



Guidance Note for Completing the Annual Environmental Report (AER) for IE¹, IPC and Waste Licensed Facilities

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¹ The AER template for the intensive agriculture sector has not been changed. Please see the link to the template and guidance <http://www.epa.ie/pubs/advice/aerprtr/aerguid/>.

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1. Purpose of this Document

This is a guidance document for completing the Annual Environmental Report (AER) template that was changed for 2019 reporting.

The use of this AER template for Industrial Emissions (IE), Integrated Pollution Control (IPC) and Waste licences will be **mandatory** for 2020 reporting onwards; with the exception of the intensive agriculture sector².

The Word template can be found [here](#).

As an EPA licence holder, you are required to submit an AER every year. In 2019, the EPA reviewed the AER reporting template with a greater focus on it being a public document. Therefore, it is worded and formatted to assist members of the public interpret the annual environmental performance of IE, IPC or waste licenced facilities. To this end the template has been significantly simplified in line with National Adult Learning Agency (NALA) plain English guidelines. **Therefore, it is important to note that some AER reporting requirements in your licence may not be facilitated in the template.** In such instances the relevant information or report shall be submitted annually as a **separate licensee return** on the EDEN portal, unless stated otherwise by the EPA.

NOTE:

The AER is a public document and will be published on the EPA website. It should **not** be confused with **Environmental Performance Reporting**³ which is available through the EDEN portal and is a separate on-line reporting requirement. Please see [here](#) for further information.

The template also provides opportunities for you to highlight your environmental achievements beyond licence requirements. However, the body of the template is not the platform for large sections of text or images.

² The AER template for the intensive agriculture sector has not been changed at this stage. Please see [here](#) for the link to the template and guidance

³ EPR meets Pollutant Release and Transfer Register (PRTR) and Large Combustion Plant (LCP) statutory reporting requirements as well as some waste survey reporting requirements and **must** be completed separately to the AER.

2. Completing the AER Template

1. Download the AER template (Word Document) from [here](#).
2. Use only the following font when editing:
 - Calibri (Body), size 14, font colour black, spacing 1.15
3. Complete the cover page by filling in the **year** and your **licence details**.
4. Answer all applicable questions and complete all applicable tables.
5. Complete the Declaration by inputting the name and position of author and ticking the box.
6. Do **not** delete or edit formatting or the explanatory notes (text in the grey boxes).
7. Keep within the assigned word limit if using comment boxes.
8. Do **not** use overly technical terms or industry jargon and expand acronyms where possible.
9. Once complete save the AER **as a pdf document**.
10. Submit as a Licensee Return (Annual Environmental Report) on the EDEN portal on or before **31st of March** of the reporting year.
11. Any reports that omit data without sufficient explanation (comment boxes are provided) may be rejected.

You are reminded that by ticking the box in the **Declaration** you thereby declare that the information you provide in the report is true and accurate to the best of your knowledge. In addition, you confirm that monitoring and performance reporting required by your licence, including on-line Environmental Performance Reporting (EPR) data, has been submitted to the Agency and/or is available for inspection by the Agency.

This template is based on NALA plain English guidelines, see [here](#). It uses the first person, has a clear format and refrains from the use of technical or industry jargon. You are requested to **not** deviate from the information required in the tables and questions. Comment boxes are provided where you may wish to clarify or explain further points or figures.

3. Introduction

A brief introduction to the facility and findings from the reporting year shall be provided.

This shall include:

- Primary and secondary⁴ activities being carried out on the facility;
- Overview of compliance such as incidents and complaints;
- Infrastructural changes and upgrades;
- Production increases/decreases;
- Changes to the licence;
- Recent certifications, environmental awards;
- Other relevant environmental achievements or improvements.

There is a word limit of 250 words. Use bullet points where possible and please refrain from large sections of text, technical terms and unexplained acronyms.

Contact Us

Your licence requires that you maintain a communications programme to ensure members of the public can obtain information concerning the environmental performance of your facility. You are encouraged to use this opportunity to direct the reader to where they may find such information. This may be a dedicated website, email address or location.

NOTE

Under GDPR Regulations no personal data such as personal email addresses, monitoring locations etc. that could identify an individual shall be included in this or other reports submitted to the Agency. The EPA will **reject** any report that contains personal data.

⁴ Secondary activities are any other EPA Act 1992 as amended or Waste Management Act 1996 as amended scheduled activities that are taking place on your facility and are listed in your licence.

4. How we Manage our Facility

In this section you will include details of your environmental management system's objectives and targets where relevant to your environmental licence. The AER template refers to these as **environmental goals**.

This section gives you the opportunity to demonstrate your commitment to continuous environmental improvement and to highlight how you effectively utilise your environmental management system to achieve and maintain compliance with your licence. You may also want to highlight specific environmental initiatives, partnerships or projects that you have set key targets and goals for as part of your EMS or other relevant company policy or strategy. There is no limit on the number of goals.

Complete the table as follows:

1. Column 1 – List (chronologically) all the environmental goals set and achieved in the reporting year and any new ones proposed for the current year.
2. Column 2 – Add the target date for completion by month and year.
3. Column 3 – Progress on the goal shall be classed as one of the following:
 - Complete
 - On track
 - Ahead of schedule
 - Not commenced
 - Delayed

It is good practice to review any incidents, complaints or non-compliances that occurred during the reporting year and to include an environmental goal to demonstrate how you intend to prevent these from re-occurring.

The comment boxes throughout the template can be used to reiterate these environmental goals if you so choose.

Example

Table 1 Environmental Goals

Environmental Goal	Target Date	Progress

A comment box with a 100 word limit is provided at the end of this section.

Beyond Compliance

Reporting in this section is optional.

Beyond compliance is an approach to help deliver greater organisational performance and long-term value for the environment, society and the economy. Companies can reduce their environmental impact, improve social performance and generate economic value by incorporating sustainability practices.

You can now report on projects that have gone beyond the requirements of your licence by including them in Table 1 Environmental Goals as long/in so far as they are part of your environmental management system. When completing Table 1 interim targets should be used where long term goals are greater than 5 years.

You can also use Appendix III to provide a case study (250 word limit), an infographic or similar that describes one of these projects in more detail.

Examples of projects that potentially go beyond licence requirements are those that:

- anticipate regulatory or policy changes;
- eliminate/substitute materials particularly hazardous materials;
- divert waste to a more circular system;
- invest in renewable energy infrastructure on-site;
- develop extensive water conservation techniques;
- implement plans and monitor biodiversity;
- engage effectively with local communities for positive environmental outcomes.

The following projects would not be considered to sufficiently go beyond licence requirements: general resource use reduction projects (waste, water and energy) or projects to improve compliance with ELV's or trigger levels.

NOTE: Beyond compliance projects should be legitimately benchmarked and have well defined roadmaps that support their implementation and are embedded in the Environmental Management System.

5. Energy & Water

This section captures resource use and efficiency in the form of energy and water **only**.

Energy Used

Energy used includes all energy consumed by on-site processes relevant to your licenced activities including offices, storage etc. but does not include off-site transport.

If you generate renewable energy on-site the amount of this energy consumed by your facility shall also be included in Table 3.

For consistency of reporting the energy used and generated shall be converted to Giga Joules (GJ). The SEAI website outlines applicable conversion factors for the different fuel types and can be found [here](#).

Table 3 Energy Used

Energy Used	Quantity (GJ)	% Increase/ decrease on previous year
Electricity		
Heavy Fuel Oil		
Light Fuel Oil		
Natural Gas		
Coal / Solid Fuel		
Peat		
Renewable Biomass		
Renewable Energy Generated On-site		
Total Energy Used		

A comment box with a 100 word limit is provided at the end of this section.

Energy Generated

This is the quantity of energy your facility generated on-site in the reporting year, if applicable. If renewable energy is generated on-site details of the type of energy shall be included in the comments box provided.

Renewable sources as defined by European Communities (Renewable Energy) Regulations 2011, S.I. No. 147 of 2011 are: wind, solar, aerothermal, geothermal, hydrothermal, ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.

Table 4 Energy Generated

Energy Generated	Quantity (GJ)	% Increase/ decrease on previous year
Renewable Energy		
Total Energy Generated		

Water Use

In this section water used by all on-site activities including, where applicable, recycled water generated from on-site processes. Recycled water refers to the reuse of water that would otherwise be classed as waste water.

Table 5 Water Used

Water Use	Quantity (m³)	% Increase/ decrease on previous year
Groundwater		
Surface Water		
Public Supply		
Rainwater		
Recycled Water		
Total Water Used		

6. Environmental Complaints

In this section you will outline the number of **total** complaints for the reporting year. That is, the total number of complaints reported to the EPA and/or directly to you.

Log into the EDEN portal for information on complaints made to the EPA and whether they are open or have been closed in the reporting year.

Where complaint type “Other” is used further details shall be added in the comment box provided.

Table 6 Summary of All Environmental Complaints Received

Type of Complaint	Number of Complaints	Number Closed
Odour / Smells		
Water Quality		
Air Quality		
Noise		
Waste		
Litter		
Vermin/Flies/Birds		
Soil Contamination		
Vibration		
Other		

A comment box with a 100 word limit is provided at the end of this section.

7. Environmental Incidents

In this section you will outline the number of incidents that occurred in the reporting year by category and type. Use numerals to indicate the number of incidents. If no incidents occurred leave blank. Log into the EDEN portal to determine the incident category and type.

Where incident category type “Other” is used further details shall be added in the comment box provided. For example, an environmentally significant emission release of Fluorinated gases (F-gases) or Ozone Depleting Substances (ODS).

A comment box with a 100 word limit is provided where clarification is required.

Table 7 Number of Environmental Incidents

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Abatement Equipment Offline	No. of incidents				
Breach of Ambient ELV					
Breach of Emission Limit					
Explosion					
Fire					
Monitoring Equipment Failure					
Odour					
Spillage					
Breach of Trigger Level					
Uncontrolled Release					
Other					

8. Our Environmental Emissions

This section is broken down into the following types of monitoring that may be required by your licence:

- Storm Water
- Waste Water
- Air
- Groundwater
- Noise

Individual emission/discharge point data is **not** required. Instead, for air and water monitoring the tables shall be completed based on **compliance per parameter** monitored. For example, three storm water emission points each monitor for suspended solids. Only one line item for suspended solids is added to the storm water table. A total number of **actual** samples taken as opposed to the number required by the licence shall be included.

Actual Number of Samples

The actual number of samples taken in a reporting year may be greater or less than the number required by your licence. For example, if there was no flow during a sampling round the total number of samples will be less. Alternatively, if an incident occurred and you took samples as part of the investigation these are additional samples and shall be included in the table. Samples taken by the EPA shall **not** be included.

Then the percentage of compliant samples as per licenced emission limits or **trigger levels** shall be calculated for the total number of samples per parameter. Where a licence interprets emission limits the percentage compliance shall be based on this interpretation, if applicable.

NOTE

A breach in the trigger level “**action level**” is deemed a reportable incident and shall be included in this section when determining percentage compliance.

Storm Water

In this section you will complete the following statements. For the first you outline how you manage the storm water from your facility prior to release.

1. **Storm water from our facility is managed prior to release by; E.g. silt trap, oil interceptor etc.**

The second you will state what water bodies your facility discharges storm water into.

2. **Storm water from our facility is released into the following water bodies:**

Based on the explanation on page 11 Table 8 shall be completed as follows:

1. Column 1 - List all the storm water parameters monitored in the reporting year.
2. Column 2 - Determine the total number of samples taken per parameter (the sum of all emission points). This **excludes** samples taken by the EPA.
3. Column 3 - Calculate⁵ the number of samples as a percentage that comply with the licence requirements.
4. If there are no ELVs or trigger levels set for a parameter leave column 3 blank and state "No ELV or trigger level applicable" in column 4 under comment.

Example: If you monitored suspended solids from three storm water emission points on a quarterly basis the total number of samples is 12. If 3 of the samples breached the ELV or trigger level, then the percentage of compliant samples for suspended solids was 75%.

Table 8 Summary of Storm Water Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
Suspended Solids	12	75%	
Ammonia			

⁵ % compliant = [(number of samples compliant) / (number of samples taken)] x 100

Waste Water

You will complete the following two statements. The first states whether waste water (trade and sanitary waste water) is treated in an on-site Waste Water Treatment Plant (WWTP) or an Irish Water or another WWTP. Name the Irish Water or industrial WWTP where applicable.

- 1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody.** E.g. on-site WWTP, Irish Water (name WWTP)

Complete the second statement by naming the water bodies the treated waste water is finally discharged to. If waste water is treated at an off-site WWTP then name the water bodies it discharges to.

- 2. Treated waste water from our facility is released into the following water bodies:**

Based on the explanation on page 11 Table 9 shall be completed as follows:

1. Column 1 - List all the waste water parameters monitored the reporting year.
2. Column 2 - Determine the total number of samples taken per parameter (the sum of all emission points). This **excludes** samples taken by the EPA.
3. Column 3 - Calculate⁶ the number of samples as a percentage that comply with the licence requirements.
4. If there are no ELVs or trigger levels set for a parameter leave column 3 blank and state **“No ELV or trigger level applicable”** in the comment box.

Table 9 Summary of Waste Water Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
Suspended Solids			

⁶ % compliant = [(number of samples compliant) / (number of samples taken)] x 100

Air

In this section you will report on your monitoring of emissions to atmosphere as required by your licence including odour assessments, where applicable.

If monitoring is a requirement of your licence complete the following statement based on the number of licensed air emission points. Then complete Table 9.

- 1. We monitor air emissions from the following number of emission points at our facility.**

If your licence does not require air emissions monitoring, then answer question 1 with the following statement:

Air emissions monitoring is not a requirement of our EPA licence.

Based on the explanation on page 11 Table 10 shall be completed as follows:

1. Column 1 - List all the air emission parameters monitored in the reporting year.
2. Column 2 - Determine the total number of samples taken per parameter (the sum of all emission points). This **excludes** samples taken by the EPA.
3. Column 3 - Calculate⁷ the number of samples as a percentage that comply with the licence requirements.
4. If there are no ELVs or trigger levels set for a parameter leave column 3 blank and state **"No ELV or trigger level applicable"** in column 4 under comment.

Table 10 Summary of Air Emissions Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
Particulates			
Nitrogen Dioxide			

⁷ % compliant = [(number of samples compliant) / (number of samples taken)] x 100

Odour

If odour assessments⁸ were carried out by you or the EPA in the reporting year, then they will be reported in Table 11 as follows:

1. Column 2 – State the number of odour assessments conducted by you, or on your behalf, by a third party. Underneath you state the number conducted by the EPA. Odour assessments carried out by the EPA are submitted as site visit reports, with odour assessment in the Title. The report will state on the front page and in the body of the report whether the assessment was compliant.
2. Column 3 – Based on the number of odour assessments conducted calculate the percentage that were compliant.
3. Column 4 – If no odour assessments were carried out leave column 3 blank and state **“No odour assessments conducted”** in column 4.

Table 11 Summary of Odour Assessments Conducted

Assessment Conducted By	No. of Odour Assessments	% Compliant⁹	Comment
Licence Holder			
EPA			

NOTE:

If you used olfactometry methods to monitor odour from an air emission point the results of this monitoring shall be summarised in Table 9 by listing **odour** as a parameter.

⁸ Odour assessments are completed in accordance with EPA Odour Impact Assessment Guidance (AG5) [Air Guidance Notes | Environmental Protection Agency \(epa.ie\)](#)

⁹ % compliant = [(number of compliant odour assessments) / (number of odour assessments)] x 100

Fugitive Solvent Emissions

All licensees shall answer the first statement in this section.

Are you are required to monitor fugitive solvent air emissions emitted from your facility?

Answer Y/N

This section is applicable to licences that are required to determine fugitive solvent emissions, submit a solvent management plan or report under a solvent reduction scheme.

If you are required to report on fugitive solvent emissions complete Table 12 as follows:

1. Column 1 – Determine the quantity of solvents used in the reporting year based on your solvent mass balance analysis¹⁰.
2. Column 2 – Calculate the percentage fugitive emissions.
3. Column 3 – State whether the percentage fugitive emissions was compliant with the target or emission limit value as set out in Annex VII of the Industrial Emissions Directive¹¹.

Table 12 Summary of Fugitive Solvent Emissions

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant
		Yes / No

A comment box with a 100 word limit is provided at the end of this section.

¹⁰ See Good Practice for Solvent Mass Balance and Fugitive Emission Assessment for EPA Licensed Sites [Compliance & Enforcement: Air | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/compliance/enforcement/air/environmental_protection_agency)

¹¹ Industrial Emissions Directive <https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

Groundwater

All licensees shall answer question 1.

1. Do you have a groundwater monitoring programme in place?

Answer: Yes / No

A groundwater monitoring programme may be in place as a requirement of your licence or due to a previous or recurring groundwater contamination incident.

If yes, to question 1, answer question 2.

2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?

Answer: Yes / No

Generally, if groundwater monitoring indicates increasing trends in pollution over a five year period the licensee may be required to investigate the potential source. If you answered yes to question 2 you shall list in Table 13 all the parameters that indicated an increasing trend over the last 5 years.

Table 13 List of Groundwater Pollutants Identified

Pollutants	
Ammonia	

Add rows as necessary

Then answer question 3 outlining details of the investigation findings, recommendations and subsequent actions you took, if applicable.

A comment box with a 100 word limit is provided at the end of this section.

3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.

150 word limit

Noise

In this section you will be required to complete the following questions in relation to noise monitoring conducted at or in the vicinity of your facility for the reporting year.

1. **We conducted noise monitoring on the following dates?**

2. **Where was the noise monitoring conducted?**

- i. the boundary of your facility,
- ii. noise sensitive locations off-site, or
- iii. both

3. **Were measured noise levels compliant with your licence limits?**

Answer: Yes / No

If No, what actions did you take to address the noise level exceedances?

150 word limit

9. Waste

This section is divided into two sections;

- waste generated and;
- waste accepted

Waste Generated

Complete Table 14 with figures of hazardous, non-hazardous and inert waste generated at your facility in the reporting year. You must also state the percentage tonnage increase or decrease on the previous year and the percentage recovery. That is, the amount of total waste generated that was reused, recycled or recovered.

Table 14 Waste Generated

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous			
Non-Hazardous			
Inert			
Total Tonnes			

A comment box with a 100 word limit is provided at the end of this section. If a significant change in tonnes occurred compared to the previous year an explanation for the increase or decrease shall be provided in the comment box.

Waste Accepted

All licensees shall answer the first question, yes or no.

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Answer: Y/N

Waste accepted data is generally a requirement of the waste industry but may apply to some industrial licences. If you accepted waste onto your facility during the reporting year complete Table 15 with figures of hazardous, non-hazardous and inert waste accepted. Inert waste is defined in legislation.

In column 3 state the percentage tonnage increases or decreases on the previous year. In columns 4 the percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

Table 15 Waste Accepted

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous			
Non-Hazardous			
Inert			
Total Tonnes			

A comment box with a 100 word limit is provided at the end of this section. If a **significant change** in tonnes occurred compared to the previous year an **explanation** for the increase or decrease shall be provided in the comment box.

10. Financial Provision

All questions shall be answered in this section.

The first question relates to whether you are required to have financial provision in place that requires agreement by the EPA.

1. Are you required to have an agreed financial provision in place?

Answer Y/N

That is, your activities fall into one of the following 8 high risk categories:

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

The EPA contacted all licensees in 2019 in this regard.

If you are still unsure, please refer to the guidance from the link below.

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

NOTE:

For facilities that do not fall into one of the above categories, the agreement of environmental liabilities assessments and costings, and associated financial provisions, is no longer required by the EPA. However, the EPA recommends that licensees complete the assessments and retain financial provision for potential environmental liabilities at their facilities as best practice.

Then answer questions 2 to 4 below.

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the EPA?

3. What year was your Environmental Liability Assessment Report (ELRA) last agreed by the EPA?

4. Has there been any significant changes on your site since the last agreements?

Answer: Y / N

If yes, have you submitted details to the EPA?

Answer: Y / N/ Not Applicable (N/A)

If there have been significant changes on your site that would alter the ELRA or CRAMP, then these significant changes shall be submitted to the EPA as a licensee return on the EDEN portal. If you are not required to obtain agreement from the EPA, then tick N/A.

NOTE

All licensees shall review their ELRA and CRAMP as required by their licence.

See the following guidance for further details on financial provision and costing of environmental liability:

Guidance on Financial Provision for Environmental Liabilities

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

Guidance on Assessing and Costing Environmental Liabilities

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)