

# Dún Laoghaire-Rathdown County Council

Recommendation of the European Parliament and the  
Council Providing for the Minimum Criteria for  
Environmental Inspections in Member States (2001/331/EC)

## Inspection & Compliance plan under RMCEI 2025

Note from the Director(s):

### Acknowledgments:

We acknowledge the commitment and enthusiasm that all staff have shown towards the implementation of the Inspection & Compliance Plan. The support of management for the continued implementation of the inspection plan is appreciated. We thank everyone who contributed to the implementation of previous plans and the planned implementation of this plan.

Approved by Director of Services

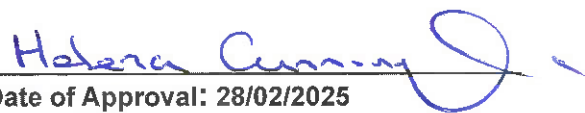


Date of Approval: 28/02/2025

Name: Paul Kennedy

Position: Director of Infrastructure and  
Climate Change

Approved by Director of Services



Date of Approval: 28/02/2025

Name: Helena Cunningham

Position: Director of Finance and Water  
Services

## Table of Contents

1.	Introduction .....	1
1.1	Plan Details.....	1
1.2	Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan.....	4
1.3	Staff Structure .....	5
2.	Priorities for Environmental Enforcement for the Year Ahead .....	8
2.1	National Environmental Enforcement Priorities for the Year Ahead .....	8
2.2	Ongoing RMCEI/Local Priorities.....	10
3.	Risk Assessment.....	11
4.	Resource Assessment for the Year Ahead .....	13
4.1	Review of the Achievement of the Previous Years Inspection Targets.....	13
4.2	Number of Staff Days Available .....	14
4.3	Environmental Enforcement Training Requirements .....	19
4.4	Health and Safety .....	19
5.	PLANNED INSPECTIONS/OTHER ACTIVITIES FOR THE YEAR AHEAD .....	20
5.1	Planned Routine & Non-Routine Inspections .....	20
5.2	Outstanding Enforcement Actions & Complaints Requiring Resources for the Year Ahead .....	22
5.3	Summary of Resource Requirements .....	22
6.	PLAN REVIEW MECHANISMS .....	24
	Appendix 1: Planned Routine & Non-Routine Inspections for the Year Ahead.....	25
	Appendix 2: Suggested Plan Implementation Review Template .....	28
	Appendix 3: National Environmental Governance Processes 2025 - 2027 .....	30

## Figures

Figure 1 Environmental Enforcement & Litter Control Section .....	6
---	---

## Tables

Table 1: Plan Details .....	4
Table 2 Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan (if any) & how these will be Addressed .....	4
Table 3 National Environmental Priorities Checklist .....	9
Table 4 (i) Additional Local Priorities .....	10
Table 5 (ii) Work Planned with Regional Lead Authorities .....	10
Table 6 Selection of Sites for Assessment in the Year Ahead.....	12
Table 7 Review of Previous Years Inspections .....	13
Table 8 Resources Available to undertake required Work for the Year Ahead .....	14
Table 9 Summary of Planned Routine & Non-Routine Inspections for the Year Ahead .....	21
Table 10 Outstanding Enforcement Actions & Complaints to be Closed Out .....	22
Table 11 Summary of Inspections to Complete and Resources Required for the Year Ahead.....	22
Table 12 Summary checklist of plan review mechanism .....	24

## Glossary/Definitions

Activity - The aim of the activity should be to achieve the intermediate outcomes and/or the final environmental outcome associated with the National Priority

Additional Intermediate outcome – Other outcomes, identified by a Council, outside those that have been specified by the EPA in the RMCEI Return template

ATF – Authorised Treatment Facility (processing of ELVs);

Baseline - To measure the progress in achieving the intermediate outcome over time, a baseline value must be established. Data gathered in subsequent years can then be compared to the baseline value in order to measure progress towards achieving the intermediate outcome.

C&D – Construction & Demolition (Waste);

CCMA – County & City Management Association;

CoR – Certificate of Registration;

DAFM – Department of Agriculture Food & Marine;

DECC – Department of the Environment, Climate Action & Communications;

DHLGH – Department of Housing, Local Government and Heritage;

DRS – Deposit Return Scheme;

DWWTS – Domestic Wastewater Treatment System;

Environmental inspection according to RMCEI includes:

- site visits,
- monitoring achievement of environmental quality standards,
- consideration of environmental audit reports and statements,
- consideration and verification of any self-monitoring carried out by or on behalf of operators of controlled installations,
- assessing the activities and operations carried out at the controlled installation,
- checking the premises and the relevant equipment (including the adequacy with which it is maintained) and the adequacy of the environmental management at the site,
- checking the relevant records kept by the operators of controlled installations.

ELV – End of Life Vehicle;

EPA – Environmental Protection Agency;

Final Environmental Outcome - is a measurable change in the environment, e.g. cleaner air or improved water quality

GAP – Good Agricultural Practice for the protection of waters Regulations;

LAWPRO – Local Authority Waters Programme;

Metric – A metric is a way of measuring the progress to achieving the intermediate outcome or the objective

NAIP – National Agricultural Inspection Programme

NIECE – Network for Ireland's Environmental Compliance & Enforcement;

NIP – National Inspection Plan;

Non-routine inspection – an inspection carried out in such cases in response to complaints, in connection with the issuing, renewal or modification of an authorisation, permit or licence, or in the investigation of accidents, incidents and occurrences of non-compliance.

PMDS – Performance Management Development System;

PRI/EPRI – Producer Responsibility Initiative or EPRI Extended Producer Responsibility Initiative;

RBMP – River Basin Management Plan;

RMCEI – EU Recommendation on Minimum Criteria for Environmental Inspections;

Routine inspection – an inspection carried out as part of a planned inspections programme, e.g. scheduled inspection of a permitted facility, scheduled monitoring of a licensed discharged; compliance assessment of a regulated facility, etc.

Specified Intermediate outcome – Those intermediate Outcomes specified by the EPA in the RMCEI Return template

TARGET - Once the baseline is established, the goal should be to reduce/increase the baseline value over time, thereby achieving the intermediate outcome. A target is the value to which the baseline value is aimed to be reduced (or increased) to for that year. A qualitative target can be developed where a baseline has not been established, or targets may also be set centrally to ensure a consistent approach to achieving an intermediate outcome/objective"

VOC – Volatile Organic Compounds;

WEEE – Waste Electrical & Electronic Equipment;

WERLA – Waste Enforcement Regional Lead Authority;

WFD – Water Framework Directive;

WFP – Waste Facility Permit.

## 1. Introduction

### 1.1 Plan Details

In Dún Laoghaire-Rathdown County Council (DLR), the responsibility for environmental enforcement falls within the Infrastructure and Climate Change (ICC) and the Finance and Water Services Directorates, each headed by a Director of Service. The environmental enforcement (air, noise, waste, litter) section and water sections work closely with the Council's environmental awareness officers and climate team to generate awareness about the importance of compliance with the law and the protection of our environment.

This Inspection and Compliance Plan (hereafter referred to as the Plan) relates to the environmental enforcement (air, noise, waste, litter) and water pollution control in the functional area of DLR for the period 1 January to 31 December 2025 and refers to the requirement of the European Parliament and Council's recommendation on the recommended minimum criteria for environmental inspections (RMCEI) in each member state (EC 2001/331/EC). The Plan has been drawn up to take account of the requirements of the Environmental Protection Agency (EPA) guidance on RMCEI enforcement planning. It encompasses both routine and non-routine environmental inspections to be carried out in the year. It includes monitoring and inspection of permitted activities and ensuring compliance by the public and the commercial and industrial sectors with regards to environmental legislation.

#### **Water**

Dún Laoghaire-Rathdown is a coastal county, with most of the county suburban with some rural areas to the southwest of the County. There is very small amount of farming in this rural part of the county and a modest number of septic tanks. The greatest threat to water quality in the county is in the developed suburban areas. Rivers are under threat from domestic misconnections urban runoff and overflows from the sewer network. The older parts of the county (Blackrock, Dalkey, Dún Laoghaire, Foxrock) have a combined sewer network and the majority of overflows from the surface water network emanate from these areas.

Bathing Waters are threatened by contamination carried to the beaches via the surface water network.

The Deansgrange Catchments is designated an area for action in the programme of measures for the third phase of the Water Framework Directive. The focus of misconnection in 2025 will be this catchment. The ArcGIS templates and systems of planning and executing the surveys developed in the Dublin Urban Rivers Life Project will be used in this work. Other mini catchments that show pollution from misconnections will be incorporated in the misconnections programme also in 2025.

The Glencullen river water body has high ecological status. These water bodies are becoming increasingly rare in Ireland. Consequently, farm surveys and Domestic Waste Water Treatment Systems (DWWTs) inspections will be focused in this catchment. The Glencullen river is the drinking water source for Enniskerry village. It is anticipated that the shared resource for Agricultural Inspections will be employed in 2025. This will enable DLR to reach its target of farm inspections in 2025.

As noted above while DLR is a coastal county the land use is dominated by residential housing with a mix of houses and apartments. There is also a mix of commercial areas including Dundrum, Dún Laoghaire town centre, Blackrock, and Stillorgan. Areas like Sandyford and Cherrywood host office and technology-based businesses. This brings a unique set of environmental regulatory challenges and opportunities from the perspective of DLR.

### **Air Quality**

Air quality can be impacted due to high volumes of traffic, particularly in urban areas like Dún Laoghaire, Dundrum, Stillorgan and along major routes such as the M50. This can lead to elevated levels of nitrogen dioxide (NO<sub>2</sub>).

The use of solid fuels for home heating, especially during winter, can contribute to air pollution such as particulate matter (PM<sub>2.5</sub>), particularly in areas with high housing density. DLR operates a network of air quality sensors across the county that monitor air quality alongside the three EPA reference grade sensors, one of which is maintained by DLR.

The large number of construction activities and ongoing development can generate dust and other air pollutants. Managing construction sites to minimize emissions is crucial.

Through implementation of the Dublin Air Quality Plan, this provides a framework for managing air quality in the region, including DLR. It sets objectives for reducing pollutant levels, identifies key sources of pollution, and outlines measures to improve air quality. DLR is working towards greater implementation of the Plan subject to resources being available.

### **Noise Pollution**

The Dublin Agglomeration Noise Action Plan 2024-2028 sets out a framework for managing noise pollution in the Dublin region, including Dún Laoghaire-Rathdown. It identifies key sources of noise, such as traffic, public transport and industry. The plan outlines measures to reduce noise levels.

Traffic noise is significant source of noise pollution, especially along busy roads and in urban centres. This can impact residents' quality of life, sleep, and mental health. Alongside this, and as noted above the large number of construction activities can generate significant noise, impacting nearby residents and businesses.

The County Development Plan 2022-2028 has integrated air quality and noise considerations as part of the requirements for new developments and these influence planning and development decisions. This includes promoting sustainable transportation, requiring noise impact assessments for new developments, and ensuring adequate green spaces to buffer noise.

### **Waste**

DLR, like other regions, faces challenges with illegal waste activities, including unauthorised dumping. With only two permitted waste facilities, DLR is not a significant recipient of waste but more so a source of waste for other regions. As such DLR focus on observing waste at source, such as construction and demolition waste and undertaking frequent roadside checkpoints on roads exiting the County.

Managing construction and demolition waste is a significant draw on resources. DLR undertake onsite inspections for Regulation 27 and national by-product source sites and large scale developments.

Increasing recycling rates for household and commercial waste streams is crucial. DLR focus on promoting waste segregation at the source and enforcing regulations related to waste collection and processing.

### **Litter**

The DLR Litter Management Plan 2024-2026 outlines targets and objectives for tackling the problem of litter pollution in the County and sets out to achieve quantifiable improvements in the prevention of litter, with the following objectives:

- Prevent and control litter pollution in the Dún Laoghaire-Rathdown County Council area
- Eliminate litter black spots

- On-going development of our education and awareness programmes in association with schools and communities
- Support any initiatives, new legislation and actions that arise from the recently published Waste Action Plan for a Circular Economy 2024 - 2030.
- Ensure rigorous enforcement mechanisms of the Litter Pollution Act 1997 and Dún Laoghaire-Rathdown County Council (Segregation, Storage and Presentation of Household and Commercial Waste) Bye-Laws, 2019 are effective.

The Council employs a contractor to remove graffiti from public spaces and writes to commercial premises to remind property owners, occupiers and operators of their obligations under the Litter Pollution Act 1997. Our Environmental Awareness and Green Schools Officers liaise with schools and residents' associations to raise awareness of the damage graffiti can cause and the impact it has on an area. The Litter Section also provide paint to local groups to tackle graffiti within their own estates, towns and villages, however, the problem of graffiti continues to be a difficult one to address.

Working closely with the Cleansing and Recycling section is imperative to ensuring that there is a quick response to litter and dumping at our bottle banks, in and around our litter bins, and across the public realm. All reported instances of litter are investigated by an Environmental Enforcement Warden and then referred to our cleansing crews for removal. The use of the same Customer Relationship Management System to refer all complaints from one section to another is a vital tool for the provision of this service and provides easy reporting on the progress of all complaints.

Dog fouling also remains an issue in the County, particularly in our parks and along our beaches. The Environmental Enforcement Wardens carry out awareness days within these areas to remind dog owners of their obligations under the Litter Pollution Act 1997. The Green Dog Walkers programme, to encourage dog owners to clean up after their dogs and encourage others to do so too, was a successful awareness campaign in 2024 that saw 102 new pledgers sign up.

The installation of cameras under the Codes of Practice for the Operation of CCTV for the purposes of prevention, detection and prosecution of litter offences continues to be an obstacle but budgetary resources have been agreed for 2025 so it is hoped this project will get under way in Q3 2025.

### **Summary**

The EPA's Local Authority Performance Framework outlines 20 National Enforcement Priorities (NEPs) that DLR addresses as follows:

- ✓ We allocate resources effectively: Ensure adequate staffing and funding for environmental enforcement activities.
- ✓ We conduct regular inspections: Proactively inspect waste facilities, construction sites, and agricultural areas to ensure compliance.
- ✓ We enforce regulations: Take appropriate action against those who violate waste management regulations, including issuing fines and initiating prosecutions.
- ✓ We promote awareness: Educate the public and businesses about proper waste management practices and the importance of compliance.
- ✓ We collaborate with other agencies: Work with other agencies, such as the EPA and An Garda Síochána, to address enforcement issues effectively.

Table 1: Plan Details

<b>Geographic Area</b>	125.8 km <sup>2</sup>
<b>Population</b>	233,457 (2022 Census)
<b>Calendar Year</b>	2025
<b>RMCEI Coordinator Name and Position</b>	Barbara FitzPatrick (Assistant Staff Officer)

## 1.2 Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan

**Table 2 Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan (if any) & how these will be Addressed**

<b>Description of known challenges and outline of how these will be addressed</b>
<p><b>Staff Changes and Knowledge Transfer.</b></p> <p>As outlined in last year's plan the retirement of an Executive Engineer has left a gap in the resourcing particularly with regards to the detailed 'on the ground knowledge' of the challenges faced in our County. This has only recently been advertised in January 2025, and it remains unclear at present when this post will be filled.</p> <p>There continues to be pressure on both administrative staff and technical staff as a result of retirement, internal transfers, promotions and staff resignations.</p> <p>The above places additional pressure on existing staff in an effort to maintain compliance in the county and achieve the targets set out in the plan each year.</p>
<p><b>Additional Duties placed on Environmental Enforcement</b></p> <p>There continues to be improvements with respect to environmental legislation across many aspects of our work. In 2024, this included the Deposit Return Scheme and the new CCTV Codes of Practice that placed additional requirements on staff that are already at full capacity. In 2025 we anticipate additional work with respect to the recent changes in the management of soil and stone from construction sites.</p> <p>The additional tasks associated with the new requirements and legislation are programmed into this plan at the expense of other tasks in order to meet our statutory obligations. Additional sanction for resources to cover these tasks will be sought where we are unable to fulfil non-statutory obligations.</p> <p>This is combined with an observed overall increase in complaints and cases raised on our customer relationship management system. In 2024, we received an additional <b>1,046</b> additional cases compared with 2022 across litter, waste, air and noise. (2022: 4,289 Cases / 2024: 5,335 Cases)</p>
<p><b>Uisce Éireann Staff Transfer</b></p> <p>Due to the transition all Local Authorities are going through with Uisce Éireann, it is unknown at the time of writing the plan what resources will be available in the Water Pollution Control Section. Staff members are currently considering whether they will transfer to Uisce Éireann. Already two staff members have left. These vacancies may be filled from within or there may have to be competitions to fill the vacancies. The 2025 plan assumes that all vacancies will be filled.</p>

### 1.3 Staff Structure

Environmental Enforcement and Water Services operate under separate organisational Directorates. This plan is therefore divided into two separate parts to reflect this:

#### **A: Environmental Enforcement**

The first section of the plan covers the Environmental Enforcement activities of the Council in relation to waste, litter, air, and noise. In addition to inspection activities conducted by Council staff, some inspections following on from air and noise pollution complaints are conducted by the Environmental Health Officers who are based in HSE Offices in Sandyford.

The inspection duties regarding the control of petroleum vapours come under the remit of the Chief Fire Officer in Dublin City Council.

Figure 1 below is the current structure of the Environmental Enforcement & Litter Control Section showing staff members that are involved in delivering the key objectives of the RMCEI plan and undertaking environmental inspections.

#### **B: Water Services**

Enforcement activities relating to water bodies are covered separately in the second part of this plan. The plan outlines the plans of DLR to fulfil its responsibilities under National and EU Legislation regarding environmental water inspections. The plan does not refer to inspections of facilities/operations under the responsibility of Uisce Éireann i.e., wastewater and drinking water. All water related RMCEI inspections are conducted by the Water Pollution Control Section (WPCS), the Water Section or the Beaches Section.

Figure 2 below is the current structure of the Water Pollution Control Section, Water Section and Beaches Section showing staff members that are involved in delivering the key objectives of the RMCEI plan and undertaking environmental inspections.

The co-ordination of the Plan will be the responsibility of the RMCEI co-ordinator. Tasks are allocated between staff depending on experience and associated risks. Staff resources are prioritised to non-routine inspections that come to the Council's attention through complaints or environmental incidents where the risk of environmental pollution is great and to the national priorities' inspections. All investigations / inspections are carried out by staff who are authorised under the relevant legislation.

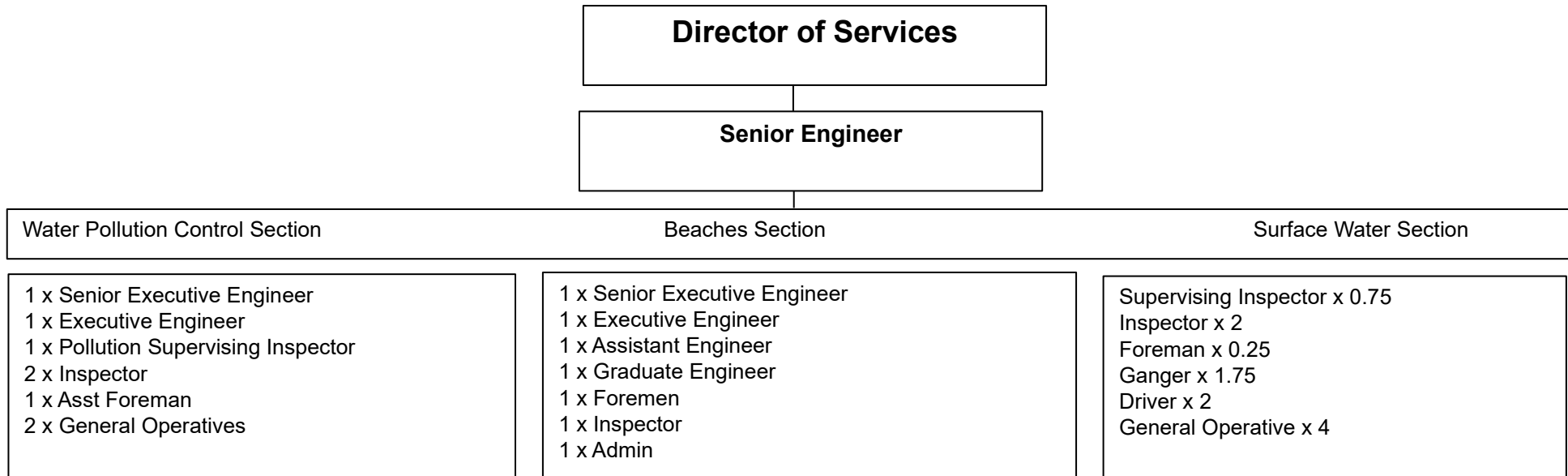


Figure 1 Environmental Enforcement &amp; Litter Control Section



**Figure 2 Water Pollution Control, Water Section and Beaches Section**

Below is the current structure of the Water Pollution Control Section, Water Section and Beaches Section showing staff members that are involved in delivering the key objectives of the RMCEI plan and undertaking environmental inspections.



## 2. Priorities for Environmental Enforcement for the Year Ahead

### 2.1 National Environmental Enforcement Priorities for the Year Ahead

This plan takes account of the new cycle of the National Enforcement Priorities 2025 -2027 as shown below:

<b>Waste</b> Note 1	<b>Water</b> Note 2	<b>Air and Noise</b> Note 2	<b>Governance Processes</b> Note 2
Tackling illegal waste activities and Multi-Agency Sites/Operators of Concern	Pressures from Agriculture (Farmyards) - slurry/soiled water collection and storage	Solid Fuel	Planning for Environmental Inspections and Compliance
Construction and Demolition Material	Pressures from Agriculture (Farmland) - slurry and fertiliser spreading	Air Quality Monitoring and Data Use	Recording & Reporting of Environmental Inspections, Compliance and Enforcement Data
Household Waste	Discharge Licences/ Misconnections	Environmental Noise Directive (END) Activities	
Commercial Waste	Local Water Quality Pressures including Septic Tanks and Private Water Supplies	Local Air and Noise Investigations	
Plastics and Producer Responsibility Initiatives			

Note 2: These priorities are as advised by DECC Circular WP 09/24 issued on 07/11/24, agreed by the National Waste Enforcement Steering Committee.

Note 2: These priorities have been defined following consultation with the NIECE Steering Committee, CCMA representatives, DHLGH, DECC and LAWPRO.

In addition, the plan implements the WERLA programme of co-ordinated work for 2025 and relevant sections of Regional Waste Management Plan.

Furthermore, the plan incorporates ongoing air enforcement; including solvents, deco-paints & petroleum vapour regulations, the implementation of both the Dublin Air Quality Plan 2021 and the Dublin Agglomeration Noise Action Plan 2024-2028; as well as complaint handling across all sections within environmental enforcement.

This plan takes into account the requirement for Councils to consider carrying out local catchment assessments (upstream of priority areas for action) and allow time for catchment assessment data entry into the WFD IT application / participation in Regional Characterisation Workshops.

Table 3 National Environmental Priorities Checklist

Ref. No	National Environmental Priorities	Have the relevant NEP activities for focus been incorporated into your inspection plan for the year ahead?		Where you have answered 'No' please provide a comment to explain.
		Yes	No	
<b>1.0</b>	<b>Water - Improving Water Status in all waterbodies</b>			
1.1	Pressures from Agriculture (Farmyards) – slurry / soiled water collection and storage	X		
1.2	Pressures from Agriculture (Farmland) – slurry and fertiliser spreading	X		
1.3	Discharge Licences / Misconnections	X		
1.4	Local Water Quality Pressures including Septic Tanks and Private Water Supplies	X		
<b>2.0</b>	<b>Air - Protecting public health and to improve and maintain air quality</b>			
2.1	Solid Fuel	X		
2.2	Air Quality Monitoring and Data Use	X		
2.3	Environmental Noise Directive (END) Activities	X		
2.4	Local Air and Noise Investigations	X		
<b>3.0</b>	<b>Waste - Improving waste management and protecting our environment</b>			
3.1	Tackling illegal waste activities and Multi-Agency Sites/Operators of Concern	X		
3.2	Construction and Demolition Material	X		
3.3	Household Waste	X		
3.4	Commercial Waste	X		
3.5	Plastics and Producer Responsibility Initiatives	X		

## 2.2 Ongoing RMCEI/Local Priorities

Table 4 (i) Additional Local Priorities

Local Priorities	Yes	No	Where you have answered 'Yes' please provide a summary of the local priorities for the year ahead
Are there additional local priorities for the year ahead which are not activities for focus under the NEPs?	X		Design for a wetland in Cabinteely Park will improve water quality in the Cabinteely Stream and provide habitat and amenity in the park. Design in 2025 and construction planned for 2026.

Table 5 (ii) Work Planned with Regional Lead Authorities

Authority	Plans for the Year ahead
<p>This may include work with some of the following bodies not referred to above:</p> <p>e.g. WERLA, Teagasc &amp; Dept of Agriculture Food &amp; the Marine (DAFM), EPA, DECC, DHLGH, LAWPRO</p> <p>If all such work has already been referred to above leave this blank.</p>	<p>DLR will liaise with WERLA, other Local Authorities, the Environmental Protection Agency (EPA), National Waste Collection Permit Office (NWCPO), National Trans Frontier Shipments Office (NTFSO), An Garda Síochána, Department of Social Protection, Road Safety Authority, Health and Safety Authority and other enforcement bodies to carry out concerted actions throughout the year. DLR is committed to continually developing its working relationship with these agencies and improving enforcement efficiencies. For example, DLR sits on the Local Authority Implementation Group for the Solid fuel regulations as co-chair. In addition, we regularly partake in the following working groups:</p> <ul style="list-style-type: none"> <li>• Solvent and Deco Paints Working Group,</li> <li>• EPA Noise Steering Group,</li> <li>• Working Group on the revised Protocol for dealing with Noise Complaints for Local Authorities,</li> <li>• Garda Dublin Metropolitan Region - Multi-Agency Forum for Environmental / Wildlife Crime,</li> <li>• Public Sector Drone Network.</li> </ul> <p>DLR also has a close working relationship with Dublin City Council on the Dublin Bay Task Force. This group includes the Department of Housing Local Government and Heritage and Fingal County Council. DLR is engaging with LAWPRO in relation to grants from the Communities Water Development Fund for projects in the County and public liaison on several projects within the County. DLR plans to engage with Inland Fisheries regarding the proposed provision of Integrated Constructed Wetland in Cabinteely Park (other sites being considered too) and also in relation to construction works (Council and private contractors) affecting water courses within the County.</p>

### 3. Risk Assessment

Table 6 Selection of Sites for Assessment in the Year Ahead

Type of Regulated Installation (i.e. Discharge Licences/ Waste Permit Facilities / Certificate of Registration / Sites licensed under the Air Pollution Act / etc)	Total No. of Installations in your functional area	Total No. of Installations in your functional area Per Risk Category			No. Of Inspections Planned Per Risk Category <sup>1</sup>			Total No. Of Inspections Planned	Additional Comment (e.g. include rationale for selection of sites to be inspected and/or indicate whether any of the inspections planned include installations that have been recommended for inspected by Lead Authorities)
		A	B	C	A	B	C		
Discharge Licences	5			5			30	30	These sites are sampled on a regular basis throughout the year.
Waste Permit Facilities	2		2			2		2	These are the only two Waste Facility Permit Holders in the County. We conduct inspection(s) annually or as required to ensure compliance.
Certificate of Registration	37			37				37	We have 37 cert of registration (CoR) bottle banks and recycling centres in the County. These are prone to dumping and unauthorised clothes banks been placed at these sites previously. They are all inspected frequently by our cleansing staff as well as by the team of Environmental Enforcement Wardens.
Total No. Of Inspections Planned								69	

<sup>1</sup> Unless directed otherwise

## 4. Resource Assessment for the Year Ahead

### 4.1 Review of the Achievement of the Previous Years Inspection Targets

Table 6 presented below illustrates the review of the 2024 inspections and compares them against the planned inspections. In addition, we present the percentage difference between planned and completed inspections. Where a significant difference, i.e. greater than 25%, occurred these are explained in the table.

**Table 7 Review of Previous Years Inspections**

Inspection Type <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	No. of Planned Inspections set out at the start of the Previous Year	No. of Completed Inspections at the end of the Previous Year	Difference (+/- %)	Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)	Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead
Routine Waste Inspections	549	588	+7%		
Non-Routine Waste Inspections	1,460	1,557	+7%		
Routine Litter Patrols/Investigations	4,646	4,665	+0.4%		
Routine Water/Wastewater Inspections	1,767	2,291	+30%		2025 target based on 2024 figures
Non-Routine Water / Wastewater Inspections	132	50	-62%	Previous year's planned figure was based on double counted CRM complaints received and so was an error.	2025 target based on 2024 figures
Routine Air/Noise Inspections	187	180.5	-3%		
Non-Routine Air/Noise Inspections	220	310	+41%	Non-Routine Air/Noise are only completed as result of complaints received. Overall number of complaints also noted to be increased significantly	Increase of 40%.
Routine producer Responsibility Inspections	153	159	+4%	-	
Planning inspections	302	381	+26%	Particularly busy year during 2024 for planning	Planned increase in inspections to allow for 400 inspections.



Inspection Type <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	No. of Planned Inspections set out at the start of the Previous Year	No. of Completed Inspections at the end of the Previous Year	Difference (+/- %)	Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)	Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead
				related inspections.	
<b>Total</b>	<b>9,416</b>	<b>9,964.5</b>	<b>4% average</b>		

## 4.2 Number of Staff Days Available

Table 8 Resources Available to undertake required Work for the Year Ahead

Department	Available Resources	Name	Focus Area for this Resource	Available days for RMCEI	Basis of calculating Resource Available days
<b>National Enforcement Priorities 2025-2027 (excluding Water)</b>					
<b>Infrastructure and Climate Change</b> Environmental Enforcement, Litter & Animal Control	1 x Administrative Officer		All NEPs (excluding water).	124	Standard Staff Calculation (see below) x 70% on RMCEI = 124 Balance of 53 days a year on dogs, graffiti and other work as required.
	1 x Senior Executive Scientist		All NEPs (excluding water).	177	Standard Staff Calculation (see below).
	1 x Executive Scientist		Tackling illegal waste activities and Multi-Agency Sites/Operators of Concern.	177	Standard Staff Calculation (see below).
			Air Quality Monitoring and Data Use.		
			Local Air and Noise Investigations.		
	1 x Environmental Enforcement Officer		Tackling illegal waste activities and Multi-Agency Sites/Operators of Concern.	177	Standard Staff Calculation (see below).
			Construction & Demolition material.		

Department	Available Resources	Name	Focus Area for this Resource	Available days for RMCEI	Basis of calculating Resource Available days
			Household Waste.		
			Air Quality Monitoring and Data Use		
			Local Air and Noise Investigations.		
	2 x Senior Staff Officers		Administrative support to all NEPs (excluding water).	177	Standard Staff Calculation (see below)
				132.75	Standard Staff Calculation (see below) x 75% on RMCEI = 132.75 Balance of 44.25 days a year on dogs, graffiti and other work as required.
	2 x Staff Officer		Commercial Waste	177	Standard Staff Calculation (see below)
			Plastics and Producer Responsibility Initiatives		
			Solid Fuel		
			Local Air and Noise investigations		
			Administrative support to all NEPs (excluding water).	177	
	3 x Assistant Staff Officer		Administrative support to all NEPs (excluding water).	177	Standard Staff Calculation (see below)
				177	Standard Staff Calculation (see below)
				17.7	10% on RMCEI tasks.
	4 x Clerical Officers		Administrative support to all NEPs (excluding water).	708	4 x Standard Staff Calculation (see below)
	1 x Environmental Health Officer		Local Air and Noise investigations	160	Estimation received from HSE
	1 x Environmental Awareness Officer		No NEP identified relevant to role.	50	30 days interacting with community groups on clean-ups and assisting the formation of new community clean up groups. 15 days participating in the DLR Tidy Districts Competition – lead up activities and the event

Department	Available Resources	Name	Focus Area for this Resource	Available days for RMCEI	Basis of calculating Resource Available days
					itself. 5 days administrating, budgeting and promoting green schools, tidy districts, clean-up and environmental awareness activities.
	1 x Assistant Environmental Awareness Officer			50	10 days to monitor potential green school candidates for the year and asses their participation. 35 days to make assessment of participating schools, make reports and liaise with An Taisce. 5 days to provide support to DLR Tidy Towns Competition.
	6 Litter / Environmental Enforcement Wardens		Tackling illegal waste activities and Multi-Agency Sites/ Operators of Concern.	1046.5 <sup>2</sup>	252 working days per staff minus 24 days annual leave.  @ 80% productivity to take into account sick leave, training, other admin duties, etc. This leaves 182 days.
			Local Air and Noise Investigations.		
	<b><u>Environmental Enforcement, Litter &amp; Animal Control Sub total</u></b>				<b><u>3,705</u></b>
Standard Staff Calculation: 251 working days per staff minus 30 days annual leave. 80% productivity to take into account sick leave, training, other admin duties, queries etc. This leaves 177 days.					
<b>National Water Enforcement Priorities 2025 – 2027</b>					
<b>Finance and Water Services</b> Water Pollution Control	Supervising Inspector		Discharge Licences / Misconnections	100	Farm Surveys DWWTS Inspections Misconnection Surveys Planning Incident Responses Licensing 50 Routine 50 Non Routine
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies		
	Inspector		Discharge Licences / Misconnections	75	Some Irish Water Duties 50 Routine 25 non-Routine
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies		

<sup>2</sup> Vacant Warden anticipated to be filled by Q2 2025, therefore 75% of the annual availability allowed i.e. 182 days x 75% = 136.5

Department	Available Resources	Name	Focus Area for this Resource	Available days for RMCEI	Basis of calculating Resource Available days
	Inspector	[REDACTED]	Discharge Licences / Misconnections	128	Investigating existing sources of river pollution in the catchments, river walks, SW sewer surveys. Some Irish Water Duties 60 Routine 68 non-Routine
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies		
	Executive Engineer	[REDACTED]	Pressures from Agriculture (Farmyards) - slurry/soiled water collection and storage.	60	50 Routine 20 non-Routine  Working half time on planning applications.
			Discharge Licences / Misconnections		
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies		
	General Operative	[REDACTED]	Discharge Licences / Misconnections	185	252 days minus 20 AL. @ 80% productivity to take into account sick leave, training, other admin duties, queries etc. All Routine Work Some IW duties
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies		
	General Operative	[REDACTED]	Discharge Licences / Misconnections	185	252 days minus 20 AL. @ 80% productivity to take into account sick leave, training, other admin duties, queries etc. All Routine Work Some IW duties
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies		
	Senior Executive Engineer	[REDACTED]	Local Water Quality Pressures including Septic Tanks and Private Water Supplies	10	Total 114 Days RMCEI  (Split: 57 Days Routine 57 Days Non-Routine)
			Discharge Licences / Misconnections	5	
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies	37	

Department	Available Resources	Name	Focus Area for this Resource	Available days for RMCEI	Basis of calculating Resource Available days
			Discharge Licences / Misconnections	50	
			Local Water Quality Pressures including Septic Tanks and Private Water Supplies	5	
Infrastructure and Climate Control Beaches Section	Foreman	Beaches Personnel	Local Water Quality Pressures including Septic Tanks and Private Water Supplies	25	Routine
Infrastructure and Climate Control Beaches Section  Municipal Services Dublin Urban Rivers Life Project	Senior Executive Engineer	Beaches Personnel	Local Water Quality Pressures including Septic Tanks and Private Water Supplies	10	Routine
Municipal Services Beaches Section	Assistant Engineer	Beaches Personnel	Local Water Quality Pressures including Septic Tanks and Private Water Supplies	40	Routine
	Admin	Beaches Personnel		7	Routine
	Technician	Beaches Personnel		10	Routine
Water Subtotal				932	
TOTAL DAYS AVAILABLE				4,637	

### 4.3 Environmental Enforcement Training Requirements

Training is provided in the relevant environmental legislation, and in environmental investigation and enforcement. Training is provided to Environmental Enforcement staff throughout the calendar year as new legislation and other training needs are identified. Staff also avail of training provided by the WERLA through the Environmental Service Training Group. Delivery of the RMCEI targets and objectives is also a key part of Environmental Enforcement staff PMDS (Performance Management Development System) team plan and personal development plans and progress towards targets is covered in the mid-year and end year reviews as well as at monthly team meetings.

<b>Course/Training provided to enforcement staff in previous year:</b>	<b>Course/Training provided by:</b>	<b>Comment</b>
Courtroom Skills	Local Authority Services National Training Group	None.
DPP Training on file preparation	WERLA	None.

<b>Course/Training planned for enforcement staff for the reporting year:</b>	<b>Course/Training provided by</b>	<b>Comment</b>
Unknown	Unknown	PDPs for 2025 not complete at time of writing.

<b>Training is linked to PMDS Personal Development Plans</b>	
<b>Yes/No</b>	<b>If answered No, state your reasoning.</b>
Yes	

### 4.4 Health and Safety

Safety is paramount when conducting inspections. All inspections shall be conducted in accordance with the Council's Parent Safety Statement and the Environmental Enforcement Section's and the Water and Drainage Section's Ancillary Safety Statements. Relevant risk assessments are conducted for inspections to identify risks so that the proper control measures are put in place. Environmental Enforcement and Water and Drainage staff will be provided with the necessary PPE as identified in the risk assessments and shall comply with the site's safety procedures. Safety outcomes are recorded in Environmental Enforcement Section's and Water and Drainage Section's Inspection Database.

<b>Planned Health and Safety training for the reporting year:</b>
<b>None at the time of writing.</b>
<b>Comments:</b>

## 5. PLANNED INSPECTIONS/OTHER ACTIVITIES FOR THE YEAR AHEAD

### 5.1 Planned Routine & Non-Routine Inspections

#### **Planned Routine Inspections:**

Inspections of regulated installations and water bodies will be conducted to assess compliance with relevant legislation and water quality, as set out in this RMCEI Plan. If circumstances come to light that indicate that the specified frequency of inspections is insufficient or excessive then the plan schedule shall be updated to accommodate this change and the reason for it shall be recorded. Where possible all inspections shall be unannounced unless the visit has to be pre-arranged to view particular activities.

#### **Non-Routine Inspections:**

These inspections shall be conducted to investigate issues that come to the attention of the Council. Non-routine inspections are reactive in their nature and are undertaken in response to follow-up investigations, complaints, or environmental incidents. All complaints received are logged on the CRM system. Non-routine inspections will be conducted as soon as possible after the issue/s come to the attention of DLR. It is difficult to estimate the number of non-routine inspections / apply time values due to their nature; however, we would expect that the number of non-routine inspections will be similar to 2024 in 2025. Set out below are the typical examples of non-routine inspections for the section:

- Investigations of Complaints
- Cradle-to-Grave inspections for C & D
- National by Product Registrations / Regulation 27 Notifications
- Concerted actions with other Agencies
- Site investigations of unauthorised waste disposal sites
- Investigations of fly tipping/waste storage and burning of waste
- Investigations of unauthorised waste collection, transport, and disposal
- Investigations related to Planning Legislation

#### **Water**

Non routine inspections arise in response to water pollution incidents, public complaints, visits to building sites before and during construction and after breaches of Section 4 licence conditions. It is difficult to estimate the number of non-routine inspections and apply time values as due to their nature; they can be dependent on weather and the volume of construction activity; however, we would expect that the number of non-routine inspections in 2025 will be similar to 2024. All non-routine inspections are recorded in an Access database. Set out below are the typical examples of non-routine inspections for the section:

- Inspections relating to water pollution incidents/complaints.
- Unauthorised discharges investigated.
- Inspections in relation to water pollution licence applications.

Table 9 Summary of Planned Routine &amp; Non-Routine Inspections for the Year Ahead

Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Waste</b>				
Routine Inspections	442	Various	327	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
Non-Routine Inspections	1,552	Various	476	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
<b>Total Inspections</b>	<b><u>1,994</u></b>		<b><u>803</u></b>	
<b>Litter</b>				
Routine Inspections	4,646	Various	1,935	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
<b>Total Inspections</b>	<b><u>4,646</u></b>		<b><u>1,935</u></b>	
<b>Water/Wastewater</b>				
Routine Inspections	1876	Various	916	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
Non-Routine Inspections	67	Various	68	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
<b>Total Inspections</b>	<b><u>1,943</u></b>		<b><u>984</u></b>	
<b>Air/Noise Inspections</b>				
Routine Inspections	157	Various	109	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
Non-Routine Inspections	275	Various	275	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
<b>Total Inspections</b>	<b><u>432</u></b>		<b><u>384</u></b>	
<b>Producer Responsibility Inspections</b>				
Routine Inspections	148	Various	36.25	See Appendix 1 for full detail on estimates of time per inspection & write up (days).
Non-Routine Inspections	0	Various	0	
<b>Total Inspections</b>	<b><u>148</u></b>		<b><u>36.25</u></b>	
<b>Planning (Environmental) Inspections</b>				
Routine Inspections	327	Various	250.5	See Appendix 1 for full detail on estimates of time per inspection & write up (days). <i>This includes both desktop inspections of documentation and physical site inspections. This can vary year on year depending on the volume of applications for planning permissions received.</i>
Non-Routine Inspections	0	Various	0	
<b>Total Inspections</b>	<b><u>327</u></b>		<b><u>250.5</u></b>	
<b>Grand Totals</b>	<b><u>9,490</u></b>		<b><u>4,392</u></b>	



## 5.2 Outstanding Enforcement Actions & Complaints Requiring Resources for the Year Ahead

Table 10 Outstanding Enforcement Actions & Complaints to be Closed Out

Inspection Type	No. of Inspections to close out in the Year Ahead	Estimate time per inspection+ write up (days)	Time for all Inspections (days)
<b>Outstanding Complaints</b>			
Litter (excluding fly tipping and illegal dumping)	9	0.15	1.4
Waste, non C&D. Includes fly tipping and illegal dumping	10	0.25	2.5
Waste, C&D.	0	0.25	0
Water/Wastewater	0	0	0
Air/Odour	7	1	7
Noise	12	1	12
<b>Subtotal</b>	<b>38</b>		<b>22.9</b>
<b>Outstanding Enforcement Actions</b>			
Warning Letters	0		
Section Notices	4	0.25	1
Court Cases	16 (11 x Waste bye-laws, 5 x Litter Pollution Act)	0.25	4
<b>Subtotal</b>	<b>20</b>		<b>5</b>
<b>Total</b>	<b>58</b>		<b>27.9</b>

## 5.3 Summary of Resource Requirements

Table 11 Summary of Inspections to Complete and Resources Required for the Year Ahead

Inspection Type	No. of Inspections Planned for the Year Ahead	Total Time for all Inspections (days)
<b>Total Routine Inspections (obtained from <i>Appendix 1: Planned Routine &amp; Non-Routine Inspections for the Year Ahead</i>)</b>	7,596	3,573
<b>Total Non-Routine Inspections (obtained from <i>Appendix 1: Planned Routine &amp; Non-Routine Inspections for the Year Ahead</i>)</b>	1,894	819
<b>Outstanding Enforcement Action &amp; Complaints to be Closed out – (outlined in Table 9)</b>	38	23
<b>Totals</b>	<b>9,528</b>	<b>4,415</b>
<b>Total Available Resources (Days) – (outlined in Table 7 of the Plan)</b>		<b>4,637</b>

The difference between the estimated required resources versus the estimated available resources represents **5%** additional capacity of the overall estimated available resources compared to anticipated required. DLR consider it prudent to build in contingency to cover unforeseen changes such as lengthy court cases, staff changes etc. It's important to note also that all resources are not capable of completing all tasks therefore the balance can be somewhat misleading. DLR will review progress against targets on an ongoing basis throughout 2025.

In addition, as shown below, we estimate that there is approximately **45** days spent on RMCEI between all the resources and reviews that have occurred in both the preparation of the plan and the National Environmental Priorities Progress report. There is nowhere in Appendix 1 to take account of this time.

RMCEI / Nemis Reporting	Days	Resources	Total
RMCEI Plan Annually	5	2	10
NEP Progress Report Annually	12	1	12
NEMIS Reporting Monthly	18	1	18
Other RMCEI / NEMIS related tasks e.g. training, webinars etc	5	1	5
<b>Totals</b>	<b>40</b>	<b>-</b>	<b>45</b>

## 6. PLAN REVIEW MECHANISMS

Table 12 Summary checklist of plan review mechanism

Question	Yes	No
<b>Q1 Have progress implementation meetings been planned to be undertaken to assess Plan progress through the year?</b>	X	
<b>Q2 Will the Director of Services, Senior Engineer, Senior Management and Environment Strategic Policy Committee be informed of Plan progress (on a monthly or quarterly basis).</b>	X	
<b>Q3 Are objectives for the delivery of the RMCEI Plan incorporated within staff PMDS Team Development Plans?</b>	X	
<b>Q4 If aspects of the Plan need to change (i.e. achieved good progress in some areas and are behind in other areas), as a result of a quarterly review, is there a mechanism in place to implement the change?</b>	X	
<b>Q5 Will monitoring of the progress of the Plan be documented (i.e. monthly/quarterly monitoring reports, preparation of minutes and circulation of same in relation to any progress meetings)?</b>	X	

Director of Services are kept informed of progress or any issues at the weekly leaders meeting. They may advise Management Team of progress / issues if needed at Monthly Management Team meetings. A presentation is given to SPC annually. If aspects of the Plan need to change these will be recorded on the template in Appendix 2 and resources will be redeployed, targets amended, and the EPA will be informed.

In addition, a formal review will be presented by Environmental Enforcement and Water Services to the Directors of Infrastructure and Climate Change / Finance and Water services during June / July 2025.

## Appendix 1: Planned Routine & Non-Routine Inspections for the Year Ahead

	Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
<b>Waste</b>					
<b>6.1</b>	<b>Routine Waste Inspections</b>				
6.1.1	Inspections of Waste Permitted Facilities	2	0.5	1	
6.1.2	Joint inspections with NTFSO	0	0	0	No commercial ports / airports in the county, DLR will support the NTFSO if needed.
6.1.3	Inspections of Cert of Registration sites (private)	0	0	0	No private CORs in County
6.1.4	Inspections of LA Cert of Registration sites, e.g., bring centres and bottle banks	37	0.25	9.25	37 DLR owned CoRs in County
6.1.5	Multi-agency inspections, including vehicle inspections and multi-agency site inspections	10	2	20	1 per quarter in Q 2, 3 & 4 dependent on Garda availability. (1 day planning / 1 day execution for each checkpoint)
6.1.6	Hazardous waste sectoral inspections (e.g. WTF, garages, mini-labs, industrial, healthcare, POPs & others)	30	0.5	15	
6.1.7	Inspections in relation to segregation, recovery and disposal of C&D waste at construction/development sites to include major public projects (e.g. Waste Mgt. Plans, Gypsum handling, etc.)	100	1	100	
6.1.9	Registration of Sewage Sludge Facility inspections	0	0	0	No Sewage Sludge facilities in DLR.
6.1.10	Household Waste Surveys	100	1	100	
6.1.11	Inspections in relation to the household and commercial kerbside waste collection regime (including brown bin)	2	0.5	1	Primarily undertaken by enhanced WERLA function - some time allowed for local issues.
6.1.12	Other inspections of waste collection permit holders to include, for example, data validation audits (onsite) but not included above in 6.1.11	20	1	20	Increased due to time spent per inspection as well as cradle to grave inspections with WERLA
6.1.13	Commercial Food Waste Inspections (original waste producers, e.g. hotels, nursing homes, restaurants, etc.)	100	0.5	50	
6.1.14	Inspections in relation to authorised ELV facilities (ATFs) with an emphasis on traceability requirements (SI 320 of 2014)	0	0	0	No ATFs in DLR.
6.1.15	Inspection in relation to Mercury Regulation (S.I. No. 533/2018)	39	0.25	9.75	
6.1.16	Other routine inspections (not included in above numbers) - please specify	2	0.5	1	Bray Landfill – Historic Landfill
	<b>Subtotal Routine Waste Inspections</b>	<b>442</b>	<b>-</b>	<b>327</b>	
<b>6.2</b>	<b>Non-Routine Waste Inspections</b>				
6.2.1	Investigative inspections of fly tipping or illegal dumping, <b>excluding</b> unauthorised C&D, ELVs & Tyres	1,200	0.25	300	
6.2.2	Investigative Inspections in relation to unauthorised C&D sites (sites with no permit)	0	1	0	
6.2.3	Investigative Inspections in relation to unauthorised ELV sites and suspected sites of origin as notified by the NTFSO (sites with no permit)	2	5	10	Two suspect sites being investigated currently
6.2.4	Investigative Inspections in relation to unauthorised Tyre dumps (no permit in place)	0	0	0	None have come to attention of DLR
6.2.5	Inspections in relation to unauthorised waste collectors (collectors with no permit), e.g. Man-In-Van, scrap collection, unauthorised C&D collection, etc.	25	0.25	6.25	21 recorded in 2024. Allowing for monitoring of social media and local advertising.
6.2.6	Inspections in relation to other Unauthorised Waste sites excluding those mentioned above - incl. crashed vehicle inspections, PTUs, etc.	0	0	0	None have come to attention of DLR
6.2.7	Inspections in relation to Waste Facility Permits continuing to operate after their permit has expired	0	0	0	None have come to attention of DLR
6.2.8	Inspections in relation to extractive industries	0	0	0	None are active in DLR
6.2.9	Household Waste/waste presentation Inspections arising from complaints, including backyard burning	300	0.35	105	
6.2.10	Inspections of sites notified under Article 27	20	1.5	30	
6.2.11	Other non-routine inspections (not included in above numbers)	5	5	25	Halloween Operation additional resources from Waste Team
	<b>Subtotal Non-routine Waste Inspections</b>	<b>1,552</b>	<b>-</b>	<b>476.25</b>	
<b>6.3</b>	<b>Litter Patrols/Investigations</b>				
6.3.1	Litter Patrols/Investigations	3,635	0.3	1,091	
6.3.2	Litter pollution Monitoring surveys	200	0.25	50	
6.3.3	Litter pollution quantification surveys	36	0.25	9	
6.3.4	Visits in relation to Green Schools programme	35	0.5	17.5	These actions are conducted by the Environmental Awareness Officers.

	Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
6.3.5	Providing support to community groups during litter clean ups	700	-	700	Supplies are given to groups by the Environmental awareness officers and the cleansing team collect the bags. (Number is per roll of 10 bags)
6.3.6	Judging Tidy Towns/Villages competitions	33	1	33	The Environmental Enforcement Wardens conduct these actions.
6.3.7	Other routine litter patrols/investigations (not included in above numbers)	7	5	35	Halloween Operation additional resources from Litter Team
	<b>Subtotal Routine Litter Patrols/Investigations</b>	<b>4,646</b>	<b>-</b>	<b>1,935</b>	
<b>Water/Wastewater</b>					
<b>6.4</b>	<b>Routine Water/Wastewater Inspections</b>				
6.4.1	Inspections of Discharges Licenses to Water (Section 4)	30	0.5	15	
6.4.2	Audits of private water supplies	2	1	2	
6.4.3	Monitoring samples from private water supplies	12	0.17	2	Note that this item is not required on NEMIS. It is noted that 'This data is collected by EPA'
6.4.4	Farm Inspections under GAP Regulations conducted by Local Authority (not including farm inspections by DAFM)	27	2	54	Number given in correspondence from EPA dated 22 <sup>nd</sup> Feb 2024. Dependent on the arrival of a New Resource which is to be shared between SDCC and DLR.
6.4.5	Farm Inspections conducted by DAFM	0	0	0	
6.4.6	Farm Inspections Other e.g. routine farm inspection but not GAP inspection	0	0	0	
6.4.7	Monitoring programmes, Operational and Surveillance samples taken	211	0.3	63	Routine River Sampling DURI and Routine Sampling was 211 in 2024. Same programme in 2025. Changed from 100 (DURL was left out last year) PB
6.4.8	No. of days of locally lead investigative assessments (including SSRS, sampling, river walks, etc.)	30	1	30	
6.4.9	WFD investigative monitoring samples and analysis by Local Authorities.	27	0.5	14	Investigative samples on the Carrickmines River for 6 months
6.4.10	No of days of engagement with LAWPRO and Communities Programme	8	1	8	
6.4.11	Bathing Water Inspections	306	0.25	77	
6.4.12	DWWTS inspections under National Inspection Plan	10	2.5	25	
6.4.13	No. of DWWTS Engagement Activities	3	0.5	1.5	
6.4.14	Inspections for the purposes of administering the DWWTS grant in High Status Objective Areas and Priority Areas for Action	10	2.5	25	
6.4.15	Other Surface & Groundwater Protection Inspections [e.g. drinking water source protection, zone of contribution monitoring, etc] – excluding inspections of behalf of Uisce Éireann	-	-	-	
6.4.16	Misconnection Surveys	1200	0.5	600	
	<b>Subtotal Routine Water/Wastewater Inspections</b>	<b>1,876</b>		<b>916</b>	
<b>6.5</b>	<b>Non-Routine Water/Wastewater Inspections</b>				
6.5.1	Inspections relating to water pollution incidents/complaints, excluding non-routine farm inspections.	60	1	60	
6.5.2	Non-routine farm inspections, e.g. on foot of pollution incident or complaint.	1	2	2	
6.5.3	Unauthorised Discharges Investigated	1	1	1	
6.5.4	Inspections in relation to Water Pollution Licence applications	5	1	5	
	<b>Subtotal non-routine Water/Wastewater Inspections</b>	<b>67</b>		<b>68</b>	
<b>Air/Noise Inspections</b>					
<b>6.6</b>	<b>Routine Air/Noise Inspections</b>				
6.6.1	Inspections of Air Pollution Licenced sites	0	0	0	None in DLR
6.6.2	Number of inspections carried out under the Solid Fuel Regulations	50	0.5	25	
6.6.3	Number of multi-agency inspections carried out under the Solid Fuel Regulations, e.g. in conjunction with other local authorities, EPA, DECC, etc.	0	0	0	These inspections are subject to agreement from other local authorities, EPA, DCCAE, etc. DLR will assist when required.
6.6.5	Total number of fuel samples collected and analysed	0	0	0	These samples will be analysed if / when they come to the Council's attention and subject to funding.
6.6.6	Solid Fuel information/engagement/education campaigns to increase public knowledge and/or operator knowledge	2	5	10	Campaigns to be run during Q3 and Q4 2025
6.6.7	Inspections of sites under 2012 Deco Paints Regulations (S.I. 564 of 2012) – Vehicle Refinishers	10	0.5	5	
6.6.8	Inspections of sites under 2012 Solvents Regulations (S.I. 565 of 2012) –e.g. Dry cleaners, surface cleaning etc.	10	0.5	5	
6.6.9	Inspections of sites under Petroleum Vapours Regulations	30	0.25	7.5	
6.6.10	Ambient Air Monitoring Programme inspections	4	0.25	1	Maintenance and calibration are provided by contractor.
6.6.11	Annual Noise Action Plan progress report submitted to EPA	1	5	5	

	Inspection Types	Planned Inspections for Year	Estimate time per inspection& write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
6.6.12	Other routine air & noise inspections	50	1	50	Time allocated to implementation of Noise Action Plan / Air Quality Action Plan.
	<b>Subtotal Routine Air/Noise Inspections</b>	<b>157</b>		<b>109</b>	
<b>6.7</b>	<b>Non-Routine Air/Noise Inspections</b>				
6.7.1	Incident/complaint related inspections	275	1	275	Includes 0.5 from DLR Staff and 0.5 from EHO per complaint
	<b>Subtotal Non-Routine Air/Noise Inspections</b>	<b>275</b>		<b>275</b>	
<b>6.8 Producer Responsibility Inspections (Routine)</b>					
6.8.1	WEEE Inspections	20	0.25	5	
6.8.2	Battery Inspections	15	0.25	3.75	
6.8.3	Inspections on suspected vehicle importers (ELV Regulations 2016)	1	0.5	0.5	
6.8.4	Farm Plastics Inspections	2	0.25	0.5	
6.8.5	Plastic Bag Levy Inspections	15	0.1	1.5	
6.8.6	Inspections under the Packaging regulations – Suspected Major Producers	5	0.5	2.5	
6.8.8	Inspections under the Tyre Regulations – Tyre Retailers	60	0.25	15	
6.8.9	Inspections carried out under the Deposit Return Scheme (DRS) Regulations	30	0.25	7.5	
	<b>Subtotal (Routine) Producer Responsibility Inspections</b>	<b>148</b>		<b>36.25</b>	
<b>6.9 Planning (Environmental) Inspections (Routine)</b>					
6.9.1	Inspections (environmental) of existing planning permissions	175	1	175	
6.9.2	Inspections (environmental) in advance of grant/refusal of planning permission	150	0.5	75	
6.9.3	Quarry Inspections (e.g. relating to noise, dust, surface/groundwater emissions, vibration etc.)	2	0.25	0.5	Two inactive quarries in DLR
6.9.4	Other planning inspections relating to environmental issues	0	1	0	
	<b>Subtotal Planning Inspections (Routine)</b>	<b>327</b>	<b>-</b>	<b>250.5</b>	
	<b>Total Routine Inspections end of year</b>	<b>7,596</b>		<b>3,573</b>	
	<b>Total Non-Routine Inspections end of year</b>	<b>1,894</b>		<b>819</b>	
	<b>Total Inspections end of year</b>	<b>9,490</b>		<b>4,392</b>	

## Appendix 2: Suggested Plan Implementation Review Template

### RMCEI/Enforcement Plan Implementation Review Report

Meeting Date:

Meeting Time:

Attendees:

Name	Title

Reason for the Meeting:

Monthly Implementation Review:	
Quarterly Implementation Review:	
Other Reasons:	

Important Notes/Actions from Previous Meeting:

Table A – Progress Against Priorities

National Priority:			
Areas Requiring Review for this Priority - for example:	Progress to Date	Further Work Required	Responsibility Assigned
<ul style="list-style-type: none"> <li>For authorised sites- compliance rates;</li> <li>Site selection methodology, and/or early interventions;</li> <li>Detection of non-compliances/follow up;</li> <li>Progress in the NEP shown;</li> <li>Positive environmental outcomes – not just inspections targets;</li> <li>Collaborative work with WERLA, LAWPRO, EPA, Catchment Care Projects;</li> <li>Data analysis/sharing for enforcement targeting – and other activities as described in Table 1 of the Guidance.</li> </ul>			

Table B – Progress Against Inspection Targets

Inspection Plan Review				
	Areas	Progress to Date	Further Work Required	Responsibility Assigned
1				
2				
3				



## Appendix 3: National Environmental Governance Processes 2025 - 2027

National Environmental Governance Processes 2025 – 2027			
National Enforcement Priority (2025 -2027)	Objective (2025 – 2027)	Outcome (2025 -2027)	Activities for Focus in 2025
<b>Planning for Environmental Inspections and Compliance</b>	Environmental inspection tasks are planned and carried out according to Recommendation 2001/331/EC of the European Parliament and of the Council, providing for Minimum Criteria for Environmental Inspections (RMCEI), thereby strengthening compliance with, and contributing to a more consistent implementation and enforcement of environmental law in all	<ul style="list-style-type: none"> <li>• Appropriate inspection and compliance planning, resourcing environmental tasks based on risk, and implementing inspection schedules, focussed on the National Enforcement Priorities (NEPs).</li> </ul>	<ul style="list-style-type: none"> <li>➤ Produce an Environmental Inspection &amp; Compliance Plan according to RMCEI requirements<sup>3</sup> to include:               <ul style="list-style-type: none"> <li>➤ The time period and geographical area to which the plan relates.</li> <li>➤ The resources available to undertake inspection tasks and any challenges to implementation.</li> <li>➤ The incorporation of the National Enforcement Priorities (NEPs) into the Plan with related inspection/compliance tasks.</li> <li>➤ The sites or types of installations covered by the plan.</li> <li>➤ Environmental risk ranking of sites or installations and prioritisation of resources based on risk.</li> <li>➤ A programme for routine environmental inspections and resource provision for non-routine inspections.</li> <li>➤ A periodic review structure (minimum biannually) for assessing the implementation and adaptation of the Plan and progress of NEPs and planned inspection targets.</li> <li>➤ Sign-off of the Plan and reviews by Director of Services.</li> </ul> </li> <li>➤ Submit the Plan to the EPA by the required deadline.</li> </ul>

<sup>3</sup> RMCEI Plan Template is available on the NIECE website at <https://www.niece.ie/Topics/RMCEI.aspx>

	local authority functional areas.		
<b>Recording &amp; Reporting of Environmental Inspections, Compliance, and Enforcement Data</b>	Environmental Inspections, Compliance, and Enforcement Data is reported in a timely manner through the National Environmental Management Information System (NEMIS), to facilitate national reporting on RMCEI statistics and implementation of the National Enforcement Priorities (NEPs).	<ul style="list-style-type: none"> <li>• Accurate and timely data recording and reporting of inspections, compliance, and enforcement data by all local authorities.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Enter environmental inspection and complaints<sup>4</sup> data on a quarterly basis in NEMIS across all environmental sectors of Waste, Water, Air and Noise.</li> <li>➤ Enter agricultural inspection, compliance, and enforcement data on a quarterly basis in the NAIP spreadsheet and submit this to <a href="mailto:naip@epa.ie">naip@epa.ie</a></li> <li>➤ Produce NEP Progress Reports for each priority area and submit to the EPA by the required deadline. The NEP reports should adhere to the criteria set out in Local Authority Performance Framework Assessment Methodology and Guidance<sup>5</sup> with clear examples of positive environmental outcomes provided.</li> <li>➤ Use relevant inspection templates and guidance from WERLA, NAIP, etc.</li> <li>➤ Ensure all annual RMCEI statistics are reported via NEMIS by the required deadline.</li> </ul>

<sup>4</sup> Appropriate systems should be in place for recording and tracking environmental complaints and reporting these numbers for each thematic area in NEMIS.

<sup>5</sup> Available on the NIECE website at <https://www.niece.ie/Topics/RMCEI.aspx>