

The National Enforcement Priority Sites List

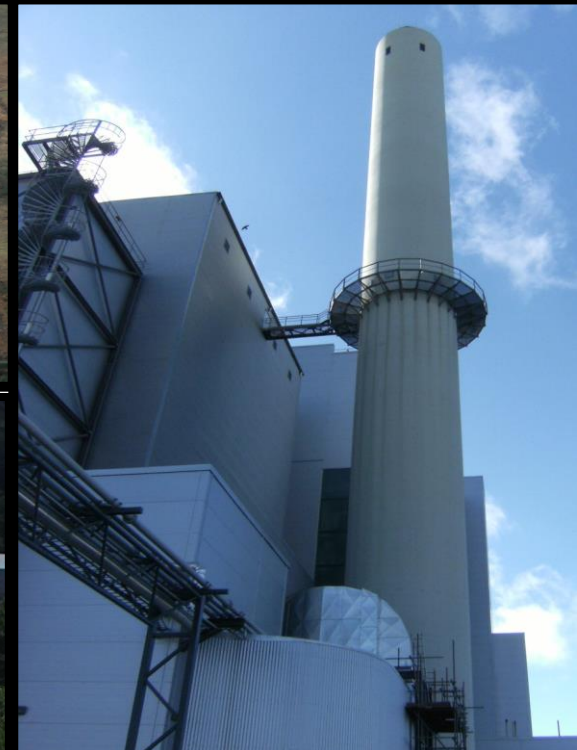


The development of enforcement tools using an ICT system

Kealan Reynolds, EPA Ireland.

Industry & Waste Permit Enforcement in the OEE

- 840 licences in place, just over 700 are operational sites
- Licensed sites range from small scale operators to very large and complex industrial sites.
- Sectors include Chemical, Solvents, Energy, Cement, Landfill, Waste Transfer Stations, Compost, Incineration, Intensive Agriculture, Food & Drink, Timber Treatment, Metals etc



OEE Enforcement Systems

- LEMA - **L**icensing, **E**nforcement, **M**onitoring and **A**ssessment System
- CRM based system launched in January 2013
- All correspondence with licensees is via web portals
- EDEN – **E**nvironmental **D**ata **E**xchange **N**etwork (LEMA ↔ EDEN)
- Approx. 10,000 items of incoming correspondence in relation to industrial and waste licensed per annum
- EPA issue site visit reports, approval notices, requests for information, action requests, non-compliance notices, investigations etc via LEMA



Paperless



The OEE Standards Unit

“To ensure quality data in LEMA and adherence to procedures across OEE to ensure consistency and good governance”

- Established the LEMA Standards Unit in the Castlebar Office in March 2016.
- The Vision for the Standards Unit is that OEE becomes a leader in data governance and application of standards within the Agency.
- Mission is to provide high quality, targeted and timely data, assessments and evidence to inform decision making by the OEE.

Role of the OEE Standards Unit

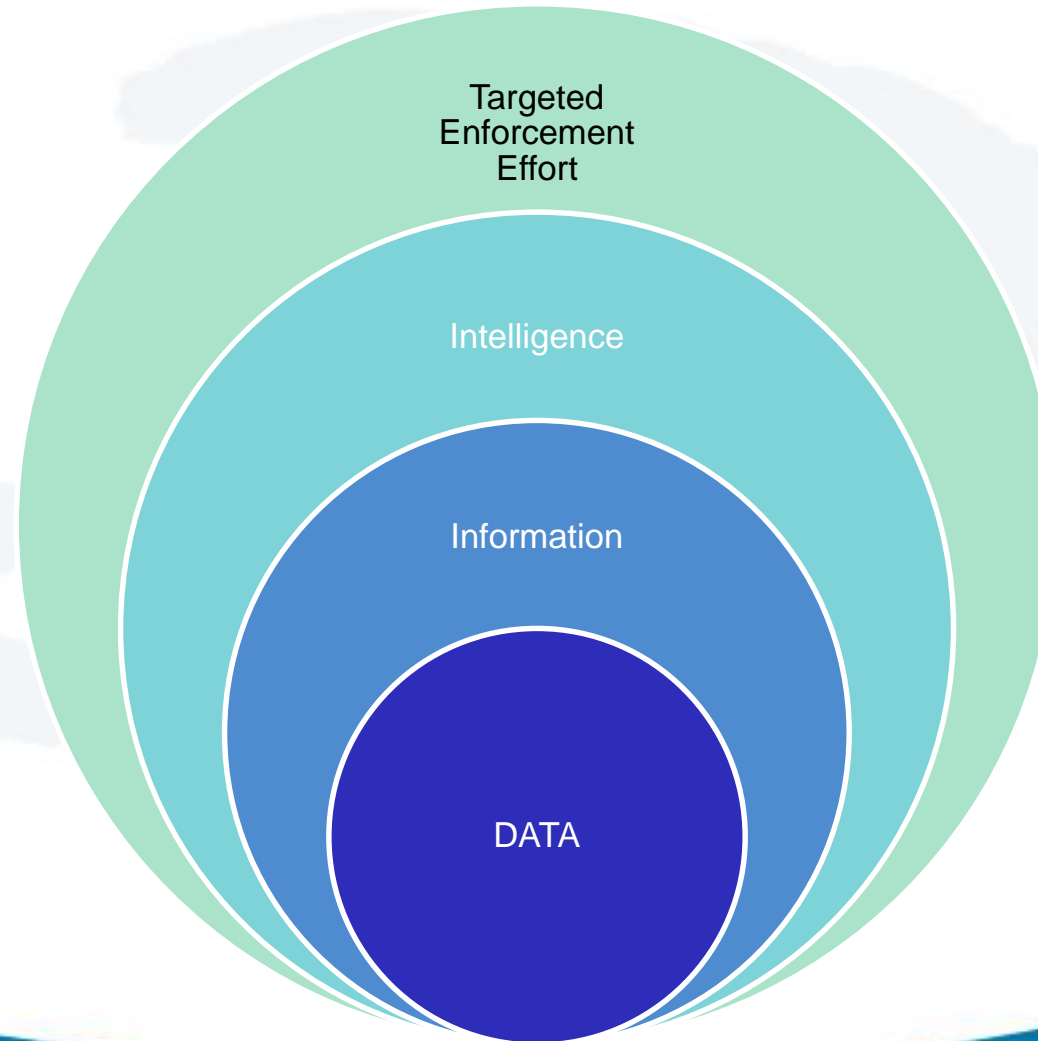
- **Governance:** Reviewing data for consistency, adherence to procedures, quality of data. Use data to monitor OEE performance in relation to key work areas.
- **Procedures:** Establishing, reviewing and updating LEMA guidance documents and procedures.
- **Communications:** Liaising with OEE Regions in relation to the adherence to procedures, the consistency and quality of data for each Region.
- **Reporting:** The use of a single unit to produce data for enforcement reports to ensure consistency of approach and the generation of accurate and timely data.



Use of LEMA Data

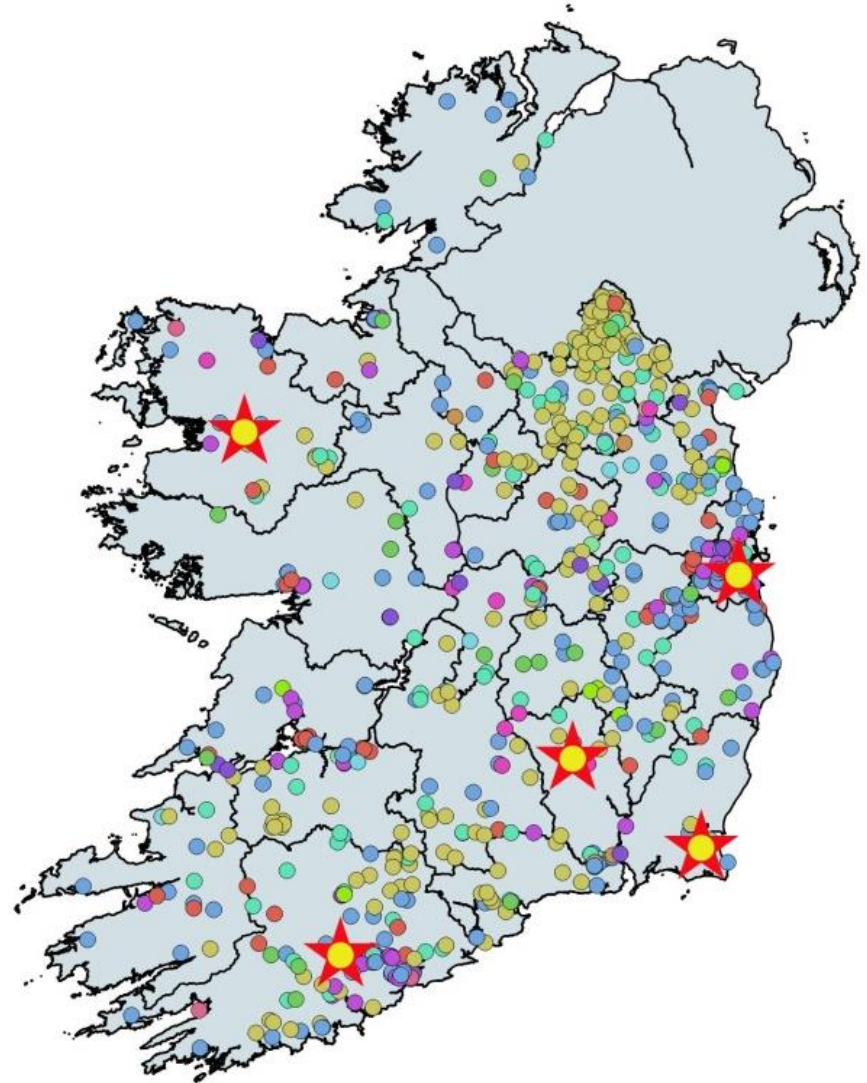
*“The EPA has developed a...system (LEMA) which allows **effective data collection and analysis, risk assessment and targeting** of compliance assurance work for industrial installations.”*

EU Commission, Feb 2017



OEEs National Priority Sites List

- Large number of licensed sites (>800)
- Limited resources
- Enforcement must be based on risk to environment and led by intelligence
- Target high risk areas
- Detect trends and patterns within sectors



National Priority Sites List

- A methodology based on the performance of a permitted facility in terms of **licence compliance**
- The data (from the LEMA System) for the **previous 6 months** is assessed
- **Ranks all** EPA permitted Sites based on enforcement/compliance status
- **Identifies sites** considered a 'National Enforcement Priority'
- **Publish** the 'Priority Site List' on a quarterly basis (commenced in 2017)
- There have been 41 sites identified as NPS since end of Q2 2017

Transparent policies and procedures.
Accurate, consistent & proportionate data.

**OEE Standards
Unit**

Enforcement Modules in LEMA



Site Visits



Compliance Investigations



Licensee Returns

What is a Compliance Investigation?

- The compliance investigations module of LEMA is a management system to allow inspectors to define, plan and implement **investigations into environmental issues** and non-compliances.
- A compliance investigation is created when an issue exists that **is causing or has potential to cause an environmental effect** and merits further investigation by the EPA.
- Assigned a **Response Level** (of High, Medium or Low) based on the severity of the effect on the environment and the likelihood of the effect occurring.
- All enforcement actions and communications relating to the investigation will be managed from within the Compliance Investigation management system.

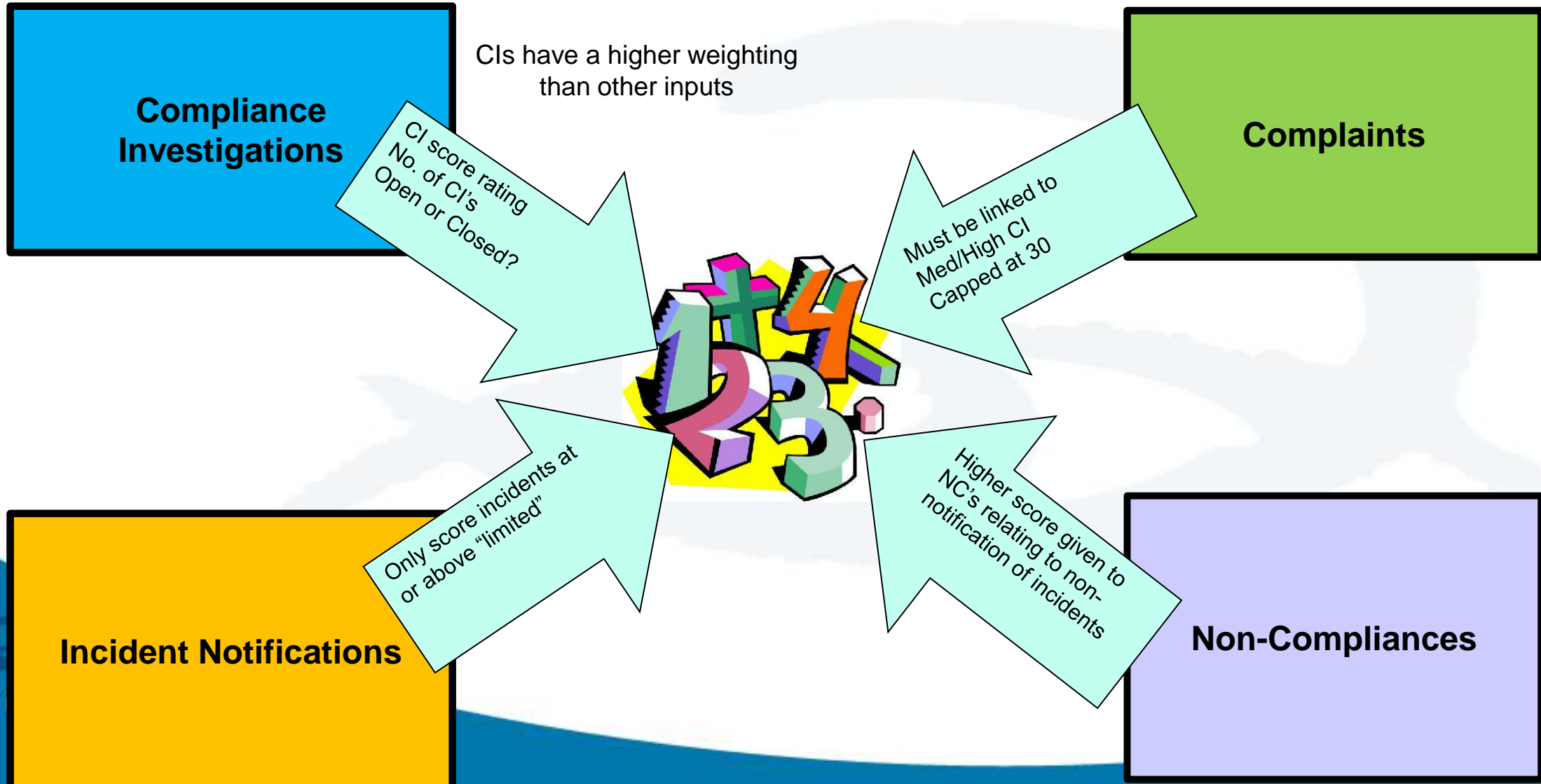


What are Non-Compliances, Incidents & Complaints?

- The recording of a **non-compliance** against a licence condition is a means of letting the licensee know that they are in breach of a licence condition and is a formal **record of the compliance** history of the site.
- **Incidents are notified to the OEE by licensees.**
 - Incidents categorised on a scale of 1 - 5: 1(minor) – 5 (catastrophic)
- **Complaints:** Only complaints **linked to a Compliance Investigation** are counted in the NPS.



Foundation stones of the NPA 'scoring' system



National Priority Sites List - Scoring

Scoring Component	Score Allocation		
Complaints	1 Point per Complaint		
	<i>* Note: Complaint must be linked to a Medium or High (Open) CI to score and is limited to a max of 30 complaints</i>		
Incidents	<u>Category</u>		
	5. Catastrophic	30 Points	
	4. Very Serious	20 Points	
	3. Serious	10 Points	
	2. Limited	2 Points	
	1. Minor	No Score	
Compliance Investigations	<u>CI Response Level</u>	<u>Status Open</u>	<u>Status Closed</u>
	High	20 Points	4 Points
	Medium	10 Points	2 Points
	Low	3 Points	1 Point
	<i>* Note: Only the top 3 scoring CIs are counted</i>		
Non-Compliances	<u>NC Type</u>		
	Basic NC	1 Point	
	For Non-Notification of an Incident	5 Points	

Communications from OEE

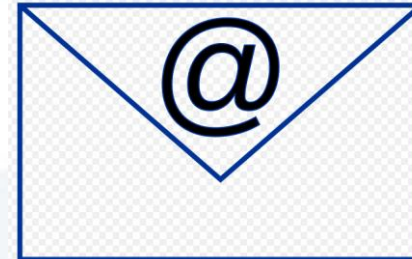
Priority Site

- Total Score > 30 Points with CI score \geq 10 Points
- Letter issued to OEE Contacts and Director of Company
- Licensees name published on EPA website

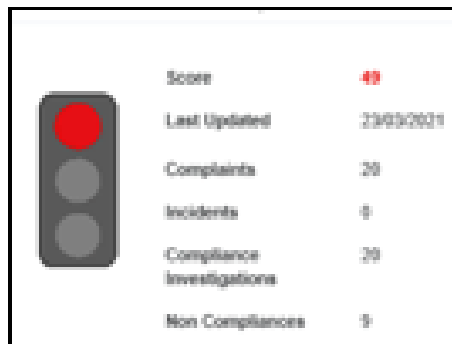
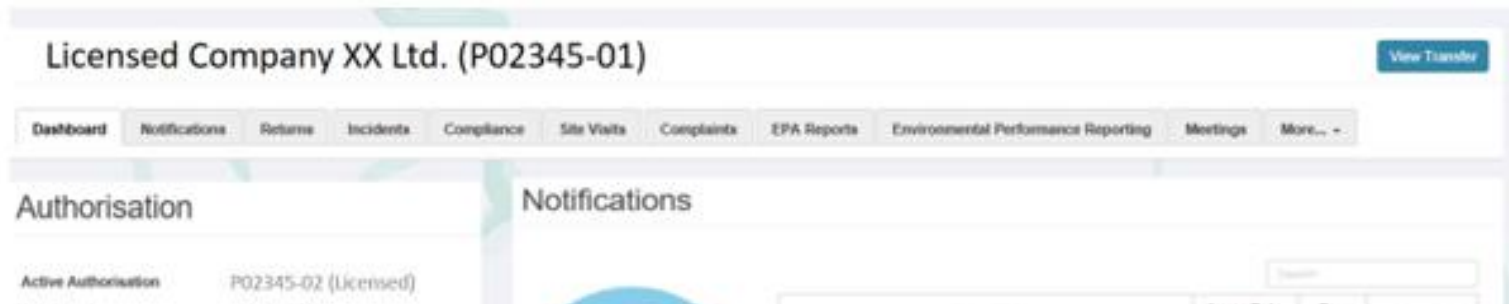


Candidate Priority Site

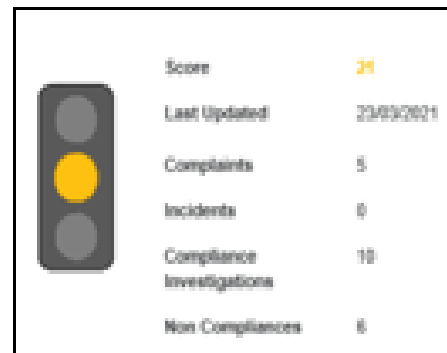
- Total Score 20-30 Points or Total Score >30 Points with CI score \leq 9 Points
- Letters issued to OEE Contacts



Informing the site operator



National Priority Site (>30 points)



Candidate National Priority Site (20-30 points)



< 20 points



FARMERS JOURNAL

FARM IRELAND

Four agri-food 'priority sites' for

AgriLand Dairy giants feature on latest EPA national priority list



Conor Finnelly Apr 20, 2018, 1:29pm



Two major players in the dairy processing industry on the island of Ireland feature on the Environmental Protection Agency's (EPA's) latest National Priority Sites List for Enforcement. Some seven industrial sites have been named on the list, with four of the sites based in the

Guinness

The EPA said it from tanker filli food sector. at the St James's Ga.

EPA Ireland @EPAIreland · Jul
We have published the EPA N
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Noise Emissions. See the full



EPA Ireland @EPAIre
Our National Priority
sites inspected by EI
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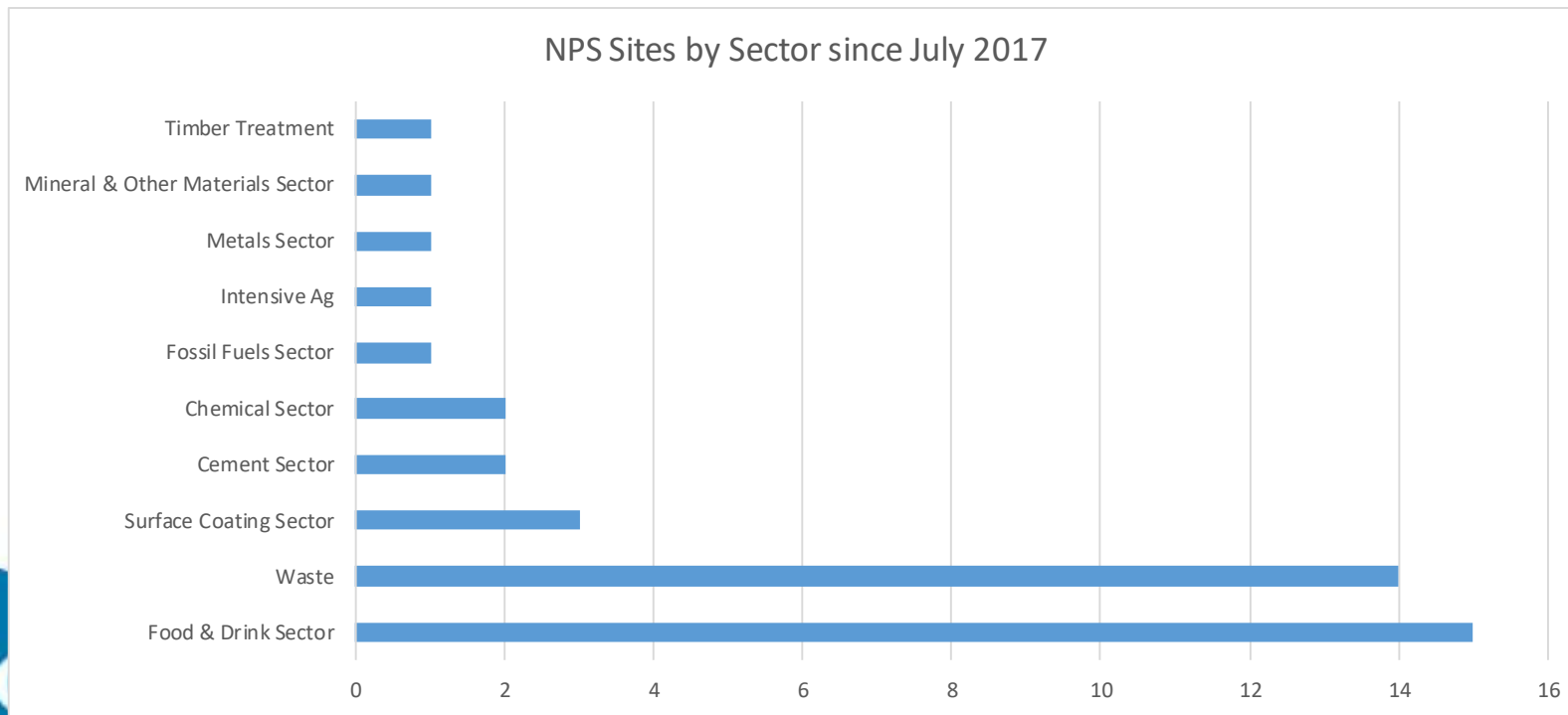
Environment & You
Environmental Topics
Our Services
Publications
Who we are

Search for a licence or permit

key indicators of environmental performance and licence compliance:

National Priority Sites since July 2017

- 41 Sites have been listed
- 51% of those sites appeared just once on the list
- 79% appeared 3 times or less
- Varying media attention when list is published



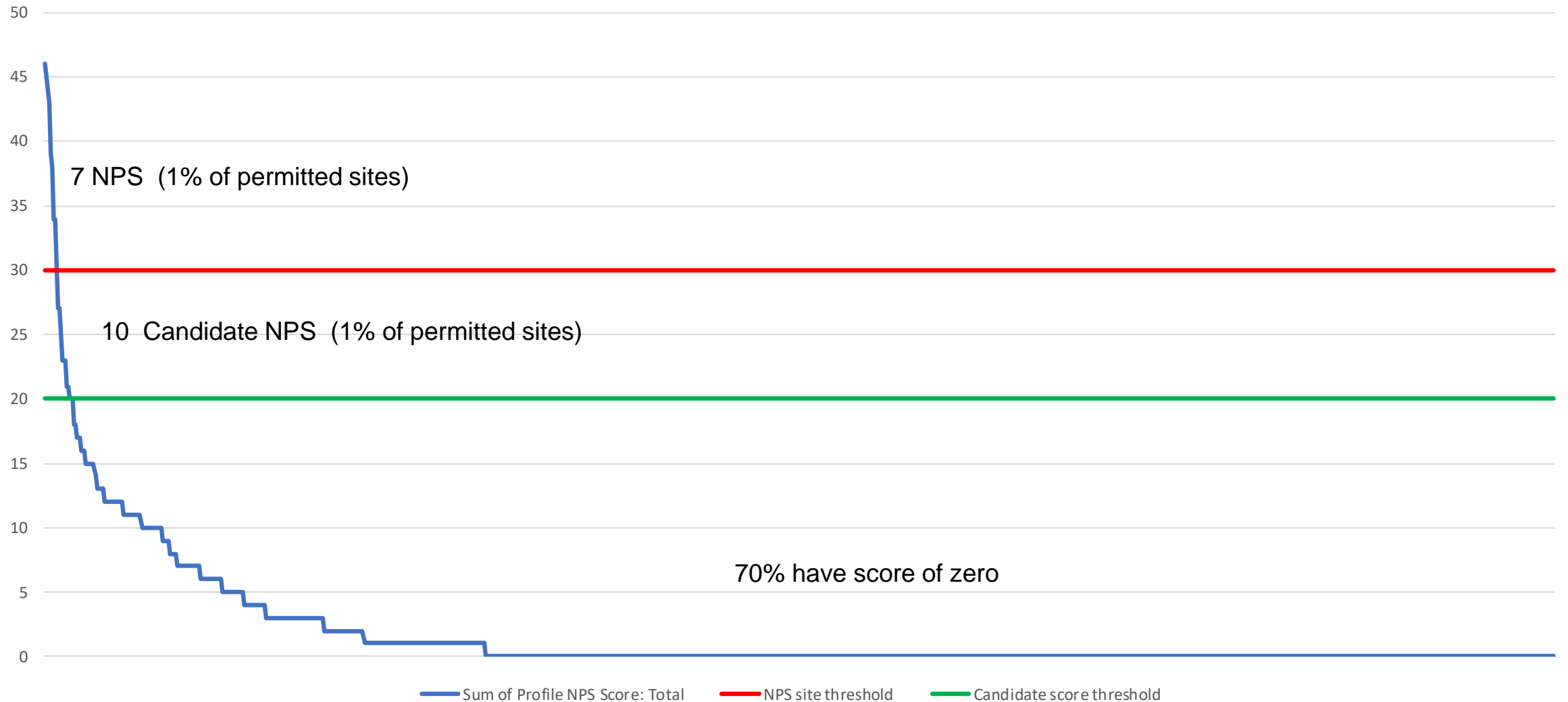
- NPS as an enforcement tool

- Very useful enforcement tool, Industry does not want to appear on the list
- Examples of NPS impact
 - National food producer scheme amended
 - Finance bank placed agent on-site
 - The quarterly publication gives industry time to rectify the issue and reduce their score
 - Corporate reporting of scores
- Impact on the Office of Environmental Enforcement
 - The spotlight is on inspectors to ensure the score is an accurate reflection of environmental issues at the facility
 - Quality assurance of inspectors work – Standards unit
 - Influence on inspector behaviour ?.....
 - Repeat offenders on the list ?
- 2019 Review of the NPS System



Effect of the PS System - Drive Compliance!

NPS Score for all site July 2021



Thank You for Listening!



Any questions?

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