

Feedback Survey on the EPA's Environmental Performance Reporting Application

Summary Report

November 2021



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Executive Summary

This report summarises the results and findings from a survey issued by the EPA to receive feedback on the Agency's Environmental Performance Reporting (EPR) application and outlines how the EPA intends to address this feedback

The EPR application is designed to provide EPA licensees with a single online system to comply with annual data reporting obligations, thereby reducing duplication in reporting. The EPA launched the waste reporting phase of EPR in early 2021, which enables licensees to meet EPA annual waste reporting obligations via the online EPR form. This built on the first phase of EPR launched in 2019, which brought online Pollutant Release and Transfer Register (PRTR) and Large Combustion Plant reporting.

A short online survey, consisting of 5 questions, was issued by the EPA in June 2021 via SurveyMonkey to gain feedback from EPA licensees on their experience of using the new online reporting system.

Question 1	How would you rate your overall experience of using the EPR application?
Question 2	Which of the following features and supports did you find useful?
Question 3	What changes or new features or supports would you like to see to improve the EPR application?
Question 4	How did you find the timing and frequency of EPA communications on EPR?
Question 5	What is your view of the EPA taking a stronger enforcement approach to late reporters?

The survey was sent to 852 licensees, consisting of waste, IPC/IED, and selected quarries, and urban waste water facilities that come within the scope of PRTR reporting. A total of 200 responses were received. Key findings from the survey, summarised in this report, include:

- Overall 65% of respondents were satisfied with the application and see the advantages that using it will bring in future years, once users become more familiar with the system.
- Most respondents found the EPR features and supports useful. However, 9 respondents found the application to be very time intensive.
- Respondents would like additional guidance and increased clarity on how to use the system.
- Many respondents left comments and suggestions for improvements to the system. This included suggestions for some features that are in fact already available in the EPR application.
- Respondents believe that a stronger enforcement approach by EPA to late reporters should be case dependent as, at times, there are valid reasons for delayed reporting.

The feedback received will be given careful consideration by the EPA. The findings and suggestions received will help to inform future system improvements and guide the development of additional supports to further improve the user experience.

1. Introduction

The EPA's Environmental Performance Reporting (EPR) application is an online system designed to allow EPA licensees to comply with annual data reporting obligations in a single online form. It captures key information and data on the performance of EPA licensed facilities over the reporting year based on the results of monitoring and assessment. Phase 1 of EPR was launched in February 2019 and brought online Pollutant Release and Transfer Register (PRTR) and Large Combustion Plant reporting. Phase 2 was launched in the first quarter of 2021 and brought online the remaining waste reporting.

In June 2021, the EPA issued a survey to receive feedback from licensees on their experience of using the EPR application following the recent developments made. This short report summarises the key findings and comments received from survey respondents and outlines how the EPA intends to address the feedback received.

2. Methodology

The feedback survey consisted of five questions, which included a mix of closed and open-ended questions. In addition, free-text boxes were provided to allow respondents to give more detailed comments and feedback. The survey was anonymous; however, respondents were given the option to include their company name if they wished. It was issued as an online survey (via SurveyMonkey) on 1st June 2021. The survey was issued to a total of 852 licensees (selected quarries and urban waste water treatment plants that come within the scope of PRTR reporting) and remained open for two weeks. A reminder email was issued after one week. Responses were received from 200 licensees, equating to a response rate of 23% (note: respondents were not obliged to answer every question).

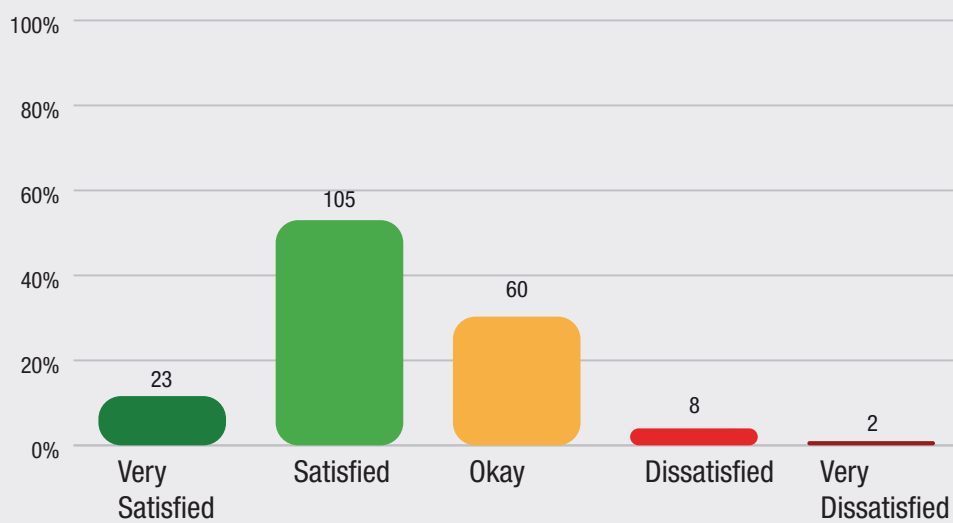


3. Results

The responses received to each of the survey questions are summarised in the sections below.

Q1. How would you rate your overall experience of using the EPR application?

Figure 1. Respondents' overall experience of using the EPR application.

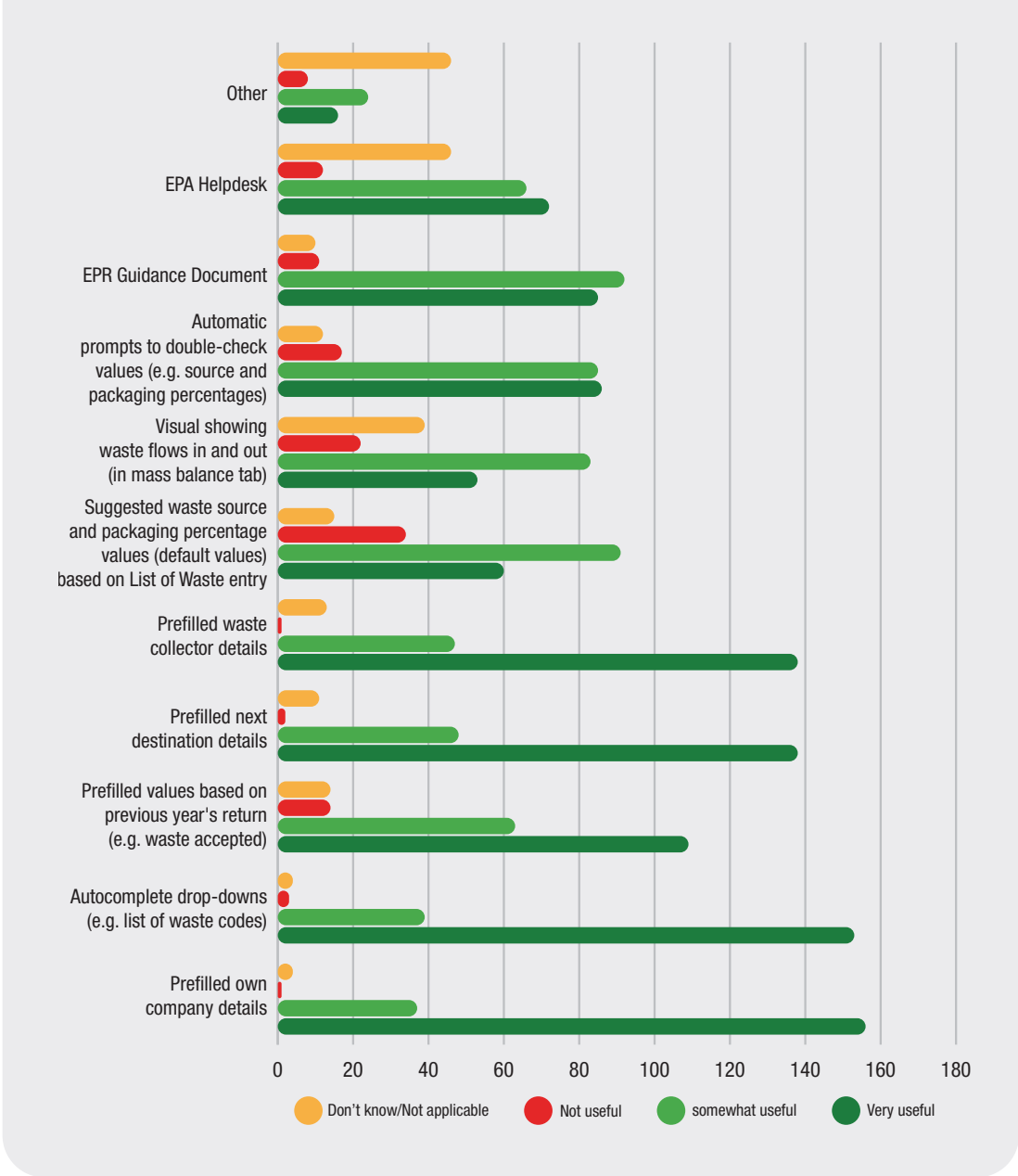


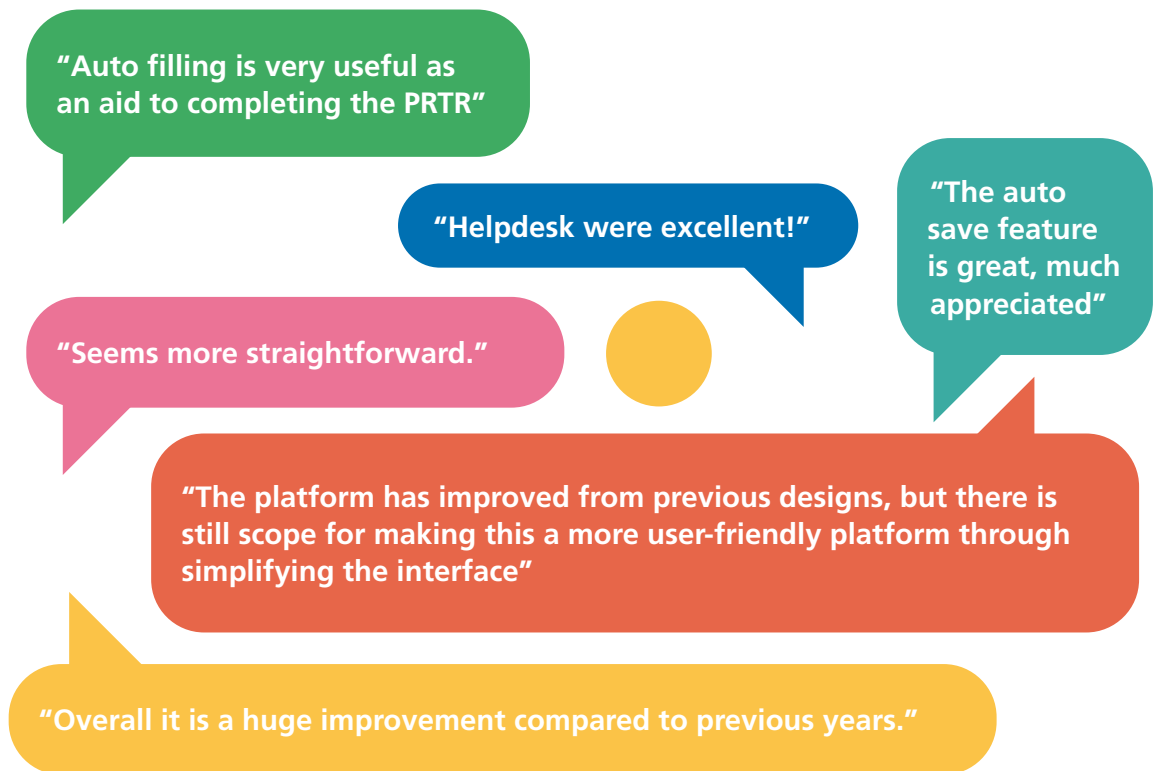
Of the 200 respondents, 198 answered this question and two skipped it. As illustrated in Figure 1, some 65% of respondents said that overall they were satisfied or very satisfied with the experience of using the EPR system, 30% found the application okay and only 5% were dissatisfied or very dissatisfied with their experience. Only 10 respondents reported being dissatisfied or very dissatisfied with the application.

Q2. Which of the following features and supports did you find useful?

This question sought to determine which features of the EPR application were most useful to reporters. As shown in Figure 2, the top two features that respondents found very useful were the prefilled company details and the autocomplete dropdowns. Some features – including the inclusion of suggested waste source and packaging percentage values and the visual showing waste flows – received a mix of responses, with some respondents saying they weren't useful but others finding them useful. Under 'other', some respondents suggested additional features they might like included; these are included under Q3 below detailing the improvements reporters would like to see made to the EPR application. How the EPA intends to address these are suggestions for improvements is outlined in Section 4. Next Steps.

Figure 2. Respondents' feedback on the usefulness of various different EPR features and supports





The top five positive comments received from respondents in the free text fields included the following:

- 6 respondents noted how much the application has improved and how user friendly it is, relative to previous experiences of submitting returns to the EPA.
- 3 respondents stated that the system is straight-forward to use
- 3 respondents reported being happy with the auto save feature
- 3 respondents reported being happy with the EPA helpdesk
- 2 respondents reported being happy with the autofill feature.

The negative comments received from respondents in free text responses centred on seven main areas:

- The most common difficulty that licensees reported was with the user interface and navigating through the system. This issue was raised 11 times, with users reporting issues around navigating between tabs, finding the options they needed in drop-down lists, and struggling to navigate the EDEN portal in general.
- Nine of the licensees who responded to the survey stated that the EPR online form takes too long to complete.
- Linked to this was the time taken for the system to load. Four licensees stated that they needed excellent broadband in order to complete the EPR form.
- Three respondents were unhappy with the level of communication, commenting that the guidance document was issued too late and that the majority of communications from the EPA were received on Friday evenings.
- Two respondents were unhappy with having to differentiate between next and final destinations for waste transfers. Some respondents reported having difficulty in getting this information from third-party waste companies.
- Two respondents were unhappy that some information requested did not apply to their facility but these sections of the form still needed to be completed, in particular percentages of food and packaging waste.
- Finally, two respondents reported experiencing a loss of data while completing the form (note: this was subsequently found to be user error).

How the EPA intends to address the issues raised by respondents is outlined in Section 4. Next Steps.

"System is very slow so inputting data takes longer than usual"

"The completed guidance document was issued too late"

"It should not be the responsibility of the licence holder to know where a third party brings, disposes or treats waste"

"Navigating between tabs can be very cumbersome and take a long time"

"Very time intensive providing estimates of food waste and packaging waste for every single waste stream"

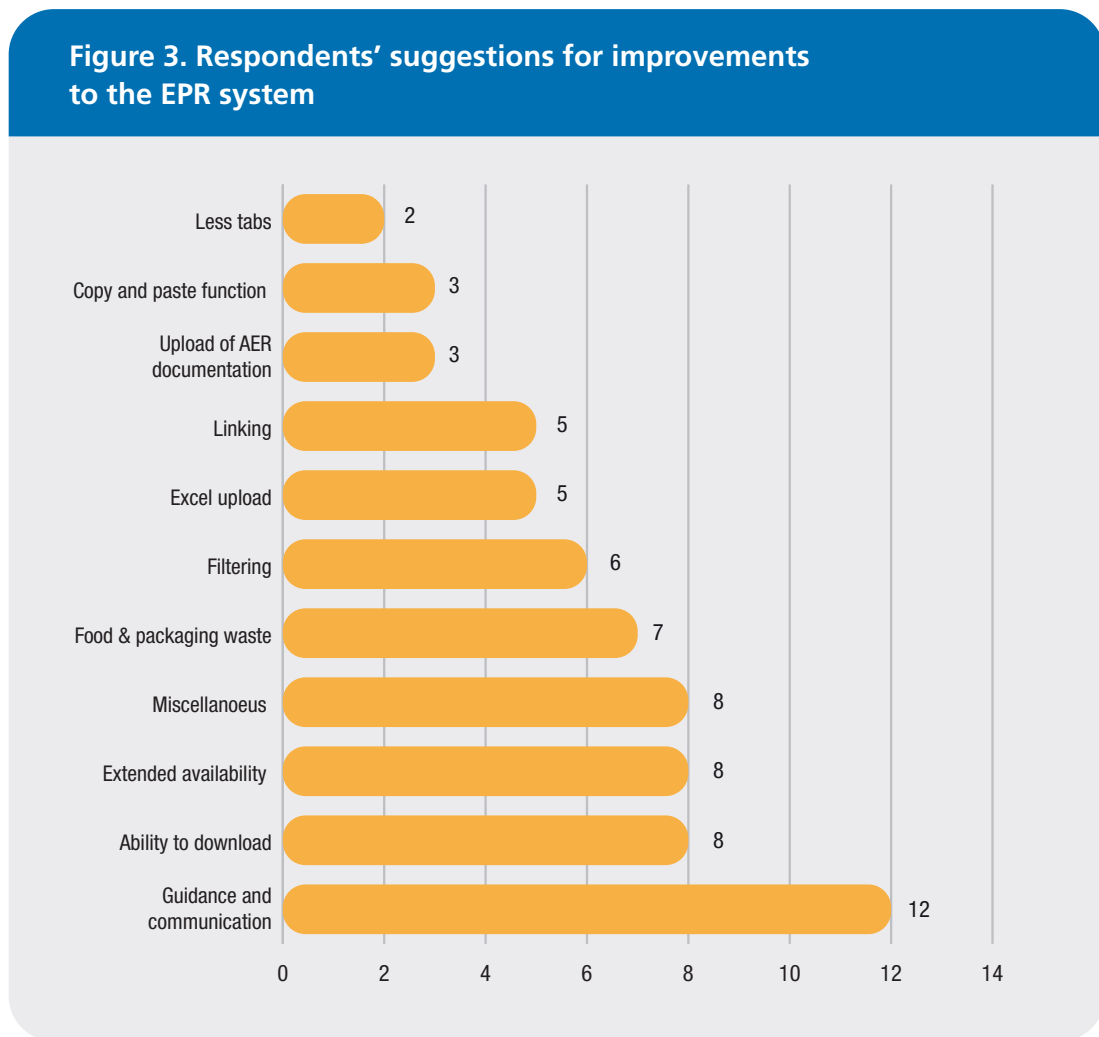
"The linking was laborious but could be tidied up a bit."



Q.3 What changes or new features or supports would you like to see to improve the EPR application.

Respondents provided a number of suggestions on how they would like to see the EPR application improved and changes they would like to see made to make it less time consuming and more user friendly. These are summarised in Figure 5 and the subsequent sections below.

How the EPA intends to address the suggestions made is outlined in Section 4. Next Steps.



Guidance and communication

The biggest improvement that 12 survey respondents would like to see is in relation to the guidance received to aid in users' understanding of the application. This included suggestions for: detailed foot notes, short video explanations, worked examples in the guidance document and more clarification on the level of detail needed. Two respondents also reported that they were unsure of where to go in the event of needing help and that the helpdesk should be publicised more.

Ability to download

A key feature that eight survey respondents wanted to see is the facility to download an Excel or pdf version of their completed report that they could then print off. This would make it easier for facilities to cross check data and ensure it was fully correct before submission. (note: this feature was in fact available in 2021, as outlined in Section 4).

Timeframe for completion

Eight survey respondents would like the EPA to extend the timeframe for completing the EPR return. A number of respondents commented that they have to complete reports for several sites and would like the application to be made available earlier in the year so that they are under less time pressure. They suggested that an opening date in January is essential and that all systems changes should be notified before February.

Food and packaging waste

The need to provide information on food and packaging waste percentages was raised as an issue by seven respondents and also came up in other parts of the survey. Respondents would prefer if these fields were not mandatory to complete, as these breakdowns are not applicable for certain List of Waste Codes and waste streams. One respondent suggested that some logic is put behind certain List of Waste Codes so that a percentage did not have to be entered where it was not relevant.

Filtering & presentation of data

In terms of the order in which the data are presented, six licensees reported a desire to be able to filter the data by List of Waste Code. Five respondents believe that the linkages across all tabs need to be improved. The issue of linking also came up in some of the more negative comments throughout the survey; survey respondents found the process of linking to be too laborious and time consuming. Users would like improved clarification on what sections need to be linked and a simplified means of creating the links.

Uploading & copying/pasting

When it comes to uploading, five respondents then stated that they would prefer if there was an option to fill out the data in an excel spreadsheet and import the data from that. Three respondents commented that they would like to be able to upload their AER documentation. Three respondents said that when entering data, they would like a copy and paste function and believe that would cut down the time it takes to complete.

Additional comments

Other suggestions made by single respondents included:

- Provide the ability to clearly see relevant haulier details once information is inputted
- Make the application more mobile friendly
- Include full listing of all possible waste companies in Ireland
- Include more options in dropdown menus
- Provide a spell check feature.

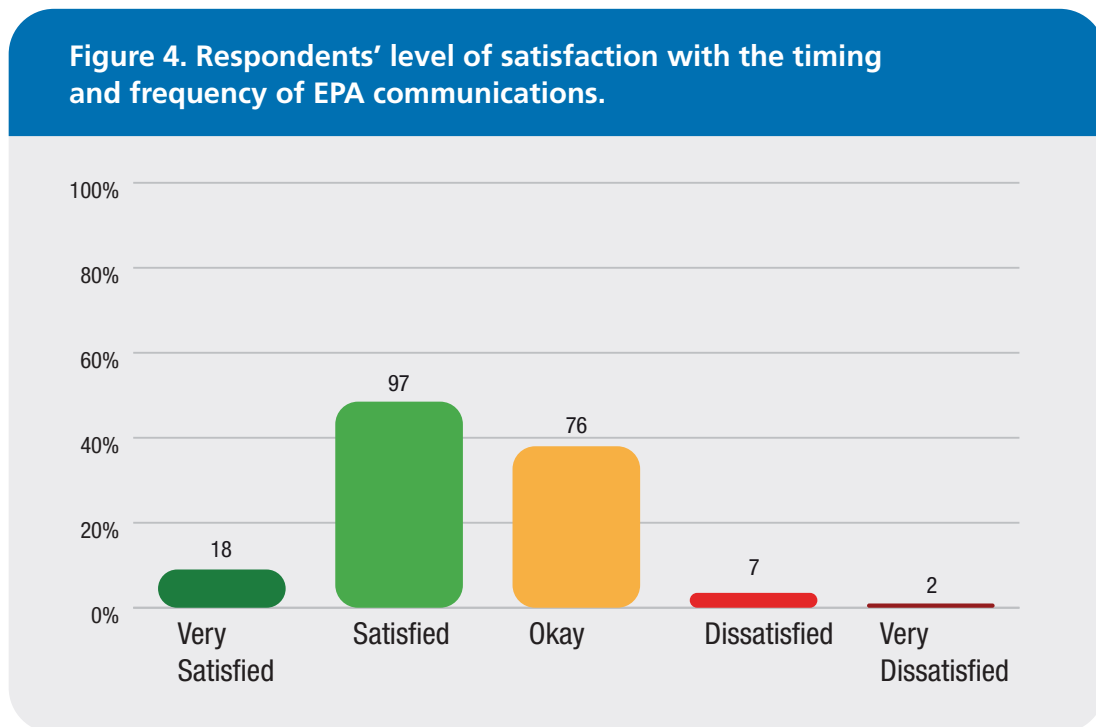
How the EPA intends to address the suggestions made by respondents is outlined in Section 4. Next Steps.

Q4. How did you find the timing and frequency of EPA communications on EPR?

When asked about the frequency and the timing of EPA communications on EPR:

- 115 respondents were satisfied with 18 of these being very satisfied
- 76 respondents said that the timing and frequency was okay,
- nine respondents were dissatisfied with the overall level of communication.

Some 19 free-text comments were left in response to this question, both positive and negative. Several respondents were dissatisfied with the timing of the release of the guidance and with the deadlines. Others were complimentary of the EPA Helpdesk and the support provided. These comments are summarised in the sections above and illustrated in Figures 3 and 4. How the EPA intends to address the feedback received is outlined in Section 4. Next Steps.



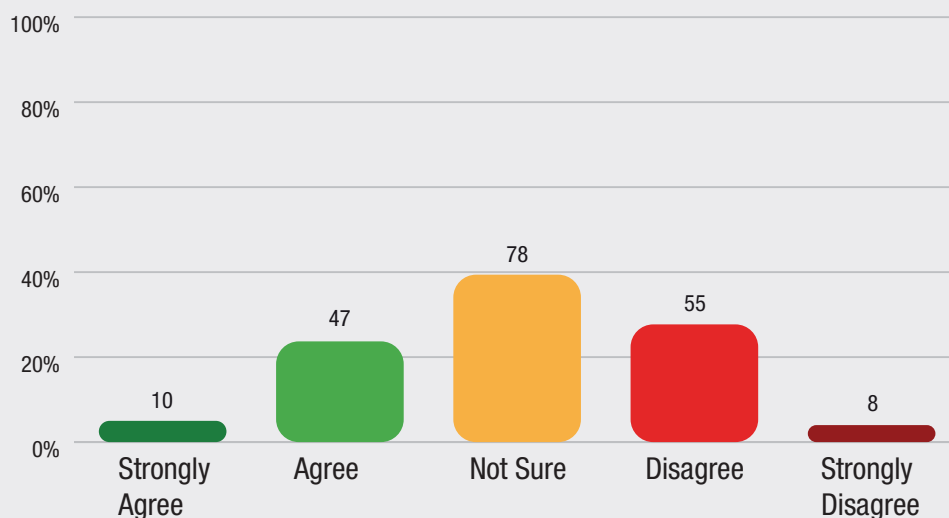
Q5. What is your view on the EPA taking a stronger enforcement approach to late reporters? (The EPA can take enforcement action under licence conditions or if a reporter commits an offence under Regulation 7(9) of the PRTR Regulations (S.I. 649 of 2011)).

This final question asked survey respondents their opinion on the EPA taking a stronger enforcement approach to late reporters. Almost 40% of respondents said that they were unsure and could neither agree nor disagree. The remaining respondents were divided, with 29% agreeing that the EPA should take a stronger enforcement approach and 32% disagreeing. Eight respondents strongly opposed the idea of stronger enforcement action, with five stating that they already have a big workload trying to compile all the necessary data and meet various other reporting requirements.

In the free text comments, some 17 respondents said that the level of enforcement must be case specific, as licensees may have a valid reason for late submission and felt that stronger enforcement should not be taken for once-off late reporting. Two respondents commented that it should depend on how late the submission is. One respondent commented that stronger enforcement should be taken in all cases because the deadlines are clear.

Some respondents suggested alternative approaches to stronger enforcement. Four said that they believe the EPA should communicate more with reporters to build a stronger relationship and help licensees to understand the requirements. Other suggestions made included publicly naming late reporters, giving an incentive for early reporting and making an extension available.

Figure 5. Respondents' views on the EPA taking a stronger enforcement approach to late reporting.



4. Next Steps

The EPA is grateful to all respondents who took the time to complete the feedback survey and provide comments and suggestions. The feedback received is being carefully considered by the EPA and will be used to inform future EPR system improvements and additional supports to further improve the user experience.

A number of the issues identified by respondents have already been addressed and several others are in progress:

- All bugs identified during the first reporting period were investigated and resolved.
- The facility to download an Excel version of the waste data report was already available in 2021 but based on the comments received, it is clear that not all respondents were aware of this feature. Improved instructions will be provided in future.
- Landfill and Brokered waste respondents will now be able to see the relevant haulier details in the main screen.
- All respondents will be able to make edits to the next and final destination details without having to re-enter the whole form for a waste stream.
- The drop-down list of destination facilities will be kept up to date to ensure a full listing of waste facilities in Ireland;
- The auto-populate feature in EPR will ensure that, in future years, less information will need to be inputted by users, reducing the time taken to complete the EPR form.
- An FAQ document has been developed and will accompany the guidance in 2022 which will be available from the time the system opens at the beginning of January going forward. There will be ongoing improvements to the supporting documentation, guidance and tooltips.

Additional features that are being considered for development include:

- The facility to sort and filter the data on the main pages of each tab.
- New tooltips to remind users of different button functionality.
- Landfill and Brokered waste reporters will be able to see tonnages entered from the previous year for any given List of Waste code.
- Further small in-report validation aids.

Reporting timelines was raised as an issue by a number of respondents, with some respondents requesting that the timeframe for completing the EPR return be extended. The late opening of some parts of the EPR online form in Q1 2021 was a once-off occurrence caused by the release of new system developments. In future years, all parts of the EPR online form will be fully available from 1st January each year. The statutory PRTR reporting deadline of March 31st prohibits a later deadline for the EPR form as a whole.

