• A further local area air quality monitoring station will be commissioned in 2022 following selection of a suitable site</li> </ul> <p>Dublin City Council will continue to work with partners on a number of air quality projects including Google and DPD and project reports will be issued on these during 2022.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Yes</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<ul style="list-style-type: none"> <li>• <b>Expansion of local air quality monitoring network (at least 3 additional stations) and finalising of novel air quality projects</b></li> <li>• <b>Continued operation of the ambient noise monitoring network</b></li> </ul>


## A.9 Air and Noise - Environmental Noise Directive (ENDs)

National Enforcement Priority: 2.3 Air and Noise – Environmental Noise Directive (ENDs)	
	Activities
<b>Looking forward to the year ahead</b> 	<b>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.</b>  <i>[Guideline of up to 500 words per priority area]</i>
<b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	Dublin City Council in conjunction with the other local authorities in the Dublin Cork and Limerick Agglomerations will issue a tender for noise mapping and will submit the relevant data required under the Environmental Noise Directive to the EPA by end 2022.
<b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b>	Yes
<b>The Final Environmental Outcome to be achieved?</b>	<b>Compliance with the Environmental Noise Directive</b>


## A.10 Air and Noise - Air and Noise Control (including Planning)

National Enforcement Priority: 2.4 Air and Noise – Air and Noise Control (including Planning)	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>In 2022 Dublin City Council will prioritise addressing air and noise issues that arise due to non-compliance with pre-existing planning conditions. These predominantly occur during the construction phase of developments. Due to the scale of individual developments in Dublin City, the construction phase may be quite prolonged, in some cases 3-5 years. The other issue of concern in Dublin is that these individual developments may occur concurrently with other similar scale projects in very condensed areas of the city alongside existing residents and amenities. .</p> <p>There are robust protocols in place with Dublin City Council Planning Department to address these issues. These have been developed on the basis of necessity and in particular the Dublin City Council guidance document for construction and demolition has proved to be a very effective approach to addressing these challenges.</p> <p>Alongside this, the ongoing input to assessing new planning applications will continue and will require ongoing resources.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Yes</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p><b>Support Planning Department in interventions (including legal proceedings) in cases of non-compliance</b></p>

## A.11 Air and Noise - Ongoing Air and Noise Enforcement Work


National Enforcement Priority: 2.5 Air and Noise – Ongoing Air and Noise Enforcement Work	
	Activities
<b>Looking forward to the year ahead</b> 	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Dublin City Council will continue to work with operators in the solvent and deco-paints sector to ensure compliance with the relevant legislation. 2022 will continue to be a very challenging year for these operators as many of them are one-person businesses.</p> <p>During 2022 Dublin City Council will concentrate on working with those operators to ensure continued compliance with the relevant legislation, although there may be some slippage in time lines in terms of renewal dates of certificates. As mentioned in previous years many of the operators may not necessarily have a business address other than the operating address, therefore during 2022 on-going checks will be required to check if site operations have recommenced.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Yes</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p><b>100% operators compliant or enforcement proceedings underway</b></p>

## A.12 Waste - Tackling illegal Waste Activities and Multi-Agency Sites of Concern

National Enforcement Priority: 3.1 Waste – Tackling illegal waste activities and Multi-Agency Sites of Concern	
	Activities
<b>Looking forward to the year ahead</b> 	<p><b>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.</b></p> <p style="text-align: center;"><i><b>[Guideline of up to 500 words per priority area]</b></i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>In 2022 Dublin City Council’s Waste Enforcement Unit will again prioritise the prevention of illegal waste activities and lead a targeted effort on identified sites of concern. A number of intelligence led operations will be undertaken throughout 2022 using a Multi-Agency approach which will include co-operation from An Garda Síochána, EMWERLA, NTFSO and other LA’s.</p> <ul style="list-style-type: none"> <li>• Unauthorised sites of concern will be given priority and a number of methods and enforcement tools will be deployed to identify and prevent illegal activity and the risk to the environment. Strategic check-points, FPN’s, Direction letters and if necessary, the possible detainment of suspected offenders vehicles.</li> <li>• 47% of available resources for Waste Enforcement will be allocated to non-routine activities for 2022. This will include:             <ul style="list-style-type: none"> <li>○ Monitoring and compliance of authorised waste collectors to ensure that they do not engage or facilitate illegal activity.</li> <li>○ Ensuring where possible a rapid response to illegal household collections (resulting from leaflet /flyers),</li> <li>○ Identification of suspected illegal collector and the use of all and necessary enforcement tools such as possible detainment and subsequent recommendation for legal proceedings.</li> </ul> </li> <li>• 9% of available resources for planned inspections including: Roadside inspections of waste collection permit holders which will again form a key piece of work in 2022 and increase compliance and visibility of DCC’s Waste Enforcement Unit in the community.</li> <li>• DCC’s Waste Enforcement Unit will endeavour to take where appropriate criminal prosecutions at District, Circuit or High Court level to ensure that the sanction is commensurate with the crime.</li> <li>• Waste Enforcement will take guidance and information from EMWERLA on areas of concern and operations in 2022 ensuring a consistent Best Practice approach</li> </ul>


	<p>and the best possible outcome from a Local Authority, a national and an environmental perspective.</p> <p>Furthermore, Waste Management services are proposing on a Litter Warden restructure 2022 bringing management under remit of Litter Enforcement Manager. Post implementation targeted city wide campaigns will be planned. Adopted Litter Management Plan from 2021 will continue to be implemented.</p> <ul style="list-style-type: none"> <li>• ADI/Bonfire steering group continued ownership. Increase in public litter bins, increased community engagement as restrictions continue to reduce. Proactive approach to summer outdoor socialising.</li> </ul>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></b></p>	<p>Appropriate resources have been allocated for this NEP. As detailed above, in addition to approximately 9% - Waste Enforcement only - of total hours available being allocated to Planned Routine Inspections under this heading (e.g. Checkpoints, Man in Van ops and waste collection permit spot-checks), another 47% of total available resources are assigned to “Non-routine inspections” which is normally allocated for tackling illegal waste activity resulting from investigations of complaints and other field based intelligence activities by Waste Enforcement Officers.</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p><b>Protection of human health and the environment against harmful effects that may be caused by the generation, collection, transport, treatment, storage and disposal of waste. To ensure compliance with all relevant Waste Legislation and prevent/reduce waste crime. Also: “(To) Enforce all waste regulations through increased monitoring activities, and enforcement actions for non-compliance with authorisations and regulatory obligations.”</b> In line with EMRWMP Policy F2</p>

## A.13 Waste - Construction and Demolition Waste Activity

National Enforcement Priority: 3.2 Waste – Construction and Demolition Waste Activity	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Dublin City Council’s Waste Enforcement Unit and Waste Regulations Office have again allocated considerable resources to Construction &amp; Demolition activity (C&amp;D) in 2022. DCC will use the proven and valuable enforcement tool of C&amp;D spot checks to deter unauthorised waste activity and waste related offences. Attention will duly be given to known and identified repeat offenders in the industry and enforcement action will be taken through direction letters, FPN’s and legal proceedings for breaches under the Waste Management Act 1996. Where applicable NWCPO holders will be recommended for review using the failure to satisfy Section 34D (1) (a) of the Waste Management Act 1996, Fit and Proper Person.</p> <ul style="list-style-type: none"> <li>• Dublin City Council Waste Enforcement Unit will target C &amp; D Spot Checks in Q1 – Q2 2022.</li> <li>• Unauthorised C &amp; D sites in the Dublin City Council functional area have also been allocated resources in 2022 and will be aligned with Non-Routine Inspections i.e. concerted action and monitoring.</li> <li>• The CWMP inspections provide an opportunity for early intervention by Waste Enforcement and other departments within the organisation e.g. Planning Enforcement, Water Pollution and Dangerous Building along with other agencies such as the HSA. In 2021 Dublin City Council reviewed and inspected 497 Construction Waste Management Plans (CWMP’s). As reflected in the targets for 2022, the number of CWMP’s is projected to decrease while C&amp;D inspections and spot-checks will increase, resulting in a clearer picture of compliance, unauthorised activity and waste movements within this waste stream.</li> <li>• Article 27 Inspections will continue to be carried out through Waste Regulations and any relevant sites of interest will be forwarded to Waste Enforcement for forensic follow-up.</li> <li>• Dublin City Council will again work with EMWERLA and RWMPO (on the AR Validation Project if taking place) in 2022, carrying out inspections on the largest C &amp; D collectors in the functional area and will work with the WERLA on investigations requiring a multi-functional area approach thus ensuring a consistent approach across Dublin City Council functional area and surrounding counties.</li> </ul>


	<ul style="list-style-type: none"> <li>• Dublin City Council have already requested a list of Essential Projects currently operational from WERLA and will focus on these in Q1 2022.</li> </ul> <p>Dublin City Council's Waste Enforcement will again continue to issue FPNs against NWCPO holders for non-compliance with permit conditions, initiate sanctions (including legal proceedings, NWCPO Permit reviews) against authorised C&amp;D NWCPO collectors and/or unauthorised collectors.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></b></p>	<ul style="list-style-type: none"> <li>• Areas identified above have been planned and adequately resourced according to previous year resources on similar volumes of work.</li> <li>• 23% of overall resources for Planned Routine Inspections have been allocated to the area of Construction &amp; Demolition Waste, while many movements of C &amp; D waste will be identified during field monitoring i.e. Non Routine Inspections</li> </ul>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p><b>Reduction in illegal C&amp;D Waste Activity, Increased compliance and the presentation of key statistics to measure the success of actions detailed above</b></p>

## A.14 Waste - End-of-Life Vehicles (ELV) Directive & the Waste Metal Industry


National Enforcement Priority: 3.3 Waste – End-of-Life Vehicles (ELV) Directive & the Waste Metal Industry	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p><b>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.</b></p> <p><b><i>[Guideline of up to 500 words per priority area]</i></b></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<ul style="list-style-type: none"> <li>• Dublin City Council have 3 ATF's (WFP) operational in their functional area, in 2022 4 inspections of these ATFs (2 Inspections scheduled for an ATF permit granted in June 2020) are planned, this is not inclusive of AR Desktop Validations and AR Data Validations which will be undertaken as per updated NWCPO guidance issued in 2022.</li> <li>• Dublin City Council's Waste Enforcement Unit will inspect any and all sites of concern identified by EMWERLA and NTFSO relating to potential under breaches of the End-of-Life (ELV) directive.</li> <li>• In 2022 Dublin City Council will, where deemed necessary, put in place a Multi-Agency response with all relevant stakeholders (EMWERLA, NTFSO, An Garda Síochána and other LAs) to deal with sites suspected of storing immobilised vehicles and activity related to unauthorised waste metal storage and collection.</li> <li>• Dublin City Council's ATFs can't accept ELVs from members of the public, Waste Enforcement will continue to inspect records at ATFs in line with the conditions of their WFP to ensure compliance with this i.e. assess recovery rates, assess the number of Certificate of Destruction (CoDs) in line with the number of ELVs accepted into the facility.</li> <li>• For 2022 Dublin City Council will focus on 2 granted WFPs currently accepting waste from members of the public. These 2 WFP's have been reviewed and a technical amendment issued to improve traceability of high value metal waste and deter unauthorised collection, recovery and disposal of this waste in order to protect the environment. Waste Enforcement will put greater emphasis on monitoring of waste acceptance from the members of the public thus changing inspection procedures and using the recent technical amendment to close channels of monetary gain for possible criminal elements.</li> <li>• Dublin City Council will also carry out a number of intelligence led targeted checkpoints/monitoring operations in relation to unauthorised metal waste collectors</li> </ul>

<b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD?</u></b>	Appropriate resources have been allocated for this NEP. As detailed above, a resource of 20 days of planned Routine and Non-Routine days have been allocated to the area of ELVs and Waste Metal Sector which reflects the seriousness DCC views this activity.
<b>The Final Environmental Outcome to be achieved?</b>	<b>Continued compliance under the ELV Directive/ELV Regs and prevention of WEEE leakage through forensic inspection of WFP facilities and other operators</b>

## A.15 Waste - Waste Collection: Household and Commercial

National Enforcement Priority: 3.4 Waste – Waste Collection - Household and Commercial Waste	
	Activities
<p><b>Looking forward to the year ahead</b> </p>	<p><b>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.</b></p> <p style="text-align: center;"><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p>Dublin City Council will prioritise the area of Food Waste in 2022 following a difficult period of site inspections in 2020 &amp; 2021. Waste Enforcement will give due attention going forward to the proper segregation and disposal of Food Waste from all relevant premises. A key focus for 2022 will be the Food Waste surveys of households and apartment blocks and the recording of key information to track compliance levels across all socio-economic areas.</p> <ul style="list-style-type: none"> <li>• Dublin City Council recognises that the recovery rate of Food Waste in its functional area both commercially and domestically need to improve and will give this area particular focus for 2022 with the targeting of household waste collectors and brown bin rollout. DCC will use Regulation 5/Regulation 10 Notices under the Household Food Waste and Bio-Waste Regulations 2015 as a tool to improve compliance.</li> <li>• In 2022 Waste Enforcement will continue to ensure that all WCP Annual Returns assigned are validated as per the 2022 NWCPO AR Validation guidance document.</li> <li>• DCC will also continue to ensure that correct List of Waste (LoW) codes are being used by permit holders through inspections of WCP dockets and corresponding weighbridge documentation.</li> <li>• DCC will continue to use the “assisted compliance” approach in 2022 to educate and guide operators in the correct use of Tabs for reporting collections from Apartments/Kerbside and through inspections on the accuracy of data submitted e.g. tonnages</li> </ul>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Appropriate resources have been allocated for this NEP. As detailed above, approximately 6% of overall planned Routine Inspections have been allocated to this National Priority – Household &amp; Commercial Waste Collection.</p>
<p><b>The Final Environmental Outcome to be achieved?</b></p>	<p><b>Improved compliance with waste recovery targets for Household &amp; Commercial Waste Collection with a key focus on food waste and brown bin rollout in the region</b></p>

## A.16 Waste - Producer Responsibility Initiatives (PRIs) and Local Priorities

National Enforcement Priority: 3.5 Waste – Producer Responsibility Initiatives (PRIs) and Local Priorities	
	Activities
Looking forward to the year ahead 	<p>Tell the story of what your council plans to do on this priority in the year ahead. You are not required to duplicate other information within this plan.</p> <p><i>[Guideline of up to 500 words per priority area]</i></p>
<p><b>1. Describe the work to be carried out to address this National/Additional Local priority <u>FOR THE YEAR AHEAD</u> – including:</b></p> <ul style="list-style-type: none"> <li>• For authorised sites, a compliance rate and context/analysis;</li> <li>• Appropriate site selection methodology, and/or early interventions;</li> <li>• Detection of non-compliances/unauthorised activities and follow up;</li> <li>• Progress in the NEP;</li> <li>• Positive environmental outcomes – not simply reaching a target of inspections;</li> <li>• Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>• Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>	<p><b>Packaging: Suspected Major Producers (SMP) Inspections/Audits:</b> DCC’s Waste Enforcement Unit will prioritise the clearing of any outstanding SMP Audits from 2021. DCC will liaise with the EMWERLA to ensure continued progress with this area of priority in 2022, by sharing and updating SMP lists. DCC will continue to carry out SMP audits using the most up to date guidance.</p> <p><b>Packaging: Self-compliance Audits:</b> DCC’s Waste Enforcement Officers will return to onsite inspections in 2022 changing from remote inspections only in 2020 &amp; 2021.</p> <p><b>Waste Tyres:</b> DCC’s Waste Enforcement Unit will again prioritise tyre inspections in September, October, November as part of 2022’s Halloween Task Force, with targeted inspections of Tyre Retailers suspected of giving tyres away or not securing in an appropriate manner. DCC will also target unregistered/revoked retailers as specified by Repak ELT through EMWERLA guidance and co-operation.</p> <p><b>ELV Producer Audits:</b> All inspections will again return to onsite inspections in 2022 following remote inspections only for 2020 and 2021 reporting years.</p> <p><b>WEEE/Batteries: Retail Inspections:</b> DCC’s emphasis in 2022 will be to continue to move away from previously inspected premises and target new businesses that fall into the WEEE/Batteries Regulations 2014.</p>
<p><b>2. Have appropriate resources been assigned to carry out the work associated with this activity <u>FOR THE YEAR AHEAD</u>?</b></p>	<p>Appropriate resources have been allocated for this NEP. As detailed above, over 40 days in 2022 have again been allocated to complete 81 inspections in the area of Producer Responsibility Initiatives</p>
<b>The Final Environmental Outcome to be achieved?</b>	<ul style="list-style-type: none"> <li>• <b>Improved compliance rates in DCC’s functional area with the requirements of PRI schemes and where possible to exceed 2021 compliance rates as detailed below:</b> <ul style="list-style-type: none"> <li>○ <b>89% compliance Waste Tyre inspections,</b></li> <li>○ <b>75% Suspected Major Producers,</b></li> </ul> </li> </ul>

- **100% Packaging Self-Compliance,**
- **94% WEEE/Batteries**

**To continue to promote environmental awareness among compliant and non-complaint retailers/businesses**

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

	Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Waste</b>					
<b>6.1</b>	<b>Routine Waste Inspections</b>				
6.1.1	Waste Permitted Facilities	29	1	29	
6.1.1	WFP Annual Return Data Verifications	26	0.5	13	
6.1.1	WFP Annual Return Desktop Validations i.e. Sign Off on NWCPO Portal	26	0.25	6.5	
6.1.2	Joint inspections with NTFSO	4	n/a	n/a	Inspections conducted with NTFSO - for WFPs and ATFs - therefore not requiring extra time or inspection days. NTFSO Inspections separate to 6.1.5
6.1.3	Inspections of Cert of Registration sites (private)	5	1	5	
6.1.3	COR Annual Return Data Verifications	3	0.5	1.5	
6.1.3	COR Annual Return Desktop Validations i.e. Sign Off on NWCPO Portal	3	0.25	0.75	

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.1.4	Inspections of LA Cert of Registration sites	0	0	0	Inspections not carried out by waste enforcement
6.1.5	Multi-agency inspections, including vehicle inspections and multi-agency site inspections	30	1	30	Majority will be multi-agency checkpoints
6.1.6	Hazardous waste sectoral inspections (e.g. Mercury Regulations, WTF, garages, mini-labs, industrial, healthcare & others)	30	0.25	7.5	
6.1.7	Inspections in relation to segregation, recovery and disposal of C&D waste at construction/development sites to include major public projects - C & D Site Inspections and C & D WCP Spot Checks	110	0.5	55	40 C & D Site Inspections, 70 C & D WCP Spot Checks
6.1.7	Inspections in relation to segregation, recovery and disposal of C&D waste at construction/development sites to include major public projects - Waste Management Plans	380	0.75	285	
6.1.8	Inspections of notifications under Prohibition of Waste Disposal by Burning Inspections	0	0	0	n/a Dublin City Council
6.1.9	Registration of Sewage Sludge Facility inspections	-	-	-	-
6.1.10	Household Waste Surveys	10	0.5	5	i.e. Apartment Blocks

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.1.11	Inspections in relation to the household and commercial kerbside waste collection regime (including brown bin)	6	1	6	Auditing WCP holders
6.1.12	Other inspections of waste collection permit holders to include, for example, data validation audits (onsite) but not included above in 6.1.11 – Waste Collection Permit holders (Full Audit)	75	1	75	
6.1.12	Other inspections of waste collection permit holders to include, for example, data validation audits (onsite) but not included above in 6.1.11 – WCP AR Data Verification	75	0.5	37.5	
6.1.12	Other inspections of waste collection permit holders to include, for example, data validation audits (onsite) but not included above in 6.1.11 – WCP AR Desktop Validation i.e. Sign-off on WCP Portal	119	0.25	29.75	
6.1.13	Commercial Food Waste Inspections (original waste producers, e.g. hotels, nursing homes, restaurants, etc.)	50	0.5	25	
6.1.14	Inspections in relation to authorised ELV facilities (ATFs) with an emphasis on traceability requirements (SI 320 of 2014) - Authorised Treatment Facility Holders (Full Audit)	4	1	4	
6.1.14	Inspections in relation to authorised ELV facilities (ATFs) with an emphasis on traceability requirements (SI 320 of 2014) - ATF Annual Return Data Verifications	3	0.5	1.5	

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.1.14	Inspections in relation to authorised ELV facilities (ATFs) with an emphasis on traceability requirements (SI 320 of 2014) - ATF Annual Return Desktop Validations i.e. Sign-off on NWCPO Portal	3	0.25	0.75	
6.1.15	Other routine inspections (not included in above numbers) - please specify	0	0	0	Previously inspections under the Mercury Regulations. n/a for DCC in 2022
6.1.16	Other routine inspections (not included in above numbers) - General Business Audits, General WCP Spot-Checks	110	0.5	55	40 General Business Audits, 70 General WCP Spot-Checks
	<b>Subtotal Routine Waste Inspections</b>	<b>1101</b>	<b>Variable</b>	<b>672.75</b>	
<b>6.2</b>	<b>Non-Routine Waste Inspections</b>				
6.2.1	Investigative inspections of fly tipping or illegal dumping, <b>excluding</b> unauthorised C&D, ELVs & Tyres	10	4	40	
6.2.2	Investigative Inspections in relation to unauthorised C&D sites (sites with no permit)	2	2	4	
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)	2	2	4	Pending NTFSO information
6.2.4	Investigative Inspections in relation to unauthorised Tyre dumps (no permit in place)	0	0	0	Historically n/a to DCC

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
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.	15	4	60	
6.2.6	Inspections in relation to other Unauthorised Waste sites excluding those mentioned above - incl. crashed vehicle inspections, PTUs, etc.	3	1	3	
6.2.7	Inspections in relation to Waste Facility Permits continuing to operate after their permit has expired	2	1	2	Ongoing/Pending inspections by Dublin City Council
6.2.8	Inspections in relation to extractive industries	0	0	0	n/a DCC Waste Enforcement
6.2.9	Household Waste/waste presentation Inspections arising from complaints, including backyard burning	0	0	0	n/a DCC Waste Enforcement
6.2.10	Inspections of sites notified under Article 27	10	0.5	5	Ongoing/Pending inspections by Dublin City Council
6.2.11	Other non-routine inspections (not included in above numbers)	0	0	0	
	<b>Subtotal Non-routine Waste Inspections</b>	<b>44</b>	<b>Variable</b>	<b>118</b>	
<b>6.3</b>	<b>Litter Patrols/Investigations</b>				
6.3.1	Litter Patrols/Investigations	5180	0.5	2590	
6.3.2	Litter pollution Monitoring surveys	570	0.1	57	

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.3.3	Litter pollution quantification surveys	40	0.2	8	
6.3.4	Visits in relation to Green Schools programme	60	0.5	30	
6.3.5	Providing support to community groups during litter clean ups	110	0.75	82.5	
6.3.6	Judging Tidy Towns/Villages competitions	75	0.1	7.5	
6.3.7	Other routine litter patrols/investigations (not included in above numbers)	2125	0.08	170	Abandoned vehicle reports decreasing inspections in line with trend. Time per inspections reviewed.
	<b>Subtotal Routine Litter Patrols/Investigations</b>	<b>8160</b>	<b>Variable</b>	<b>2945</b>	
<b>Water/Wastewater</b>					
<b>6.4</b>	<b>Routine Water/Wastewater Inspections</b>				
6.4.1	Discharges licenses to waters (Section 4)	200	1	200	Planned inspections include but are not limited to trade effluent sampling at licenced sites.
6.4.2	Audits of private water supplies				Not applicable to Dublin City Council
6.4.3	Monitoring samples from private water supplies	0	0	0	Not applicable to Dublin City Council
6.4.4	Farm Inspections under GAP Regulations conducted by Local Authority (not including farm inspections by DAFM)	0	0	0	Not applicable to Dublin City Council
6.4.5	Farm Inspections conducted by DAFM	0	0	0	Not applicable to Dublin City Council

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.4.6	Farm Inspections Other e.g. routine farm inspection but not GAP inspection	0	0	0	Not applicable to Dublin City Council
6.4.7	Monitoring programmes, Operational and Surveillance samples taken	56	0.5	28	Surveillance and Operational sampling carried out by Dublin City Council on behalf of the Environmental Protection Agency (EPA). Each river is sampled in accordance with annual sampling schedule issued by the EPA.
6.4.8	No. of days of locally lead investigative assessments (including SSRS, sampling, river walks, etc.)	814	0.25	203.5	Investigative assessments carried out to monitor water quality, change in status and identify any new pressures for investigation
6.4.9	WFD investigative monitoring samples and analysis by Local Authorities.	400	0.5	200	Planned inspections include routine river sampling of rivers throughout Dublin City Council and investigative sampling carried out on WFD catchments to support ongoing projects
6.4.10	No of days of engagement with LAWPRO and Communities Programme	10	5	50	
6.4.11	Bathing Waters	275	2	685	Planned inspections include sampling at designated and other monitored waters during 2022. Samples include scheduled and investigative monitoring during the bathing season and fortnightly sampling outside of the bathing season at 8 locations.
6.4.12	DWWTS inspections under National Inspection Plan	0	0	0	Not applicable to Dublin City Council
6.4.13	DWWTS Engagement Activities	0	0	0	Not applicable to Dublin City Council
6.4.14	DWWTS inspections of referrals from LAWPRO	0	0	0	Not applicable to Dublin City Council

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.4.15	Other Surface & Groundwater Protection Inspections [e.g. drinking water source protection, zone of contribution monitoring, etc]	0	0	0	Not applicable to Dublin City Council
6.4.16	Misconnection Surveys	1000	0.25	250	Conservative figure of 1000 inspections planned for 2022, taking COVID-19 and other health and safety risks into consideration.
	<b>Subtotal Routine Water/Wastewater Inspections</b>	<b>2755</b>	<b>Variable</b>	<b>1617</b>	
<b>6.5</b>	<b>Non-Routine Water/Wastewater Inspections</b>				
6.5.1	Inspections relating to water pollution incidents/complaints, excluding non-routine farm inspections.	500	0.76	382	Forecast inspections will be carried out in response to complaints and incident notifications received by the section.
6.5.2	Non-routine farm inspections, e.g. on foot of pollution incident or complaint.	0	0	0	Not applicable to Dublin City Council
6.5.3	Unauthorised Discharges Investigated	0	0	0	These figures are included in section 6.5.1 as they are inspections relating to water pollution incidents and are covered by section 6.5.1.
6.5.4	Inspections in relation to Water Pollution Licence applications	108	1	108	
	<b>Subtotal non-routine Water/Wastewater Inspections</b>	<b>608</b>	<b>Variable</b>	<b>490</b>	
<b>Air/Noise Inspections</b>					
<b>6.6</b>	<b>Routine Air/Noise Inspections</b>				
6.6.1	Inspections of Air Pollution Licenced sites	0	0	0	No sites in functional area

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.6.2	Total number of inspections carried out under the solid fuel regulations (S.I. 326 of 2012 and as amended).	50	0.5	25	
6.6.3	Number of multi-agency inspections carried out under the solid fuel regulations (S.I. 326 of 2012 and as amended), e.g. in conjunction with other local authorities, EPA, DCCAE, etc.	0	0	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	0	0	(25)	This is already captured in 6.6.2 - not to be double counted
6.6.5	Total number of fuel samples collected and analysed	0	0	0	
6.6.6	Inspections of sites under 2012 Deco Paints Regulations (S.I. 564 of 2012) – Vehicle Refinishers	15	0.5	7.5	
6.6.7	Inspections of sites under 2012 Solvents Regulations (S.I. 565 of 2012) –e.g. Dry cleaners, surface cleaning etc.	10	1	10	
6.6.8	Inspections of sites under Petroleum Vapours Regulations	0	0	0	
6.6.9	Ambient Air Monitoring Programme inspections	1100	0.3	330	
6.6.10	Other routine air/noise inspections	60	2	120	

	Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
	<b>Subtotal Routine Air/Noise Inspections</b>	<b>1235</b>	<b>Variable</b>	<b>492.5</b>	
<b>6.7</b>	<b>Non-Routine Air/Noise Inspections</b>				
6.7.1	Incident/complaint related inspections	308	2 (estimated)	817.5	This includes close out of outstanding enforcement actions
	<b>Subtotal Non-Routine Air/Noise Inspections</b>	<b>308</b>	<b>Variable</b>	<b>817.5</b>	
<b>6.8 Producer Responsibility Inspections (Routine)</b>					
6.8.1	WEEE Inspections	15	0.25	3.75	
6.8.2	Battery Inspections	15	0.25	3.75	
6.8.3	Inspections on suspected vehicle importers (ELV Regulations 2016)	5	0.5	2.5	
6.8.4	Farm Plastics	0	0	0	
6.8.5	Plastic Bag Levy	0	0	0	
6.8.6	Inspections under the Packaging regulations – Suspected Major Producers	5	2	10	
6.8.7	Inspections under the Packaging regulations – Registered Self-compliers	6	0.5	3	
6.8.8	Inspections under the Tyre Regulations – Tyre Retailers	35	0.5	17.5	
	<b>Subtotal (Routine) Producer Responsibility Inspections</b>	<b>81</b>	<b>Variable</b>	<b>40.5</b>	
<b>6.9 Planning (Environmental) Inspections (Routine)</b>					

	<b>Inspection Types</b>	<b>Planned Inspections for Year</b>	<b>Estimate time per inspection &amp; write up (days)</b>	<b>No. of Inspections Days for this Inspection Type</b>	<b>Local Authority Comments for Planned Inspections for the Year Ahead</b>
6.9.1	Inspections (environmental) of existing planning permissions	90	1	90	
6.9.2	Inspections (environmental) in advance of grant/refusal of planning permission	300	2	600	
6.9.3	Quarry Inspections (e.g. relating to noise, dust, surface/groundwater emissions, vibration etc.)	0	0	0	
6.9.4	Other planning inspections relating to environmental issues	0	0	0	
<b>Subtotal Planning Inspections (Routine)</b>		<b>390</b>	<b>Variable</b>	<b>690</b>	
<b>Total Routine Inspections end of year</b>		<b>14464</b>	<b>Variable</b>	<b>7146.28</b>	
<b>Total Non-Routine Inspections end of year</b>		<b>Variable</b>	<b>Variable</b>	<b>1380.83</b>	<b>Complaint numbers/inspections/estimated time will vary</b>
<b>Total Inspections end of year</b>		<b>14464 (excluding Total Non-Routine Inspections end of year)</b>	<b>Variable</b>	<b>8527.1</b>	