

# Focus on Local Authority Environmental Enforcement - Performance Report 2022





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## Executive Summary

This report sets out the results of the EPA's assessment of local authority environmental enforcement performance for 2022. This assessment is based on the EPA's Local Authority Performance Framework (LAPF), which measures performance against the delivery of environmental outcomes under National Enforcement Priorities (NEPs).

While the scale of environmental enforcement work carried out by local authorities is significant, in many areas it is not delivering the necessary environmental outcomes such as improved water and air quality and waste segregation.

### Results

The performance of each local authority was assessed against each of the 20 NEPs. Overall, local authorities met the required standard in 59% of the assessments, up from 46% in 2021.

The results show a significant variation across the NEPs and across the 31 local authorities. Most local authorities performed well in some areas but not consistently across all 20 NEPs. Local authorities need to ensure that this vital work is appropriately prioritised and that adequate resources are deployed to deliver their statutory functions in environmental protection.

Ten local authorities achieved the required standard of Strong or Excellent in at least 70% of their NEPs. These were Kildare, Meath, Fingal, Monaghan, Leitrim, Donegal, Cavan, Dublin City, Carlow and Cork County.

Four local authorities achieved the required standard in only 30% or less of their NEPs. These were Waterford, Offaly, Kilkenny and Wexford.

There has been some overall improvement in LAPF scores since 2021, which likely reflects the greater local authority focus driven by the national priorities. However, greater effort is needed to bring all local authorities up to the required standard. Many key environmental indicators remain static or trending in the wrong direction. Local authorities have enforcement responsibilities to drive change in each of these key environmental indicators.

### Waste Enforcement

Overall, the best performing waste enforcement priority area was combatting illegal waste activities, leading to the detection and cessation of large-scale unauthorised waste collection and dumping operations across the country. In contrast, household and commercial waste management was the poorest performing area. Poor waste segregation remains an ongoing problem with households and businesses still putting the majority of their waste in the wrong bin. Local authorities need to enforce the roll-out and use of 3-bin systems, to improve segregation and increase recycling of both household and commercial waste. Urgent action is needed if we are to move to a circular economy and close the wide gap to the national municipal recycling target.

### Water Enforcement

Local authorities generally completed their water monitoring programmes, providing up to date information on water quality. Overall, water quality is not good enough, with just

over half of rivers, lakes, estuaries and coastal waters in satisfactory condition. Agriculture continues to have a significant impact on water quality, causing excess levels of nutrients (nitrogen and phosphorus) to enter our waterways. While the number of local authority farm inspections carried out under the Good Agricultural Practice (GAP) Regulations increased nationally in 2022, the number is still too low and local authorities need to further increase the number of farms inspected. The National Agricultural Inspection Programme (NAIP), which commenced in 2022, takes a risk-based approach to inspections. The EPA's *Targeting Agricultural Measures Map* shows local authorities where they should prioritise their inspections to mitigate the specific pollutants of concern. The main areas of non-compliance are the management of soiled water, slurry and fertilisers. Increased focus is needed to ensure they are used effectively without undue loss of nutrients to our waterways.

### Air Enforcement

Air quality in Ireland is generally good and met the standards in the Cleaner Air for Europe (CAFE) Directive, but did not meet the health-based World Health Organisation (WHO) guidelines in 2022. There are concerning localised issues relating to fine particulate matter and nitrogen dioxide which impact negatively on people's health. More than 1,300 premature deaths per year in Ireland are due to air pollution<sup>1</sup>. Ireland's ambition as set out in the Clean Air Strategy is to move towards the WHO Air Quality guidelines. This will be challenging but will have a significantly positive impact on health.

Local authorities made good progress in implementing the new Solid Fuel Regulations introduced in October 2022. However, sustained focus is required to ensure that only approved solid fuels are available for sale, to

reduce air pollution from the combustion of solid fuels for home heating.

### Noise Enforcement

Noise is the lowest performing enforcement priority across the framework. Most local authorities struggle to implement their own Noise Action Plans developed under the Environmental Noise Regulations. The European Commission's Zero Pollution Action Plan sets a target of reducing the negative impacts of exposure to transport noise by 30% by 2030. Local authorities need to allocate adequate resources and collaborate with other bodies to prioritise and mitigate excessive noise exposure, particularly transport noise, and should also designate quiet areas in cities for people's health and wellbeing.

### Actions Required by Local Authorities

The report highlights areas where further action is required by local authorities including:

- Prioritise and resource environmental functions to deliver the national enforcement priorities.
- Increase the number of risk-based farm inspections and follow up enforcement to reduce the impact of agricultural activities on water quality.
- Target enforcement to improve the segregation and recycling of household and commercial waste and to increase material reuse and recovery.
- Ensure that only approved solid fuels are available for sale, to reduce air pollution from the combustion of solid fuels for home heating.
- Better implement Noise Action Plans to reduce people's exposure to transport noise and to designate quiet areas in cities for people's health and wellbeing.

Achievement of these goals will require strong leadership within the local authorities.

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<sup>1</sup> [Health impacts of air pollution in Europe, 2022 — European Environment Agency \(europa.eu\)](https://european-council.europa.eu/media/e3000000/1/press-19-2022-0001-01-en.pdf)

# 1. Introduction

The Environmental Protection Agency (EPA) has a supervisory role in relation to the performance by local authorities of their statutory environmental protection duties. Since 2014, the EPA has been measuring and reporting on local authority environmental enforcement performance using the EPA’s Local Authority Performance Framework (LAPF). This framework was substantially updated in 2021. 2022 is the first year of assessment under the three-year cycle 2022-2024.

Local authority performance is evaluated against the National Enforcement Priorities (NEPs), which are focused on achieving environmental outcomes. The NEPs fall under four themes: Governance Processes, Waste, Water, Air & Noise. There are 20 NEPs in total with five in each of the four thematic areas as detailed in Figure 1.

The assessment framework is focussed on achieving environmental outcomes rather than just reporting on the level of enforcement activity submitted through the Recommended Minimum Criteria for Environmental Inspection (RMCEI) data. Each NEP varies in nature and scope. The objectives, outcomes and focus for each NEP is outlined in Appendix IV.

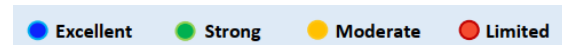
<b>Governance Processes:</b> <ul style="list-style-type: none"> <li>• RMCEI Plan: Planning for the NEPs</li> <li>• RMCEI Plan: Environmental Resource Planning</li> <li>• RMCEI Plan: Environmental Outcomes</li> <li>• RMCEI: Review and Reporting</li> <li>• Environmental Complaint Handling</li> </ul>	<b>Water:</b> <ul style="list-style-type: none"> <li>• Pressures from Agriculture (Farm Yards) - slurry/soiled water collection and storage</li> <li>• Pressures from Agriculture (Farmland) - slurry and fertiliser spreading</li> <li>• DWWTS/Septic Tanks</li> <li>• Discharge Licences/ Misconnections</li> <li>• Local Priorities and Water Quality Monitoring</li> </ul>
<b>Waste:</b> <ul style="list-style-type: none"> <li>• Tackling Illegal Waste Activities and Multi-Agency Sites of Concern</li> <li>• Construction and Demolition Waste</li> <li>• End-of-Life Vehicles and Metals</li> <li>• Household and Commercial Waste</li> <li>• Producer Responsibility Initiatives and additional local priorities</li> </ul>	<b>Air &amp; Noise:</b> <ul style="list-style-type: none"> <li>• Solid Fuel</li> <li>• Air Quality Monitoring and Data Use</li> <li>• Environmental Noise Directive (ENDs)</li> <li>• Air and Noise Controls (including Planning)</li> <li>• Ongoing Air and Noise Enforcement Work</li> </ul>

Figure 1: National Enforcement Priorities (NEPs) 2022

Local authorities are required to submit NEP Progress Reports for all relevant NEPs. These reports are designed to allow local authorities demonstrate how their enforcement activities deliver environmental outcomes for waste management, water and air quality.

Each NEP is assessed against a set of specified criteria including compliance rates, appropriate site selection, identification and follow through of non-compliance/unauthorised activities and the demonstration of a positive environmental outcome.

Each NEP is scored according to a four-point scale:



The objective is that all local authorities should be performing at or above the Strong level across all NEPs by the end of the three-year cycle 2022-2024.

Further information on the LAPF assessment process is available in Appendices I and IV.

This report outlines the results for 2022 and:

- documents the environmental enforcement performance of 31 local authorities;
- outlines trends in performance of national enforcement priorities;
- highlights key national enforcement priorities that require more focus; and
- highlights actions for improvement at a national level.

## 2. Overview of Local Authority Performance Scores for 2022

### General Findings

There was strong engagement by local authorities in the assessment framework with 28 local authorities completing NEP Progress Reports within the requested timeframe. Significant efforts were made to report the details of inspections, follow-up actions and results. The scale of local authority environmental inspection and enforcement work is significant and is growing each year.

While this report focuses primarily on environmental outcomes it is worth noting that the overall number of inspections decreased by 4% to 197,300 compared to the 2021 reporting period. This is likely explained by a decrease in reactive inspections due to a 14% reduction in the number of complaints received in 2022. The level of inspection and enforcement activities remain high in waste enforcement, with lower levels in water, air & noise enforcement (see Appendix III for an overview of activities). A high portion of resources are applied to dealing with almost 70,000 complaints, most of these relate to litter and waste.

In total, over 520 local authority staff were engaged in environmental enforcement activities nationally spread across waste (64%); water (26%) and air/noise/other (10%).

In 2022, local authorities began using the new National Environmental Management Information System (NEMIS) to submit their annual RMCEI data returns. This online system has improved the efficiency and consistency of reporting.

NEMIS is being further developed to feature a complaints handling system, which will improve the efficiency of complaint handling, along with the planning and implementation of environmental enforcement activities.

The results from the assessment framework are outlined below. They are summarised by each National Enforcement Priority (Figure 3) and by the performance of each local authority (Figure 4).

### National Enforcement Priority Results

The performance of each local authority was assessed against each of the 20 NEPs for activities undertaken in 2022. The 20 NEPs vary in nature and scope, and some are not applicable to certain local authorities<sup>2</sup>. Each NEP was assessed for the 31 local authorities, resulting in a total of 620 individual assessments. More than half (59%) of the assessments achieved the required standard of Strong or Excellent (see Figure 2). The comparable figure for 2021 was 46%.

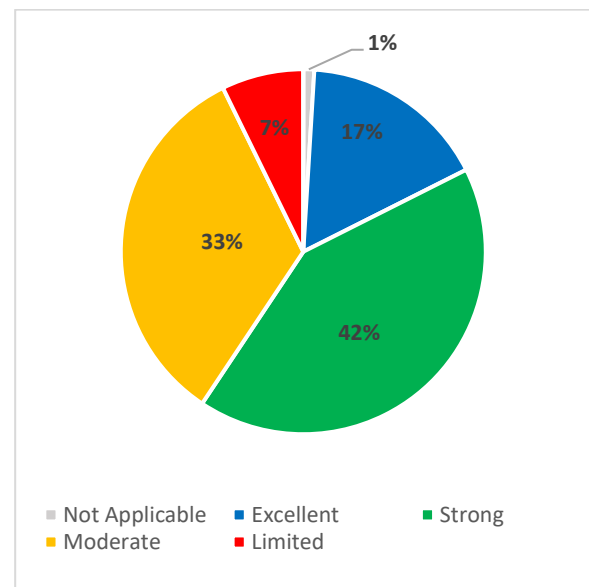


Figure 2: Performance Scores for Local Authorities 2022 (n=620)

<sup>2</sup> Some NEPs did not apply to certain local authorities, e.g. the water NEPs on Agriculture were not applicable to Dublin City Council or Galway City Council, the Septic Tanks NEP was not applicable to Dublin City Council and the End of Life Vehicles NEP was not applicable to Dun Laoghaire Rathdown County Council.



Grade		Waste	Water	Air & Noise	Governance Processes
Required Standard	Excellent	5% (4%)	12% (8%)	15% (6%)	35% (32%)
Required Standard	Strong	49% (36%)	42% (32%)	36% (34%)	41% (35%)
Below Required Standard	Moderate	43% (48%)	35% (44%)	36% (46%)	19% (23%)
Below Required Standard	Limited	3% (12%)	8% (16%)	13% (14%)	5% (10%)

Table 1: 2022 NEP performance scores achieved in the four areas (2021 result shown in brackets)

As shown in Table 1, the allocation of scores differed slightly between the three environmental thematic areas of waste, water, air & noise. The percentage of assessments meeting the required standard were waste; 54%, water; 54%, air & noise; 51%. This is an improvement from 2021 where the required standard was achieved across 40% of the relevant NEPs under each of the these thematic areas.

Under governance processes, 76% of the NEPs achieved the required standard. The higher scores achieved in this area are likely to be because the processes to support governance have been in place since 2006 when the RMCEI planning, reviewing and reporting commenced.

Overall, the results highlight the challenges for local authorities in achieving positive outcomes across multiple areas. Waste has the highest proportion of results in the Moderate and Strong categories demonstrating some level of local authority activity across the five waste NEPs. In contrast, the higher proportion of Excellent and Limited results in the water, air & noise NEPs indicates that local authorities prioritised certain work areas at the expense of other priority areas.

The 2022 NEP assessment results for the 31 local authorities are shown by NEP in Figure 3 and by local authority in Figure 4. Only one local authority, Kildare County Council, achieved the required standard across all 20 NEPs.

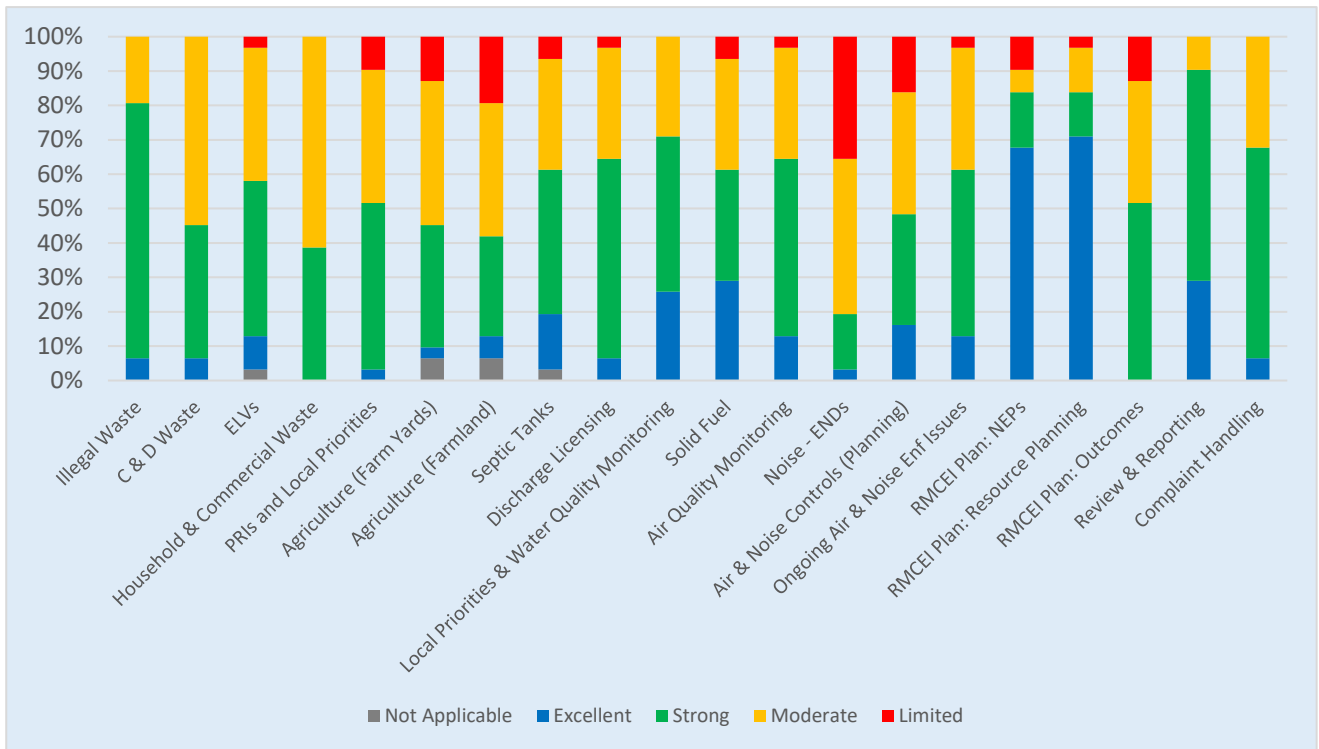


Figure 3: 2022 National Enforcement Priority Results

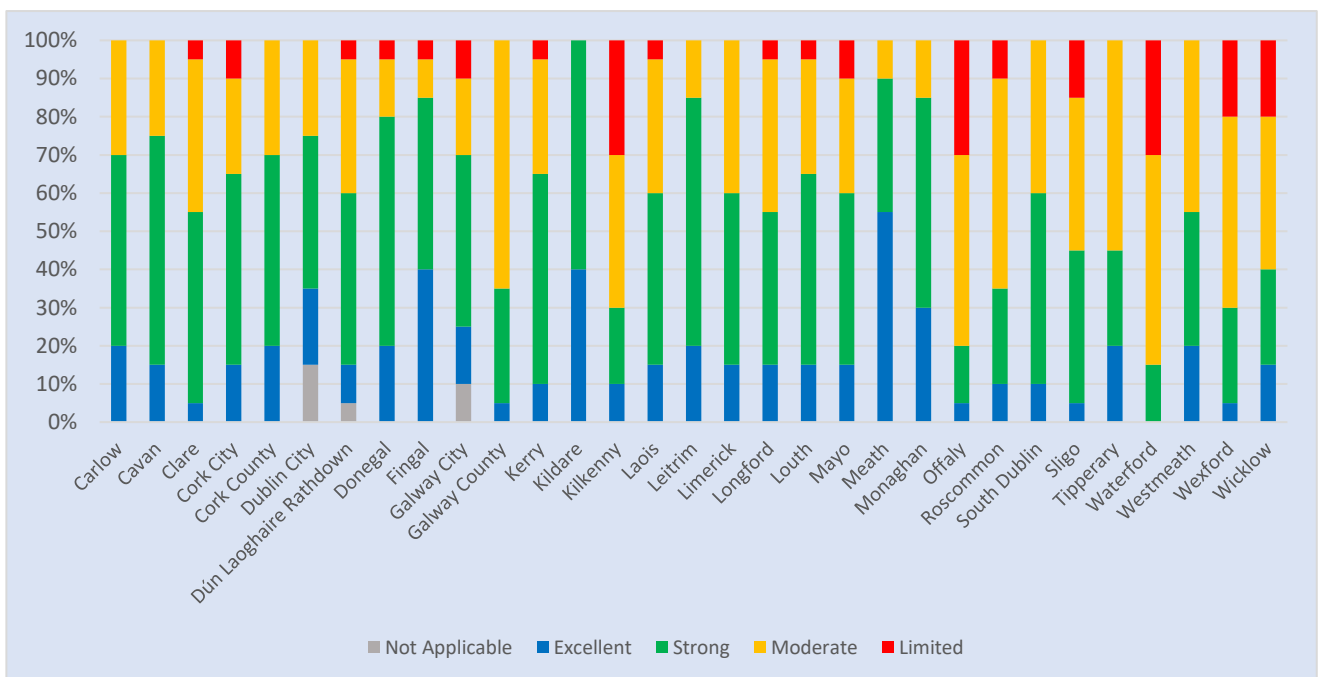


Figure 4: 2022 Performance Scores for each Local Authority

## Individual Local Authority Performance Scores

In 2022, 10 local authorities achieved the required standard of Strong or Excellent in 70% or more of the NEPs. These were Kildare, Meath, Fingal, Monaghan, Leitrim, Donegal, Cavan, Dublin City, Carlow and Cork County (see Figure 4).

Four local authorities achieved the required standard in only 30% or less of their NEPs. These were Waterford, Offaly, Kilkenny and Wexford.

Further information on the performance of local authorities under each of the thematic areas are provided in the following sections of this report. Details of performance results by individual local authority are also available on the EPA website<sup>3</sup>.

## Audits of Local Authority Performance

Following the introduction of the revised local authority performance framework, the EPA commenced a programme of audits of local authorities in 2023. These audits focussed on assessing progress against the National Enforcement Priorities and offered advice and support to help improve statutory performance, if required. The audits were carried out in accordance with Section 63(2) of the Environmental Protection Agency Acts 1992 and 2003.

Eleven local authorities were audited between March and October 2023; Clare, Dublin City, Galway County, Kildare, Kilkenny, Louth, Mayo, Offaly, Roscommon, Waterford and Wexford. The audits identified the measures needed to improve performance under each of the NEPs and to better demonstrate the activities undertaken. It was evident from both the audits and the NEP progress reports that

environmental protection is still not being adequately prioritised and resourced in many local authorities.

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<sup>3</sup> *Local Authority Environmental Enforcement Individual Local Authority Performance Results 2022* is available on the EPA website.

### 3. Waste Enforcement

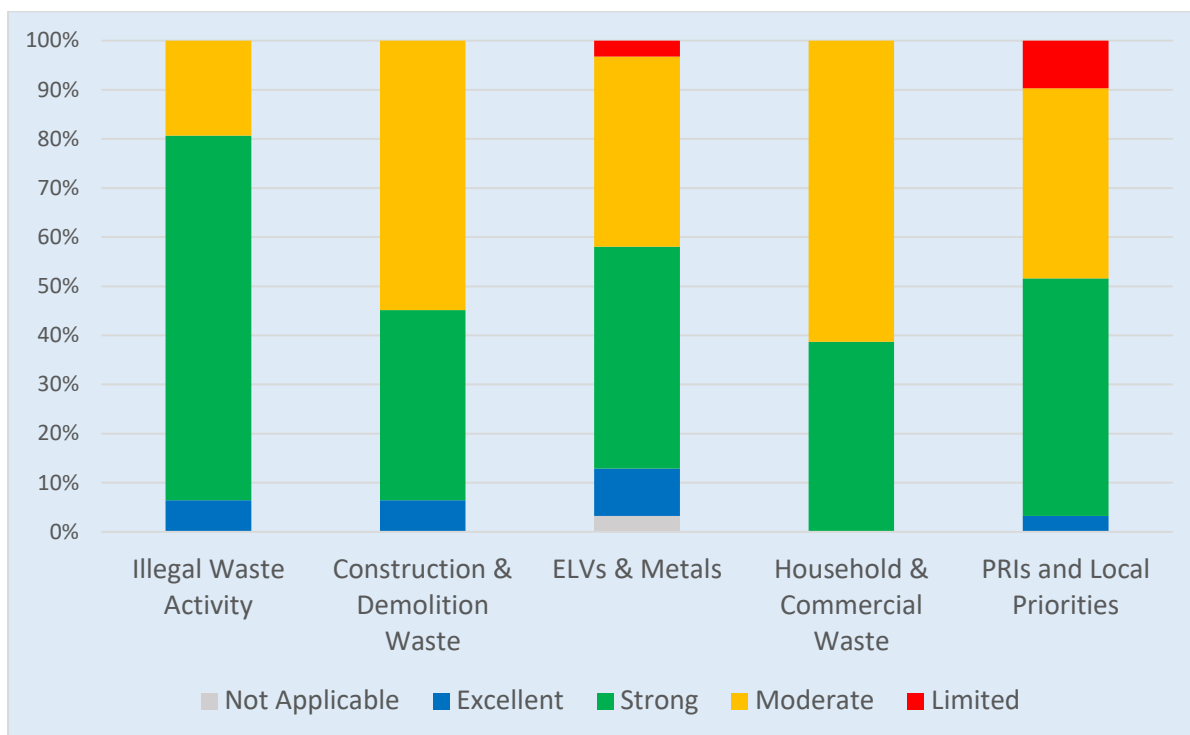


Figure 5: Waste NEP Results

Poor waste segregation remains an ongoing problem with households and businesses still putting the majority of their waste in the wrong bin. Urgent action is needed if Ireland is to move to a circular economy and close the wide gap to the national municipal recycling target<sup>4</sup>. The latest national municipal waste characterisation study found that over two thirds of waste in the general household and commercial bins should have been placed in the recycling and organic waste bins.

Waste and litter enforcement continues to have the highest level of dedicated resources within local authorities with 64% of enforcement staff assigned to this area in 2022. This area also received 90% (approximately 62,000) of the environmental complaints. Almost 70% (approximately 135,000) of the reported 2022 environmental inspections were related to waste and litter enforcement. The inspections are divided across authorised and unauthorised activities.

93% (580) of the environmental prosecutions were initiated in the waste sector (excluding litter).<sup>5</sup>

#### Results

A breakdown of the waste NEP results is presented in Figure 5 and Figure 6, and in Appendix II. The key findings are:

- Five local authorities achieved the required standard of Strong or Excellent across all five waste NEPs. These were Mayo, Meath and for the second consecutive year, Fingal, Kildare and Leitrim.
- Three local authorities failed to meet the required standard in any of the five waste NEPs. These were Roscommon, Wicklow and for the second consecutive year, Offaly.

<sup>4</sup> The 2020 municipal waste recycling rate in Ireland was 41%. The EU recycling targets are 55% in 2025, 60% in 2030 and 65% in 2035.

<sup>5</sup> Appendix III provides an Overview of the Local Authority Activity Trends as reported through the RMCEI data.

- The ELVs and metal NEP was considered not applicable in Dún Laoghaire-Rathdown as they had no authorised facilities in their functional area in 2022.
- The results indicate that local authorities are spreading their waste enforcement resources across all 5 waste NEPs. However, the proportion achieving Excellent is low at 5%. This indicates that while all waste NEPs are being addressed, the full range of activities under each NEP are not being fully actioned.
- Waste segregation and the enforcement of waste acceptance procedures was a common issue spanning a number of NEPs. Effective waste segregation is critical to driving materials reuse and to achieving the desired circular economy outcomes.
- **Tackling Illegal Waste Activities and Multi-Agency Sites of Concern:** This priority relates to the detection and cessation of unauthorised waste collection and dumping activities and the remediation of polluted sites. Reactive work in response to unauthorised waste activities achieved the strongest performance score for the waste NEPs, with 80% of local authorities achieving the required standard, a significant increase from 55% in 2021. This activity involved proactive identification of illegal waste activities, which may be a factor in the 15% reduction in waste complaints observed in 2022. This reduction may also be linked to the removal of COVID-19 restrictions, as a noticeable increase in complaints was observed during the height of the pandemic in 2020.
- **Construction & Demolition (C&D) Waste:** The quantity of C&D waste generated and collected in Ireland increased to 9 million tonnes in 2021, from 8.2 million tonnes in 2020. This priority relates to the effective and authorised management, movement and disposal of C&D waste. Performance improved to 45%, an increase from 26% in 2021. C&D waste is a very broad enforcement area and many local authorities only demonstrated activity in some aspects of the sector. A common issue was the lack of detail on the waste cradle-to-grave analysis. For instance, enforcement action at the construction sites was demonstrated but there was a lack of detail on data validation and inspection of Waste Collection Permits and Waste Facility Permits.
- **End-of-Life Vehicles (ELVs) & Metal Waste:** This priority requires that all relevant ELV facilities are authorised and maintain a high level of compliance for the acceptance, classification, segregation, recycling and disposal of ELVs. Performance improved to 57%, up from 32% in 2021. Inspections at Authorised Treatment Facilities (ATFs) for ELV sites are being carried out. Local authorities must demonstrate that high value waste streams, including metal waste, are being managed through authorised facilities. Data validation of Waste Collection Permits and Waste Facility Permits needs to be improved to identify and address anomalies in the area.
- **Waste Collection - Household & Commercial Waste:** The objective of this NEP is to maximise the segregation and recycling of municipal waste by householders and businesses. This priority area is the lowest performing waste NEP at 39%, compared to 32% in 2021. Similar to C&D waste, this is a broad enforcement area and many local authorities only demonstrated activity in some aspects of the sector, often with only enforcement activity in the household waste sector or the commercial waste sector being fully demonstrated.

Inspections must be carried out at the source (correct use of the 3-bin system at households and commercial premises), at the collectors (segregated roll-out and collection by authorised hauliers) and at the authorised waste facilities to ensure that segregation and accurate classification of this waste is maximised. Improved separation at source by householders and businesses is needed to collect higher quantities of recyclable packaging materials. In 2021, 69% of Irish households who had a kerbside bin collection service had a brown bin (this includes households who share a bin). A large proportion of Ireland's food waste continues to be disposed of in mixed waste bins. The mandatory separate collection of biowaste<sup>6</sup> from 2023 requires focused enforcement of the national roll-out and use of the 3-bin system.

- **Producer Responsibility Initiatives (PRI) and Local Priorities:** This NEP requires the enforcement of all operators subject to producer responsibility obligations. The local priorities reported by local authorities vary from local litter and waste management programmes, seasonal waste initiatives and diesel laundering waste enforcement. Overall performance reduced marginally to 52% in 2022, down from 55% in 2021. Local authorities failed to consistently demonstrate that enforcement actions were taken against suspected producers, to promote registration and compliance under the various PRI schemes. Local authorities reported that the PRI area was the most impacted by staff resource issues, resulting in failure to complete the planned activities. This area must not be neglected as the local authority responsibilities will soon expand with the implementation of the Single Use Plastic Directive and the Deposit Return Scheme to increase recycling of drinks bottles and cans.

#### **Waste - Actions Required by Local Authorities:**

- Focused enforcement of the roll-out and use of the 3-bin system to improve segregation and increase recycling of household and commercial waste.
- Improved enforcement of the construction and municipal waste sectors at all stages of the waste cycle (source, collector and facility).
- Focused enforcement of producer responsibility initiatives including new initiatives such as the Single Use Plastic Directive and the Deposit Return Scheme.

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<sup>6</sup> All households require separate organic waste collection from the end of 2023, under the revised EU Waste Framework Directive.

## Waste NEPs

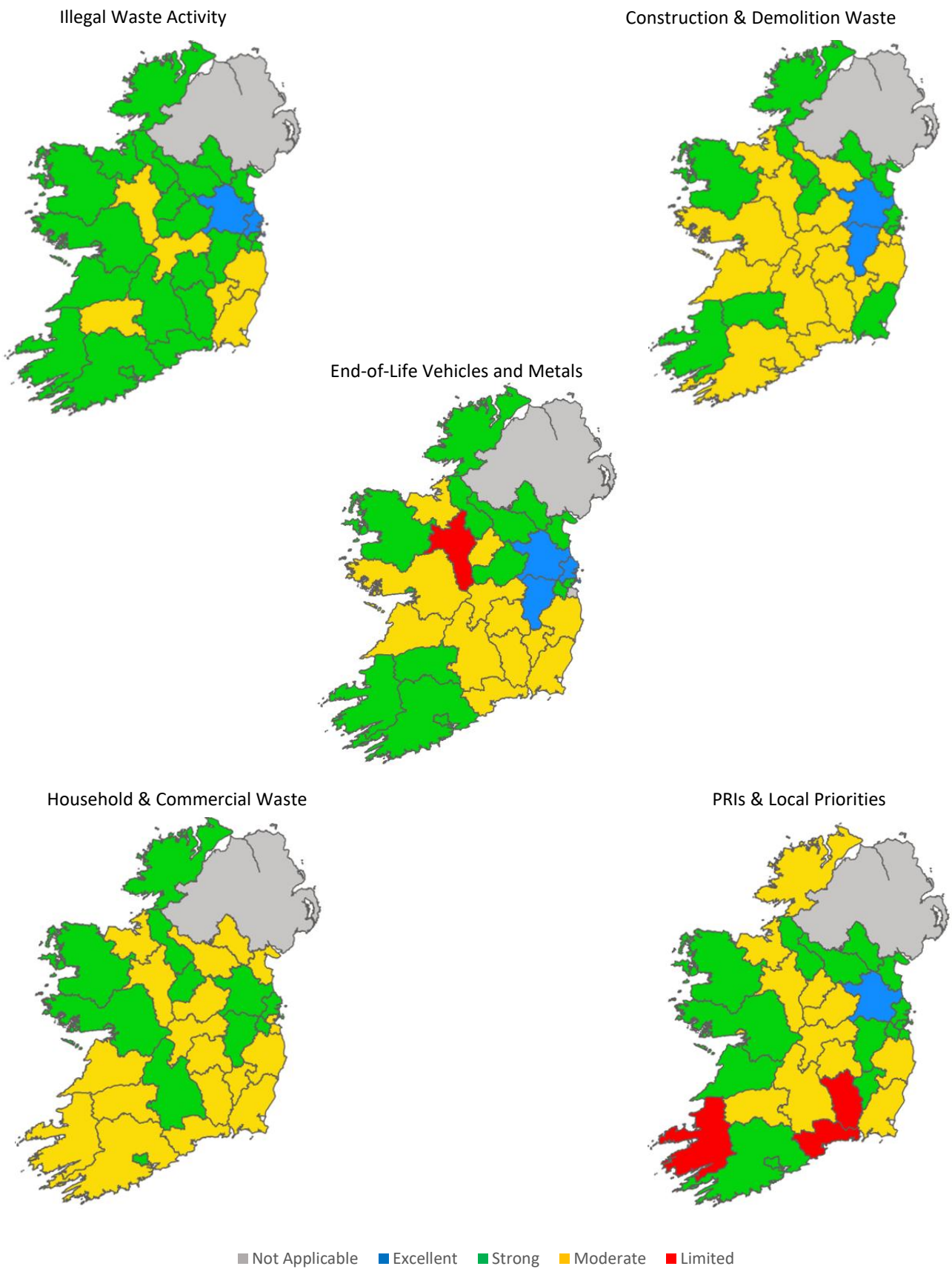


Figure 6: Waste NEP Results by Local Authority

## 4. Water Enforcement

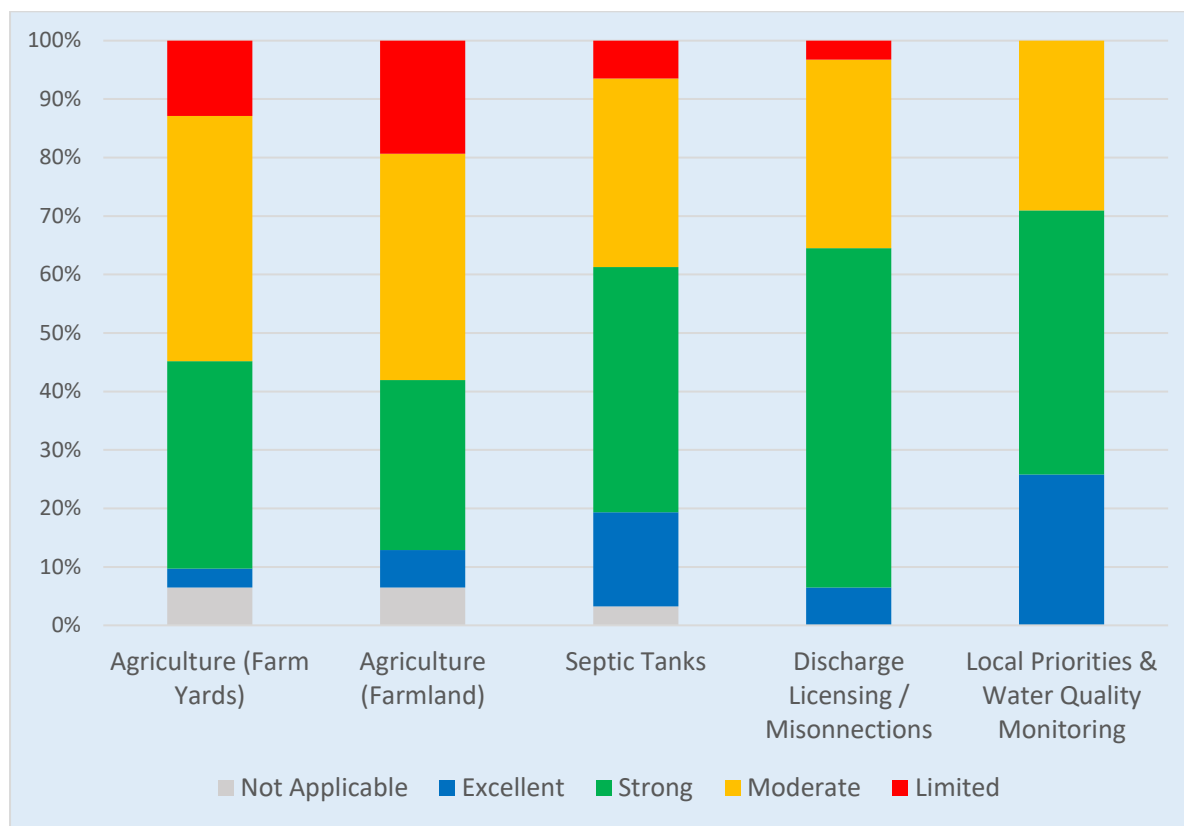


Figure 7: National Water NEP Results

Overall, water quality in Ireland is not good enough, with just over half of rivers, lakes, estuaries and coastal waters in satisfactory condition. Local authority inspection and enforcement activity is low, with 26% of environmental staff assigned to water monitoring and enforcement in 2022. Nationally, water inspections represent 21% of the environmental inspections undertaken by local authorities. Over 41,000 water related inspections were undertaken by local authorities during 2022. The number of water complaints received by local authorities decreased by 22% to 2,800 in 2022<sup>7</sup>.

Agriculture has been identified as a significant pressure in over 1,000 waterbodies. Nitrogen levels, mainly from fertilisers and manures, were too high in 40% of rivers and 20% of estuaries in 2022. Phosphorus levels, mainly

from agricultural runoff and wastewater discharges, are generally stable but are still too high in many rivers and lakes. In 2022, the number of local authority farm inspections carried out under the GAP Regulations increased to over 2,200 inspections of 1,600 farms. However, this number is still too low and local authorities need to further increase the number of farms inspected. The NAIP, which commenced in 2022, sets out a risk-based approach to the targeting of inspections using the EPA's *Targeting Agricultural Measures Map*. The main areas of non-compliance are the management of soiled water, slurry and fertilisers, which need an increased focus to ensure they are used effectively without undue loss of nutrients to our waterways.

<sup>7</sup> Appendix III provides an Overview of the Local Authority Activity Trends as reported through the RMCEI data.



## Results

A breakdown of the water NEP results is presented in Figure 7 and Figure 8, and in Appendix II. The key findings are:

- Four local authorities achieved the required standard in all five Water NEPs. These were Carlow, Fingal, Kildare and Meath. Dublin City also achieved the required standard in the Water NEPs, however only two of the five NEPs apply in their case. Five local authorities achieved the required standard in four of the water NEPs. These were Cavan, Donegal, Leitrim, Louth and Monaghan.
- Two local authorities failed to meet the required standard in each of the five water NEPs. These were Kilkenny and Waterford.
- For two urban local authorities, some of the water NEPs were not considered applicable for the reporting year, e.g. the agriculture NEPs were not applicable to Dublin City or Galway City, and the septic tanks NEP was not applicable to Dublin City.
- **Pressures from Agriculture (Farm Yards):** Local Authorities inspect farms under the GAP Regulations. Surface waters and groundwaters continue to be under pressure from nitrogen and phosphorus from agricultural activities. 41% of local authorities achieved the required standard for this NEP.

Overall, the total number of agricultural inspections increased by 22% compared to 2021. Most of these inspections were undertaken in the farmyard areas. Local authorities need to further increase the number of farms inspected annually to drive compliance with the GAP Regulations. Inspections must be risk-based and targeted at specific pollutants of concern (phosphorus, nitrogen and

organics), using the EPA's *Pollution Impact Potential (PIP) Maps* and EPA's *Targeting Agriculture Measures Map*. Under the NAIP, more data is being collected on compliance levels, issues detected, follow up actions and effectiveness of measures. The NAIP will bring a consistent approach across the country and greater awareness of the GAP Regulations requirements aimed at improving water quality.

- **Pressures from Agriculture (Farmland):** Inspection and surveillance activity by local authorities in farmland areas was notably low in 2022. 38% of local authorities achieved the required standard for this NEP. Local authorities need to increase the level of inspections on farmlands to monitor that there is no spreading of soiled water, slurry or fertiliser in the closed season or under unsuitable weather or soil conditions.
- **Domestic Waste Water Treatment Systems / Septic tanks:** Local authorities inspect Domestic Wastewater Treatment Systems (DWWTS) under the National Inspection Plan for DWWTS. 60% of local authorities achieved the required standard in this NEP, up from 55% in 2021.

Strong performance scores were achieved by local authorities carrying out the required number of inspections in the National Inspection Plan and demonstrating compliance promotion and awareness raising activities, such as using local radio, newspapers, social media and exhibition stands at local events. There was better demonstration of such engagement activities by local authorities in 2022, compared to the previous year. Overall, enforcement by local authorities needs to be more consistent. The main issue relates to delays in closing out advisory notices which require householders to fix systems that fail inspection.

- ◆ **Discharge Licensing / Misconnections:** Local authorities inspect compliance with water pollution discharge licences and investigate misconnections impacting on water quality. 65% of local authorities achieved the required standard in this NEP, which represents a significant increase from 33% in 2021.

Overall there was better demonstration of activity under this NEP in 2022. Misconnections was a new focus, and some local authorities demonstrated a proactive and collaborative approach to tackling misconnections and associated risks to local water quality.

- ◆ **Local Priorities & Water Quality Monitoring:** The statutory monitoring programmes under the Water Framework Directive and Bathing Water Directive were substantially completed by local authorities in 2022, providing up to date information on water quality. There was better demonstration of the use of investigative monitoring and targeting local enforcement efforts to follow up on any local water quality issues. 71% of local authorities achieved the required standard, which represents a significant increase from 39% in 2021.

This NEP also covers private drinking water supplies. Local authorities are responsible for ensuring private water supplies meet the requirements of the drinking water regulations through monitoring, investigation and enforcement activities. While some local authorities reported little or no activity in this area, there was an overall increase in the monitoring of registered small private supplies to 84% compared to 75% in 2021. However, the total number of small private supplies remains unknown as not all have registered with their local authority.

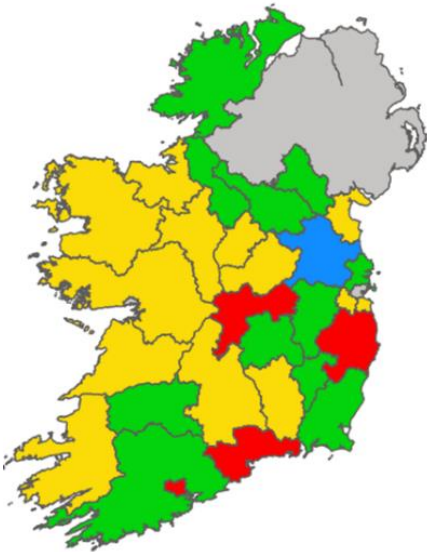
Unauthorised extraction of peat is a significant environmental issue in a small number of local authority areas. There has been very limited enforcement action in relation to the unauthorised extraction of peat. Local authorities need to ensure that where peat extraction is taking place, that it is properly authorised and approved under Planning legislation.

#### **Water - Actions Required by Local Authorities:**

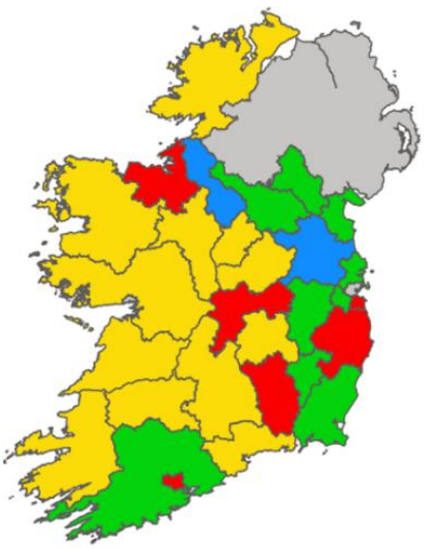
- Increase the number of farm inspections and follow up enforcement in areas of greatest risk to water quality.
- Increase the level of inspection activity on farmlands to monitor that there is no spreading of soiled water, slurry or fertiliser in the closed season or under unsuitable weather or soil conditions.
- Make sure that all private drinking water supplies are registered and monitored. Investigate supplies that fail to meet drinking water quality standards and take necessary enforcement action.
- Increase enforcement actions, including prosecution where warranted, to resolve faulty domestic waste water treatment systems so that the environment and public health is protected.

Water NEPs

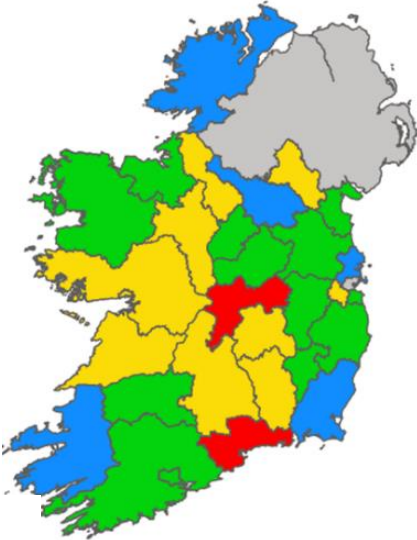
Pressures from Agriculture - Farm Yards



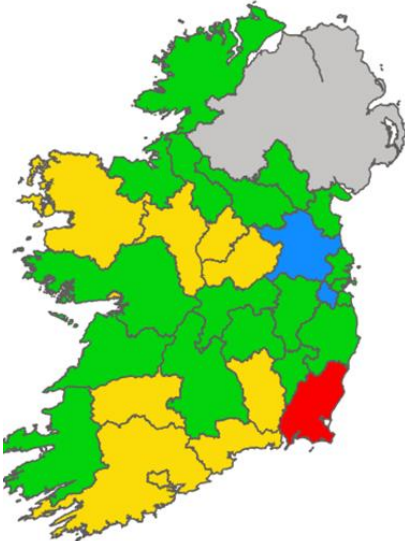
Pressures from Agriculture - Farmland



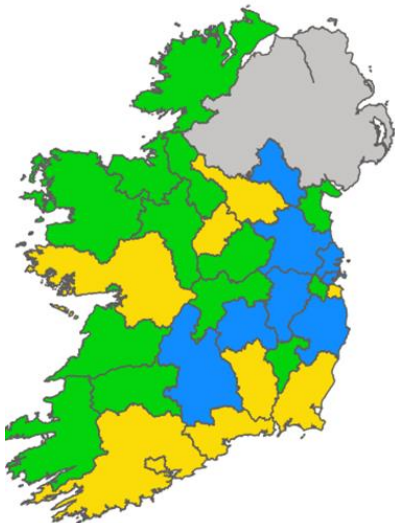
Septic Tanks



Discharge Licences / Misconnections



Local Priorities & Water Quality Monitoring



■ Not Applicable ■ Excellent ■ Strong ■ Moderate ■ Limited

Figure 8: Water NEP Results by Local Authority

## 5. Air and Noise Enforcement

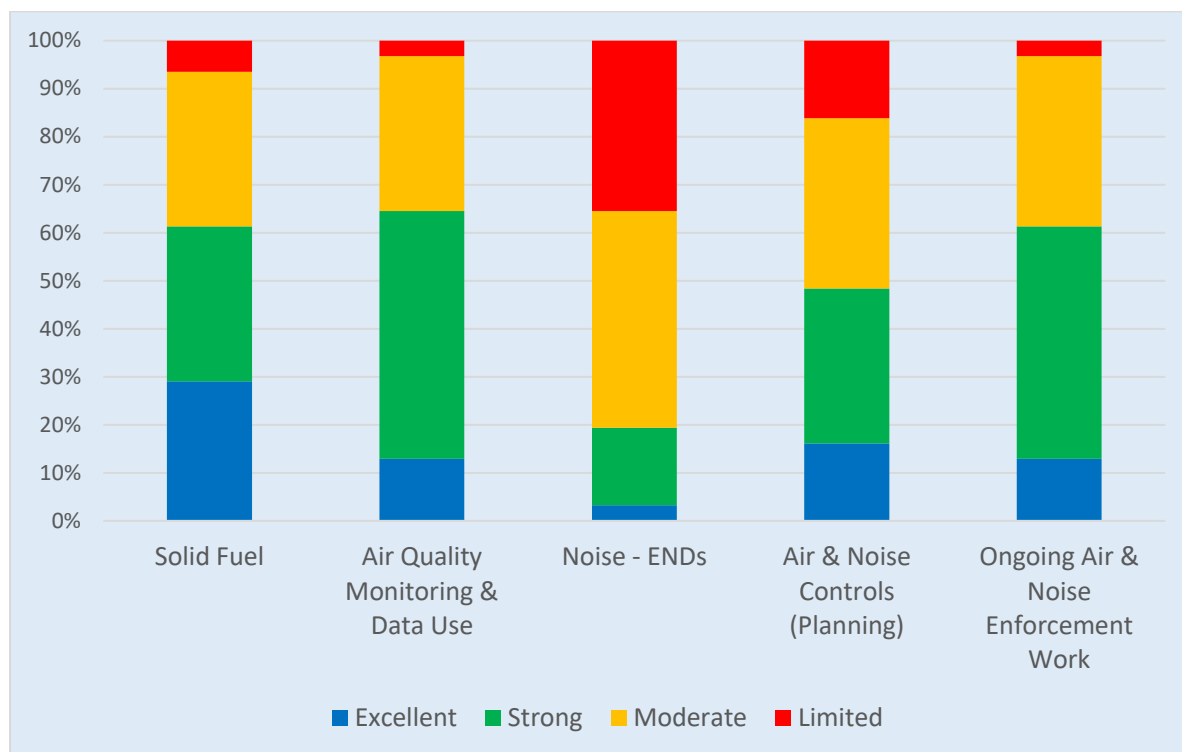


Figure 9: National Air & Noise NEP Results

Air quality in Ireland is generally good and met the standards in the Cleaner Air for Europe (CAFE) Directive, but did not meet the health-based World Health Organisation (WHO) guidelines in 2022. There are concerning localised issues relating to fine particulate matter and nitrogen dioxide which impact negatively on people’s health. More than 1,300 premature deaths per year in Ireland are due to air pollution<sup>8</sup>. Ireland’s ambition in the Clean Air Strategy is to move towards the WHO Air Quality guidelines. This will be challenging but will have a significantly positive impact on health.

Air & noise enforcement have the lowest level of dedicated resources within local authorities with only 10% of staff assigned to this area in 2022. Local authorities carried out 2,270 environmental inspections<sup>9</sup> under the Solid Fuels, Decorative Paints, Petroleum Vapour

and Solvents Regulations, a 20% increase compared to 2021. Air and noise complaints increased by 7%. The nature of the complaints was often related to domestic burning of fuels and waste, dust from construction sites and quarries, odours related to certain agricultural and commercial activities, and noise associated with entertainment and leisure activities, commercial sites and port activities.

### Results

A breakdown of the air and noise NEP results is presented in Figure 9 and Figure 10, and in Appendix II. The key findings are:

- Overall performance has improved in four of the five air & noise NEPs. This reflects both an increased level of inspection by local authorities and better demonstration and reporting of enforcement actions in 2022.

<sup>8</sup> [Health impacts of air pollution in Europe, 2022 — European Environment Agency \(europa.eu\)](https://www.euro.who.int/en/health-topics/air-quality/news-and-events/news/2022/08/health-impacts-of-air-pollution-in-europe-2022)

<sup>9</sup> Appendix III provides an Overview of the Local Authority Activity Trends as reported through the RMCEI data.

- One local authority (Kildare) achieved the required standard of Strong or Excellent across all five air & noise NEPs. Seven local authorities achieved the required standard in four NEPs. These were Cavan, Cork City, Cork County, Kerry, Meath, Monaghan and Westmeath.
- One local authority (Kilkenny) failed to meet the required standard in any of the five air & noise NEPs. Five local authorities failed to meet the required standard in four of the five NEPs. These were Galway County, Louth, Waterford, Wicklow and Wexford.
- **Solid Fuel:** The new Solid Fuel Regulations<sup>10</sup> were introduced in October 2022 to restrict the online and commercial sale of smoky coal, turf and wet wood to protect and improve air quality. The sale and distribution of solid fuels that are not approved under the Regulations is prohibited. 61% of local authorities achieved the required standard in this NEP, an increase from 52% in 2021.

Overall compliance rates of fuel merchants and retailers inspected was very high, indicating a good national awareness of obligations under the Solid Fuel Regulations. However, fuel sulphur sampling results confirmed that a percentage of non-compliant coal products were sold on the Irish market.

Ten local authorities participated in a pilot project on the implementation of the Solid Fuel Regulations, funded by the Department of Environment, Climate & Communications. This funding allowed local authorities to raise awareness, monitor local air quality and test solid fuels offered for sale in the marketplace.

- **Air Quality Monitoring and Data Use:** The EPA Ambient Air Monitoring Programme expansion continued during 2022. Most local authorities assisted with maintenance and

calibration of air monitoring stations to ensure availability of accurate real-time air quality data.

This NEP had the strongest performance across the air & noise NEPs. 65% of local authorities achieved the required standard compared to 52% in 2021. Most local authority websites provided public access to real-time air quality data via link to the EPA Air Quality Index for Health<sup>11</sup>. 18 local authorities reviewed the air quality data to identify local hotspots, with 8 identifying actions to address the issues. Local authorities should continue to focus on using air quality data to identify priority areas to target enforcement actions and increase public awareness of air quality issues.

- **Environmental Noise Directive (ENDs):** Local authorities have responsibilities under the Environmental Noise Regulations 2018<sup>12</sup>, relating to reducing the harmful effects from exposure to environmental noise. As the preparation of noise mapping was completed prior to 2022, the assessment of performance under this NEP was based solely on information contained in each local authority Noise Action Plan Progress Report. 29 local authorities submitted their Noise Action Plan Progress Reports to the EPA. This demonstrates progress compared to 2021 when only 14 local authorities submitted the report by the required date.

19% of local authorities achieved the required standard in this NEP, compared to 33% in 2021. This is the lowest performing enforcement priority across the framework. Most local authorities struggle to implement their own Noise Action Plans. The European Commission's Zero Pollution Action Plan sets a target of reducing the negative impacts of exposure to transport noise by 30% by 2030. Local authorities need to allocate adequate

<sup>10</sup> Air Pollution Act 1987 (Solid Fuels) Regulations 2022 (S.I. No. 529 of 2022)

<sup>11</sup> <https://airquality.ie>

<sup>12</sup> European Communities (Environmental Noise) Regulations 2018 (S.I. No. 549 of 2018)

resources and collaborate with other bodies to prioritise and mitigate excessive noise exposure, particularly transport noise in urban areas, and should also designate quiet areas in cities for peoples health and wellbeing.

- **Air & Noise Controls (including Planning):** Local authorities assess the potential environmental impacts from air and noise emissions, as part of the planning process. This function is carried out by both the environment and planning sections in local authorities.

48% of local authorities achieved the required standard in this NEP, an increase from 26% in 2021. Most local authorities outlined the screening and referral process between the planning and environment sections. However, local authorities need to demonstrate specific examples of air and noise impacts of certain industries causing local problems and the enforcement activities undertaken to tackle the issues, along with outcomes from any monitoring and enforcement activities carried out post-planning to ensure compliance with conditions and emission limit values.

- **Ongoing Air & Noise Enforcement Work:** The objective of this NEP is to ensure appropriate controls are in place to minimise or prevent air and noise emissions that may be harmful to the environment or to people’s health. Local authorities inspect compliance under the Solvents, Decorative Paints, Petroleum Vapours Regulations, and sites licensed under the Air Pollution Act. They also investigate air and noise incidents or complaints reported by the public.

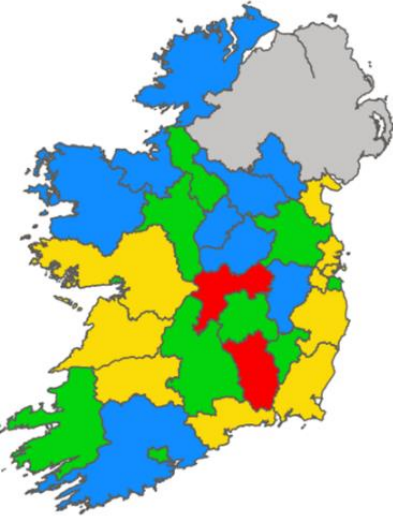
61% of local authorities achieved the required standard in this NEP, a significant increase from 39% in 2021. Lower performance scores were attributed to low inspection activity and lack of details on overall compliance levels and related enforcement actions and outcomes. 18 local authorities keep up-to-date registers under the Solvents and Deco Paints Regulations. Activities related to the identification and targeting of unauthorised operators increased in 2022 but continued effort in this area is needed.

**Air & Noise - Actions Required by Local Authorities:**

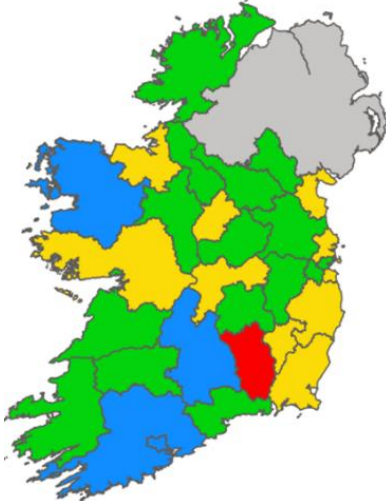
- Target inspections of solid fuel retailers and non-compliant fuel products under the Solid Fuel Regulations.
- Take action, including awareness raising, to address localised air pollution issues.
- Better focus on the implementation of Noise Action Plans and reporting on progress.
- Identify and target unauthorised operators under the Solvents, Decorative Paints and Petroleum Vapour Regulations.

Air & Noise NEPs

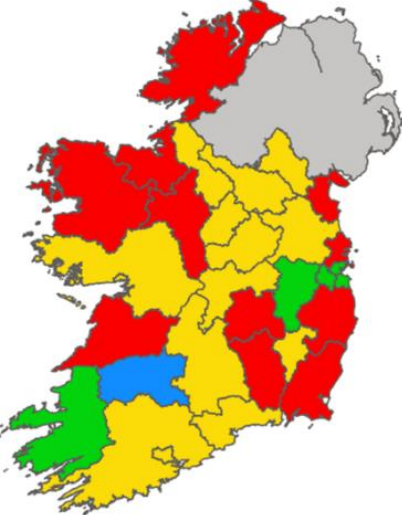
Solid Fuels



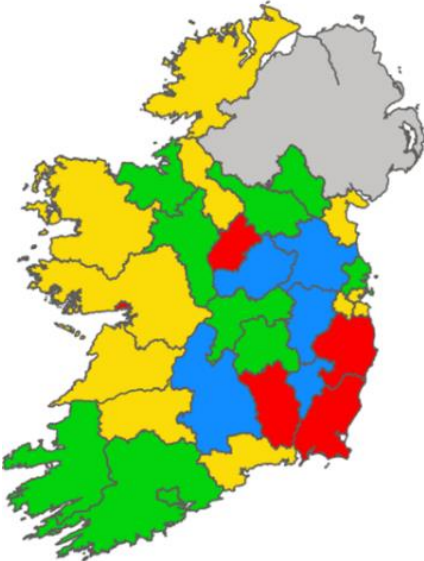
Air Quality Monitoring & Data Use



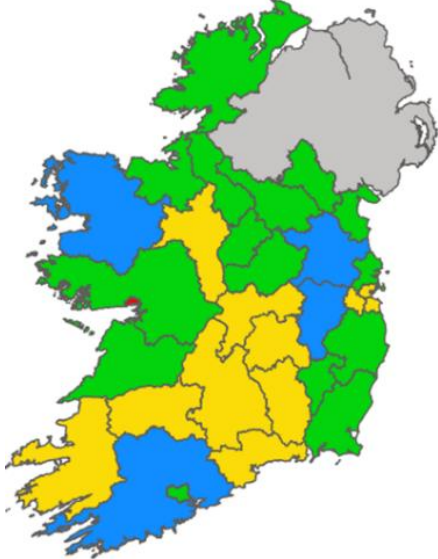
Environmental Noise Directive



Air & Noise Controls (including Planning)



Ongoing Air & Noise Enforcement Work



■ Not Applicable ■ Excellent ■ Strong ■ Moderate ■ Limited

Figure 10: Air & Noise NEP Results by Local Authority

## 6. Governance Processes

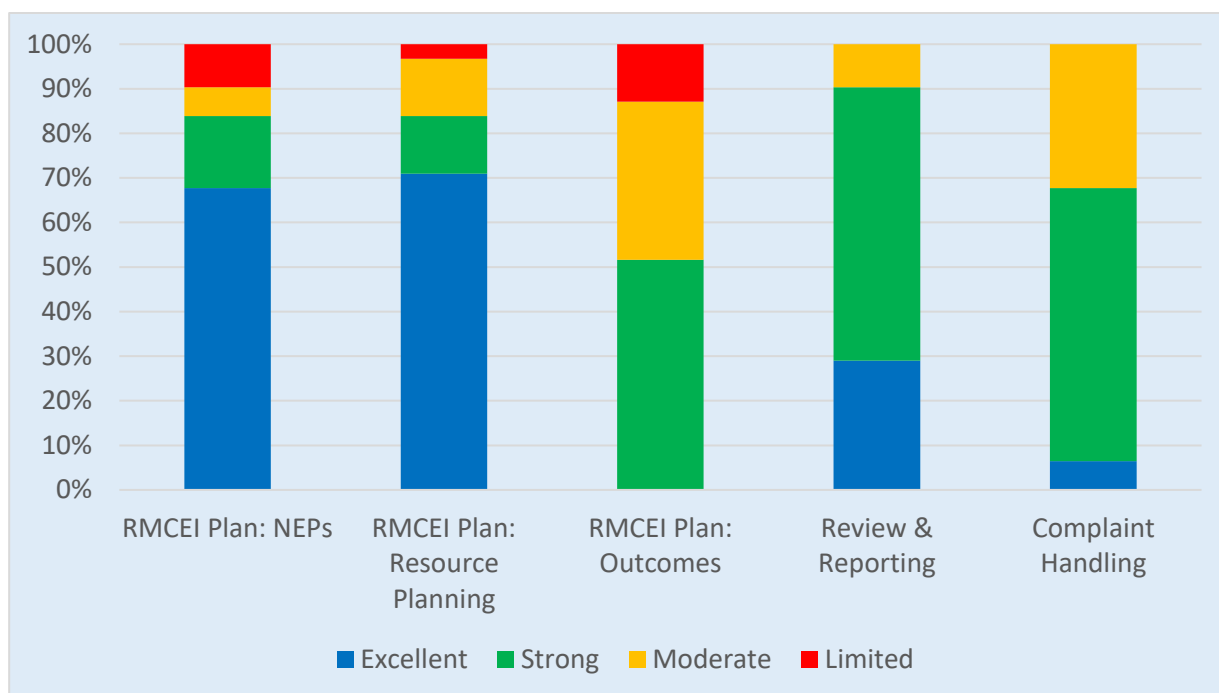


Figure 11: Governance Process NEP Results

Since 2006, local authorities have developed annual enforcement plans (RMCEI Plans) to improve the organisation and effectiveness of environmental inspections and enforcement. The governance process NEPs focus on the environmental enforcement processes and systems reported through the annual RMCEI Plan. The governance process NEPs do not reflect the effectiveness of the environmental enforcement activities, which are assessed under the relevant waste, water, air & noise NEPs. According to the 2022 RMCEI data, over 520 environmental enforcement staff across the 31 local authorities carried out over 197,000 environmental inspections and received almost 70,000 environmental complaints<sup>13</sup>.

### Results

A breakdown of the governance process NEP results is presented in Figure 11 and Figure 12, and in Appendix II. The key findings are:

- 14 local authorities achieved the required standard across all five NEPs. This represents an increase from 6 local authorities in 2021.
- Three local authorities failed to meet the required standard in four of the five NEPs. These were Offaly, Waterford and Wexford. Waterford was the only local authority that did not submit an RMCEI Plan for the 2022 reporting period.
- Governance processes achieved stronger scores than the NEPs for waste, water, air & noise, with 76% of the NEPs achieving the required standard, up from 67% in 2021. This is most likely due to the established reporting structures and templates in place for RMCEI planning, review and reporting by the local authorities and the advice and supports provided to local authorities via the NIECE<sup>14</sup> network.

<sup>13</sup> Appendix III provides an Overview of the Local Authority Activity Trends as reported through the RMCEI data.

<sup>14</sup> Network for Ireland's Environmental Compliance and Enforcement



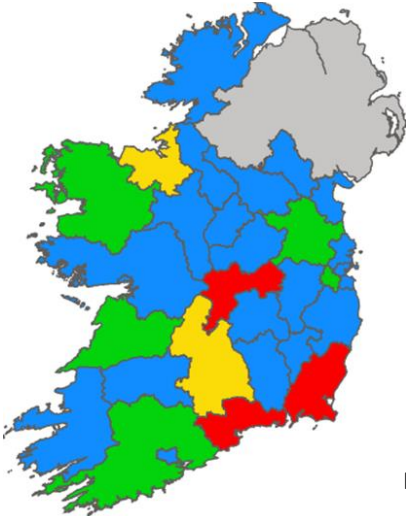
- **RMCEI Plan: Planning for NEPs.** This priority relates to planning for the delivery of NEPs through the RMCEI process. 84% of local authorities achieved the required standard, up from 77% in 2021. This indicates that the NEPs were widely integrated into enforcement planning in 2022.
- **RMCEI Plan: Environmental Resource Planning.** This priority relates to resource planning at the start of the year. 84% of local authorities achieved the required standard, up from 77% in 2021. This demonstrates that planned resources were well structured to achieve targets and objectives. It should be noted, however, this NEP does not address the delivery of those targets and objectives.
- **RMCEI Plan: Environmental Outcomes.** Local authorities are responsible for clearly outlining measurable environmental outcomes in the RMCEI Plan. This is the lowest scoring of the governance process NEPs with 52% of local authorities achieving the required standard, up from 29% in 2021. No local authorities achieved an Excellent result, while the following four local authorities achieved a Limited result; Mayo, Offaly, Sligo and Waterford. Overall local authorities' RMCEI Plans need to better define environmental outcomes that are targeted and quantifiable across all the thematic areas. Without clear outcomes, it is difficult to measure progress.
- **RMCEI Review & Reporting.** This priority relates to the periodic review mechanism to check the implementation of the RMCEI Plan during the reporting year. 90% of local authorities achieved the required standard, by demonstrating that RMCEI plan review processes are in place. This is an increase from 81% in 2021. Sufficient input is required by senior management into the review of RMCEI plans throughout the year. This is to cater for revisions to the work plan and to align available staff resources to planned activities.
- **Environmental Complaints Handling.** Local authorities received almost 70,000 environmental complaints in 2022, a 14% reduction since 2021. The processes and systems for handling and resolution of complaints are a key aspect of environmental governance, as complaints are the main source for detecting illegal activity. Significant resources are required to deal with complaints.  
  
68% of local authorities achieved the required standard in this NEP, a decrease from 71% in 2021. Local authorities must ensure that complaints are investigated in a timely manner and that complaints open from previous years are progressed. Many local authorities rely on older complaint ICT systems, making it difficult to handle complaints efficiently. The Local Government Management Agency (LGMA) are in the process of rolling out a complaints module in NEMIS. It is expected that this will support more efficient complaint handling by local authorities.

#### **Governance Processes - Actions Required by Local Authorities:**

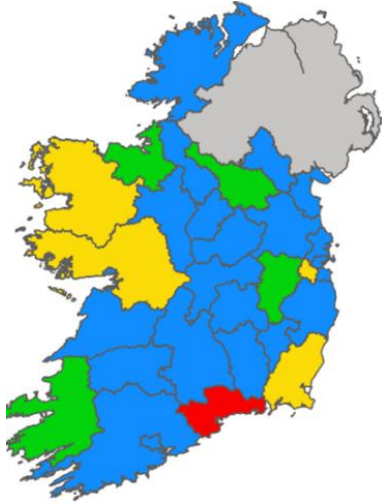
- Provide strong leadership on the delivery of environmental outcomes.
- Ensure that environmental complaints are investigated in a timely manner and open complaints from previous years are progressed and brought to conclusion.

Governance Process NEPs

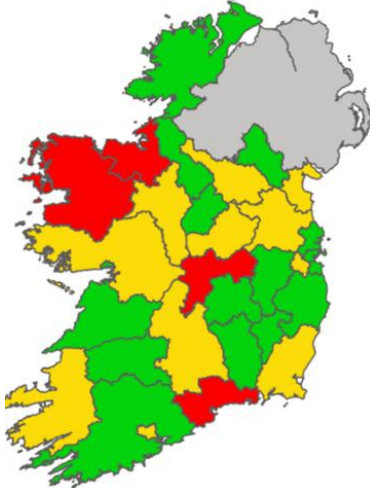
RMCEI Plan: Planning for NEPs



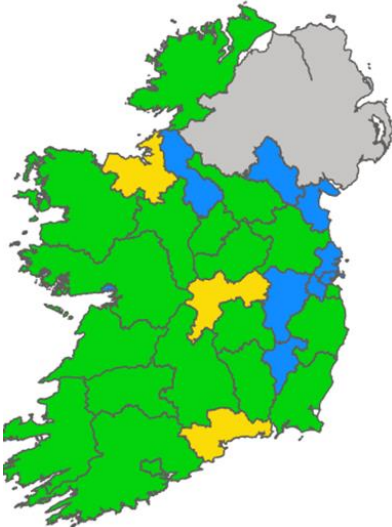
RMCEI Plan: Environmental Resource Planning



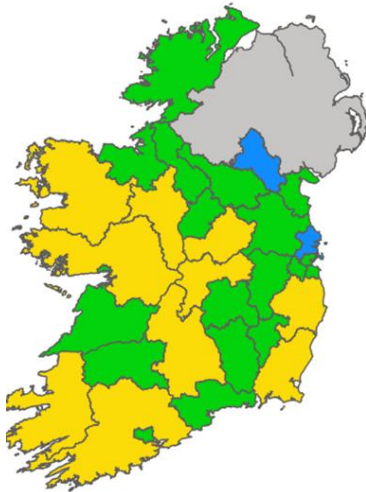
RMCEI Plan: Environmental Outcomes



RMCEI Review & Reporting



Environmental Complaint Handling



■ Not Applicable ■ Excellent ■ Strong ■ Moderate ■ Limited

Figure 12: Governance Process NEP Results by Local Authority

## Appendix I - Local Authority Performance Framework Process

The Local Authority Performance Framework (LAPF) evaluates the performance of local authorities in progressing the National Enforcement Priorities (NEPs) designed to achieve national environmental outcomes. The NEPs for Local Authorities and the associated key activities are proposed and discussed with all relevant parties on an annual basis. For waste, approval is given by the National Waste Enforcement Steering Committee and for water and air/noise, approval is given by the NIECE<sup>15</sup> Steering Committee. Each priority has an agreed objective and a specified outcome to be achieved over a three-year cycle, with the first three year cycle of the revised framework running from 2022-2024. Although the priorities remain unchanged during each cycle, the focus of the activities associated with each priority can be revised on an annual basis.

There are 20 NEPs in total, with five NEPs in each of the areas of waste, water, air & noise, and governance processes. The EPA's assessment of local authority performance is based on the information and data contained in the Recommended Minimum Criteria for Environmental Inspections (RMCEI) Plans, RMCEI Data Returns and NEP Progress Reports which are submitted to the EPA annually. EPA and third-party intelligence is also considered in the assessments.

The NEP assessment criteria are outlined in the Table 2 below.

NEP Assessment Criteria		
<b>A</b>	<b>For authorised sites, a compliance rate</b> documented and compared over the previous years, and analysed or explained;	<b>CORE</b>
<b>B</b>	Demonstrate appropriate <b>site selection</b> methodology and inspection implementation and/or early interventions;	
<b>C</b>	Demonstration <b>that non-compliances/unauthorised activities</b> are being detected and are being followed up – and some progress in the NEP is shown.	
<b>D</b>	Clear example of a positive <b>environmental outcome</b> – something was achieved to improve the environment (not simply reached a target of inspections);	
<b>E</b>	Clear <b>useful learning in a NEP area</b> (positive or negative e.g. what to do, or what not to do, or identification of illegal sites or unauthorised operators);	<b>Complementary</b>
<b>F</b>	<b>Collaborative work</b> with WERLA, NTFSO, RWMPO, LAWPRO, EPA, Catchment Care Projects, inter-departmental within the local authority or with other local authorities; cross cutting NEP collaboration.	
<b>G</b>	Demonstration of a <b>proactive approach</b> , or <b>innovation</b> in dealing with a problem or demonstration of an <b>enforcement curiosity</b> .	
<b>H</b>	<b>Compliance promotion and awareness</b> raising activities;	
<b>I</b>	Activities on <b>data validation, data analysis, systems development, website development</b> ;	
<b>J</b>	<b>Significant enforcement actions/prosecutions</b> and the outcomes such as remediation, sharing of lessons learnt to aid national consistency of enforcement;	
<b>K</b>	<b>Case studies written up and shared</b> that encompass any of the above properties.	

Table 2: NEP Assessment Criteria

The results along with detailed recommendations for areas of improvement, if required, are sent to each local authority. Local authorities should review the recommendations and make any necessary changes to the planning and implementation of their environmental protection functions.

<sup>15</sup> The Network for Ireland's Environmental Compliance and Enforcement, NIECE, is a network of organisations and individuals involved in the enforcement of environmental legislation, environmental engagement and promotion.

An overview of the 2022 LAPF process is presented in Figure 13.

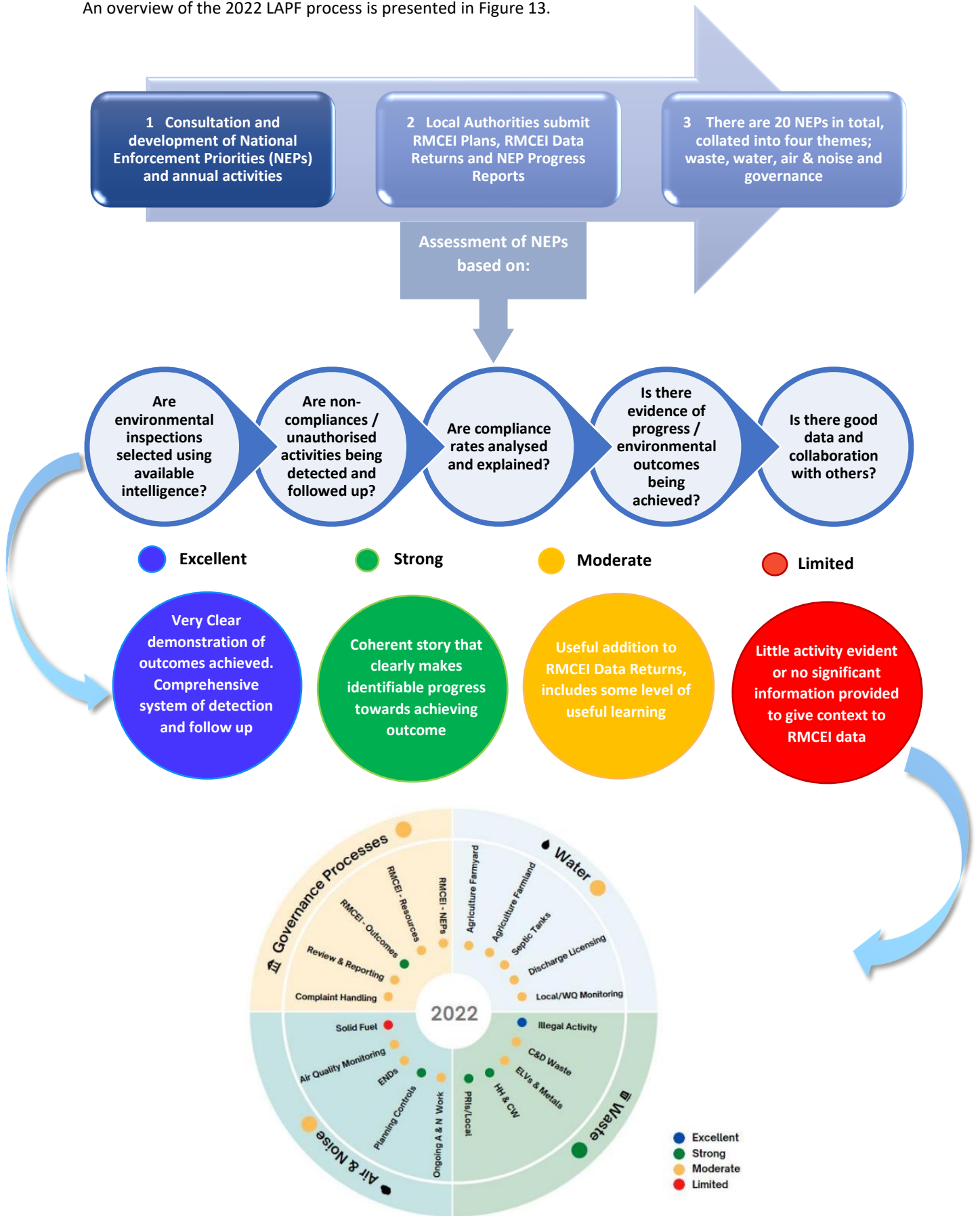


Figure 13: Overview of the Local Authority Performance Framework Assessment

## Appendix II – Performance Scores

### Waste NEP Performance Scores

Local Authorities	National Waste Priorities				
	Tackling Illegal Waste Activities & Multi-Agency Sites/Operators of Concern	Construction & Demolition Waste	ELVs & Metals	Household & Commercial Waste	PRIs & additional Local Priorities
Carlow County Council	Yellow	Yellow	Yellow	Yellow	Green
Cavan County Council	Green	Yellow	Green	Yellow	Green
Clare County Council	Green	Yellow	Yellow	Yellow	Green
Cork City Council	Green	Yellow	Green	Green	Green
Cork County Council	Green	Yellow	Green	Yellow	Green
Dublin City Council	Green	Green	Green	Yellow	Green
Dun Laoghaire Rathdown Council	Green	Yellow	Grey	Yellow	Green
Donegal County Council	Green	Green	Green	Green	Yellow
Fingal County Council	Blue	Green	Blue	Green	Green
Galway City Council	Green	Green	Green	Green	Yellow
Galway County Council	Green	Yellow	Yellow	Green	Green
Kerry County Council	Green	Green	Green	Yellow	Red
Kildare County Council	Green	Blue	Blue	Green	Green
Kilkenny County Council	Green	Yellow	Yellow	Yellow	Red
Laois County Council	Green	Yellow	Yellow	Yellow	Yellow
Leitrim County Council	Green	Green	Green	Green	Green
Limerick City & County Council	Yellow	Green	Green	Yellow	Yellow
Longford County Council	Green	Green	Yellow	Green	Yellow
Louth County Council	Green	Green	Green	Yellow	Green
Mayo County Council	Green	Green	Green	Green	Green
Meath County Council	Blue	Blue	Blue	Green	Blue
Monaghan County Council	Green	Green	Green	Yellow	Green
Offaly County Council	Yellow	Yellow	Yellow	Yellow	Yellow
Roscommon County Council	Yellow	Yellow	Red	Yellow	Yellow
South Dublin County Council	Green	Green	Green	Green	Green
Sligo County Council	Green	Yellow	Yellow	Yellow	Yellow
Tipperary County Council	Green	Yellow	Yellow	Green	Yellow
Waterford City & County Council	Green	Yellow	Yellow	Yellow	Red
Westmeath County Council	Green	Yellow	Green	Yellow	Yellow
Wexford County Council	Yellow	Green	Yellow	Yellow	Yellow
Wicklow County Council	Yellow	Yellow	Yellow	Yellow	Yellow

■ Not Applicable ■ Excellent ■ Strong ■ Moderate ■ Limited

## Water NEP Performance Scores

Local Authorities	National Water Priorities				
	Pressures from Agriculture (Farm Yards)	Pressures from Agriculture (Farmland)	DWWTS / Septic Tanks	Discharge Licences / Misconnections	Local Priorities & Water Quality Monitoring
Carlow County Council	Strong	Strong	Strong	Strong	Strong
Cavan County Council	Strong	Strong	Excellent	Strong	Moderate
Clare County Council	Moderate	Moderate	Moderate	Strong	Strong
Cork City Council	Limited	Limited	Strong	Moderate	Moderate
Cork County Council	Strong	Strong	Strong	Moderate	Moderate
Dublin City Council	Not Applicable	Not Applicable	Not Applicable	Strong	Excellent
Dun Laoghaire Rathdown Council	Moderate	Limited	Strong	Strong	Moderate
Donegal County Council	Strong	Moderate	Excellent	Strong	Strong
Fingal County Council	Strong	Strong	Excellent	Strong	Excellent
Galway City Council	Not Applicable	Not Applicable	Moderate	Moderate	Strong
Galway County Council	Moderate	Moderate	Moderate	Strong	Moderate
Kerry County Council	Moderate	Moderate	Excellent	Strong	Strong
Kildare County Council	Strong	Strong	Strong	Strong	Excellent
Kilkenny County Council	Moderate	Limited	Moderate	Moderate	Moderate
Laois County Council	Strong	Moderate	Moderate	Strong	Excellent
Leitrim County Council	Strong	Excellent	Moderate	Strong	Strong
Limerick City & County Council	Strong	Moderate	Strong	Moderate	Strong
Longford County Council	Moderate	Moderate	Strong	Moderate	Moderate
Louth County Council	Moderate	Strong	Strong	Strong	Strong
Mayo County Council	Moderate	Moderate	Strong	Moderate	Strong
Meath County Council	Excellent	Excellent	Strong	Excellent	Excellent
Monaghan County Council	Strong	Strong	Moderate	Strong	Excellent
Offaly County Council	Limited	Limited	Limited	Strong	Strong
Roscommon County Council	Moderate	Moderate	Moderate	Moderate	Strong
South Dublin County Council	Moderate	Strong	Moderate	Excellent	Strong
Sligo County Council	Moderate	Limited	Strong	Strong	Strong
Tipperary County Council	Moderate	Moderate	Moderate	Strong	Excellent
Waterford City & County Council	Limited	Moderate	Limited	Moderate	Moderate
Westmeath County Council	Moderate	Moderate	Strong	Moderate	Strong
Wexford County Council	Strong	Strong	Excellent	Limited	Moderate
Wicklow County Council	Limited	Limited	Strong	Strong	Excellent

■ Not Applicable ■ Excellent ■ Strong ■ Moderate ■ Limited

## Air & Noise NEP Performance Scores

Local Authorities	National Air & Noise Priorities				
	Solid Fuel	Air Quality Monitoring & Data Use	Noise - ENDS	Air & Noise Controls (including Planning)	Ongoing Air & Noise Enforcement Work
Carlow County Council	Strong	Moderate	Moderate	Excellent	Strong
Cavan County Council	Excellent	Strong	Moderate	Strong	Strong
Clare County Council	Moderate	Strong	Limited	Moderate	Strong
Cork City Council	Strong	Excellent	Moderate	Strong	Strong
Cork County Council	Excellent	Excellent	Moderate	Strong	Excellent
Dublin City Council	Moderate	Strong	Strong	Moderate	Moderate
Dun Laoghaire Rathdown Council	Strong	Moderate	Strong	Moderate	Moderate
Donegal County Council	Excellent	Strong	Limited	Moderate	Strong
Fingal County Council	Moderate	Moderate	Limited	Strong	Strong
Galway City Council	Strong	Strong	Moderate	Limited	Limited
Galway County Council	Moderate	Moderate	Moderate	Moderate	Strong
Kerry County Council	Strong	Strong	Strong	Strong	Moderate
Kildare County Council	Excellent	Strong	Strong	Excellent	Excellent
Kilkenny County Council	Limited	Limited	Limited	Limited	Moderate
Laois County Council	Strong	Strong	Limited	Strong	Moderate
Leitrim County Council	Strong	Strong	Moderate	Moderate	Strong
Limerick City & County Council	Moderate	Strong	Excellent	Moderate	Moderate
Longford County Council	Excellent	Moderate	Moderate	Limited	Strong
Louth County Council	Moderate	Moderate	Limited	Moderate	Strong
Mayo County Council	Excellent	Excellent	Limited	Moderate	Excellent
Meath County Council	Strong	Strong	Moderate	Excellent	Excellent
Monaghan County Council	Excellent	Strong	Moderate	Strong	Strong
Offaly County Council	Limited	Moderate	Moderate	Strong	Moderate
Roscommon County Council	Strong	Strong	Limited	Strong	Moderate
South Dublin County Council	Moderate	Strong	Strong	Moderate	Moderate
Sligo County Council	Excellent	Moderate	Limited	Strong	Strong
Tipperary County Council	Strong	Excellent	Moderate	Excellent	Moderate
Waterford City & County Council	Moderate	Strong	Moderate	Moderate	Moderate
Westmeath County Council	Excellent	Strong	Moderate	Excellent	Strong
Wexford County Council	Moderate	Moderate	Limited	Limited	Strong
Wicklow County Council	Moderate	Moderate	Limited	Limited	Strong

■ Not Applicable ■ Excellent ■ Strong ■ Moderate ■ Limited

## Governance Process NEP Performance Scores

Local Authorities	Governance Processes				
	RMCEI Plan: Planning for NEPS	RMCEI Plan: Resource Planning	RMCEI Plan: Environmental Outcomes	Review and Reporting	Complaint Handling
Carlow County Council	Excellent	Excellent	Strong	Excellent	Strong
Cavan County Council	Excellent	Strong	Moderate	Strong	Strong
Clare County Council	Strong	Excellent	Strong	Strong	Strong
Cork City Council	Excellent	Excellent	Moderate	Strong	Strong
Cork County Council	Strong	Excellent	Strong	Strong	Moderate
Dublin City Council	Excellent	Excellent	Strong	Excellent	Strong
Dun Laoghaire Rathdown Council	Excellent	Excellent	Strong	Strong	Strong
Donegal County Council	Excellent	Excellent	Strong	Strong	Strong
Fingal County Council	Excellent	Excellent	Strong	Excellent	Excellent
Galway City Council	Excellent	Excellent	Strong	Excellent	Strong
Galway County Council	Excellent	Moderate	Moderate	Strong	Moderate
Kerry County Council	Excellent	Strong	Moderate	Strong	Moderate
Kildare County Council	Excellent	Strong	Strong	Excellent	Strong
Kilkenny County Council	Excellent	Excellent	Strong	Strong	Strong
Laois County Council	Excellent	Excellent	Strong	Strong	Strong
Leitrim County Council	Excellent	Excellent	Strong	Excellent	Strong
Limerick City & County Council	Excellent	Excellent	Strong	Strong	Strong
Longford County Council	Excellent	Excellent	Strong	Strong	Strong
Louth County Council	Excellent	Excellent	Moderate	Excellent	Strong
Mayo County Council	Strong	Moderate	Limited	Strong	Moderate
Meath County Council	Strong	Excellent	Moderate	Strong	Strong
Monaghan County Council	Excellent	Excellent	Strong	Excellent	Excellent
Offaly County Council	Limited	Excellent	Limited	Moderate	Moderate
Roscommon County Council	Excellent	Excellent	Moderate	Strong	Moderate
South Dublin County Council	Strong	Moderate	Moderate	Excellent	Strong
Sligo County Council	Moderate	Strong	Limited	Moderate	Strong
Tipperary County Council	Moderate	Excellent	Moderate	Strong	Moderate
Waterford City & County Council	Limited	Limited	Limited	Moderate	Strong
Westmeath County Council	Excellent	Excellent	Moderate	Strong	Moderate
Wexford County Council	Limited	Moderate	Moderate	Strong	Moderate
Wicklow County Council	Excellent	Excellent	Strong	Strong	Moderate

■ Not Applicable ■ Excellent ■ Strong ■ Moderate ■ Limited



## Appendix III – Overview of Local Authority Activity Trends

**Table 3: Summary of National Environmental Enforcement and Inspection Data from the RMCEI, 2019 - 2022.**

This list is non-exhaustive but covers the main activities reported under the Local Authority RMCEI data returns.

Total Number	2019	2020	2021	2022
Licences/Permits/Certificates	14,800	15,000	16,400	16,500
Inspections Undertaken	188,000	180,600	205,100	197,300
Environmental Complaints Received	78,000	85,600	80,800	69,700
Enforcement Actions Taken	22,900	18,900	20,880	17,700
Prosecution Actions Initiated	520	445	630	621
<b>Waste</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Waste & Litter Complaints Received	72,400	78,400	72,800	62,400
Illegal Dumping Inspections	21,100	24,850	23,510	17,900
Multi-agency Inspections	270	170	240	280
Household Waste Surveys	8,490	8,780	6,340	7,830
Commercial Food Waste Inspections	1,480	730	890	1,100
C&D Handling Inspections	970	1,490	1,490	1,500
Litter Patrols	48,870	54,170	51,100	48,730
Waste Collection Permit Inspections	1,900	2,660	3,020	2,500
% Completion of Waste Collection Permit Data Verification	60%	81%	85%	84%
Producer Responsibility Initiatives Inspections (WEEE, Batteries, Tyres, ELV, Packaging, Farm Plastic and Plastic Bags)	3,280	2,530	2,450	2,850
<b>Water</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Water/Wastewater Complaints Received	2,200	3,200	3,600	2,800
WFD Monitoring & Investigations <sup>1</sup>	14,910	13,500	15,190	11,740
Water Pollution Incidents/Complaints Investigations	4,150	3,300	4,220	4,050
Farm Inspections under GAP Regulations conducted by Local Authority	1,380	830	640	2,200
Farm Inspections Other (including DAFM inspections conducted on behalf of the local authority)	3,070	1,900	1,880	880
Inspections required in Septic Tank National Inspection Plan	1,800	1,500	1,070	1,140
Discharge Licences (S4) Inspections	2,370	2,110	2,290	2,090
<b>Air</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Air/Odour & Noise Complaints Received	3,400	4,000	4,300	4,600
Solid Fuel Regulation Inspections	1,050	790	800	1,160
Decorative Paint Regulation Inspections	460	320	520	470
Petroleum Vapour Regulation Inspections	500	300	390	440
Solvent Regulation Inspections	130	110	180	200

<b>Enforcement Actions Initiated</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Waste Enforcement Actions	20,500	16,900	17,900	14,400
Water/Wastewater Enforcement Actions	1,500	1,100	1,500	1,660
Air Enforcement Actions	570	840	670	980
Noise Enforcement Actions	280	400	630	650
PRI Enforcement Actions	10	120	180	10
<b>Total Enforcement Actions Initiated</b>	<b>22,860</b>	<b>19,360</b>	<b>20,880</b>	<b>17,700</b>
<b>Prosecution Actions Initiated</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Waste Prosecution Actions <sup>2</sup>	483	383	578	580
Water/Wastewater Prosecution Actions	26	24	40	35
Air Prosecution Actions	6	2	8	5
Noise Prosecution Actions	2	0	2	1
<b>Total Prosecutions Initiated</b>	<b>517</b>	<b>409</b>	<b>628</b>	<b>621</b>

<sup>1</sup> This includes the WFD monitoring programme, sampling programme and WFD assessments undertaken by local authorities including investigative assessments such as small stream risk scores or surveys.

<sup>2</sup> Does not include litter prosecution.

## Appendix IV – 2022 National Enforcement Priorities

National Waste Enforcement Priorities 2022 – 2024			
National Enforcement Priority (2022 -2024)	Objective (2022 – 2024)	Outcome (2022 -2024)	Activities for Focus in 2022
<b>Tackling illegal waste activities and Multi-Agency Sites of Concern</b>	Detection and cessation of unauthorised collection and dumping activities and remediation of polluted sites.	<ul style="list-style-type: none"> <li>• Unauthorised collectors detected and closed down.</li> <li>• Active list of unauthorised sites/operators in place.</li> <li>• Consistent policy agreed and implemented for dealing with illegal waste deposits in the ground.</li> <li>• Authorised (permitted &amp; licensed) facilities should not facilitate the unauthorised treatment of waste.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Targeted inspections and follow up enforcement actions of unauthorised collectors and site operators using intelligence from waste data flows, complaints and other available data.</li> <li>➤ Co-ordination with, and input from Revenue/Social Protection/An Garda Síochána in relation to unauthorised activity and identified sites of concern.</li> <li>➤ Multi-agency investigations for sites of concern.</li> <li>➤ Roadside check points.</li> <li>➤ Relevant Anti-Dumping Initiatives implemented.</li> <li>➤ Traceability requirements to be enforced at Permitted/Licensed sites.</li> <li>➤ Focus on those who are facilitating the unauthorised treatment of waste.</li> </ul>
<b>Construction and Demolition Waste</b>	Effective and authorised management, movement and disposal of C&D waste.	<ul style="list-style-type: none"> <li>• Authorised waste treatment facilities accepting waste from authorised collectors/sources only.</li> <li>• Compliance of construction sites with inspection template checks including waste classification, segregation and waste movement, Art 27.</li> <li>• Accurate waste classification and quantification of waste data in AERs from WCP/WFP and licensed operators.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Risk based inspections of construction sites using WERLA intelligence and inspection templates.</li> <li>➤ Inspection of Article 27 sites of origin and destination to include material notified under Article 27 being accepted at WFP/Licensed sites.</li> <li>➤ Inspection of soil recovery sites to ensure only appropriate materials accepted.</li> <li>➤ Validation and inspection of WCP/WFP and licensed sites dealing with C&amp;D waste.</li> <li>➤ Take all necessary steps to resolve non-compliant issues including the selling of crushed concrete from WFPs/Licensed sites without EoW decision.</li> <li>➤ Incorporate proposed improvements to the Article 27 notification system.</li> <li>➤ Tracking of waste delivered to Licensed sites.</li> <li>➤ Based on researched data and local knowledge, identify authorised operators for further investigation and/or enforcement action.</li> <li>➤ Focused monitoring of the resources and systems available for gathering and reporting waste data to be carried out as part of site audits at waste facilities/waste collectors.</li> </ul>
<b>ELV and Metals</b>	All relevant ELV facilities are authorised and maintain a high level of compliance for	<ul style="list-style-type: none"> <li>• Authorised (permitted &amp; licensed) waste treatment facilities to accept</li> </ul>	<ul style="list-style-type: none"> <li>➤ Risk based inspections of Authorised Treatment Facilities and other ELV sites using WERLA intelligence and inspection templates (at least one inspection per annum of permitted sites).</li> </ul>

	acceptance, classification, segregation, recycling and disposal of ELVs.	<p>waste from authorised collectors/sources only.</p> <ul style="list-style-type: none"> <li>• Accurate waste classification and quantification of waste data in AERs from WCP/WFP and licensed operators.</li> <li>• Hazardous components and WEEE are adequately segregated and transferred to appropriate recycling/treatment facility.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Validation and inspection of records for WCP/WFP and licensed operators dealing with ELV and metal waste.</li> <li>➤ Take all necessary steps to resolve non-compliant issues.</li> </ul>
<b>Household and Commercial Waste</b>	Maximise segregation, and recycling of municipal waste	<ul style="list-style-type: none"> <li>• 3 bin systems are in place and being utilised i.e. separation of dry recyclables and organic materials at all commercial sites.</li> <li>• Accurate waste classification and quantification of waste data in AERs from WCP and WFP operators of municipal waste.</li> <li>• High level of compliance amongst households availing of a door-to-door waste collection service or a suitable alternative.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Inspection of WCP operators for provision of 3 bin system.</li> <li>➤ Surveys of retail, hospitality and industrial sectors to ensure proper use of 3 bin system, segregation and use of authorised collectors.</li> <li>➤ Sampling/analysis of treated waste outputs</li> <li>➤ AER Validations on WCP and WFP priority lists.</li> <li>➤ Maintenance of register of households with/without a waste collection service and targeted inspections in areas with low compliance.</li> <li>➤ Focused monitoring of the resources and systems available for gathering and reporting waste data to be carried out as part of site audits at waste facilities/waste collectors.</li> <li>➤ Monitoring of waste acceptance criteria at authorised sites e.g. WFP, Waste Transfer Sites, Landfills and Waste to Energy Plant.</li> </ul>
<b>Producer Responsibility Initiatives and additional local priorities</b>	<p>All operators subject to producer responsibility initiatives registered with appropriate organisation(s).</p> <p>Good regulatory compliance at all waste facilities including those owned by local authorities.</p>	<ul style="list-style-type: none"> <li>• All suspected producers under WEEE, Packaging, Farm Plastics, Tyres, Batteries and ELV Regulations, including vehicle importers, requiring registration to be registered.</li> <li>• Consistent approach to enforcement of Extended Producer Responsibility requirements.</li> <li>• All local authority owned waste facilities in compliance with authorisations.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Identification and inspection of all suspected producers who require registration.</li> <li>➤ Examination of potential for information exchange between Local Government Sector and other Agencies, where appropriate.</li> </ul>

National Water Enforcement Priorities 2022 – 2024			
National Enforcement Priority (2022 -2024)	Objective (2022 – 2024)	Outcome (2022 -2024)	Activities for Focus in 2022
<b>Pressures from Agriculture (slurry/soiled water collection and storage)</b>	Issues at farm level are identified and resolved through farm inspections both in areas identified with agriculture as a significant pressure with a small percentage in areas not at risk.	<ul style="list-style-type: none"> <li>• Adequate slurry storage capacity at farms.</li> <li>• Adequate soiled water collection and storage.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Inspections of farmyards in areas where agriculture is identified as a significant pressure, with a small percentage in areas not at risk.</li> <li>➤ Follow up and close out non-compliances and LAWPRO referrals.</li> <li>➤ Cross reporting of non-compliances to DAFM.</li> </ul>
<b>Pressures from Agriculture (slurry and fertiliser spreading)</b>	Issues at farm level are identified and resolved through farm inspections in areas identified with agriculture as a significant pressure with a small percentage in areas not at risk.	<ul style="list-style-type: none"> <li>• Spreading of slurry and fertilisers must not take place in the closed season or under unsuitable weather and/or soil conditions.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Inspections of slurry and fertiliser spreading in areas where agriculture is identified as a significant pressure, with a small percentage in areas not at risk.</li> <li>➤ Follow up and close out non-compliances and LAWPRO referrals.</li> <li>➤ Cross reporting of non-compliances to DAFM.</li> </ul>
<b>DWWTS/Septic Tanks</b>	The National Inspection Plan is implemented.	<ul style="list-style-type: none"> <li>• Non-compliant systems are identified via risk-based inspections, and subsequently followed up and resolved.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Take all necessary steps to ensure advisory notices are closed out.</li> <li>➤ Follow up and close out non-compliances and LAWPRO referrals.</li> </ul>
<b>Discharge licences/ Misconnections</b>	All wastewater discharges that are a pressure on water bodies are compliant.	<ul style="list-style-type: none"> <li>• All Section 4 licenses associated with significant pressures are compliant with emission values.</li> </ul>	<ul style="list-style-type: none"> <li>➤ All Section 4 licences discharging into water bodies at risk to be monitored and non-compliances resolved.</li> <li>➤ Licence discharges subject to Section 4 licences.</li> <li>➤ Follow up and close out non-compliances and LAWPRO referrals.</li> </ul>
<b>Local Priorities and Water Quality Monitoring</b>	<p>Undertake statutory WFD and bathing water sampling and monitoring.</p> <p>Inspect and enforce any local water quality issues (not covered by other National Enforcement Priorities), including any climate related enforcement issues, private drinking water supplies and RBMPs.</p>	<ul style="list-style-type: none"> <li>• The monitoring data is available for characterisation and to support targeting of local authority inspections and enforcement actions.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Complete statutory monitoring for water framework directive monitoring, investigative monitoring and bathing water monitoring.</li> <li>➤ Inspect and follow up any local issues (not covered by the other NEPs).</li> <li>➤ Address any climate related water inspection issues e.g. issues arising due to extreme weather events.</li> <li>➤ Enforcement of private drinking water standards.</li> <li>➤ Investigate sources of any non-compliances with water quality standards including follow up of LAWPRO referrals.</li> <li>➤ Engage with LAWPRO and other WFD fora on RBMP.</li> </ul>

National Air and Noise Enforcement Priorities 2022 – 2024			
National Enforcement Priority (2022 -2024)	Objective (2022 – 2024)	Outcome (2022 -2024)	Activities for Focus in 2022
<b>Solid Fuel</b>	Only compliant fuel products are available for purchase by the end-user.	<ul style="list-style-type: none"> <li>Fuel products used by the end-user comply with standards.</li> </ul>	<ul style="list-style-type: none"> <li>Tackle the sale of non-compliant fuel and its use via compliance promotion, inspection and enforcement of fuel merchants and retailers.</li> <li>Participate in multi-agency operations investigating the sale of non-compliant fuels.</li> <li>Develop and implement a programme for the sampling and analysis of fuel types (this can be carried out per individual Local Authority or a joint approach can be adopted with other Local Authorities).</li> <li>Carry out awareness programme to promote compliance by increasing the awareness of how the choices people make in heating their homes impacts on their air quality and health and legal obligations.</li> <li>Establish and/or maintain a list including the number and profile of solid-fuel merchants operating in each local authority area including those using social media platforms to market solid fuels.</li> <li>Build capacity through engaging, collaborating and sharing with colleagues in other Local Authorities via networks and working groups and participating in training events.</li> </ul>
<b>Air Quality Monitoring and Data Use</b>	<p>Deliver enhanced real-time information to improve air quality forecasting and identification of priority sites/areas for action</p> <p>Encourage greater understanding and involvement of the public in air quality issues.</p>	<ul style="list-style-type: none"> <li>Air quality data to be used to identify priority sites/areas for action.</li> <li>All Local Authorities to display real-time data on local air quality via their websites.</li> </ul>	<ul style="list-style-type: none"> <li>Work with the EPA to complete the expansion of the Ambient Air Monitoring Programme network including: <ol style="list-style-type: none"> <li>Assist EPA to determine viable locations for air quality monitoring stations.</li> <li>Assist EPA to progress siting of air quality monitoring stations.</li> <li>Assist EPA to troubleshoot issues at existing air quality monitoring station including the nomination and notification to the EPA of a primary and secondary contact person.</li> <li>Assist (where possible, to the best extent possible) EPA to maintain existing and new air quality monitoring stations.</li> </ol> </li> <li>Review local air quality data to identify hotspots and to prioritise sites/areas for action.</li> <li>Ensure local air quality data including a map is made available to the general public as soon as technically possible for each local authority. As a minimum, a link to the relevant page(s) of the EPA site should be placed on each Local Authority website.</li> </ul>

<b>Environmental Noise Directive (ENDs)</b>	<p>Reduce the share of people chronically disturbed by transport noise as well as preserve environmental noise quality where it is good.</p>	<ul style="list-style-type: none"> <li>• Regulatory compliance.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Deliver the Round 4 Noise Mapping requirements as set out in the Environmental Noise Regulations of 2018. This includes the timely submission of any relevant datasets and information in the required format as requested by the RMO /Urban Agglomeration Project Team and/or any other specified body.</li> <li>➤ Prepare and submit the Annual Noise Action Plan Progress Report to the EPA by the 28th of February.</li> <li>➤ Annual Noise Action Plan Progress Report should demonstrate progress on the key issues and priority areas for action.</li> </ul>
<b>Air and Noise Control (including Planning)</b>	<p>Appropriate Air and Noise controls are in place.</p>	<ul style="list-style-type: none"> <li>• Environment staff assessing environmental impacts from air and noise emissions and liaising with planning staff on appropriate air and noise controls.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Preplanning assessments of air and noise impacts.</li> <li>➤ Environment staff assist in follow up of air and noise issues including use of Section 107 and 108 of the EPA, the Air Pollution Act and liaising with planners where planning enforcement is more appropriate.</li> <li>➤ Increased public awareness of noise induced health impacts.</li> </ul>
<b>Ongoing Air and Noise Enforcement Work</b>	<p>Appropriate controls in place to minimise, reduce or prevent air and noise emissions that may be harmful to the environment or to human health.</p>	<ul style="list-style-type: none"> <li>• Regulatory compliance.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Inspect and carry out any required enforcement actions of facilities/activities as specified in the RMCEI template and/or as otherwise determined by the Local Authority.</li> <li>➤ Make available on their websites, the EPA Vehicle Refinishers video and use appropriate channels to promote it.</li> <li>➤ Inspect and carry out any required enforcement actions under Sections 107 and 108 of the Environmental Protection Agency Act, 1992 in order to limit noise nuisance.</li> <li>➤ Build capacity through engaging, collaborating and sharing with colleagues in other Local Authorities via networks and working groups and participating in training events</li> </ul>

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