

# Irish Waste Management Association Conference

## 28<sup>th</sup> November 2017



connacht-ulster  
waste region



eastern - midlands  
waste region



southern  
waste region

Local Authorities supported by  
Waste Enforcement Regional Lead Authorities  
(WERLAs)

**Seán Scott,  
Regional  
Coordinator  
CU WERLA.**



# Outline of Presentation

1. Introduction
2. WERLAs Background
3. Role of Local Authorities
4. Regional Waste Management Plans
5. Work Planning and Performance Assessment
6. RMCEI Statistics
7. WERLA work including National Priorities
8. ICT & Future Projects
9. Conclusion

# Waste Enforcement Regional Lead Authorities (WERLAs)

- Coordinating waste enforcement actions
- Setting priorities and common objectives for waste enforcement
- Ensuring consistent enforcement of waste legislation across the three existing waste management planning regions
- Local Authority personnel as first responders on the ground to specific breaches of waste legislation

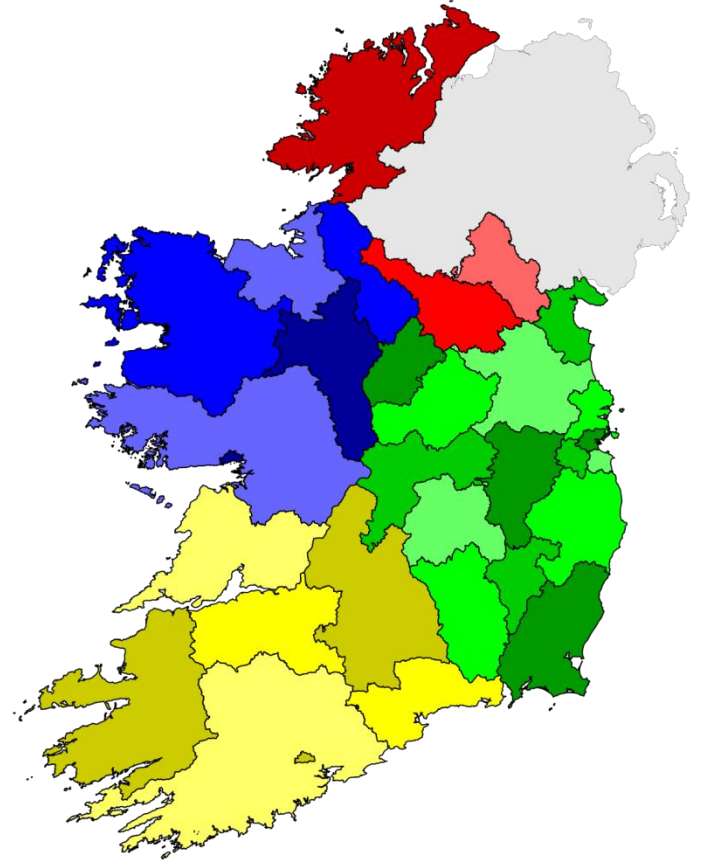


# Irish Times (Saturday 13<sup>th</sup> May 2017)

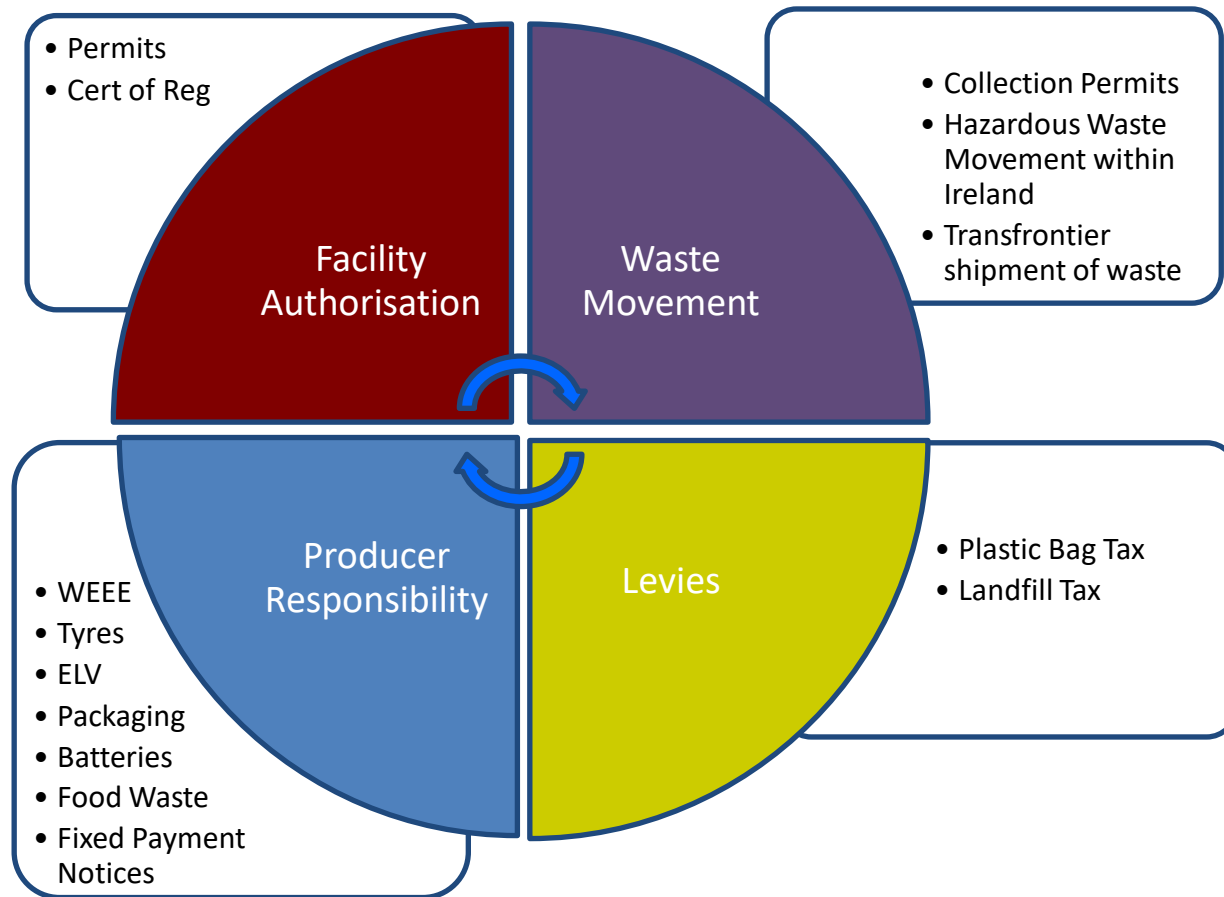
- *At this point, a little-known body, the Waste Enforcement Regional Lead Authorities (WERLA) took a hands-on role.*
- *WERLAs are part of the European Union-ordered regulatory rules.*
- *In effect, local authority officials assigned to WERLAs are there to breathe down the necks of councils. If they are found wanting, information is fed to Department of the Environment.*

# Local Authorities & Environmental Protection

- 500 Environmental Protection Obligations
- 100 Pieces of Legislation



# Local Authority Responsibilities



# Change Management – Waste Enforcement

## 3. Role of Local Authorities

- New Technology/Systems
- Data Management Systems
- Three Bin system / Split truck
- New waste treatment technologies
- Innovation to address circular economy
- New Recovery options

- Waste Collection Permit Regulations
- PRI schemes
- Food Waste Regs
- Facility Permit Regs
- TFS movement of Waste



Source: Rius-Siempre, Mexico.

- WERLAs
- Dealing with issues of increased criminality with regard to waste crime
- Coordinated and integrated enforcement approach
- National Priorities
- Fixed Payment Notices

- Rationalisation of Waste Regions from 10 to 3
- NWCPO
- NTFSO



# Regional Waste Management Plans

## 4. Regional Waste Management Plans

 <p><b>Connacht - Ulster Region</b> Waste Management Plan 2015 - 2021</p>	 <p><b>Southern Region</b> Waste Management Plan 2015 - 2021</p>	 <p><b>Eastern - Midlands Region</b> Waste Management Plan 2015 - 2021</p>
 <p><b>Plan Target</b> 1% Reduction Per Annum in the Quantity of Household Waste Generated per capita over the period of the plan</p> <p><b>Plan Target</b> Achieve a recycling rate of 50% of managed municipal waste by 2020</p> <p><b>Plan Target</b> Eliminate the direct disposal of unprocessed residual municipal waste to landfill</p>	 <p><b>Plan Target</b> 1% Reduction Per Annum in the Quantity of Household Waste Generated per capita over the period of the plan</p> <p><b>Plan Target</b> Achieve a recycling rate of 50% of managed municipal waste by 2020</p> <p><b>Plan Target</b> Eliminate the direct disposal of unprocessed residual municipal waste to landfill</p>	 <p><b>Plan Target</b> 1% Reduction Per Annum in the Quantity of Household Waste Generated per capita over the period of the plan</p> <p><b>Plan Target</b> Achieve a recycling rate of 50% of managed municipal waste by 2020</p> <p><b>Plan Target</b> Eliminate the direct disposal of unprocessed residual municipal waste to landfill</p>
<p><i>the next d</i></p> <p><a href="http://www.curwmo.ie">www.curwmo.ie</a></p>	<p><i>do one more th</i></p> <p><a href="http://www.southernwasteregion.ie">www.southernwasteregion.ie</a></p>	<p><i>new region new vision</i></p> <p><a href="http://www.emwr.ie">www.emwr.ie</a></p>

# Regional Waste Management Plan Targets



## What are the Regions' Targets of the RWMP

- Reduction in waste arising by 1% per annum over the life of the Plan.
- Recycling rate of 50% of managed municipal waste by 2020.
- Eliminate the direct disposal of unprocessed residual municipal waste to landfill.



# Regional Waste Management Plan Targets

What are the EU Mandatory Targets over the Plan's life time?

- Recycling of household paper, plastic, glass etc 50% by 2020 (*55% as a minimum by weight of packaging waste will be recycled.*)
- Recycling of construction and demolition wastes 70% by 2010, excluding natural soils and stone
- Maximum biodegradable municipal waste to landfill 427K tones July 2016 (*Biodegradable municipal waste going to landfills must be reduced to 35% of the total quantity (by weight) biodegradable municipal waste produced in 1995 (427,000 t)*)
- End of life vehicles recovered 95% by 2015
- End of life vehicles recycled 85% 2015
- Batteries collected 45% by 2016
- WEEE recovered and recycled 4kg per person by 2015. (*Separate collection of > 4kg of WEEE from private households per person per year.*)



**The power  
of recycling**

# Coordination of RWMP Local Authority RMCEI plans

- Regional Waste Management Plans signed off by Local Authorities
- WERLAs have worked with relevant stakeholders to ensure that RMCEI plans are aligned with the objectives of the RWMPs (2015 to 2021)
- This will help to deliver on the overall targets set out in the RWMPs

# 19.7 ENFORCEMENT AND REGULATION ACTIONS

## (Strategic Objective F)

The region will Implement a consistent and coordinated system for the regulation and enforcement of waste activities in cooperation with other environmental regulators and enforcement bodies.

Four Policies – F1, F2, F3 and F4

19 Policy Actions



# Work Planning (RMCEI)



- Workload prepared in accordance with Recommendation 2001/331/EC providing for ***minimum criteria for environmental inspections*** (RMCEI) as adopted by the European Parliament.
- Sets minimum criteria for organising, carrying out, following up, reporting and publicising the results of environmental inspections.
- Strengthen compliance rates and encourage more consistent approach
- Based on above, submit an annual programme of works to the EPA outlining resources available, and no's of inspections etc,
- All Local Authorities have an enforcement policy in place.

# RMCEI Planning

- The WERLAs standardised the Waste section of RMCEI plans for 2017 and have completed a further revision with the EPA for 2018
  - to ensure the alignment of Local Authority RMCEI programmes to the Regional Waste Management Plans and the inclusion of the National Priorities.
  - greater consistency of approach across Local Authorities in terms of objectives, decisions, actions, and final environmental outcomes.
  - Met all relevant stakeholders
  - Communicate Regional plan to inform LA RMCEI plans

# Performance Assessment

## 2015 Performance Report

**Summary:** This report presents summary results for each Local Authority and combined results to give a national picture of environmental enforcement based on 2015 data. The report builds on the baseline report previously published. The information will be used to build a culture of continuous improvement and will facilitate sharing of best practice and encourage solutions to common administrative challenges among Local Authorities.



**Published:** 2016

**ISBN:** 978-1-84095-708-2

**Pages:** 36

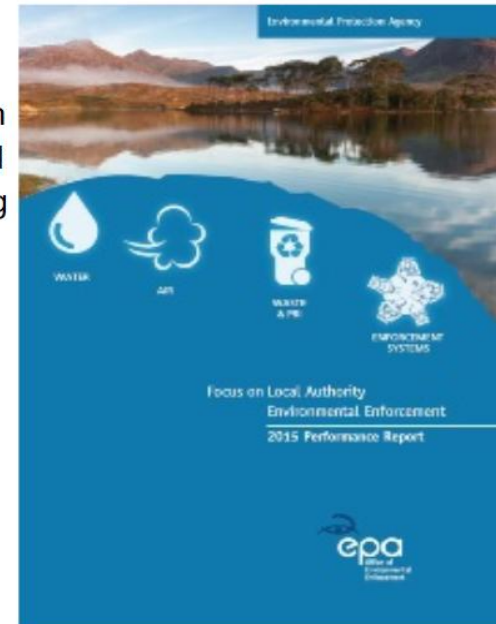
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**Format:** pdf

[Download now](#)

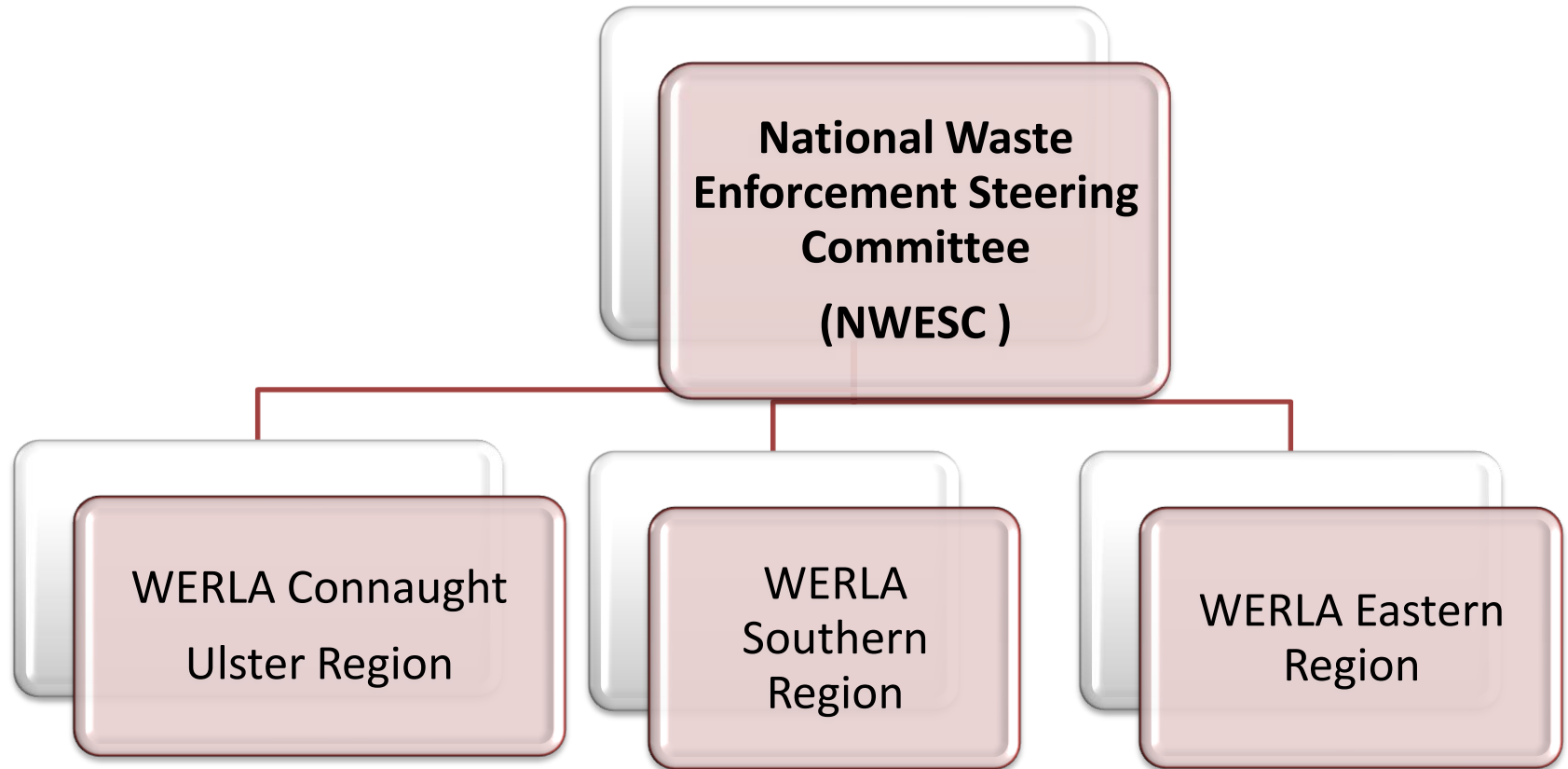
## Related documents

- ▶ [Focus on Local Authority Environmental Enforcement - Baseline Enforcement Report](#)
- ▶ [Local Authority Environmental Enforcement - A Detailed Assessment](#)
- ▶ [Local Authority Environmental Enforcement - Guidance Booklet B](#)
- ▶ [Local Authority Environmental Enforcement - The Performance Measurement Framework](#)





# Governance



# Role of WERLAs

Coordinate

Support

Consistency

Develop strategic responses to issues

Implement priorities

Enforcement proceedings

Greater cooperation between enforcement authorities

Address training deficits

Increased peer-to-peer learning

Visible presence in the field

# Communication

- Regional Planning & WERLA Steering Group
- National Waste Enforcement Steering Committee
- Industry Contact Group
- Regional WERLA Operations Group
- Regional Waste Planning Office/s
- Regional Waste Enforcement Officers network
- EPA, NWCPO and NTFSO
- County Councils,
- Strategic Policy Committees
- Senior Management Teams
- LA Env Teams
- PRI schemes
- Key Agencies e.g. Irish Water, ESB etc
- Multi Agency Networks
- NGOs

# Why The Need For Enforcement

1. Protection of the Environment
2. Polluters Pay Principle
3. Compliance is not negotiable (Terry A'Hearn)
4. Consequences of non-compliance.
5. Culture of Certainty in Enforcement
6. Escalating Cost of Failure
7. Loss of Scarce Resources
8. Waste Framework Directive & RWMP



# How – 2016/17

As set out in the Business Plan CU WERLA is to provide for a consistent approach to Waste Enforcement in the Region

## 1. Technical assistance through

- Guidance notes
- Enforcement Manual
- Training
- Management Information Systems (MIS)
- Alignment of plans

## 2. Tactical assistance though

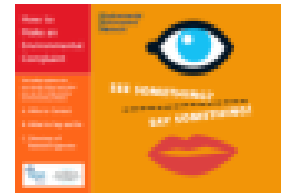
- Joint Operations with and between Client Local Authorities
- Supporting Criminal Investigations.
- Multi-Agency networks

# Intelligence Led Multi-Agency Approach

NPWS



DAFM



# Multi-Agency Cooperation

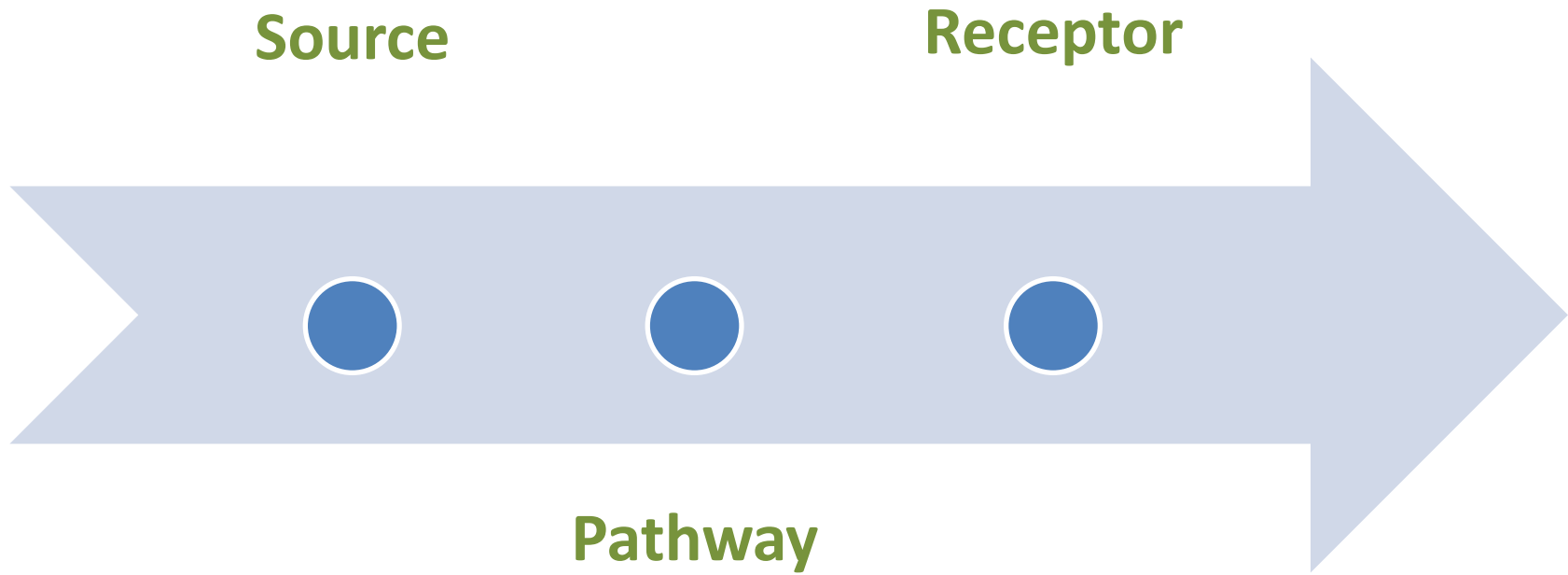


# Risk Based Approach to Enforcement

- Analyse Patterns of Noncompliance
- Identify the Best Time for intervention
- Coordinated Approach
  - Multi-Agency
- Not Just prosecution – Disruption Teams (Multi Agency)







# National Priorities - 2017

- Household Waste Management Compliance including Brown Bin;
- Illegal Dumping including construction and demolition waste;
- End- of-Life Vehicles;
- Tyres
- Pilot Packaging Report

# Household Waste Collection

Source - Householders

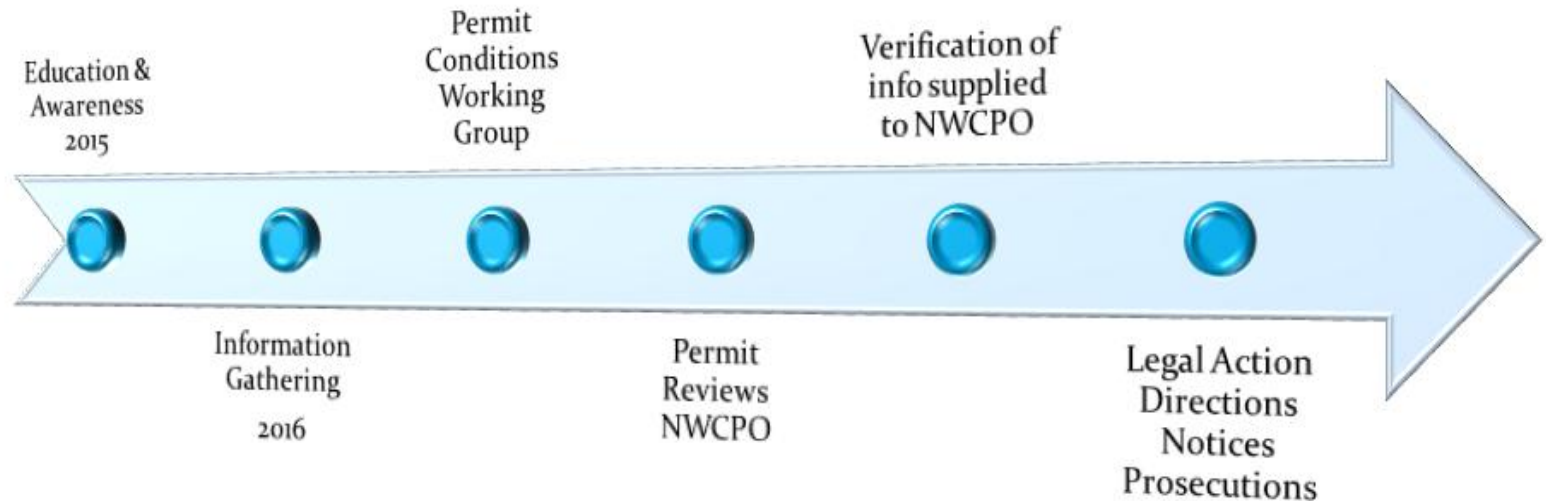


Pathway - Waste Collection permit  
Holders



Receptor – Licensed Facilities

# Food Waste Bin Journey



**Move from Compliance Assistance to enforcement**

# Brown Bin Roll Out

National Brown Bin Roll Out 2016 and 2015 = 50.78% and 46.96%

66% of population in agglomerations greater than 1500. (CSO)

Agglomerations greater than 500 to be provided with FWB.

2017 - 83 Notices in accordance with Regulation 10 of the food waste Regulations served.

- The number of households from which you collect waste in the area or areas specified in Appendix D to Waste Collection Permit number [insert permit number];
- How many of these households have been provided with a separate approved waste receptacle for the collection of food waste; and
- How many of these households avail of the separate approved waste receptacle for the collection of food waste.
- Details of collection routes and list of agglomerations served, including dates and approximate times, shall be submitted to this office within 14 days of the date of service of this Notice.

# Commercial Food Waste

- Collectors to inform Local Authorities of businesses not using BB (31<sup>st</sup> December each year)
- Coordinated National Approach March and April 2017
- Inspections carried out using standard formats provided by WERLAs
- 3872 inspections in 2016



# Closing in on Food waste

- Commercial Food waste Inspections & follow up enforcement
- 83 Regulation 10 notices served by LAs
- Closing in on a handful of significant non compliers
- EPA – enforcement of BMW condition
- Cradle to Grave Food waste analysis of AERS, looking for Anomalies



# Waste Tyres – New Regs

Tyre Regulations came into force 1<sup>st</sup> October 2017

Obligations on those who supply tyres to the market

Manufacturers

Wholesalers

Suppliers

Traders

Retailers

Waste Collectors

Farmers

Must Register with Approved Body (Repak ELT)

Proper and Sound Environmental Management of Tyres and Waste Tyres when they reach end of Life Cycle.

Over 3000 retailers, 1363 inspections in 2016



# Waste Tyres – New Regs

## Progress on Tyre Regulations

Letters Issued to Tyre Retailers by WEOs

Tyre Pack Developed by PROs to assist WEOs

- Tyre Inspection Workflow Diagram

- Letter Template for Retailers

- Tyre Inspection Form

- Section 14 Letter Template

- Recommendation to Prosecute Template

- CE Order Template

- Frequently Asked Questions (FAQs)

- Repak ELT Certificate of Membership

- Government Circular 06.17

- Waste Tyre Regulations 2017

On the ground enforcement by Local Authorities – targeted in Q4

% registered with REPAK ELT –

DCCAE provided €1M towards tyre dump clean ups coordinated by WMPLAs

# End Of Life Vehicles

## Actions

- Review ATFs that have not returned AER
- Coordinated national action - ATF spot check inspections in accordance with RMCEI plan target numbers)
- Focused on CODs and Record keeping (Cash for scrap)
- CODs issued up by 12% following 2016 targeted approach
- A number of multi agency inspections on unauthorised activities
- Evidence to suggest unauthorised elv facilities using permitted collectors or licensed/permitted facilities to dispose ELVs once they are finished breaking.
- Unauthorised facilities pose significant pollution threat (238 inspections in 2016)



# End Of Life Vehicles

## ELV ANNUAL DATA FIGURES 2012-2015

TARGET	REUSE & RECYCLING	REUSE & RECOVERY	
PRE 2015 (%)	80.0	85.0	
2015 (%)	85.0	95.0	
ACTUAL	REUSE & RECYCLING	REUSE & RECOVERY	
2011 (%)	80.5	82.7	MISSED RECOVERY TARGET
2012 (%)	81.8	87.8	MET BOTH TARGETS (1ST TIME)
2013 (%)	80.4	91.6	MET BOTH TARGETS
2014 (%)	82.1	90.7	MET BOTH TARGETS
2015 (%)	83.3	91.8	MISSED TARGET



# Pilot Packaging Project

- Targeted Enforcement
- Focused on Free Riders
  
- Turnover > €1 million
- Packaging > 10 tonnes

# Pilot Packaging Project

- Packaging Pack Developed by PROs to assist Waste Enforcement Officers(WEOs)
  - Work Flow Diagram
  - Guidance on Packaging Regulations 2014
  - Procedure for undertaking a SMP Inspection
  - Letter Template for SMPs
  - Standard Inspection Form & Caution
  - Regulation 25 Notice

# Construction and Demolition Waste

- Details of Major Government Projects Collated and Circulated to LAS
- List of Article 27s (excess of 500) circulated to LAs
- Ground-truthing exercise to verify onsite activities
- Where waste encountered enforcement actions follow
- A number of actions already initiated in Q4 2017
- Continue in 2018

# Interpol – 30 Days of Action

- 30 Days of Action
  - Multi-Agency VCPs
  - Multi-Agency Site Inspections
- An Garda Síochána considered the operation to be
  - Successful
  - Informative
  - Rewarding

## An Garda Síochána

Bíró Náisiúnta um Imscrúdú Coiriúil,  
Cearnóg Fhearchair,  
Sráid Fhearchair,  
Baile Átha Cliath 2  
D02 DH42.



National Bureau of Criminal Investigation,  
Harcourt Square,  
Harcourt Street,  
Dublin 2  
D02 DH42.

Teilifón/Tel: (01) 6663494  
Facs/Fax: (01) 6663316

Láithreán Gréasain/Web Site: [www.garda.ie](http://www.garda.ie)  
Ríomh-phoist/Email: [philip.pa.ryan@garda.ie](mailto:philip.pa.ryan@garda.ie)

Bi linn/Join us  

Please quote the following Ref. No. \_\_\_\_\_

Date: 17 July 2017



# Multi-Agency Cooperation

- **What is happening:**
- **Working with An Garda Síochána to set up of Multi Agency taskforces across all Garda Regions Nationally (6).**
- **CU WERLA have prepared a short business case including suggestions for TOR and output reports.**



# Major Investigations

- Limitations on what can be reported.
- Key Role in the WERLA's Business Plan.
- Collaboration, Supporting Las,
- Utilising WMA powers to full extent,
- WCP review process,
- FPNs etc



# Complaints CU WERLA Region to Oct 2017

- Waste and Litter Related Complaints and Enforcement Actions  
CU Region Year to October 2017-

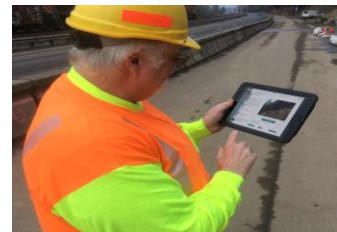
2017 Total Complaints Waste & Litter	6360 (7632)
2017 Total Waste Enforcement Actions arising as a Result	1542
2017 Total Fixed Payment Notices Litter Pollution Act (Fines)	1020
2017 Total Cases before the Courts	59

# Exploring Intelligence Opportunities

- Satellite Imagery
- GIS data
- Drone data
- Ground-truthing exercises
- Public Domain Listings
- Complaint Systems
- Crowd sourcing eg See it Say it and Fix your street apps

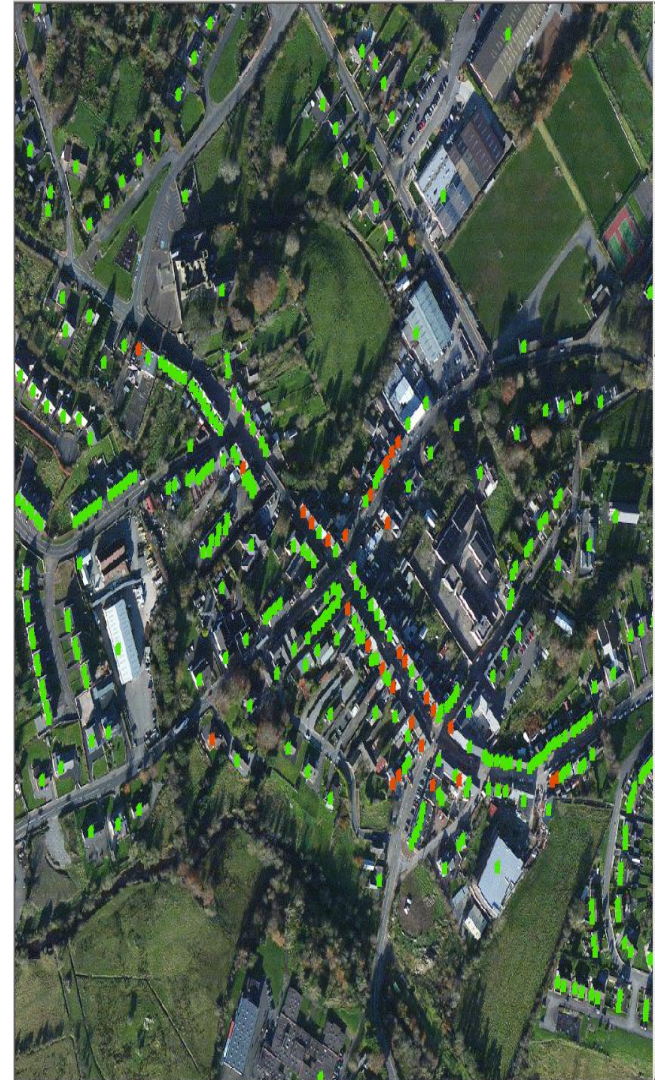
# Promoting Efficiencies

- Mobile Workforce
  - Capture inspection details digitally
  - Eliminate manual re-inputting of data and paper accumulation
  - Capture contextual spatial/GPS details
  - Ability to “Push” live data to officers in the field
  - More powerful reporting and analysis potential
  - Promote use of standard enforcement forms
  - Trials in 2 LAS



# Un-serviced Households

- Pilot Project – Sligo Co Co, CUR WERLA and WMPLA, Local Waste Collectors
- Using powers of S34 C of WMA,
- Collate eircode data for households on kerbside
- Collate eircode data from those using Recycling Centres
- Use GIS to highlight households not on service
- Target enforcement actions on un-serviced households



# Anti-Dumping Initiative 2017

Phase	No Applications Received	of	No Applications Funded	of
1	111		85 (34)	
2	134		105 (47)	
Total	245		190 (81)	



1500 Tonnes CUR  
578 Tonnes EMR

# Waste Crime – Tackling Britains Dirty Secret (Eunomia Report)

- Cost of Waste Crime to the UK economy - £567.9M
- £1 spent on enforcement – Return of £3.6 - £5.6 (£3.2 in taxes)
- Issues similar
- Intelligence
- Consequences of enforcement action do not outweigh profits made

*Figure 2: SEPA Compliance Spectrum*



# Waste Crime – Tackling Britains Dirty

## Secret (Eunomia Report)

- Lost revenue through
  - Fly tipping especially C&D
  - Deliberate misclassification of waste
  - Permitted sites undertaking processing that its permit does not cover
  - Sites operating wholly outside the permitting system, including illegal landfilling
  - Storing waste without a permit
  - Illegal waste exports
  - Man in van operations (tyres for eg.)



# National Priorities 2018

- Illegal Dumping including Construction and Demolition Waste;
- Household & Commercial Waste Management Compliance;
- Waste Tyres;
- Unauthorised Sites of Concern Which Require a Multi-Agency Response
- ELV Pilot
- Packaging Pilot

# Profile of Waste Enforcement –

- <https://www.kildarestreet.com/wrans/?id=2017-07-11a.1661>
- <https://dublingazette.com/news/news-city-edition/armed-gardai-called-help-fight-illegal-dumping/>
- <http://www.thatsfarming.com/news/waste-company-illegal-dumping-charges>
- <http://www.wexfordecho.ie/2017/06/27/major-county-council-enforcement-operation-in-north-wexford/>

# Thank you for Listening

