

# The Revised RBME Risk Model 2020



## Revised Charging Model 2020

January 2020

Commencing in 2020, we calculate every year a single Charge or Price Point for twelve Risk Categories, as described in the publication '**EPA Revised RBME Risk Model 2020**'. We use this single Charge Point as the main basis for the overall annual enforcement charge.

This calculation helps us

- to recover the full cost of the enforcement function of the industrial and waste sectors, based on the most recent completed actual costs;
- to account for the number of OEE enforcement staff who enforce industrial and waste licences, so that we only assign that portion of the full enforcement costs to this scheme,
- to reflect the number of inspector days assigned to sites in A, B, C or D risk categories <sup>1</sup>.

The calculation of each charge point for each risk category considers the proportion of facilities in that risk category, thus incorporating the burden sharing principle across the scheme.

The only exception to apportioning all inspection and monitoring effort across the industrial and waste community arises where there are significant costs to be applied to a small defined group of licensees each year.

We apply these exceptions where we arrange to carry out specialised air monitoring or conduct surveillance at a small number of sites involved in the Cork Animal Health Sentinel Scheme (CAHSS), or to individual sites, if retrospective charges<sup>2</sup> are applied.

As these activities only occur at a limited number of sites, we consider it fairer to add these costs individually to the base charge point after the charge point per risk category has first been determined.

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<sup>1</sup> Currently, this provides for 10 inspection days for A sites, 5 inspection days for B sites, and 2 ½ inspection days for a C site. This is based on enforcement experience and is mirrored in annual OEE enforcement plans.

<sup>2</sup> The present policy allows for applying retrospective charges, but in practice they seldom arise.

Finally, we will add a standing charge that applies to all licensees. Currently, this is determined at €570 for 2020.

$$\text{ANNUAL ENFORCEMENT CHARGE} = \text{BASE CHARGE FOR RISK CATEGORY} + \text{STANDING CHARGE} + \text{AIR MONITORING} + \text{CAHSS}$$

A facility with an A2 risk category, for example, will now have a base charge (before adding on of additional costs such as Standing Charge and/or if air monitoring is required) of €23,564<sup>3</sup> as illustrated in the following diagram.

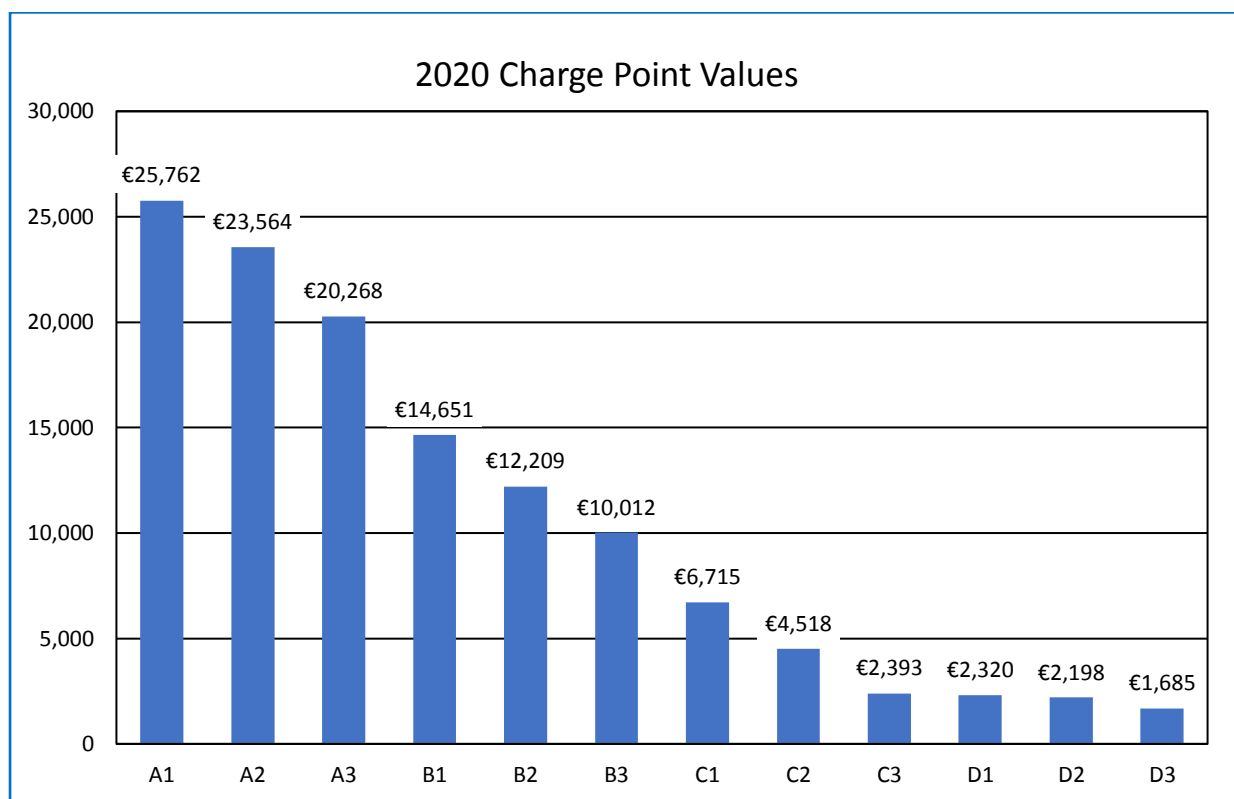


Figure 1: Range of new Charge (Price) Points over all the RBME 2020 Risk Subcategories.

<sup>3</sup> Based on 2018 financial cost data.