

# WASTE ENFORCEMENT REGIONAL LEAD AUTHORITIES

## ANNUAL REPORT 2019

WERLA-R-5598



connacht - ulster  
waste region



eastern - midlands  
waste region



southern  
waste region



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# GLOSSARY

<b>CCMA</b>	County and City Managers Association
<b>AA</b>	Appropriate Assessment
<b>AER</b>	Annual Environmental Return
<b>AGS</b>	An Garda Siochana
<b>ATF</b>	Authorised Treatment Facility
<b>C&amp;D</b>	Construction & Demolition
<b>CEO</b>	Chief Executive Officer
<b>CAED</b>	Criteria for Assessment of Environmental Damage
<b>DECLG</b>	Department of Environment, Community and Local Government
<b>EEA</b>	European Economic Area
<b>EFTA</b>	European Free Trade Association
<b>ELV</b>	End of Life
<b>ELVES</b>	End of Life Vehicle Environmental Services
<b>EPA</b>	Environmental Protection Agency
<b>ESTG</b>	Environment Services Training Group
<b>EU</b>	European Union
<b>EWC</b>	European Waste Catalogue
<b>FPN</b>	Fixed Payment Notice
<b>HH</b>	Household
<b>ICG</b>	Industry Contact Group
<b>ICT</b>	Information Communication Technology
<b>IMVRA</b>	Irish Motor Vehicle Recyclers Association
<b>IMPEL</b>	European Network for the Implementation and Enforcement of European Law
<b>IWMA</b>	Irish Waste Management Association
<b>LASNTG</b>	Local Authority Services National Training Group
<b>LGMA</b>	Local Government Management Agency
<b>LoW</b>	List of Waste
<b>MIS</b>	Management Information System

<b>NEICE</b>	Network for Ireland's Environmental Compliance and Enforcement
<b>NTFSO</b>	National Transfrontier Shipment Office
<b>NWCPO</b>	National Waste Collection Permit Office
<b>PRO</b>	Producer Responsibility Officer
<b>RC</b>	Regional Coordinator
<b>SEE</b>	Senior Executive Engineer
<b>SEO</b>	Senior Executive Officer
<b>SMP</b>	Suspected Major Producers
<b>SOP's</b>	Standard Operation Procedures
<b>TFS</b>	Transfrontier Shipment
<b>UAV</b>	Unmanned Aerial Vehicle - Drone Technology
<b>WEO</b>	Waste Enforcement Officer
<b>WFP</b>	Waste Facility Permit
<b>WMA</b>	Waste Management Act
<b>ADI</b>	Anti-Dumping Initiative
<b>DCCAE</b>	Department of Communications, Climate Action and Environment
<b>IDC</b>	Industry Contact Group
<b>NWESC</b>	National Waste Enforcement Steering Committee
<b>WERLA</b>	Waste Enforcement Regional Lead Authority
<b>WERLA CUR</b>	Waste Enforcement Regional Lead Authority in the Connaught Ulster Region
<b>WERLA EMR</b>	Waste Enforcement Regional Lead Authority in the Eastern Midlands Region
<b>WERLA SR</b>	Waste Enforcement Regional Lead Authority in the Southern Region
<b>Local Authority / LA</b>	includes the corporation of a borough of any kind and the council of an urban district
<b>PRI</b>	Producer Responsibility Initiative
<b>RMCEI</b>	Recommended Minimum Criteria for Environmental inspections

# INTRODUCTION

The Waste Enforcement Regional Lead Authorities (WERLAs) were established in 2015. The three WERLAs are as follows; Connacht-Ulster, Eastern Midlands and Southern Region. The WERLAs were established to enhance and support the waste enforcement functions in Local Authorities.

The WERLA offices are responsible for co-ordinating the waste enforcement actions of Local Authorities, DCCAE set the priorities and common objectives for waste enforcement and ensuring consistency of enforcement of waste legislation while still leaving Local Authority personnel as first responders on the ground.

A business case to further enhance the WERLA structure was progressed in 2019. Following a peer review process this business case was agreed by the Public Reform Oversight Committee in quarter 4 2019 and the Department of Communications, Climate Action and Environment. The role, capacity and responsibilities of the Waste Enforcement Regional Lead Authorities will be enhanced to position the Local Authority sector better to respond to emerging and priority enforcement challenges.

## WERLA MISSION STATEMENT

To protect and improve our high-quality natural environment by ensuring waste activities in Ireland are monitored, and waste legislation is enforced, in a consistent, coordinated and efficient manner in accordance with EU and national legislation and policy through a process of continuous improvement.

# WERLA WORK PLAN 2019

## OBJECTIVES & POLICIES

### OBJECTIVE A:

Implement EU and national legislation and policy to ensure a consistent approach to waste enforcement.

**A1 Policy:** Support and monitor Implementation of the national waste enforcement priorities for 2019 as agreed by the National Waste Enforcement Steering Committee (NWESC).

**A2 Policy:** Support and monitor implementation of PRI schemes in 2019 as agreed by the NWESC.

**A3 Policy:** Support and monitor implementation of Mercury Regulations in 2019 as agreed by the NWESC.

**C1 Policy:** Ensure all guidance issued is accurate, consistent and takes account of relevant legislation.

**C2 Policy:** Provide the structure to facilitate greater cooperation between enforcement authorities, allow for increased peer-to-peer learning and allow for the creation of forums for knowledge sharing of best practice.

**C3 Policy:** To communicate effectively amongst stakeholders.

### OBJECTIVE D:

Drive improved performance and consistency of waste enforcement through clearly defined structure and procedures.

**D1 Policy:** Provide standard waste enforcement guidance to ensure best practices and efficiencies are adopted.

**D2 Policy:** Work with stakeholders on structures to develop knowledge sharing.

**D3 Policy:** Improve performance through the use of technology.

### OBJECTIVE B:

Identify and manage national waste enforcement issues through a clearly defined strategy.

**B1 Policy:** Review and maintain Annual work plan.

**B2 Policy:** Continue working relationships with stakeholders and utilise the data gathered to identify enforcement challenges.

**B3 Policy:** Deliver an integrated approach to drive consistent enforcement of legislation.

### OBJECTIVE E:

Work with Local Authorities and other stakeholders to deal with serious environmental waste crime.

**E1 Policy:** Develop measures to assist Local Authorities with the prevention, reduction, and cessation of unauthorised waste activities.

**E2 Policy:** Identify serious national waste enforcement issues and liaise with stakeholders in formulating appropriate responses.

### OBJECTIVE C:

Communicate and coordinate waste enforcement strategies and activities and work with relevant stakeholders to drive improved levels of compliance.

# GOVERNANCE

The WERLAs report to the CCMA Environment Committee and the National Waste Enforcement Steering Committee (NWESC) on a quarterly basis.

The NWESC is chaired by the DCCAE. The NWESC determine national waste enforcement priorities for the WERLAs and drive consistency at a central level.

The NWESC includes representatives from a wide range of regulatory authorities including the Environmental Protection Agency (EPA), An Garda Síochána, National Transfrontier Shipment Office (NTFSO), National Waste Collection Permit Office (NWCPO), Department of Social Protection, Waste Management Planning Lead Authorities (WMPLA), Office of Revenue Commissioners, CCMA and the WERLAs. The Committee supports the WERLAs in dealing with issues of serious waste crime.

The Industry Contact Group (ICG) is a forum for information exchange between key stakeholders. It is chaired by the Irish Waste Management Association (IWMA) and consists of members from the DCCAE, EPA, WERLAs, NTFSO, NWCPO, Producer Responsibility Compliance Schemes and other groups such as the Irish Motor Vehicle Recyclers Association (IMVRA).

The WERLAs report to the CCMA on a quarterly basis. The CCMA provide a platform to deal with enforcement issues and emerging challenges within the sector and further support consistent enforcement effort nationally.

The WERLA Governance structures consist of Regional Steering, Operations and Enforcement networks. This facilitates the identification of emerging issues and challenges in the Local Government Sector.

The WERLAs work closely with the Waste Management Planning Lead Authorities to align enforcement activities with the requirements of the Regional Waste Management Plans and to align awareness programmes with the National Waste Enforcement Priorities.

The WERLAs have their own project board chaired by the Chief Executive, Leitrim County Council and comprising the Directors and Regional Coordinators of the three WERLAs.

# WERLA GOVERNANCE STRUCTURE

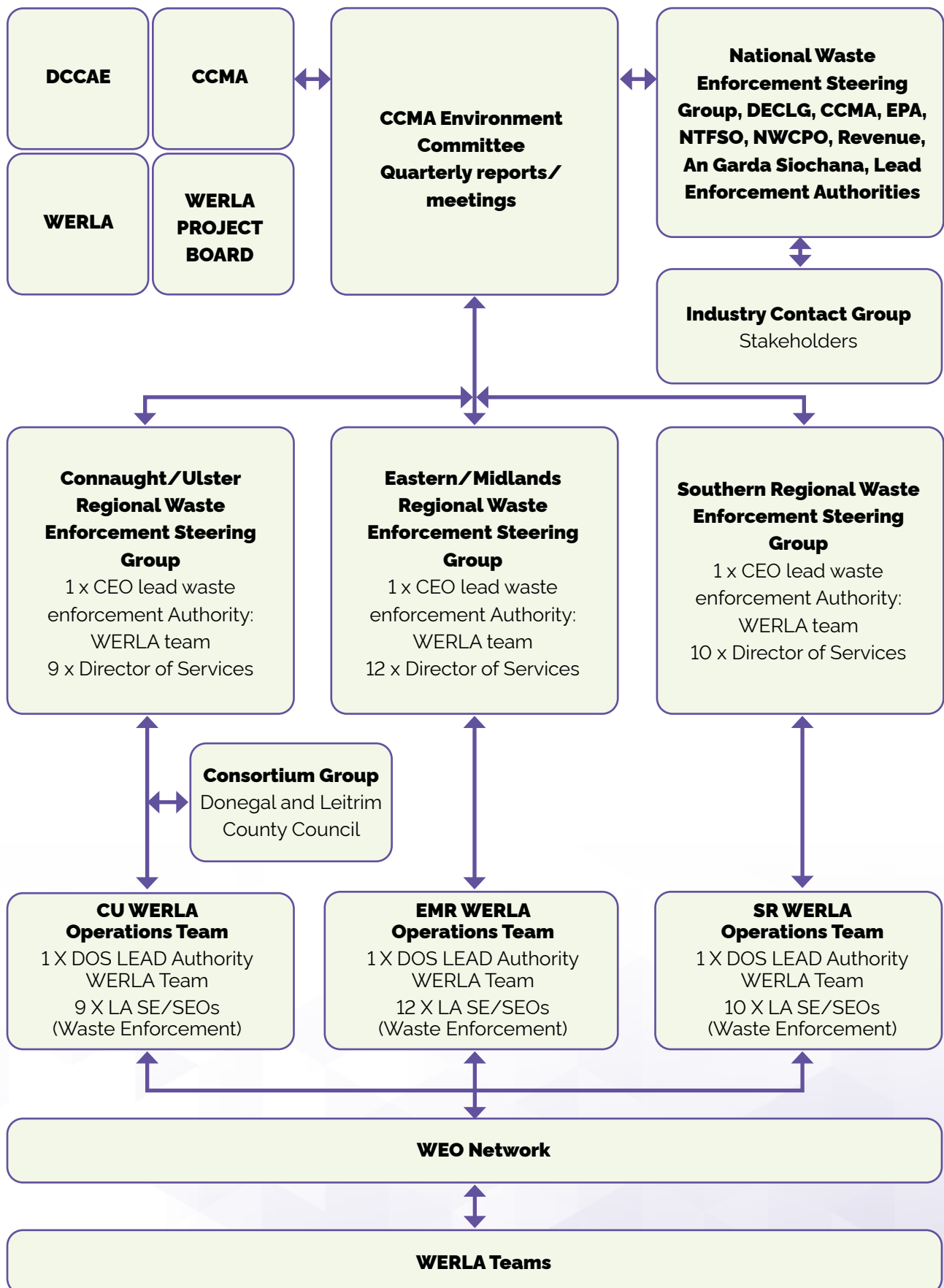


Figure 1 : WERLA Governance Structure

# STAKEHOLDER ENGAGEMENT

The WERLAs recognise the importance of identifying and working with key stakeholders to achieve its policy objectives and work plans including those set out to achieve National Priority goals.

The WERLAs and the EPA meet on a regular basis. The purpose of this collaboration is to establish consistency in terms of enforcement across the Local Authority and EPA regulated waste sector. The WERLAs work with the EPA to continuously streamline the Inspection plans developed under RMCEI process in relation to the waste function in Local Authorities.

The NIECE platform enables the WERLAs to liaise with Local Authorities continually, to facilitate information sharing and hold a repository of guidance documents and enforcement tools developed by the WERLAs.

The WERLAs participate in various Working Groups with key stakeholders, including, Packaging, End of Life Vehicles (ELVs), Tyres, Construction Waste Resource Group, Data Validation Working Group, Environmental Services Training Group (ESTG), Irish Motor Vehicle Recyclers Association (IMVRA), IMPEL (European Network for the Implementation and Enforcement of European Law) and Metal Theft Forum. A further insight into the National Metal Theft forum and IMPEL is provided below.

## METAL THEFT STAKEHOLDER FORUM

The WERLAs are members of the National Metal Theft Stakeholder forum established by An Garda Síochána. The forum comprises various groups and organisations that had been particularly affected by metal theft and aims to prevent and reduce metal theft.



Metal theft has become an international problem due to the high prices paid for many types of metal. In Ireland, as in many other countries, transport, power supply and other public utilities have been targeted by criminals, as have agricultural and commercial premises. In addition metal objects and material have been removed from many properties, including historic buildings, causing significant damage.

Waste Facility Permits for Authorised Treatment Facilities contain conditions on traceability. The WERLAs have amended standard Inspection Proformas so that inspections of these sites include an assessment of compliance with traceability requirements.

Of particular concern is the sharp increase in ESB Networks station break-ins, the ongoing theft of electrical cable and the sharp increasing trend in theft of catalytic converters. The WERLAs circulate details of suspected metal thefts to the network of authorised treatment facilities (ATF) to encourage the operators of these facilities to ask appropriate questions and report unusual sources of metal and to prevent them from inadvertently facilitating criminal activity and committing an offence of handling stolen property.





# AN GARDÁ SÍOCHÁNA

IN ASSOCIATION WITH THE  
ENVIRONMENTAL PROTECTION AGENCY



## WEEE, BATTERIES AND METAL THEFT PREVENTION

- The value of scrap metal makes metal items, including waste electrical and electronic equipment (WEEE) and waste lead acid batteries, very attractive to thieves.
- Theft of scrap metal and metal items such as WEEE and waste lead acid batteries is a crime and is no different to the theft of any other items.
- In some cases, such theft may also be considered unauthorised waste activity.

For Crime Prevention Advice, check out  
**[www.garda.ie](http://www.garda.ie)**

- If you think there might be unauthorised waste activity involved, call the  
**National Environmental Complaints Line on 1850 365 121**

- Alternatively, download the  
**"See It? Say It!" iPhone App**  
from iTunes or scan the QR code



- If you see something that might involve theft of scrap metal or WEEE, call the **Garda Síochána** on the **Emergency Line 999 or 112**, or contact your local Garda station with details.

Prevention Executive to support development of IFA crime prevention policy and the roll out of Theft Stop

Colin Connolly, Síochána with e crime prevention

Colin will work closely with An Garda Síochána on the development of a range of crime prevention initiatives, including the national roll out of Theft Stop through the IFA's 946 Branch Network and the wider rural community.

**A note from FBD**

may we thank you for your assistance in the roll out of Theft Stop

**Prevent Farm Theft with Theft Stop**

[www.theftstop.ie](http://www.theftstop.ie)



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**CONTACT JOHN MURPHY**



# EUROPEAN UNION NETWORK FOR THE IMPLEMENTATION AND ENFORCEMENT OF EUROPEAN LAW.



IMPEL is an international non-profit association of the environmental authorities of the European Union Member States, acceding and candidate countries of the EU, EEA and EFTA countries and potential candidates to join the European Community. Currently, IMPEL has 55 members from 36 countries.

## OBJECTIVES OF THE NETWORK

The Network's objective is to create the necessary impetus in the European Union to make progress on ensuring a more effective application of environmental legislation.

## EXPERT TEAMS

IMPEL organises its work into five thematic areas:

1. Industry regulation
2. Waste and TFS
3. Water and land
4. Nature protection
5. Cross-cutting tools and approaches

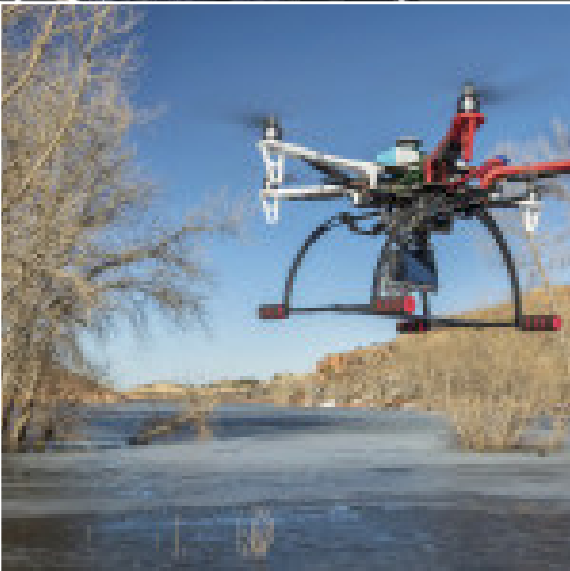
The Expert Teams are responsible for developing activities that address key implementation gaps, oversee the delivery of those activities and the quality of their outputs. A Programme Management Group brings together the team leaders of the 5 thematic areas, who then have the responsibility of organising the activities into a single integrated programme

The WERLAs are represented on the Waste & TFS team in 2019 (X cutting team).

The X-cutting team is primarily concerned with cross cutting regulatory systems to make regulators more efficient & effective and to identify and develop overarching tools to support regulators in the implementation of new regulations to ensure a level playing field within Europe. The WERLAs are participating in projects on

- Use of technology in regulation
- Criteria for the Assessment of the Environmental Damage (CAED)
- Environmental incident and emergency response
- Capacity Building & Training





# SMART ENFORCEMENT THROUGH ICT

## ANNUAL ENVIRONMENTAL RETURNS (AERS) ANOMALIES:

Authorised waste collectors and Authorised Facilities are required to furnish an Annual Environmental Return (AER) in relation to the waste activities carried out by the permit holder in the preceding calendar year.

WERLA ICT has been working with AER data to develop reports that will assist in the risk profiling of AER audits. In 2019, the focus was on Chapter 17 (C&D) Waste and Chapter 20 (Municipal) with emphasis on household and commercial municipal collections and anomalies arising. The WERLA shared ICT resource has developed capacity to identify, by LoW code, anomalies between collector and facility returns that will help identify anomalies and instances of inconsistent reporting. This query was on the 2018 data and the results were made available to Local Authorities to target their enforcement effort for 2019.

## ONLINE ADVERTISING INVESTIGATIONS

Social Media and online classified advertising is a growing opportunity for illegal operators. WERLA have been assisting Local Authorities in investigations using Open Source Intelligence techniques. WERLA has initiated discussions with the UK Environment Agency (EA), in association with Natural Resources Wales, around a collaborative approach to suspected unauthorised products and services advertised on popular online ecommerce sites. This project is at an early stage of development and builds on previous explorative work carried out by WERLA in this area.

## UNMANNED AERIAL VEHICLE (UAV)

Drone (UAV) technology is an emerging tool to assist in the investigation and monitoring of suspicious activity. WERLA has developed capacity in this area over 2018 and 2019 and has provided operational assistance, on request, to multiple Local Authorities over the years. Drone Operational Support continues to be made available to Local Authorities. WERLA personnel are now authorised by the Irish Aviation Authority to operate up to a radius of 1km and within the vicinity of airports, subject to aviation clearance.

## NIECE

The NIECE Portal Development Group convened in Sept 2018 with WERLA as a core group member. WERLA provided support and assistance in 2019 towards the tender process to upgrade NIECE.

## MOBILE WORKFORCE MANAGEMENT

WERLA has continued to provide support to this pilot project in meeting the challenges, operationally, of integrating real time mobile inspection records.

## NATIONAL COMPLAINTS PROCEDURE /INSPECTIONS SYSTEM SURVEY

WERLA has undertaken a survey of ICT systems in use by waste enforcement staff across the Local Authority sector and also in related central bodies.

# WERLA WEBSITE

The WERLA website [www.werla.ie](http://www.werla.ie) provides information to the public, and industry, on the activities of the WERLA offices and also supports the work of Waste Enforcement staff in Local Authorities. There are also links between the WERLA website and [www.mywaste.ie](http://www.mywaste.ie).

The website features information on the following:

- National Waste Enforcement Priorities
- WERLA Annual Reports

- How to make a Waste Complaint via Local Authorities and the EPA
- Useful links to other agencies and organisations involved in, and providing support to, the Waste enforcement sector
- Location Maps related to authorised waste facilities
- Information on the WERLAs and their offices

It is envisaged that the website will host waste enforcement online tutorials in 2020

## TRAINING

A significant challenge for the WERLAs in coordinating the implementation of waste policy in Ireland is managing the gap between standardisation and established local work patterns.

This gap is being addressed by empowering and up-skilling through targeted training, the standardisation of forms, guidance manuals, and the development of Standard Operating Procedures (SOPs). Further opportunities such as on-line training courses and webinars will be explored in 2020.

The Environment Services Training Group (ESTG) was setup to meet the developing requirements of the Environment Services Sector through provision of courses at the five Regional Training Centre's at Roscrea, Ballycoolin, Castlebar, Ballinacollig and Stranolar.

The Environmental Services Training Group is comprised of representatives from LASNTG, Local Authorities, Department of Communications, Climate Action and the Environment, LGMA, EPA, Local Authority Waters Programme and Waste Enforcement Regional Lead Authorities. The Group coordinates the development and delivery of training for environmental services staff to meet current and emerging needs in the sector. News and events e.g. details of upcoming conferences, information on newly launched programmes etc. is posted on this website [www.lasntg.ie](http://www.lasntg.ie).

### THE FOLLOWING TRAINING COURSES WERE DELIVERED IN 2019.

- Waste Policy & Legislation.
- Regulation of Waste Activity.
- Environmental Inspection Skills.
- Monitoring and Enforcement of Construction and Demolition Waste Activities
- Asbestos Course.
- Court Room Skills
- Dealing with Difficult & Aggressive Behaviour

The identification of current training needs among Waste Enforcement Staff is ongoing. Courses are also being update and online learning and webinars will be used to further enhance training in the sector.

WERLAs have also provided training to An Garda Síochána and to various stakeholders in relation to the Waste Management Act by means of seminars, workshops and online training modules.

The WERLAs use NIECE as a platform to inform Local Authorities of upcoming training events and seminars. In addition, this platform is also used to share newspaper articles, important announcements and all WERLA guidance documents.

# PERFORMANCE OF LOCAL AUTHORITY SECTOR IN RESPONSE TO THE ENFORCEMENT CHALLENGE

The EPA published a review of Local Authority Performance for 2018 in Quarter 4, 2019.

The report quantifies the challenge in terms of complaints and regulated activities to be managed by the Local Authority sector.

According to the report, there are 14,200 environmental licences/permits in the Local Authority Sector. 96% of these relate to waste activities.

Waste and Litter inspections account for 67% of the inspection activity. Over 41,000 waste inspections and 70,000 litter inspections were carried out in 2018.

The report noted a significant increase in waste and litter enforcement and prosecution actions. 85% of the 20,000 enforcement actions in 2018 related to waste, whilst 95% of the 850 or so prosecutions were waste/litter related.

Figure 2 demonstrates that over 51% of complaints relate to waste and 41% relate to litter.

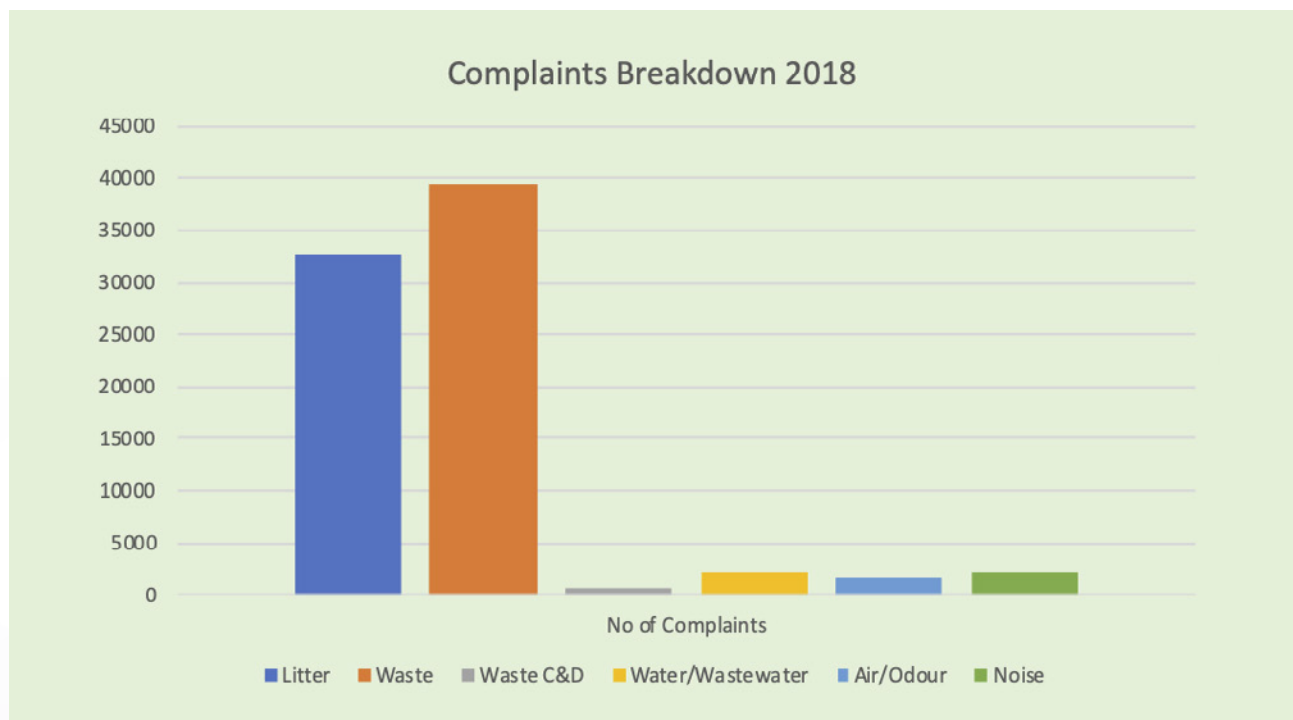


Figure 2: Complaints Breakdown 2018

## RATING

The grade awarded to the waste sector was on target, which despite the enormous effort and input of the resources outlined above is a reflection of the accuracy of the inspection planning process.

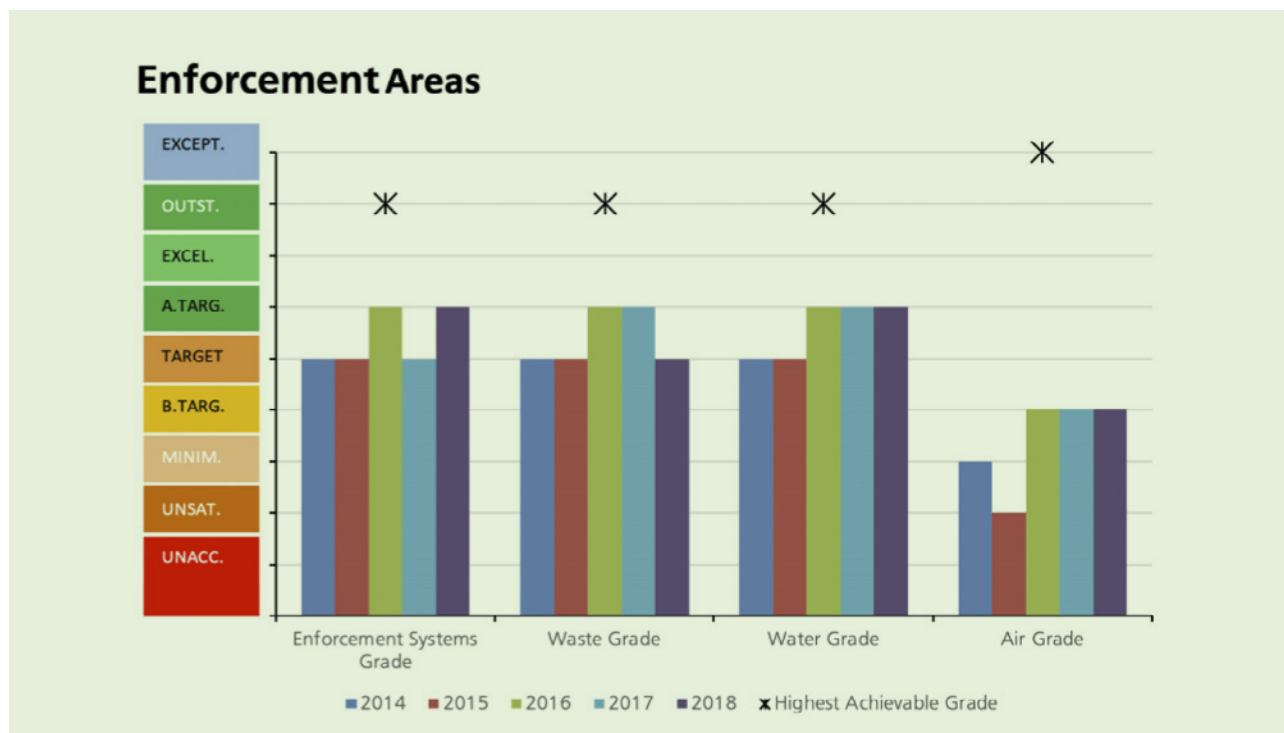


Figure 3 : EPA Enforcement Rating by Thematic Area

The performance assessment system and “RMCEI” process has helped improve the standard of enforcement in all thematic areas and is a very important piece of the overall enforcement framework. However, it does require revision in terms of what is being measured. There are concerns around like for like counting across the thematic areas and the weightings that are attributed both across and within each thematic area. There is potential for a qualitative and quantitative process to tell the outcomes. The current review of the framework being undertaken by the EPA is very welcome.



# NATIONAL PRIORITY 2019

## CONSTRUCTION & DEMOLITION WASTE AND CAPACITY CHALLENGES

### CONSTRUCTION AND DEMOLITION WASTE

Construction and demolition waste (C&D) has been a national priority for some years. C&D comprises the largest waste stream in the EU and it was deemed as a national waste enforcement priority again in 2019 through circular WP 11/18. The WERLAs outlined a programme of work for Local Authorities to address this national waste enforcement priority in a consistent and coordinated manner. This involved the development of toolkits for Local Authorities to monitor movements and tackle the misclassification of waste from major public projects, soil and stone recovery sites, construction sites, and skip facilities. An overarching cradle to grave approach was taken when developing the toolkits.

To ensure consistency, the WERLAs also developed a training course entitled 'Monitoring and Enforcement of Construction and Demolition Waste Activities' aimed at waste enforcement officers which was rolled out through the regional training centres.

Project 2040 is the Government's long-term strategy for future development which outlines many of the major public projects that are underway or planned across the country. Construction activity can also be identified through Local Authorities own commencement notices. The WERLAs compiled and circulated a list of all active and planned major public projects broken down by Local Authority area. Local Authorities were asked to inspect these sites using the associated tool kit developed by the WERLA to ensure that C&D Waste Management Plans were in place and in line with the 2006 'Best Practice Guidelines on the Preparation of Waste Management Plans for Construction & Demolition Projects'. The inspections ensured that C&D waste generated on site was being managed in an ap-

propriate manner where the most appropriate time for intervention is before waste leaves the site. The WERLAs also held a symposium entitled 'Your Waste, Your Responsibility' in 2019 aimed at the original waste producers responsible for the Major Public Projects. Speakers including regulators and industry alike delivered a simple message to stake holders highlighting "Your Waste – Your Responsibility".

By-product notifications made to the EPA under Article 27 were circulated to all Local Authorities by the WERLAs on a regular basis in 2019. The Article 27 toolkit developed by the WERLAs highlights the importance of source and destination Local Authorities liaising with each other for each notification to ensure that what is being notified is actually what is brought on to the destination site and to prevent the risk of environmental pollution. This simple method has proven very successful over time and enforcement action has been taken when for example a destination Local Authority determines that substantially more material has moved than was originally notified or if the material notified was determined not to be a by-product in the first instance and was in fact a waste. Detailed inspections and regular communications with the EPA ensure that by-product notifications are handled in a manner that controls the risk of environmental pollution and prevents the escalating cost of failure. The EPA published updated 'Guidance on Soil and Stone By-Products' in June 2019 which is welcomed by the WERLAs and the Local Authority waste enforcement officers.



AR data from waste collectors and waste facilities was used to identify anomalies for particular List of Waste (LoW) codes focussing inspections on C&D skip facilities and their records also included Back Office inspections for LoW codes 17 01 01 and 17 05 02. The appropriate WERLA toolkit was used by waste enforcement officers on the ground.

The Construction Waste Resource Group established by the DCCAE was divided into four thematic subgroups as follows:

- Article 27/End of Waste / Permit threshold limits
- Capacity, projections
- Waste prevention / Best practice on site/ Circular economy
- Enforcement / Waste flows

The WERLAs chaired the Enforcement/Waste Flows sub-group comprising stakeholders from across industry and regulators. In addition, WERLA representatives sat on the Waste prevention / Best practice on site / Circular economy and Article 27 / End of Waste / Permit threshold limits sub groups. The WERLAs undertook to draft guidance for C&D for use by planners, developers and waste enforcement staff alike and included:

- Revised C&D waste management plan template
- Suite of sample planning conditions
- Pre-planning advice

The draft guidance was presented to the Waste prevention / Best practice on site/ Circular economy; subgroup to progress further.

## NATIONAL PRIORITY 2019

# HOUSEHOLD AND COMMERCIAL FOOD WASTE INCLUDING BROWN BIN ROLL-OUT

Considerable effort has been expended by the Local Authority sector to ensure that the provision of a kerbside waste collection service includes the direct provision of a "Brown Bin" to households in agglomerations > 500 persons in line with the European Union (Household Food Waste and Bio-Waste) Regulations 2015. This enforcement effort has included

- Inspections under the Presentation of Waste Bye Laws to ensure that Householders are source segregating their waste
- Audits of Household Waste Collectors
- Referral of Household Waste collection permits for review by NWCPO
- Serving of Notices under Section 18 of the WMA on Household Waste Collectors to provide information on a monthly basis as to compliance with the Food Waste Regulations

- Serving of Notices under Regulation 10 of the Food Waste Regulations seeking information on the direct provision of Brown Bins
- Prosecutions of Household Waste Collectors for not providing the Brown Bin to their customers
- Seeking an order in the High Court requiring the direct provision of the Brown Bin to customers

This suite of enforcement actions has resulted in a significant increase in the provision of Brown Bins – however further enforcement actions are anticipated in 2020.

Where brown bins have been directly provided to Householders, the challenge will be to ensure that there is an incentivised charging mechanism for households to encourage the use of, and presentation for collection, of these brown bins.

# KEY STATISTICS

1476	Commercial Food Waste Inspections
1421	Inspections in relation to household food waste collection regime
8491	Household Waste Surveys (including monitoring of compliance with segregation requirements)

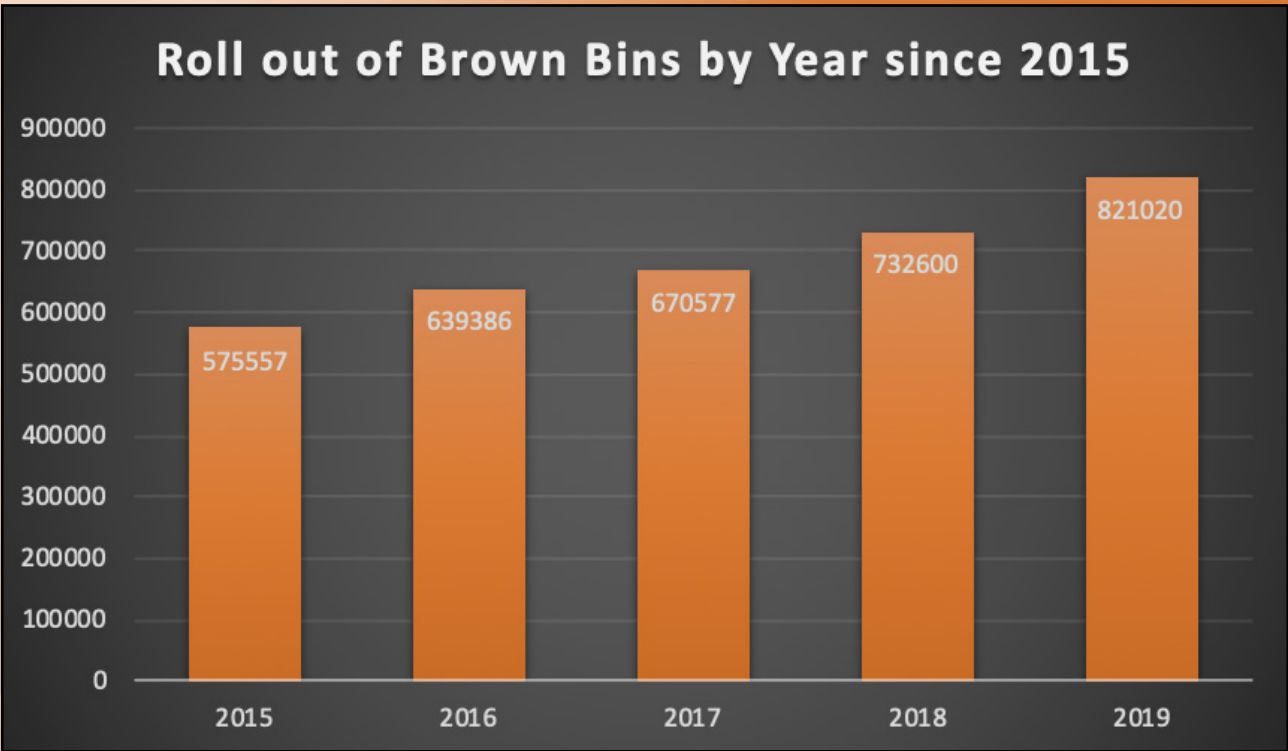


Figure 4 : Roll out of Brown Bins by Year Since 2015



# NATIONAL WASTE PRIORITY 2019

## UNAUTHORISED SITES OF CONCERN – A CASE STUDY OF A MULTI-AGENCY RESPONSE

An area of land adjacent to the Great Island Channel has been infilled at a site at Brown Island, Ballintubrid West, Carrigtwohill.

Ballintubrid lagoon is located behind Brown Island on the north shore of a section of Cork Harbour known as the North Channel, which separates lands to the south of Carrigtwohill from Great Island. It lies in an area surrounded by Ballintubrid West, Ballintubrid East and Brown Island.

The area known as Ballintubrid Lagoon is included within the following designated sites,

- Great Island Channel Special Area of Conservation (site code 001058);
- Cork Harbour Special Protection Area for birds (site code 004030).
- Great Island Channel proposed Natural Heritage Area (site code 001058);

Cork Harbour is also listed by BirdLife International as an Important Bird Area (Hunt et al., 2000) and as a Ramsar Site.

The Waste Enforcement Section, Cork County Council carried out a number of site inspections & investigations and it was discovered that there were large amounts of construction and demolition wastes (C&D) spread across the site, including, but not limited to, soil and stone, bricks, ceramics, concrete, plastics and metal wastes.

Joint inspections were also carried out with the National Parks & Wildlife Service (NPWS) & the Planning Enforcement section of Cork County Council.

A file was subsequently prepared for the DPP to prosecute on indictment and the DPP consented to the accused being returned for trial as outlined below.



## DPP VS JOHN COLLINS

The State prosecuted John Collins on indictment on three counts for offences contrary to sections 32(1)(b) and 32(6), 39(1) and (9), and 55(1)(a) and (8) of the Waste Management Act 1996 as amended.

The case came before Cork Circuit Criminal Court on 30<sup>th</sup> October, 2019 John Collins pleaded guilty to the substantive charge (causing Environmental Pollution) **on a full facts basis** on the 04<sup>th</sup> November, 2019 and the matter was adjourned for sentencing to the 06<sup>th</sup> February, 2020.

Mr. Collins was fined €50,000 by Judge Sean O'Donnabhain on Friday 28<sup>th</sup> February, 2020 in Cork Circuit Criminal Court and given 12 months to pay.



## HIGH COURT CASE – CONNACHT ULSTER REGION

The case of significant illegal dumping at a site in the Connacht Ulster Region continues to be progressed using the Multiagency Approach. Some surface waste was removed by the relevant County Council and High Court Judgements were secured for the cost of this work. The owner of the site was imprisoned for contempt in June 2019. A forensic accountant was employed on behalf of the county council involved, who provided an affidavit as to his

findings to the High Court. The contempt was the site owner's failure to adhere to orders, granted to the relevant County Council by the judge at previous sittings of the court.

These orders directed the owner to explain what had become of the money, estimated by the council to run into millions of euros, that he was paid by householders to dispose of their waste.



# NATIONAL WASTE PRIORITY 2019

## ILLEGAL ACTIVITY AND UNACCOUNTED FOR WASTE

### END OF LIFE VEHICLES (ELVS)

The aim of the End of Life Directive 2000/53/EC is to ensure that ELVs are dismantled and recycled in an environmentally sound manner. It sets clear quantified targets (85% reuse and recycling, and 95% reuse and recovery) of the ELVs and their components. In 2017, Ireland achieved a reuse and recovery rate of 94.6%.

To achieve the targets set out by the ELV Directive (85% reuse and recycling, and 95% reuse and recovery) the WERLAs assisted Local Authorities to monitor the activities of Authorised Treatment Facilities and close down unauthorised scrap yards. This was achieved by:

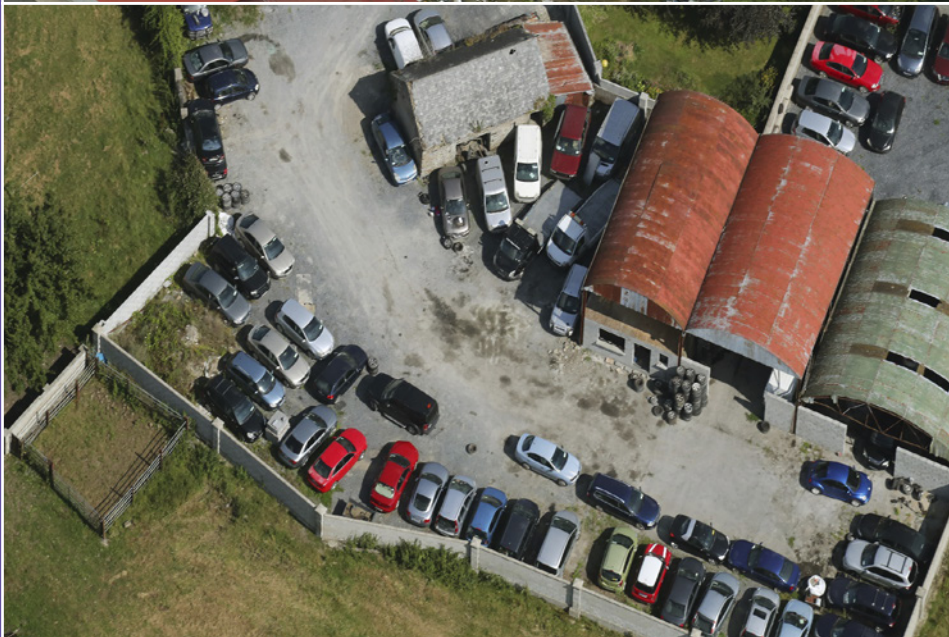
- A coordinated project with the EPA to analyse data from individual ATFs to establish if the ATF is achieving national targets, is compliant with ELV regulations, and to investigate if ATFs are facilitating the unauthorised treatment of waste in unauthorised sites.
- Conducting joint operations with the EPA on ATFs to ensure that Fluorinated-gases (F-gases) are recovered from all vehicles prior to dismantling and disposed of appropriately - Air Conditioning units in cars, buses, trucks and other vehicles designed to cool the vehicle for the comfort of passengers generally run on F-gases, such as R134a, which are powerful greenhouse gases.
- Initiating appropriate enforcement actions on unauthorised ELV sites, and unauthorised ELV collectors.

This coordinated approach of all stakeholders working together to achieve common goals and national targets has resulted in

- The number of Certificates of Destruction issued by ATFs in 2019 exceeding 100,000 (109,025 in total).
- Ireland achieved an ELV reuse and recycling rate of 86.37% and a reuse and recovery rate of 95.17% in 2018, in compliance with current EU targets.

Reference Year	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
ELV reuse and recycling %	79	77	81	82	80	82	83.3	86	85.9	86.37
ELV reuse and recovery %	82	77	83	88	92	91	91.8	92.8	94.6	95.17

Figure 5 : Rate of progress by year towards the End of Life Vehicle EU targets as per EPS Statistics.



## UNAUTHORISED WASTE COLLECTORS – “MAN IN VAN”

Circular No WP 11/18 Communicated by the DCCAE in November 2018, highlighted the National Waste Enforcement Priorities for 2019, which included Illegal waste activity and unaccounted for waste. The corresponding Local Authority work programme developed by the WERLAs identified that the 'Man in the Van' aspect of the National Waste Enforcement Priority 'Illegal Activity & Unaccounted for Waste' would be addressed in Quarter 2 2019. Unauthorised collectors known as "Man in Van", collect waste for cash and dispose of this waste in an unauthorised manner. These operators tend to advertise their activities through local newspapers and social media websites.

To ensure consistency of approach in addressing this National Waste Enforcement Priority while allowing for flexibility in addressing individual challenges, the WERLAs developed Guidance Documents and corresponding procedures for Local Authorities. These documents presented individual case studies from Local Authorities and used 'lessons learnt' and outcomes to highlight best practice in terms of operational tactics and the use of social media. The Anti-Dumping Initiative for 2019 stipulated that Local Authorities use the WERLA Guidance for the purposes of targeting unauthorised waste collectors advertising on-line.

To complement the guidance documents, the WERLAs also arranged for training through the Regional Training Centres to assist Local Authorities if dealing with 'Difficult & Aggressive Behaviour' through the course of their work.

Under section 34 of the Waste Management Act 1996 (as amended) (WMA) a person "shall not, for the purposes of reward, with a view to profit or

otherwise in the course of business, collect waste, on or after such date as may be prescribed, save under and in accordance with a permit".

Section 32 of WMA ACT act makes it an offence for a person to "transfer the control of waste to any person other than an appropriate person" where an appropriate person is a Local Authority or a person authorised under the legislation to undertake collection, disposal or recovery of the waste.

The WERLA Guidance documents along with surveillance tools using smart technology and the monitoring of social media were all used to secure successful outcomes for Local Authorities under Section 34 of the Waste Management Act. Local Authorities conducted enforcement actions in association with local Gardaí to provide support for various operations. Waste Enforcement Officers (WEO) used their powers under S14 of the Waste Management Act if operators were found to be collecting waste without a valid waste collection permit. This included the issuing of Fixed Payment Notices (FPN), directing vehicles to an appropriate location for further investigation.

Successful outcomes using the WERLA Guidance documents developed on 'Man in the Van' include:

- Waterford County Council – Prosecution secured under S34 of the Waste Management Act and fines imposed.
- Wicklow County Council – Offences under the Road Traffic Act including driving with no tax and no insurance resulting in the arrest of the collector and the vehicle being detained. Wicklow Co Co proceeding with a prosecution under S34 (1)(a) of the Waste Management Act.
- South Dublin County Council – Section 14 direction issued and a prosecution secured under S34 of the Waste Management Act.



## CASE STUDY MEATH COUNTY COUNCIL SOCIAL MEDIA CAMPAIGN:

Meath County Council undertook an extensive social media campaign to tackle 'Man in the Van' suspected illegal waste collectors advertising extensively on various social media outlets. The aim of this project was to highlight original producer responsibility at a householder level, resulting in a loss of potential customers from suspected illegal waste collectors.

The first part of the project involved Meath County Council informing householders that it was their responsibility to ensure that a 'waste collector' had a valid waste collection permit and that any householders who gave their waste to an illegal waste collector could be fined or prosecuted under the Waste Management Act.

Meath County Council then identified adverts posted by suspected illegal waste collectors on social media and re-posted them (with mobile phone numbers removed) on the Local Authority's social media platforms highlighting that the collector did not hold a waste collection permit.

Meath County Council noticed an immediate reaction on social media -with householders asking the suspected illegal waste collectors if they had a waste collection permit and people reporting this on community pages and flyers. The suspected illegal waste collectors responded by changing the style of their adverts e.g. different background or wording slightly changed. These were also re-posted on the Local Authority's media outlets, with the message that the waste collectors were unauthorised. After a number of weeks, the Local Authority noticed a number of the suspected illegal waste collectors were trying to masquerade as a different service, e.g. gardening services, pavement wash downs, cleaning gutters, etc. The campaign is ongoing and the interaction with the public remains constant. This social media content receives a large number of impressions, up to 25,000 hits at its highest, this compares to the average impression of around 1,500 hits.

Meath County Council also used billboards placed at 6 locations around the county with the intention of reaching to a wider audience who may not use social media



# ANTI-DUMPING INITIATIVE 2019

The 2019 Anti-Dumping Initiative (ADI) was officially announced in Darndale, North Dublin on the 1st April 2019 by Minister Richard Bruton. A total of 302 projects were delivered under the ADI scheme. A detailed report on the was prepared and published in April 2020 and is available to download using the following link: <http://www.werla.ie/wp-content/uploads/2020/04/ADI-3.4.2020.pdf>.

WERLA Region	No of Projects approved	Funding approved	No of projects Completed	Funding Claimed	Tonnages Collected from Clean-ups
Connacht Ulster Region	92	€ 1,000,000	114	€981,000.96	376.81
East Midlands Region	94	€ 984,817.50	86	€899,088.66	619.84
Southern Region	102	€ 1,000,000	102	€1,020,585.49	641.76
<b>Total</b>	<b>288</b>	<b>2984817.5</b>	<b>302</b>	<b>€2,900,675.11</b>	<b>1638.41</b>

Figure 6 : Summary of Projects Completed in 2019.

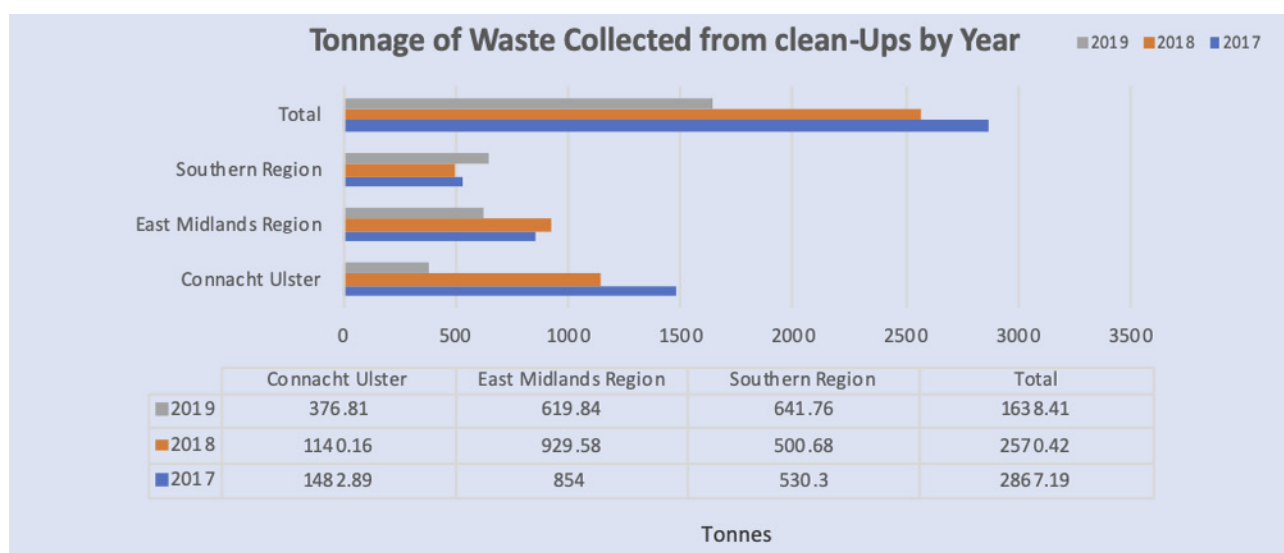


Figure 7 Tonnage of Waste Collected by Year Funded by Anti-Dumping Initiative

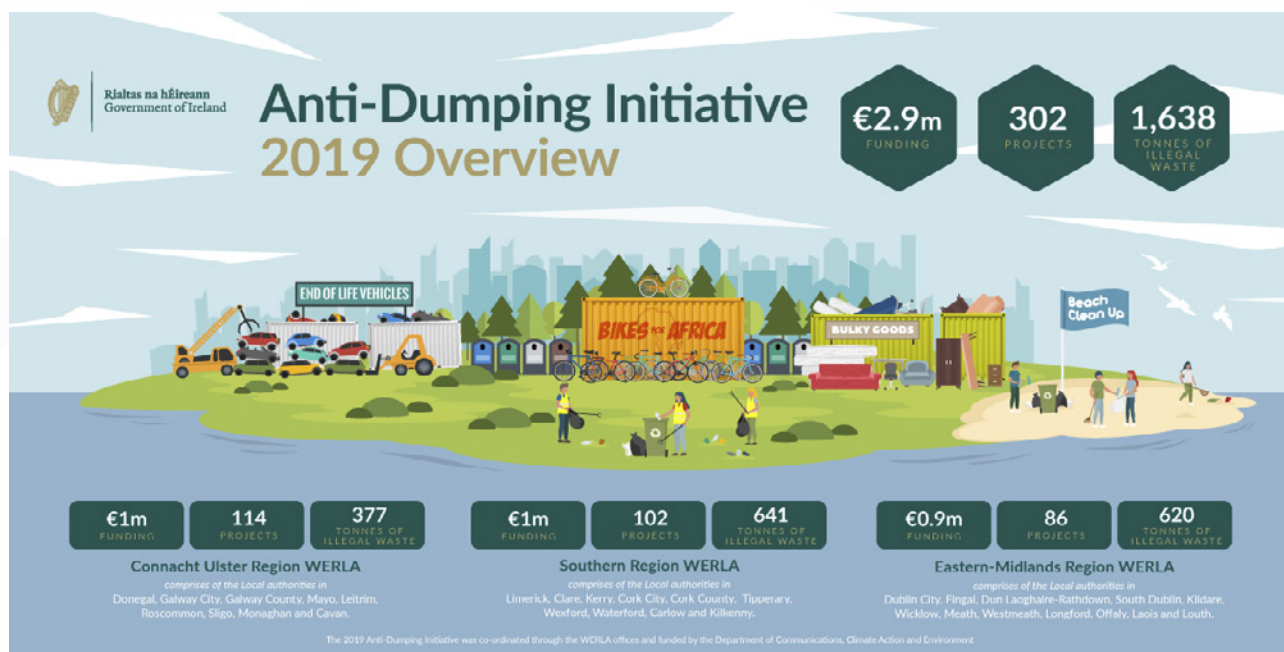


Figure 8 Anti-Dumping Initiative 2019 Overview

# NATIONAL PRIORITY 2019

## PRODUCER RESPONSIBILITY INITIATIVES

### TYRE ENFORCEMENT PROJECT

The Waste Management (Tyres and Waste Tyres) Regulations 2017 as amended (SI. No. 400 of 2017) were enacted on the 1st of October 2017 to promote the environmentally sound management of tyres and waste tyres. The Regulations provide a regulatory framework for the tracking of tyres placed on and removed from the Irish Market.

The regulations provisioned for the establishment of a Producer Responsibility Initiative (PRI) for the management of tyres and waste tyres in the Republic of Ireland. REPAK ELT is the approved body appointed by the Department of Communication, Climate Action and Environment (DCCAE).

The Local Authority enforcement drive continued throughout 2019 with the support of the WERLAs. Inspections focused on unregistered and revoked tyre retailers operating outside the regulatory framework. The use of a communication portal between the approved body, REPAK ELT and Local Authorities ensured a targeted enforcement drive. There is currently a 91% compliance rate nationally with the regulations.

### KEY STATISTICS

Local Authority  
Inspection 2019:

**611**

REPAK ELT  
Membership 2019:

**2,592**

Number of waste  
tyres collected &  
recovered by REPAK  
ELT during 2019:

**4 million**



## PACKAGING ENFORCEMENT PROJECT

The pilot packaging enforcement project commenced in 2017 and is ongoing on a yearly basis. The project focuses on suspected major producer (SMPs) of packaging who are not meeting their obligations under the regulations.

Major producers of packaging have an obligation to register with each Local Authority or with the approved body, REPAK.

The pilot packaging enforcement project continued during 2019. A national list of 93 suspected major producers was developed and circulated to Local Authorities ensuring targeted enforcement. The utilisation of a communication platform between the approved body, REPAK and Local Authorities has resulted in synergies ensuring a consistent and targeted enforcement approach.

The Producer Responsibility Officers (PROs) developed a guidance pack and tool for waste enforcement officers (WEOs) assessing major producers of packaging who wish to use the self-compliance option through registration with Local Authorities. The guidance pack and tool assists WEOs in the evaluation of applications for registration and includes quarterly returns and annual reports ensuring consistency in data returns and assessment criteria to. The Producer Responsibility Officers have provided group training and peer-to-peer training for WEOs to ensure consistency in the Local Authority Sector



### IMPORTANT STATISTICS

**Packaging major  
producer registered  
premises: 8,874**

## END OF LIFE VEHICLES (ELVS) PILOT COMPLIANCE PROJECT

The European Union (End-of-Life Vehicles) Regulations 2014 as amended place specific obligations on vehicle owners, producers and authorised treatment facilities regarding the deposit, treatment and disposal of ELVs.

The regulations encourage the reuse, recycling and recovery of ELVs. ELVES CLG is the approved body appointed by the DCCAE.

Producers of specified vehicles (importers of new and used cars) have an obligation to register with each Local Authority within the state or with the approved body, ELVES.

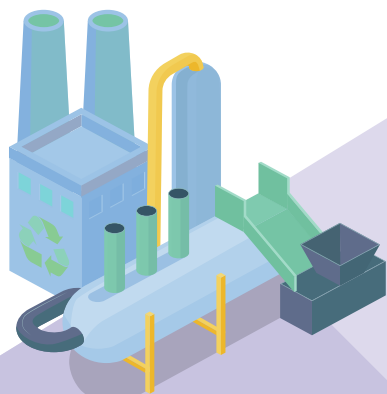
The ELV pilot compliance enforcement project continued for 2019. A national list of specified vehicle producers continued to be used by Local Authorities enabling targeted inspections.



### KEY STATISTICS

**Inspections of suspected  
vehicles importers: 349**

# KEY STATISTICS



Waste Facility Permits /  
Certificates of Registration **991**

ATFs **200**

Authorised Waste Collectors **2,013**

## INSPECTIONS

Waste Permitted Facility **1,592**

Multi Agency inspections **226**



Packaging Major Producer  
registered sites **8,874**

Tyre Repak ELT sites **2,816**

Registered Vehicle Importers **193**



## COMPLAINTS

Waste complaints  
investigated **37968**



## ENFORCEMENT ACTIONS

Waste Warning Letters	<b>4852</b>
Direction under Section 14	<b>1162</b>
Notice under Section 18	<b>333</b>
Notice under Section 55	<b>463</b>
Section 71 - Abandoned Cars	<b>2659</b>
Notice under Article 25 Packaging	<b>38</b>
Fixed Payment Notices (FPN)	<b>364</b>
PRI action initiated during the year	<b>9</b>
<b>Total</b>	<b>9880</b>



## PROSECUTION ACTIONS

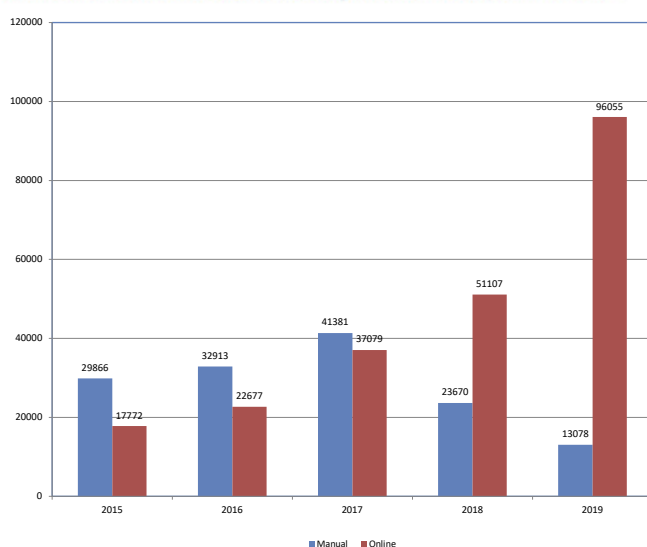
Notice under Section 14	<b>103</b>
Notice under Section 18	<b>81</b>
Notice under Section 32	<b>147</b>
Notice under Section 55	<b>86</b>
DPP / Indictments	<b>0</b>
Prosecutions for failure to pay FPN	<b>2</b>
Prosecutions in relation to PRI	<b>5</b>
Schemes	
<b>Total</b>	<b>424</b>

## KEY STATISTICS

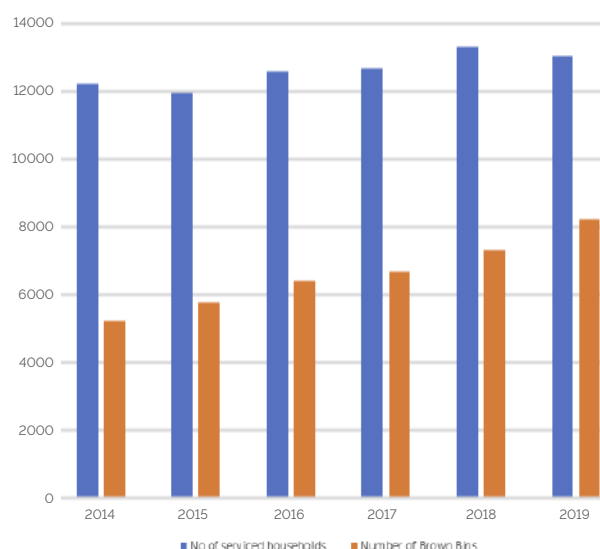


## ACHIEVEMENTS

Certificates of Destruction (COD) issued to registered owners of specified vehicles.



Households served and Brown Bin Roll Out by Year  
Source: NWCPO



## PUBLICATIONS

The WERLAs provide standard templates, reports and guidance as per Figure below.

Document Type	No of Docs provided
Advice/Recommendation templates	9
Standard Application Forms for Self-Compliant Applications for Producer Responsibility Initiatives	13

Guidance Manuals	23
Inspection Proformas	18
Reports to stakeholders	42
Standard Letter Templates	21
Standard Notices and Orders	10
Submissions to stakeholders (generally consultation)	20
Workflow systems	6

Figure 9: Publications by WERLA Offices since 2016.

# WERLA BUSINESS PLAN STRATEGY 2020

## OBJECTIVE A: IMPLEMENT EU AND NATIONAL LEGISLATION AND POLICY TO ENSURE A CONSISTENT APPROACH TO WASTE ENFORCEMENT.

**A1 Policy: Support and monitor implementation of the national waste enforcement priorities for 2020 as agreed by the National Waste Enforcement Steering Committee (NWESC).**

### **National Priority: End of Life Vehicles Directive (ELV)**

#### **Sub-National Priority: Authorised Treatment Facilities & unauthorised Scrap Yards**

Action	Target 2020
Improve recovery, reuse and recycling rates of ELVs through data gathering and compliance with WFPs and ELV regulations.	To improve compliance rates to achieve targets set out by the ELV Directive (85% reuse and recycling and 95% reuse and recovery).  To enforce WFP & ELV regulations.
Ensure appropriate enforcement actions are taken against unauthorised ELV sites/ Scrap Yards.	To ensure only Authorised Treatment Facilities operate in the ELV sector.

### **National Priority: Waste Collection- Household (HH) & Commercial**

#### **Sub-National Priority: HH & Commercial Brown Bin Roll Out and AER Validations**

Action	Target 2020
To ensure consistent enforcement of household & commercial waste legislation.	Compliance of waste operators with relevant food waste legislation & Waste Management Plan.  Conduct inspections to ensure compliance with waste collection permit and food waste regulations.

### **National Priority: Construction and Demolition Waste and Capacity Challenges**

#### **Sub-National Priority: Construction and Demolition Activity**

Action	Target 2020
Design and implement a programme to monitor construction and demolition waste activities.	Roll out programme to monitor construction and demolition waste activities.

### **National Priority: Multi-agency sites of interest**

#### **Sub-National Priority: Multi-agency sites of interest**

Action	Target 2020
Design and implement a strategy for identifying multi-agency sites of interest.	Address sites of concern using funding available from DCCAE.

<b>National Priority: Tackling Significant Illegal Waste Activity</b>	
<b>Sub-National Priority: Man in the Van</b>	
<b>Action</b>	<b>Target 2020</b>
Continue programme to identify and address Man in the Van operators.	Continue to support LAs with Man in the Van Operations.
Schedule coordinated activity to focus on Waste Collection Permits.	Ensure compliance with conditions 3.4 (Name and Number on vehicle) FPN condition and condition 2.15 (Promotional Material).
<b>Sub-National Priority: Anti-Dumping Initiative (ADI)</b>	
<b>Action</b>	<b>Target 2020</b>
Subject to funding from DCCAE, roll-out ADI programme.	To identify appropriate projects for funding subject to DCCAE criteria.
<b>A2 Policy: Support and monitor implementation of PRI schemes in 2020 as agreed by the National Waste Enforcement Steering Committee (NWESC).</b>	
<b>National Priority: PRI Compliance</b>	
<b>Sub-National Priority: Vehicle Producer Compliance Project</b>	
<b>Action</b>	<b>Target 2020</b>
Ensure compliance with ELV regulation in particular for vehicle producers and importers.	To increase the number of compliant producers.
<b>Sub-National Priority: Waste Tyres</b>	
<b>Action</b>	<b>Target 2020</b>
Ensure continued compliance with the tyre regulations.	To increase the number of registered retailers.
<b>Sub-National Priority: Packaging Enforcement Project</b>	
<b>Action</b>	<b>Target 2020</b>
Ensure obligated operators are compliant with Packaging Regulations	To ensure SMPs are compliant with the regulations.
<b>A3 Policy: Support and monitor implementation of Mercury Regulations in 2020 as agreed by the National Waste Enforcement Steering Committee (NWESC).</b>	
<b>National Priority: Compliance with Mercury Regulations</b>	
<b>Sub-National Priority: Compliance with Mercury Regulations</b>	
<b>Action</b>	<b>Target 2020</b>
Ensure compliance with Mercury Regulations as directed by DCCAE.	To ensure compliance as per DCCAE guidance.

## OBJECTIVE B: IDENTIFY AND MANAGE NATIONAL WASTE ENFORCEMENT ISSUES THROUGH A CLEARLY DEFINED STRATEGY.

<b>B1 Policy: Review and maintain Annual Work Plan.</b>	
<b>Action</b>	<b>Target 2020</b>
To prepare and maintain an annual work plan to prioritise enforcement actions and activities across the region taking account of the national enforcement priorities laid down by the EPA, DCCAE and PRIs.	<p>In line with Policy Action F3.3 of RWMP. 2020 work plan agreed by Nov 2019.</p> <p>Circulated to all LAs for RMCEI planning.</p> <p>Maintained/updated throughout the year.</p>
<b>B2 Policy: Continue working relationships with stakeholders and utilise the data gathered to identify enforcement challenges.</b>	
<b>Action</b>	<b>Target 2020</b>
Maintain working relationships with stakeholders and utilise the data gathered to address and identify enforcement challenges.	<p>In line with Policy Action F2.2 work in partnership with stakeholders to address ongoing regulatory obligations.</p> <p>To identify and recommend waste enforcement challenges to the NWESC for consideration as future national priorities.</p>
Identify Local Authorities who have become centres of excellence for enforcement functions in specific waste streams.	Establish and organise waste enforcement teams to deal with issues/ emergencies and identify operations requiring a WERLA response
<b>B3 Policy: Deliver an integrated approach to drive consistent enforcement of legislation.</b>	
<b>Action</b>	<b>Target 2020</b>
Continue to work with the EPA to develop consistency of approach with RMCEI plans and enforcement of legislation.	To ensure the Local Authority waste enforcement plans across the regions are consistent with the national waste priorities.
Improve enforcement through greater regional coordination, information sharing and prioritisation of enforcement activities.	In line with Policy Action F2.1 deliver annual work plan (B1.1.1) to LAs through the regional structure.
To ensure Local Authorities are aware of obligations under the Waste Management Plan.	To ensure Local Authorities fulfil their requirements under Objective F of the Waste Management Plan.

## OBJECTIVE C: COMMUNICATE AND COORDINATE WASTE ENFORCEMENT STRATEGIES AND ACTIVITIES AND WORK WITH RELEVANT STAKEHOLDERS TO DRIVE IMPROVED LEVELS OF COMPLIANCE.

### **C1 Policy: Ensure all guidance issued is accurate, consistent and takes account of relevant legislation.**

Action	Target 2020
Develop and maintain a document control system.	Manage document control system.
Maintain appropriate structure for provision of legal advice.	Maintain current structure for sharing legal advice.

### **C2 Policy: Provide the structure to facilitate greater cooperation between enforcement authorities, allow for increased peer-to-peer learning and allow for the creation of forums for knowledge sharing of best practice.**

Action	Target 2020
To identify current training deficits among waste enforcement staff within the region and future training requirements including specific specialist training where necessary and utilising the network of training centres to organise the relevant training and refresher training.	Meet the training needs of the region.

### **C3 Policy: To communicate effectively amongst stakeholders.**

Action	Target 2020
To communication effectively with stakeholders.	Maintain effective communications within governance structure and with other stakeholders.

## OBJECTIVE D: DRIVE IMPROVED PERFORMANCE AND CONSISTENCY OF WASTE ENFORCEMENT THROUGH CLEARLY DEFINED STRUCTURE AND PROCEDURES.

<b>D1 Policy : Provide standard waste enforcement guidance to ensure best practices and efficiencies are adopted.</b>	
<b>Action</b>	<b>Target 2020</b>
To maintain a funded Regional Waste Enforcement Office and the requisite structures (including administrative, technical & communication) to implement national policy.	<p>Ensure a funded regional office is maintained.</p> <p>Maintain SLA and other related policy documents.</p>
To maintain a Regional Coordinator, Regional Technical Officer, PRO and administrative support or as agreed with the DCCAE.	Ensure roles are in place and maintained.
<b>D2 Policy: Work with stakeholders on structures required to develop knowledge sharing.</b>	
<b>Action</b>	<b>Target 2020</b>
To develop and disseminate guidance for waste enforcement practices.	Develop and implement guidance for waste enforcement practices as required.
<b>D3 Policy: Improve performance through the use of technology.</b>	
<b>Action</b>	<b>Target 2020</b>
Explore opportunities for the use of IC technologies that add value to waste enforcement policies.	<p>Progress MIS Project.</p> <p>Develop ICT Proposal.</p>

## OBJECTIVE E: WORK WITH LOCAL AUTHORITIES AND OTHER STAKEHOLDERS TO DEAL WITH SERIOUS ENVIRONMENTAL WASTE CRIME.

### E1 Policy: Develop measures to assist Local Authorities with the prevention, reduction, and cessation of unauthorised waste activities.

Action	Target 2020
Ensure all Local Authorities maintain the role of Environmental Complaints Coordinator to manage an unauthorised waste activity database based on complaints received and monitoring undertaken.	Environmental Complaints Coordinator in place in each Local Authority.  Consistent database of unauthorised waste activities in place in each LA.
Support Local Authorities in their responsibilities in carrying out investigations and issue notifications, as required, as dictated by the unauthorised waste activity database and as directed by the EPA.	Increased investigation and prevention of unauthorised waste activities.
Scope out an appropriate response (subject to AA screening) to deal with the prevention and management of waste from significant unauthorised activities and waste arising from other criminal activities. Coordination required between the regions.	Prevent and address unauthorised activities in the region.

### E2 Policy: Identify serious national waste enforcement issues and liaise with stakeholders in formulating appropriate responses.

Action	Target 2020
Coordinate Regional / National response to unauthorised activities.	Ensure a co-ordinated approach to unauthorised activities.
Support the development of intelligence led and coordinated multi-agency enforcement.	Establish and support multi-agency group.





## Waste and Collection Licencing Agreement

