

EPA role in Cross Border Concerted Actions



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Introduction

- Roadmap
- Explore types of actions under Roadmap
- Case study
- Thoughts for Future Work

Roadmap – the origins

- EHS estimate up to 250,000 tonnes of waste deposited in 20 sites in NI from ROI
- Both NI and ROI facing infraction proceedings by the European Commission
- Meeting in Belfast October 2006 to agree a way to deal with the issues – led to the development of a “Roadmap” document
- Road Map submitted to the European Commission Jan 2007 and endorsed by them as a way to deal with the issue
- Road Map has two main aspects
 - Sets out how to deal with historic illegally shipped waste
 - Provides for actions to tackle current or future illegal movement

Actions to tackle current/future illegal movement

- A targeted series of actions to detect illegal cross border waste movements is required
- Co-ordinated inspections - compliance with Waste Shipment Regulation 1013/2006 - IMPEL-TFS project. High Visibility.
- Concerted operations – intelligence led, cradle to grave – Covert
 - Actions involving notified waste shipments
 - Planned actions targeting suspected cross border movements (non-notified) involving specific waste streams

Case Study – notified movement under TFS

- Investigation of TFS of waste from EPA licensed facility in Dublin to a sister facility in Newry in October 2006
- Stemmed from EHS suspicion of “sham recovery”
- TFS consent in place for: Dry Recyclables and other mixed wastes (23% residual, no food waste).
- EPA surveillance at Dublin facility identified appearance of lorry, route used; TFS information used in addition to that gained from a “routine” EPA inspection at facility.
- Assistance of specialist Garda surveillance unit arranged via NBCI.

Case Study ctd

- Surveillance, Inspection and Verification
 - EPA/Gardaí follow truck covertly from ROI site
 - Pass surveillance to EHS
 - EHS follow truck to facility
 - Enter premises, request truck is unloaded in particular area
 - Verification - put waste through recovery process to compare with consent conditions (23% residual, no food waste)

Case Study ctd.

- OEE staff & Gardaí - 5 unmarked vehicles.
- 07:17 - truck entered Dublin facility.
- 08:04 - truck exited Dublin facility.
- M50, N2 to Slane, R169 to M1.
- 09:42 - Surveillance transferred to EHS at Border.
- truck made two stops in NI and returned south.
- 10:40 – OEE/Gardai picked lorry up on return and recommenced surveillance.
- 11:15 – truck entered Whiteriver Landfill Site, Co. Louth.
- truck stopped, load inspected and driver questioned

Case study

- Lorry driver stated that he always intended to go to the landfill in Co. Louth
- he only went to Newry to collect a lorry part and that he did not stop at the landfill site on the way up because the queue is bad in the morning.
- Tipped waste in landfill quarantine area, inspected before it was moved to tiphead.

Inspection



Inspection

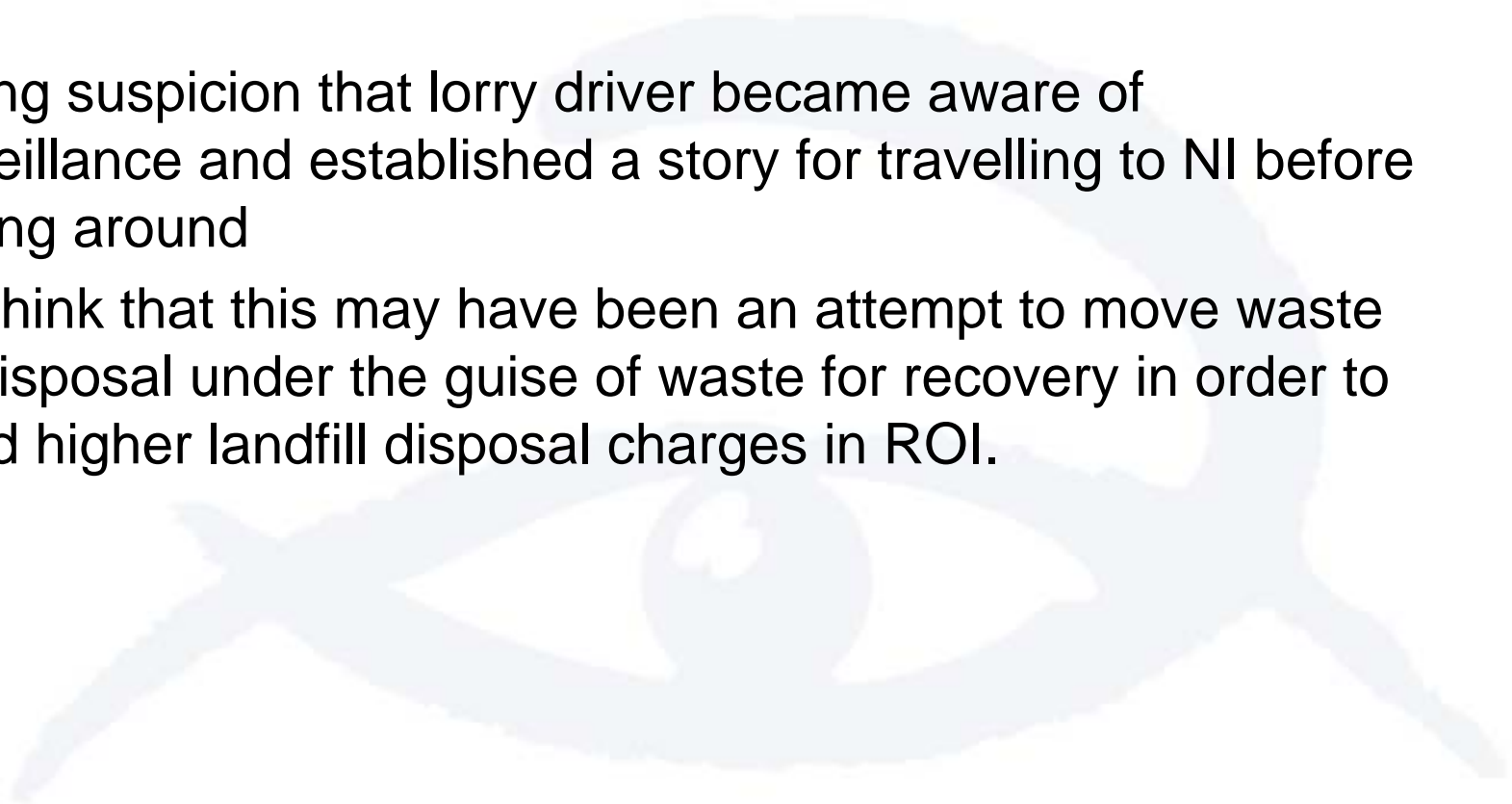


Inspection



Case study ctd

- Strong suspicion that lorry driver became aware of surveillance and established a story for travelling to NI before turning around
- We think that this may have been an attempt to move waste for disposal under the guise of waste for recovery in order to avoid higher landfill disposal charges in ROI.



Other operations

- Spring 2007 – Notified movement of dry recyclables from Monaghan to Tyrone – number of irregularities – all followed up but not considered serious enough for further action
- Q2 2007 – Notified movement of dry recyclables from Meath to Down – in compliance
- Q4 2007 – Green List ELVs ROI to Belfast – operation did not detect movement – poor intelligence.
- Q1 2008 – Repeat of 2006 Action – joint EPA/DCC/EHS operation, surveillance successful, load assessed - still under consideration

“Mindset” for Concerted Actions

■ “Routine” Enforcement work

- Compliance checking and promoting compliance
- Balance workloads/demands

■ Concerted Action work

- Need good Intelligence
- Prepare a detailed plan
- Investigate thoroughly; document fully
- Interview witnesses and suspects

Future Work in 2008

- For 2008, led by Dublin City Council/EHS as TFS competent authorities
- Need to provide for multi-party actions - local authorities, Gardaí/NBCI, EPA, PSNI, EHS
- Detailed planning required for selection and management of targetted concerted actions
- Needs to be intelligence led and targetted
- May require working outside normal hours
- Plan for and execute as if it will end up in file for DPP