

National Priority Sites for Enforcement

April 2018

Niamh O'Donoghue
Office of Environmental Enforcement

EPA Strategic Goals 2016-2020



Trusted Environmental Regulator



Leader in Environmental Evidence & Knowledge



Effective Advocate & Partner



Responding to Key Environmental Challenges



Organisationally Excellent



Trusted Environmental Regulator: Licence Enforcement

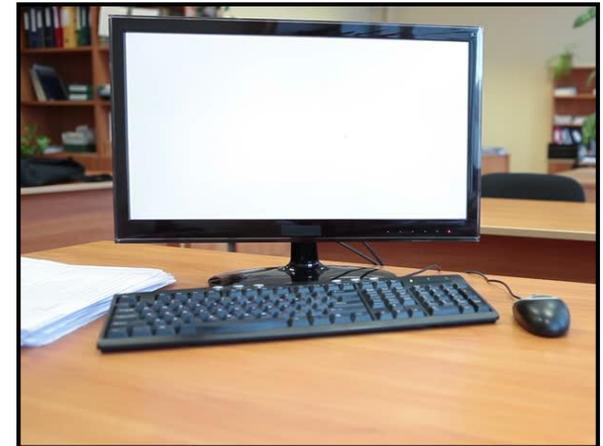
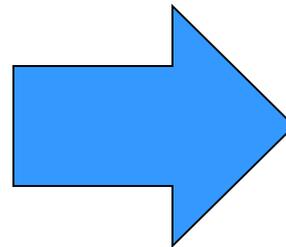
- 800 industrial, intensive ag. and waste licences

Licence	No. of licences
Industrial	372
Intensive Ag	228
Waste	200



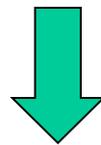
LEMA – A Paperless Enforcement System

- CRM based system launched in January 2013
- All correspondence via web portals
- ~10,000 items of incoming correspondence
- EPA site visit reports, agreements, requests for information, action items etc. are issued via this system



LEMA – An Enforcement Tools

- Site inspections: planned (350), reactive (550)
- Monitoring: licensee and EPA (500 water; 100 air)
- Report assessment (~5500 returns)
- Complaints (~1000 per annum)
- Incidents (~1100 per annum; 97% minor)



LEMA



Get better: Use Data to Inform Decisions

LEMA

My Work

- What's New
- Dashboards
- Activities
- Reports

Accounts/Contacts

- Organisations
- Contacts

Licences

Complaints Top 10

- Complaints
- Compliance
- Incidents
- Meetings
- 3rd Party Correspondence
- Non-Compliances
- Licencee Returns
- Site Visits

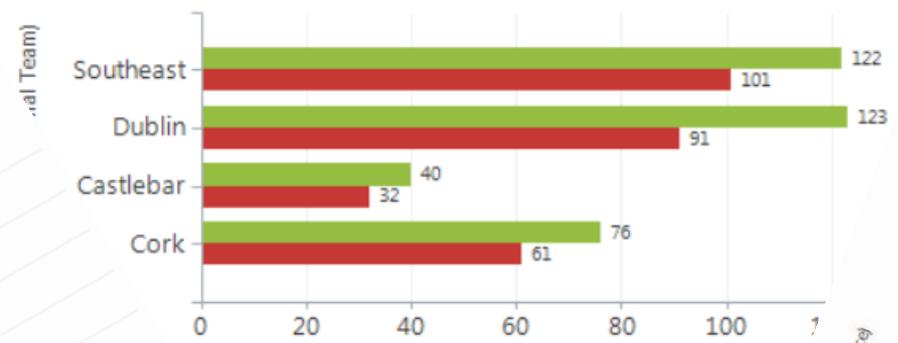
OES

- Submissions/Objections

Workplace Service

LEMA

QA/QC - Site Visit Plan by Region
QA/QC - IE Site Visit Plan 2017



Company Name	License No.	Region	Team
Swords Laboratories	P0014-04	Dublin	Dublin
ZOETIS BELGIUM S.A.	P0015-05	Southeast	OEE
Sanofi-Santelabo Pharmaceutical	P0016-02	Cork	Cork
Sanofi-Santelabo Partners	P0017-02	Cork	Cork
Sanofi-Santelabo Ireland Company Limited (Kil...	P0018-02	Cork	Cork
Sanofi-Santelabo Technology (Ireland)	P0019-02	Dublin	Dublin
Sanofi-Santelabo Non Pharmaceutical Serv...	P0020-02	Cork	Cork
Sanofi-Santelabo Ltd	P0021-02	Castlebar	Castlebar
Sanofi-Santelabo Products Limited	P0022-03	Cork	Cork
Sanofi-Santelabo International S.de R.L. Tr...	P0023-03	Cork	Cork
Sanofi-Santelabo	P0024-03	Castlebar	Castlebar
Sanofi-Santelabo	P0025-05	Cork	Cork
Sanofi-Santelabo Scope Designated Activity C...	P0027-04	Southeast	Southeast
Sanofi-Santelabo Brian Moran, Mr Tom Coughlan...	P0028-01	Cork	Cork
Sanofi-Santelabo Irish Cement Limited (Limerick)	P0029-05	Cork	Cork Inspector Team A
Sanofi-Santelabo Irish Cement Limited (Platin)	P0030-04	Dublin	Dublin Inspector Team A
Sanofi-Santelabo Holfeld Plastics Limited	P0031-02	Southeast	OEE Southeast Team A

Search for records

License Sta...	Active Lice...	Licenc...	Status (Acti...	Enfor
	29/04/2016	IEL	Active	A2
	2015	IEL	Active	A1
			Active	B2
				B1

Incidents by Sector

Sector [OEE] [Licence]	Incidents
Class 13 Secto...	6
Surface Coatin...	66
Waste	1
Cement Sector	16
Fossil Fuels S...	26
Timber Treatme...	1
Wood, Paper, Te...	9
Food & Drink S...	153
Intensive Agri...	1
Chemical Secto...	19
Metals Sector...	7
Compost Sector...	232
Non-Hazardous ...	84
Hazardous Wast...	17
Mineral Fibres...	4
Energy Sector...	70
Mineral & Othe...	40
Incineration S...	152
Landfill Secto...	194

Standards and Scrutiny

LEMA Standards Unit, Bulletin No. 3 May 2017

What's Next?

- Circulate revised Non-compliance and Incident Procedures
- Liaise with Regions on Review of Complaints and Compliance Investigation Procedure

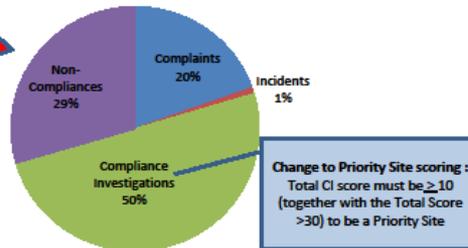
Note..... New Dashboard 'QA/QC Action Required by Licence Enforcement' highlights where progress is required.

CLARIFICATION - Site Visit Category

Visit Category	Example
Planned	IE Planned Site Visits (Annual Plan)
Reactive Enforcement Plan	Locally Planned SV's / Other Planned SV's. Are 'detailed' SV's. Template questions are used. Will re-set IE Site Visit schedule.
Reactive Non-Enforcement Plan	Unplanned SV's. e.g. Brief SV's, issue follow up etc. Template questions not always used. Will not re-set IE Site Visit schedule.

Information on National Priority Sites

Priority Sites, Sources of Scores



WE 12/05/17

Progress Required

23% of 2017 IE Site Visit Plan completed (30/05/2017)

Remember..... OEE Policy is that all Site Visit Reports are issued within 1 Month

We're making really good progress – well done to all!

- Reduction in the time taken to issue Site Visit Reports i.e. Jan–May 2016 took an average of 39 days to issue a SV report & Jan–May 2017 took an average of 22 days to issue (reduction of 17 days / >2 weeks)
- Reduction in the time taken to issue decision/close out 'Requests for Approval' i.e. Jan–May 2016 took an average of 45 days to close out and Jan–May 2017 took an average of 20 days to close out (reduction of 25 days / > 3 weeks)

Find out more.....on Sharepoint - OEE/LEMA/LEMA Standards Unit
Give your feedback.....LEMASStandardsUnit@epa.ie

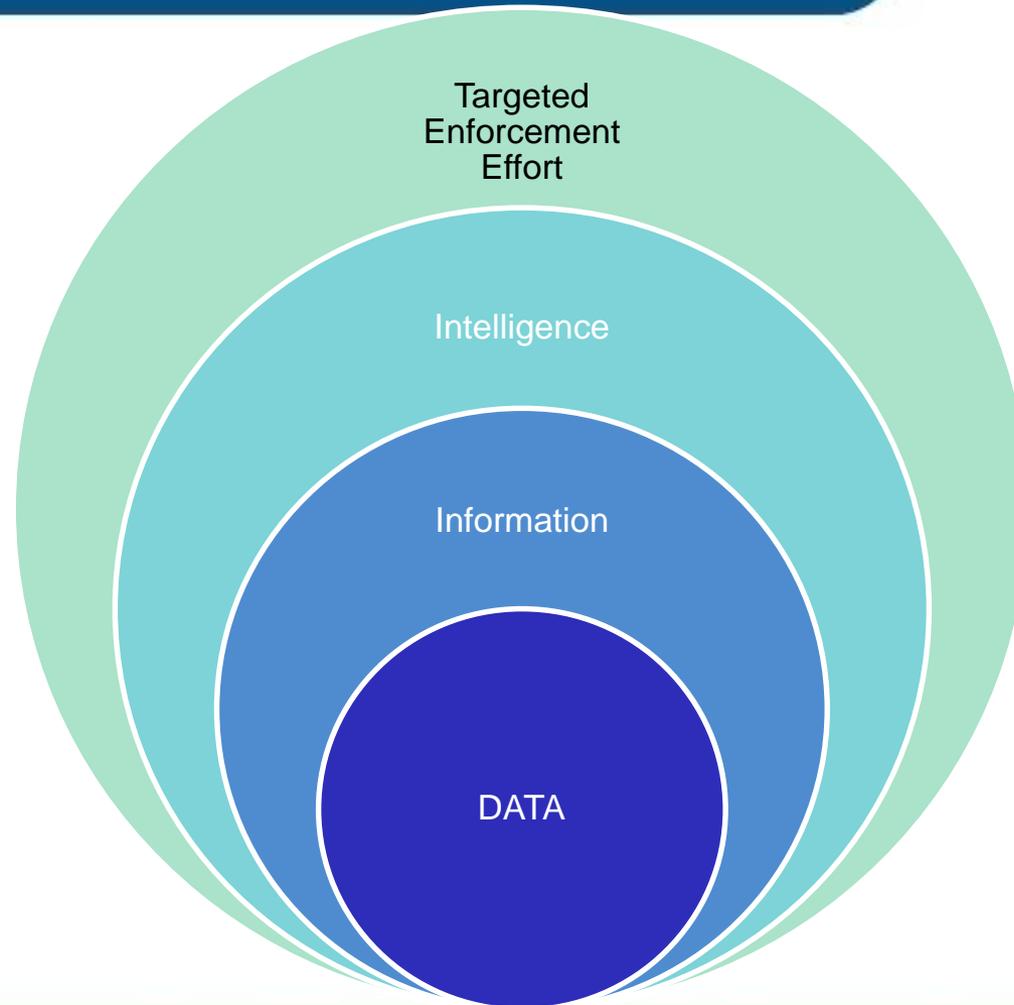
- *“The EPA has developed a...system (LEMA) which allows **effective data collection and analysis, risk assessment and targeting** of compliance assurance work for industrial installations.”*

EU Commission, Feb 2017

- *“It is to the EPA’s credit that it has been uncompromising in spelling out compliance failures.”*

Irish Times, Oct. 2017

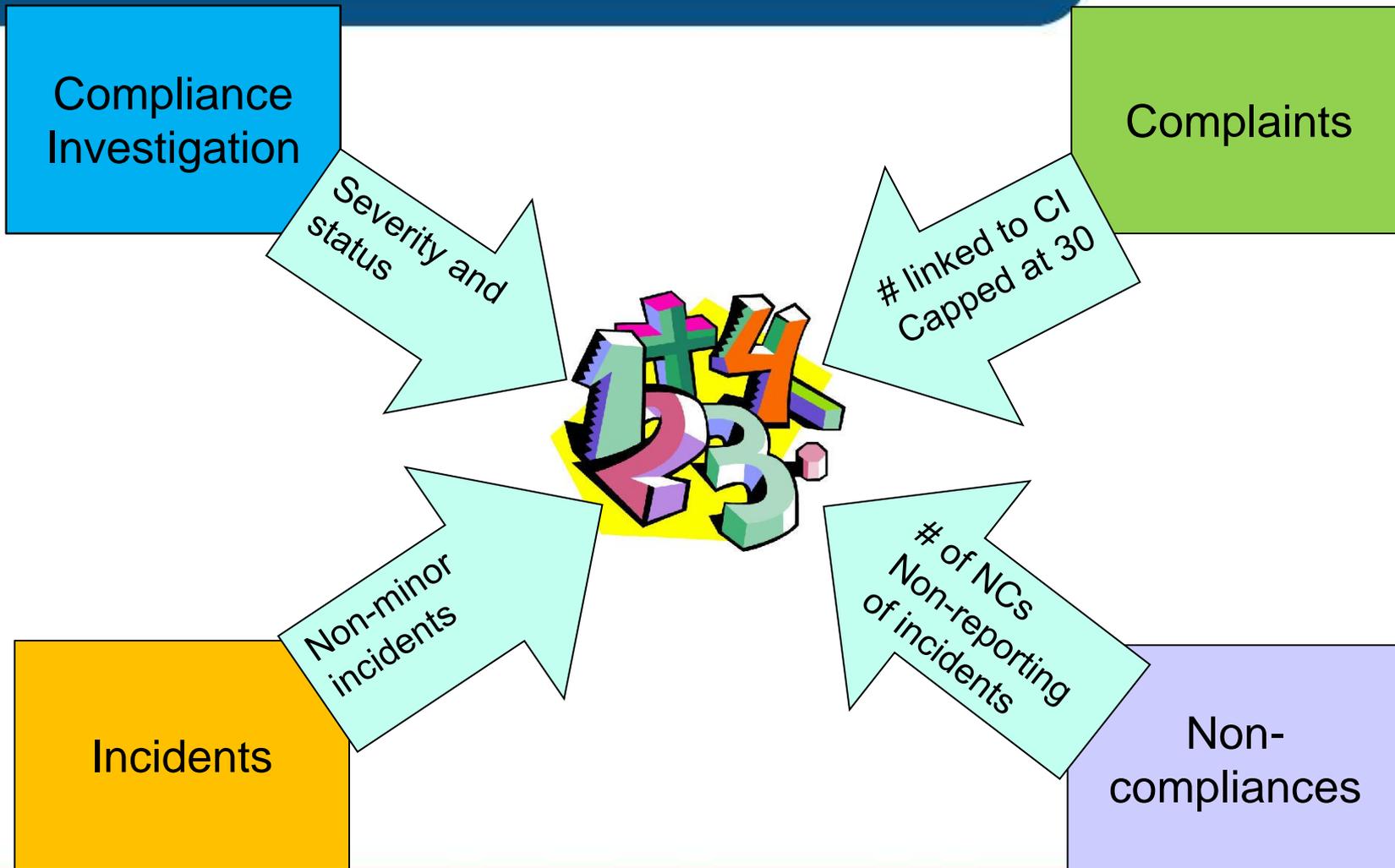
What LEMA Can Do For Us ?



National Priority Sites (NPS)

- It's a methodology based on the performance of a licensed site in terms of licence compliance
- New enforcement tool for the Agency
- There are four main “scoring” aspects to the methodology
 - Compliance Investigations
 - Non-compliances issued by the Agency
 - Incidents received by the Agency from the licensee
 - Complaints received by the Agency
- The data for the previous 6 months is assessed

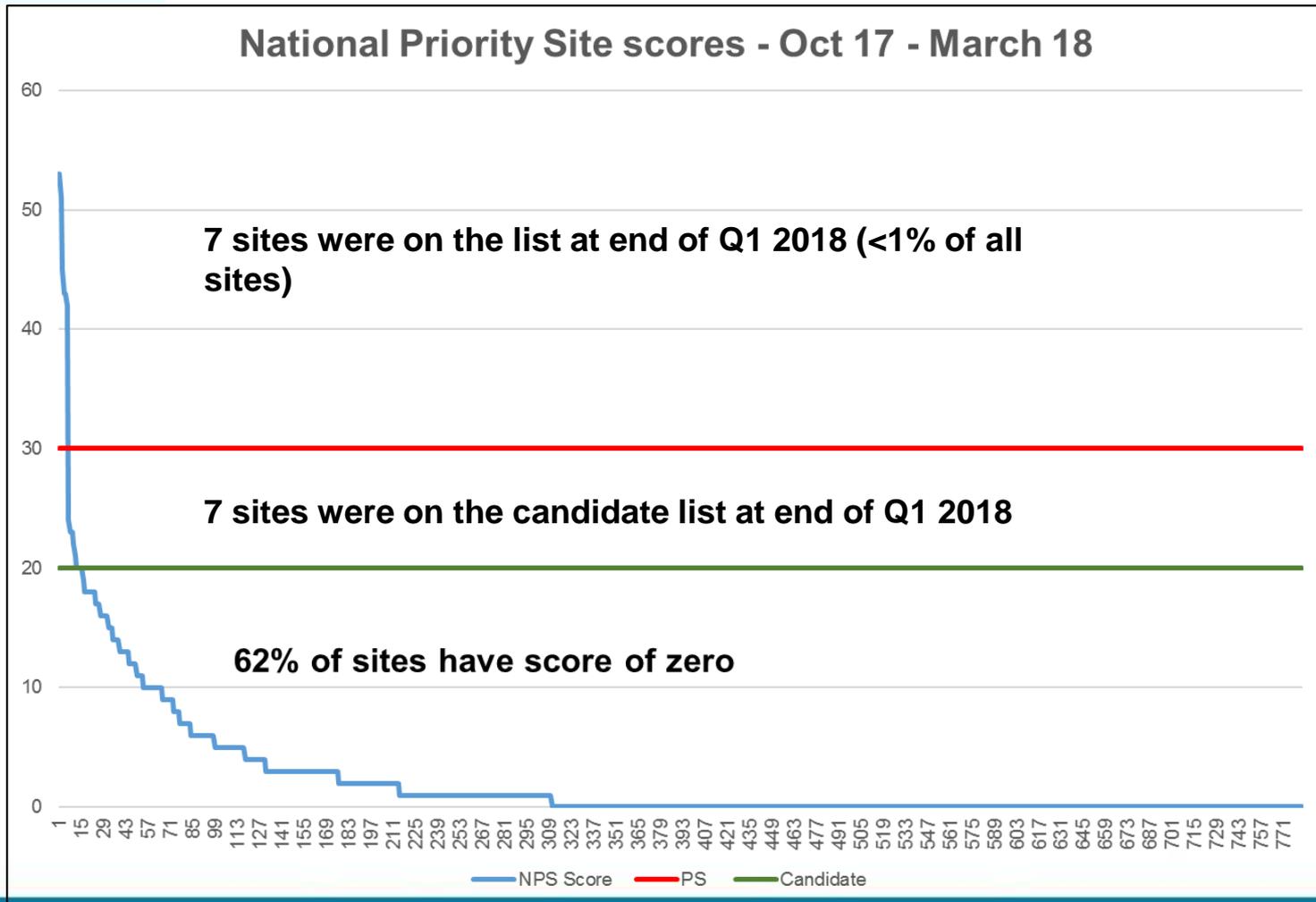
National Priority Site List - Scoring



Development of the System - Learning Points

- Developed over ~2years, 'road-tested' and fine-tuned
- Data: need quality reliable data, consistency and standards
- Engagement with industry and representative groups
- Communication with licensees and directors (since Jan 2016)
- First published July 2017- web and press release
- Focusses attention on
 - OEE enforcement
 - Licensed sites with significant issues

The results...



Sites on the National Priority Sites (NPS) List

Time-Period *	No. sites on list
Beginning 2016	25*
Beginning of 2017	10
July 2017 (Round 1)	5
Sept 2017 (Round 2)	7
Jan 2018 (Round 3)	8
April 2018 (Round 4)	7

* Scoring system amended subsequently

Who is on the list?

Round 1 (July '17)	Round 2 (Oct '17)	Round 3 (Dec '17)	Round 4 (Mar 18')
T&J Standish	T&J Standish	T&J Standish	T & J Standish
Arrow Group	Arrow Group	Arrow Group	Arrow Group
Tipperary Co-Op	Nutricia	Nutricia	C & F Automotive
Rosderra Irish Meats	Arrabawn	Rosderra Irish Meats	Rosderra Irish Meats Group
Irish Cement	Dairygold (Mallow)	Irish Cement	Glenmore Biogas Ltd
	Carbery Food	Green Pastures	Lacpatrick Dairies Limited
	Ashgrove Recycling	East Galway Landfill	Aurivo Dairy Ingredients Limited
		Shell E&P	

The Stats – April 2018

- 4 of 7 sites from agri-food sector
- Sites account for 26% of all complaints
- Sites account for 13% of open compliance investigations
- 5 sites came off the list following improvements in compliance
- 2 sites have remained on the list since first published.

Key Highlights 2017 - NPS

- 20 sites were identified as being a National Priority Site during 2017.
 - 14 of the 20 sites were a National Priority Site in just 1 of the 4 quarters of 2017
 - 3 sites were a National Priority Site for 2 of the 4 quarters - Tipperary Co-op, Nutricia, & Irish Cement.
 - 2 sites were a National Priority Site for 3 of the 4 quarters - Rosderra & T&J Standish.
 - 1 site was a National Priority Site for each of the 4 quarters - Arrow group.
- The Food & Drink Sector had the most number of National Priority Sites during 2017 (9) while 4 were from the Waste Sector
- 65% of all industrial and waste complaints received in 2017 were in relation to NPS; odour and noise were the key issues for the public.
- 17% of all non-compliances recorded for industrial and waste licensed sites during 2017 were for National Priority Sites.

Experience so far...

- Positive reaction from most sites
- Positive reaction from writing to directors
- Described as a '**game-changer**'
- Good media interest – agri-food sector
- Big driver for consistency across regions
- Driver for focussing and escalating enforcement action
- Public interest



EPA in warning to Irish Cement over environmental performance

Updated / Tuesday, 11 Jul 2017 12:17



Eight companies on latest EPA 'name and shame' list
Six of the sites cited account for more than half of all complaints received in 2017

© Tue, Jan 30, 2018, 14:36

AGRICULTURE FOOD AND DRINK
The EPA's Priority List and how to avoid it!

colas Mar 13, 2017

HOME > ENVIRONMENT > AGRI-FOOD COMPANIES DOMINATE EPA NATIONAL PRIORITY LIST

Agri-food companies dominate EPA national priority list

Conor Finnerty | Jan 30, 2018, 1:03pm



Trusted Regulator?

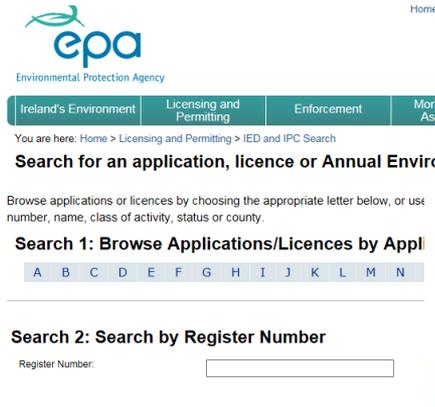


“We only have a few rules around here,
but we really enforce them.”

Access to Information



Finding out about Licensed Sites...



Home

epa
Environmental Protection Agency

Ireland's Environment | Licensing and Permitting | Enforcement | More

You are here: Home > Licensing and Permitting > IED and IPC Search

Search for an application, licence or Annual Environmental Statement

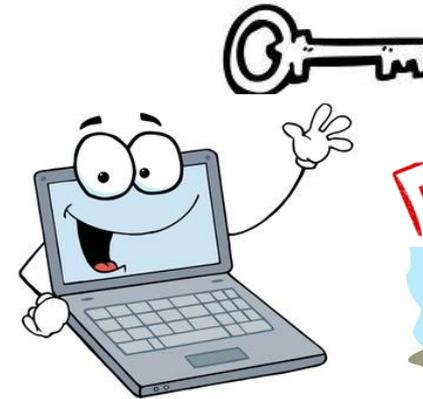
Browse applications or licences by choosing the appropriate letter below, or use number, name, class of activity, status or county.

Search 1: Browse Applications/Licences by Application Number

A B C D E F G H I J K L M N

Search 2: Search by Register Number

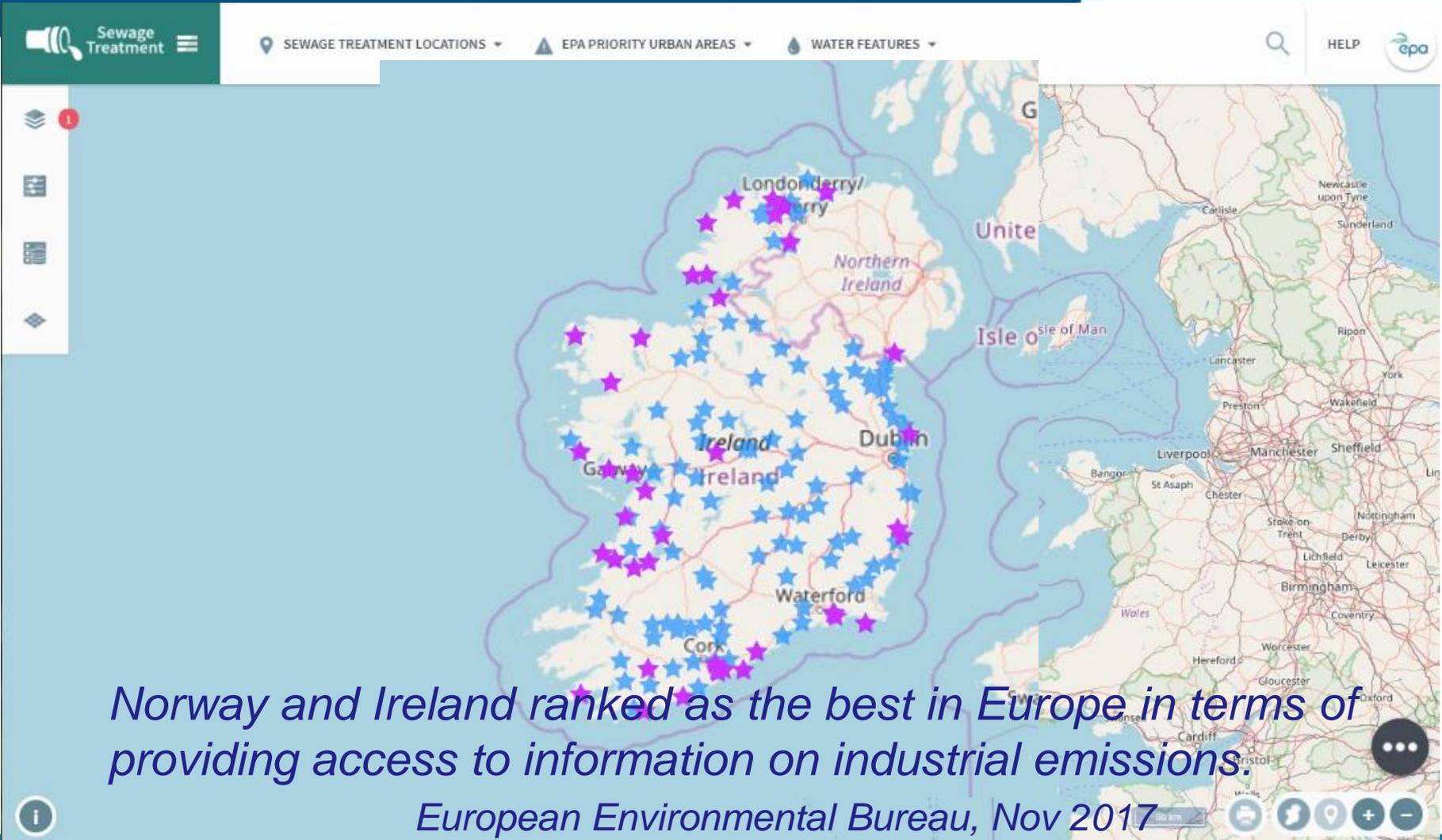
Register Number:



1994 2005 2009 2013 2014 2016 2017



EPA Maps



Norway and Ireland ranked as the best in Europe in terms of providing access to information on industrial emissions.

European Environmental Bureau, Nov 2017

THANK YOU FOR LISTENING