



NATIONAL TFS OFFICE

WASTE SHIPMENT INSPECTION PLAN 2020 – 2022



CONTACT DETAILS

Dublin City Council

National TFS Office

Block B, Floor 2, Blackhall Walk

Smithfield, D07 ENC4, Ireland

NTFSO Manager



Brian White



+353 (01) 222 5458



brian.white@dublincity.ie

Administration



David Keating



+353 (01) 222 4411 / 4601
/ 4634 / 4249



david.keating@dublincity.ie
nationaltfs@dublincity.ie



+353 (01) 411 3452

Technical



Brian Heffernan



+353 (01) 222 4829



brian.heffernan@dublincity.ie

Enforcement & Inspections



Conor Smyth



+353 (01) 222 4630



conor.smyth@dublincity.ie

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Contents

1. Introduction	5
1.1 The Waste Shipment Inspection Plan	5
1.2 Ireland's National Waste Management Policy & Background.....	6
1.3 The National TFS Office.....	7
2. Geographical Area	8
3. Structure & Resources	9
3.1 Structure of the National TFS Office.....	9
3.2 Administration Function	9
3.3 Regulatory Function	9
3.4 Financial Resources	10
3.5 Resource Planning.....	10
3.6 Training.....	11
3.7 Working Relationship with Other Authorities	12
3.8 Cooperation Arrangements	13
3.9 IMPEL.....	13
4. Outcomes of the Waste Shipment Inspection Plan	15
4.1 Primary Objective.....	15
4.2 Identifying Priorities for the Duration of the Plan	15
4.3 Risk Assessment	16
4.4 Delivering Outcomes.....	16
4.5 Evaluation of Previous Plan and Ongoing Review of Current Plan	17
4.6 Operational Plan	17
5. Enforcement Activities	19
5.1 Multi-agency Enforcement	19
5.2 Routine Enforcement Activities	20
5.3 Non-Routine Enforcement Activities.....	20
Appendix A – Waste Risk Assessment	22
Appendix B – Risk Assessment Matrix.....	23
Appendix C - 2020 Outcomes Table, Proposal of Priorities and Inspections Table	24
Appendix D – Review of 2020 Outcomes & 2021 Inspection Plan	33
Appendix E – Review of 2021 Outcomes & 2022 Inspection Plan	34
Appendix F – List of Abbreviations.....	35
References.....	36

List of Tables

Table 1. Waste Enforcement Team Total Days available for inspection 2020.....	11
Table 2. Waste Enforcement Team Training.....	11
Table 3. IMPEL, SWEAP and Stakeholder Contributions.....	14
Table 4. Planned Routine Inspections 2020.....	18
Table 5. Non- Routine Enforcement Activities 2017-2019.....	18

1. Introduction

1.1 The Waste Shipment Inspection Plan

Article 50 of Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste (also known as the European Waste Shipment Regulation, EWSR) outlines the requirement for Member States to ensure that the Regulation is enforced. Regulation (EC) No. 660/2014 of the European Parliament and of the Council of the 15 May 2014 amends Article 50 and introduces a deadline of the 1 January 2017 for each Member State to implement a waste shipment inspection plan (WSIP).

The amended Article 50.2(a) of Regulation (EC) No. 1013/2006 now states that:

“By 1 January 2017, Member States shall ensure that, in respect of their entire geographical territory, one or more plans are established, either separately or as a clearly defined part of other plans, for inspections carried out pursuant to paragraph 2 (“inspection plan”).

Inspection plans shall be based on a risk assessment covering specific waste streams and sources of illegal shipments and considering, if available and where appropriate, intelligence-based data such as data on investigations by police and customs authorities and analyses of criminal activities. That risk assessment shall aim, inter alia, to identify the minimum number of inspections required, including physical checks on establishments, undertakings, brokers, dealers and shipments of waste or on the related recovery or disposal.

An inspection plan shall include but not limited to, the following elements:

- (a) the objectives and priorities of the inspections, including a description of how those priorities have been identified;*
- (b) the geographical area covered by that inspection plan;*
- (c) information on planned inspections, including on physical checks;*
- (d) the tasks assigned to each authority involved in inspections;*
- (e) arrangements for cooperation between authorities involved in inspections*

*(f) information on the training of inspectors on matters relating to inspections;
and*

*(g) information on the human financial and other resources for the
implementation of that inspection plan*

An inspection plan shall be reviewed at least every three years and updated as required. The review shall evaluate the intermediate outcomes, outputs, targets and other elements of that inspection plan, to ensure they have been implemented and are moving towards the final environmental outcome.

This document will set out the NTFSO's WSIP for 2020 to 2022 and an evaluation of the NTFSO's WSIP for 2017 to 2019. The WSIP for 2020 to 2022 will detail routine planned inspections and the strategy employed by the NTFSO Enforcement Unit in selecting inspections in order to minimise the potential environmental risks resulting from the transfrontier shipment of waste.

1.2 Ireland's National Waste Management Policy & Background

The primary waste legislation in Ireland is the Waste Management Act 1996 (WMA). Since 2012, waste management policy has been guided by "A Resource Opportunity - Waste Management Policy In Ireland". The policy stipulated how Ireland would move away from an over dependence on landfill, by putting in place the most appropriate technologies and approaches to reduce waste, while at the same time maximising the resources that could be recovered from waste. Page 8 of this policy document states that:

"The storage and export of waste material will be strictly policed to ensure that:

No environmental damage arises from the storage of such materials prior to export;

Any exports taking place fully respect the requirements of the transfrontier shipment regulations, avoiding both the environmental and reputational damage which a breach of the regulations would cause; and

Exports are managed in an environmentally sound manner in the country of destination."

The 2012 policy document also recommended that the number of waste management planning regions in the country be reduced from ten to three. In line with this policy, Ireland is now further divided into three Waste Management Regions, the Connacht Ulster Region; the Eastern & Midlands Region and the Southern Region. Each region has since published its own Waste Management Plan

and appointed a Waste Enforcement Regional Lead Authority (WERLA) to co-ordinate and standardise enforcement activity throughout the country.

From 2020, Ireland's waste policy will be guided by a new policy document currently titled, 'Waste Action Plan for a Circular Economy'.

1.3 The National TFS Office

Regulation 4 of the Waste Management (Shipments of Waste) Regulations 2007 (WSR) designates Dublin City Council (DCC) as the national competent authority for the purposes of the EWSR. The National Transfrontier Shipment Office (NTFSO) was established by DCC in 2007 to ensure compliance with the requirements of the WSR and the EWSR.

In addition to the WSR and EWSR, DCC's NTFSO is also designated as the national Competent Authority for the

- Waste Management (Registration of Broker and Dealers) Regulations 2008; and
- European Communities (Shipments of Hazardous Waste Exclusively within Ireland) Regulations 2011, known as the WTF Regulations, covering the internal movements of hazardous wastes.

Further information on the NTFSO can be found at the link below and includes the Registration of Brokers and Dealers, the classification of waste, charging structures and the Amber and Green List waste shipment procedures.

www.nationaltfs.ie

2. Geographical Area

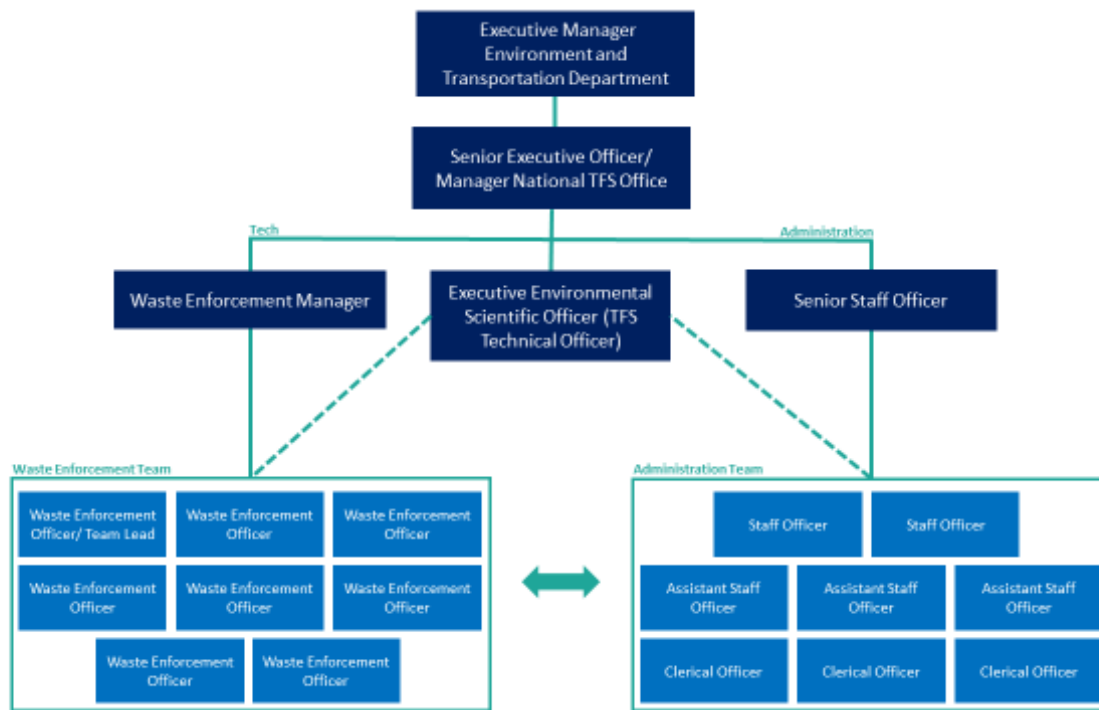
The NTFSO WSIP 2020 to 2022 applies to the geographical area covering all 26 Counties of the Republic of Ireland incorporating a population of approximately 4.9 million people. The country consists of an area of 70,273 km², a coastline estimated by Ordnance Survey Ireland to be 1,448 km and a land boundary of 443 km with Northern Ireland with in excess of 200 road crossings. There are in excess of 45 seaport facilities around the country of which the NTFSO routinely conduct waste shipment inspections in over 20.



Enforcement of the EWSR focuses on the origin, transportation and destination of all waste shipments, and on the growing number of registered waste dealers and brokers. Effective enforcement will be dependent on targeted inspections at the ports throughout the country and at border crossings where waste can potentially be imported to, exported from or transited through the country.

3. Structure & Resources

3.1 Structure of the National TFS Office



3.2 Administration Function

The administration team of ten staff consists of one Executive Environmental Scientific Officer (TFS Technical Officer), a Senior Staff Officer and eight administrative staff who perform the clerical work associated with all transfrontier waste shipments.

This team is responsible for the administration, assessment and processing of all notifiable waste shipment applications; processing and administration of all international movements of notifiable waste; recording non-hazardous TFS shipment reports; registration of waste brokers and dealers; invoicing; compiling statistical reports and dealing with general day-to-day queries.

3.3 Regulatory Function

Regulation of the EWSR is carried out by Dublin City Council's Waste Enforcement Unit (WEU) of the NTFSO, consisting of a Waste Enforcement Manager and eight Waste Enforcement Officers (WEOs). The primary objective of the WEU is to ensure compliance with the EWSR by preventing illegal TFS shipments and by protecting the environment and human health from the risks associated with these

shipments. The NTFSO's Waste Enforcement Unit Manager's time is divided between the NTFSO WEU and the management of a waste regulation enforcement unit for the Dublin City area.

The regulatory function of the NTFSO ensures that TFS shipments are compliant with the EWSR. The NTFSO's team of WEOs carry out inspections and enforcement activities throughout the 26 counties of Ireland. WEOs complete the majority of their own administrative duties so no additional administrative support is required.

To ensure efficient use of resources within the WEU, each WEO is assigned a number of Local Authority Municipal Areas. Each WEO is then responsible for the routine and non-routine inspections in their counties and each WEO becomes the main point of contact for stakeholders and other enforcement bodies for issues related to their local authorities. At the beginning of each calendar year, each WEO will set out an individual Operational Plan for each of their assigned local authorities. The Operational Plans contain specific details on planned routine enforcement activities and concerted actions for that local authority. The Operational Plans are agreed with the WEU Manager and make up the WEU's annual targets set out in Section 4.5 of this plan.

To assist the work of the NTFSO, the Technical and Administrative teams are highly active with their colleagues in Europe through the IMPEL Network. This enables the application of best practice to NTFSO procedure and for queries to be resolved quickly. In addition, the NTFSO are project leads on an IMPEL Project entitled the 'Effects of the Chinese Import Ban on Plastic Waste' and project partners with the IMPEL LIFE SWEAP project.

3.4 Financial Resources

The operation of the Administrative and the Enforcement functions of the NTFSO are resourced on a cost-neutral basis through the charging structure as set out at the following link and accounted for in Dublin City Council's annual budget.

<http://www.dublincity.ie/main-menu-services-water-waste-and-environment-waste-and-recycling-national-tfs-office/charging>

3.5 Resource Planning

Operations are planned at the beginning of each year based on the risk assessment and also dependent on the number of inspections that are viable by the human resource available. Trends

collected from previous years of non-routine enforcement actions are taken into account in order to assist prediction of future trends and time allocations for the year ahead.

Table 1. Waste Enforcement Team Total Days available for inspection 2020

The days set out in this table are based on the total available workdays minus a contingency for sick leave, meeting/training, etc.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
*Rostered days	160	139	152	155	148	154	172	156	164	164	156	171	1889
Annual Leave	13	11	12	12	12	12	14	12	13	13	12	14	151
Public holidays	8	0	8	8	8	8	0	8	0	8	0	16	72
Estimated sick leave	2	2	2	2	2	2	2	2	2	2	2	2	28
Meetings/Training	16	16	16	16	16	16	16	16	16	16	16	16	192
Total un-available Inspection days	39	29	38	39	38	39	32	39	31	39	31	48	443
Total available Inspection days	120	109	114	116	110	115	140	117	133	125	125	123	1446

* Rostered days for 6 WEO's (Dublin), 2 WEO's (Cork)

3.6 Training

Ongoing training is in place for all Officers, Team Leaders and Managers and is captured as part of Non-Routine Enforcement Activities as seen in Table 5. Time is allocated every year for officer training and factored into annual human resource availability as per Table 1 above. Examples of these courses can be seen in Table 2 below:

Table 2. Waste Enforcement Team Training

Technical & Soft Skill Training Delivered Across the Waste Enforcement Team	
Collating Information and Intelligence Training	Asbestos Awareness Training
Investigations and Prosecutions Training	CCTV Training
Court Room Skills & Expert Witness Training	Diesel Fuel Awareness Training
Interviewing Skills Training	GDPR Awareness Training
Legal File Preparation & Presentation Training	Managing Difficult and Aggressive Behaviour Workshop & Training
Surveillance & Covert Surveillance Training	Team Building Course and Workshop
Contemporaneous Note Training for Expert Witnesses	Business and Report Writing Course
Environmental Site Investigation Training	Personal Effectiveness and Managing Projects
Environmental Sampling Training	High Impact Communications Workshop & Training
Waste Policy and Legislation Training	Customer Service Best Practice
TFS Specific Waste Policy and Legislation Training	Lean 6 Sigma Training

Health and Safety Training	Microsoft Office 2015 Training
General Manual Handling	Microsoft Excel Training
TFS Port Inspections Manual Handling	Microsoft PowerPoint Training
VDU Use Training	Microsoft Visio Training
Defibrillator Training	Outlook & Time Management Training
SafePass Training & Certification	Conflict Management Training
Occupational (Defensive) Driver Training	Creating Cohesion in Teams Training
Dangerous Good Awareness Training	Introduction & Awareness Training for Quality Management Systems to ISO9001
PCB Awareness Training	Introduction & Awareness Training for Health & Safety Training to OHSAS 18001
Open Source Internet Investigations Training	Drone Operation
Level 1 Intelligence Analyst Certification	May 2020: Slovenia – IMPEL Waste Crime Training

3.7 Working Relationship with Other Authorities

The NTFSO is the sole authority within the Republic of Ireland authorised to implement the requirements of the EWSR. However, enforcement actions can at times be carried out in cooperation with other enforcement agencies. The Irish Customs Service provides additional support through sharing of information, joint inspections and scanning units when necessary. An Garda Síochána (The Irish Police Force) also provide support through roadside checkpoints and multi-agency site inspections where necessary. As noted previously the Republic of Ireland is divided into thirty-one local authorities and three waste management regions. The NTFSO routinely takes part in multi-agency regulatory activities with these agencies when required.

In February 2020 an initiative was launched by An Garda Síochána with the support and approval of the Department of Communications, Climate Action & Environment (DCCAE) establishing strategic regional multi-agency forums. These strategic forums are established in each of the four Garda Regions (Eastern, Southern, Northern and Dublin) and chaired by An Garda Síochána. All statutory agencies with enforcement powers including the NTFSO, Local authorities, Customs and Social Welfare are represented. The focus of these forums is to meet on a quarterly rota to discuss and agree on areas of mutual joint operations and co-operation as well as to review previous operations.

The NTFSO support the work of the EPA and Local Authorities through regular communications so that enforcement actions are carried out in a co-ordinated manner. Each port Authority is responsible for providing security and policing the operations at their port. The authorisation of those involved in the collection and transport of waste lies with the National Waste Collection Permit Office (NWCPO) whereas the Health and Safety Authority (HSA) has responsibility for ensuring the requirements of the European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure

Equipment) Regulations 2015 (ADR) Regulations are implemented. The NTFSO has no role in the regulation of waste facilities as this is the responsibility of the EPA and Local Authorities

3.8 Cooperation Arrangements

In 2009, the NTFSO signed a Memorandum of Understanding with the Revenue Commissioner's Customs Services of Ireland to further strengthen the cooperation between both organisations. The Memorandum of Understanding facilitates the flow of information and intelligence between the two agencies. This has enabled the development of the NTFSO's E-manifest project which is currently ongoing.

The NTFSO have also entered into a Memorandum of Understanding with the Northern Ireland Environment Agency, the Scottish Environment Protection Agency, the Environment Agency of England, the Environment Agency of Wales, Openbare Afvalstoffenmaatschappij voor het Vlaams Gewest - OVAM (the public Waste Agency of Flanders), Department of Waste and Material Management in Belgium and the Inspectorate on the Environment and Transport (ILT) in The Netherlands.

3.9 IMPEL

The NTFSO is a partner of the IMPEL Shipment of Waste Enforcement Actions Project (SWEAP) project which is funded through the European Commission LIFE Program. The project runs from September 2018 to June 2023. The overall purpose of the project is to support the circular economy by disrupting the illegal waste trade at the EU level by:

- Developing technologies/apps to assist with the enforcement of the WSR.
- Promoting information exchange so that inspections can be better targeted.
- Organizing best practice meetings and officer exchanges so that experiences can be shared.
- Improving collaboration with Police, Customs and other agencies.

As a partner of IMPEL, the NTFSO has already contributed and will continue to contribute to a number of these events throughout the lifecycle of this project.

Since 2019, the NTFSO has been the project lead for the IMPEL Project 'Effects of the Chinese Import Ban on Plastic Waste'. They have gathered waste plastic statistics for exports from the EU, analysed Customs data and presented these findings at an IMPEL conference and meetings. Currently they are preparing a guidance document on the new Basel plastic entries for the enforcement community.

Table 3 details a number of examples of recent contributions the NTFSO have made to IMPEL and other projects.

Table 3. IMPEL, SWEAP and Stakeholder Contributions

Publications	Meetings	Conferences	Stakeholder Engagements	IMPEL Exchanges
<ul style="list-style-type: none"> • Updated Guidance for the Shipment of Used Vehicle Parts and Used EEE. • Brexit Guidance. • China Project Interim Report. • NTFSO Pre-Consent Application. 	<ul style="list-style-type: none"> • DCC IS – WRMS Upgrade. • Industry Contact Group. • DCC Law Dept. • IMPEL conference and NCP Meeting Bucharest. 	<ul style="list-style-type: none"> • Asian Network Basel Action Network. • SWEAP Best Practice Meeting. • Brussels LIFE Smart Project Conference. 	<ul style="list-style-type: none"> • Customs. • NIEA. • NWCPO. • LA's. • An Garda Síochána • Brokers of Farm Plastic, Plastic and Tyres. • Customs Brexit Impact. • DCCAE – TFS Operations. • IPR MRF Site Visit. • UK HMRC Fiscal Liaison Officer. • UL/UN University – Used EEE Exports. 	<ul style="list-style-type: none"> • Decommissioning of Off-Shore Oil and Gas Platforms, Aberdeen. • Rotterdam SWEAP Best Practice. • Antwerp SWEAP Best Practice.

4. Outcomes of the Waste Shipment Inspection Plan

4.1 Primary Objective

Developed in line with Ireland's current national practice, as set out in the EPA's REMCEI Planning and Annual Returns Reporting structures, the primary objective of the WSIP is to identify and deliver a Final Environmental Outcome of "The protection of human health and the environment against harmful effects that may be caused by illegal international Transfrontier movements of waste". The aim of this WSIP is to build upon the setting out of Annual "Outputs" (i.e. Annual Inspection Plan Targets). This is achieved by setting measurable intermediate Outcomes (that will be reviewed on an ongoing basis, through establishment of metrics, baselines and targets, to ensure the aim of delivering the Final Environmental Outcome.

By identifying priority waste stream(s) and work areas based on a risk assessment approach, the NTFSO's WEU can establish inspection plans and strategic projects to develop and to work towards achieving a final environmental outcome. The identification of such plans and projects is primarily developed through the use of a risk assessment matrix (Appendix B). This includes the evaluation of outcomes from previous inspections, waste streams, waste quantity and historical records. By adhering to the WSIP, implementing the various strategic projects and enforcing priority waste types, the NTFSO will reduce and prevent risk to human health and/or the environment that may arise or be associated with the international movement of all waste to, from and transiting the Republic of Ireland.

It is the aim of this WSIP to identify, evaluate and minimise/eliminate any potential areas of international waste shipments that pose a risk to human health and/or the environment, based on a risk based priority setting and maximising resources and effectiveness.

4.2 Identifying Priorities for the Duration of the Plan

The NTFSO WEU proposed waste inspection priorities for 2020 which have been linked to the National Waste Priorities and WERLA Work Program, to which the NTFSO contributes. This decision was taken as it is the view of the NTFSO that working closely with other interested authorities and stakeholders will result in better compliance with the EWSR. National priorities that fall outside the scope of the EWSR are substituted with other relevant priorities using a risk-based approach as discussed previously. This can involve a number of factors including, historical non-compliances by waste

stream; the suspected and alleged illegal activities by waste stream and common issues with our IMPEL partners.

The risk-based approach was applied to all waste types and the following priority waste types were identified for 2020:



The priority waste types highlighted above will dictate the schedule of planned routine waste inspections as detailed in Table 4. It is also important to note that risk assessments used in developing this plan are reviewed and updated periodically.

4.3 Risk Assessment

The NTFSO's targeting of activities is risk-assessed and based on review of inspection compliance records.

A copy of the NTFSO's Risk Assessment Matrix can be found in Appendices A and B.

4.4 Delivering Outcomes

Our aim is to deliver effective, proportionate and dissuasive actions against unauthorised operators and alleged illegal activities through the use of enforcement powers. The NTFSO seeks to prevent illegal waste activity by taking a systematic, proportionate and consistent approach to enforcement against illegal waste activities to achieve the following outcomes:

- Early cessation of the illegal activity by use of powers provided under the WSR, the EWSR, the WMA and associated Regulations.
- Reduction (or minimization) of the illegal movements of waste through the use of legal and financial incentives.
- A reduction in the misclassification of waste types.

- Minimize any potential risks associated with the movement of all waste to, from or transiting the Republic of Ireland and to remove any financial gain or advantage derived through bypassing the legal requirements of the WSR.
- Timeliness in achieving cessation, regularization and remediation of those illegal waste activities referred to above.
- Promotion of awareness about the importance of compliance with the law and the achievement of societal goals.
- Application of fixed penalty notices as appropriate.
- Criminal sanctions, where appropriate.

4.5 Evaluation of Previous Plan and Ongoing Review of Current Plan

It is essential that the delivery of outcomes is regularly and accurately evaluated in order for the NTFSO to efficiently assess and prevent risk to human health and/or environmental health by way of TFS shipments. Although this WSIP is a three-year plan, both priorities and outputs are reviewed periodically, and new Inspection Plan targets and figures are set annually. These will be added to this plan in Appendices D and E at the end of 2020 and 2021 respectively. Findings of all reviews are sent to the Senior Executive Officer of DCC in order to closely monitor targets and prioritise work areas in line with best practice.

It is acknowledged that some aspects of the WSIP 2017-2019 were unmeasurable due to the nature of the deliverables, in particular the strategic projects. Work however has continued on a number of these projects, the results of which are now benefiting the work of the WEU.

The Outcomes Table in Appendix C has been developed to set out Baselines, Targets and Outcomes to ensure effective monitoring of the ongoing enforcement activities. This will ensure the Outcomes of this WSIP will be more measurable.

4.6 Operational Plan

Table 4 below illustrates the planned routine inspections for 2020. These inspections are based on the priorities and Outcomes from Appendix C and seek to ensure that appropriate enforcement actions are taken to minimise risks to the environment and human health. These are reviewed and updated every year to assist with setting the following years' targets.

Table 4. Planned Routine Inspections 2020

Planned Routine Inspections 2020		
Inspection Type	No. of planned inspections	No. of days assigned
Checkpoints	24	18
Port Inspections	190	190
Facility Inspections	170	382.5
Facility Spot-Checks	50	37.5
WTF Inspections	150	112.5
Broker & Dealer Verifications	20	10
Broker & Dealer Audits	1	30
Custom Scan Inspections	21	63
Monitoring Operations	25	100
Cone and Quartering	16	40
Total:	667	984

The NTFSO also carry out a number of non-routine enforcement actions which are reactive in nature and are undertaken in response to complaints, environmental incidents and follow-up investigations. Due to the unpredictability of non-routine enforcement actions, rolling reviews are essential in order to accurately and effectively evaluate the use of resources. The below table captures the time spent by WEO's on non-routine enforcement actions over the past three years (2017-2019). Although non-routine enforcement actions are unpredictable, adequate management and evaluation of the time required and frequency of actions, can significantly aid resource and routine inspection planning in the years to follow. This can also give an insight into problematic waste and priority selection.

Table 5. Non-Routine Enforcement Activities 2017-2019

Non-routine Enforcement Activities	2017	2018	2019
TFS Investigations	168.25	148.75	*353.57
Court	3.5	5	12
Training	**46.5	26	**38.5
Other	100.9	94	121.55
Total No. of days:	319.15	273.75	525.62

**High volume of investigations including complaints from local authorities and other stakeholders*

***High volume of training of new TFS Officers in the Dublin and Cork Offices following the departure of experienced TFS Officers.*

5. Enforcement Activities

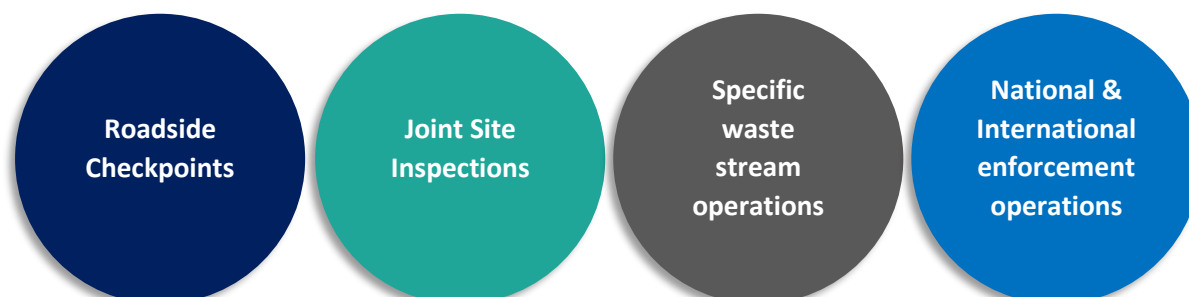
Waste enforcement activities regarding TFS shipments can be regarded as pro-active or re-active in nature. The NTFSO's Operational Plan for 2020 is based on the following enforcement activities:

Re-active in nature	Both Re-active and Pro-active in nature	Pro-active in nature
<ul style="list-style-type: none"> ✓ Non-routine Enforcement Activities ✓ Complaints/Incident Investigations 	<ul style="list-style-type: none"> ✓ Multi-agency Enforcement ✓ Concerted actions ✓ Stakeholder Guidance 	<ul style="list-style-type: none"> ✓ Routine Enforcement Activities

5.1 Multi-agency Enforcement

The NTFSO continues to be actively involved in promoting a multi-agency approach to enforcement involving continuous liaison with the WERLAs, Local Authorities, Environmental Protection Agency (EPA), National Waste Collection Permit Office (NWCPO), An Garda Síochána, Social Welfare, The Road Safety Authority, Revenue, the Health and Safety Authority and other relevant enforcement bodies as appropriate to carry out concerted actions throughout the year. The NTFSO is committed to continually developing its working relationship with these agencies and improving enforcement efficiencies.

DCC is the Waste Enforcement Regional Lead Authority (WERLA) for the Eastern Midlands Waste Region. The NTFSO has developed a close working relationship with DCC as the lead authority for the Eastern Midlands WERLA and with the other lead authorities for the Southern and Connaught/Ulster WERLA's. The NTFSO is committed to continually developing its working relationship with these agencies to improve enforcement efficiencies and standardise enforcement practices throughout the country. Examples of some of these multi-agency enforcement activities include:



5.2 Routine Enforcement Activities



Inspections are carried out to assess compliance in accordance with a specified frequency of inspection as per the risk assessment matrix detailed in Appendices A and B. If particular circumstances come to light that indicate that the specified frequency of inspection is insufficient or excessive, then the planned schedule may be updated to accommodate this change, to ensure efficient and proportionate regulation. The reason for any change to a specified frequency of inspection is recorded.

5.3 Non-Routine Enforcement Activities

Non-routine enforcement activities are generally reactive in their nature and are undertaken in response to follow-up investigations, complaints or environmental incidents. Non-routine enforcement activities are carried out as soon as possible after the incident come to the attention of the NTFSO. Non-routine enforcement activities also take into account unscheduled concerted actions that may be carried out with other agencies as well as surveillance operations.

Non-routine enforcement activities are listed on the following page:



The NTFSO aims to ensure that a WEO submits an initial inspection/investigation report within two weeks of completion of an inspection/investigation. Records are kept of all routine and non-routine inspections, all audits or incident reports and any associated correspondence. These records along with all other data maintained by the NTFSO are treated as strictly confidential in accordance with the EWSR and the Data Protection Acts.

Appendix A – Waste Risk Assessment

In considering the environmental risks associated with a waste, the NTFSO rates each waste type in relation to both the severity of the effects and the probability of such a risk. Each effect and probability is rated from 1 to 3 (1 being the lowest and 3 the highest) under the following headings:

Severity of Effects	Probability
Classification of waste & hazardous properties	Compliance record nationally
Contamination of waste	Profitability of illegal trade
Treatment methods in countries of destination	Destination country
Amount of waste generated	Recovery/disposal capacity
Amount of waste exported	Volatility of market
Imported	Recovery/disposal capacity

Appendix B – Risk Assessment Matrix

Risk	1 point - Low	2 points- Medium	3 points – High
Historical Record in last 24 months	No Non-compliances during previous inspection or no minor breaches	Not previously inspected or 1-3 current non-compliances or 1 minor breach	> 3 minor or > 1 major current non-compliances or > 1 minor breach
Housekeeping	Good housekeeping	Average	Bad housekeeping
Sites motivation to comply	Well motivated	Unknown	Less motivated
Previous convictions or TFS files/RTO	No previous convictions or TFS files/RTO	Any TFS files/RTO	Any previous convictions or >2 TFS files /RTO
Information/Intelligence	None	None	Alleged/unverified
Exporting/ Importing	No	unknown / were previously	Yes
Waste Type -See Waste Stream Tab	Low	n/a	High

***Ongoing investigation above matrix doesn't apply - Risk is high**

Risk Rating	Total risk score
Low	7 to 11
Medium	12 to 16
High	17 to 21

	Low	Medium	High
No. of inspections per year	0-1	1-2	2-4

Appendix C - 2020 Outcomes Table, Proposal of Priorities and Inspections Table

2020 Outcomes Table

Final Environmental Outcome	Work area/National Priorities denoted by Asterix	Outputs	Intermediate Outcome	Metric	Baseline	Target
The protection of human health and the environment against harmful effects that may be caused by illegal international transfrontier movements of waste. It is the aim of the NTFSO to minimise any potential risks associated with the international movement of	Shipment of Used vehicles, Parts, EEE/WEEE*.	Physical port Inspections Paperwork verification Inspections Custom intelligence container inspections Multi-Agency site of loading Inspections	Reduction of illegal shipments of this waste type that may contribute to environmental pollution in developing countries To reduce the number of ELV's being wrongly declared and exported as used vehicles. To reduce the number of WEEE items being wrongly declared	Reduce illegal shipments Reduction in the number of unauthorised sites of loading. Reduction in the number/percent age of used vehicle inspections that require return to origin for investigation To increase the percentage of shipments compliant on	Baseline: A total of 118 Inspections of Used Vehicles, Parts, EEE/WEEE shipments in 2019, 31 (26%) of these shipments were recorded as non-compliant. 17 (54%) of these non-compliant shipments required a direction letter. 7(22%) of these non-complaint waste shipments were minor breaches and did not require a direction letter. *NB. The figures below do not include minor breaches. 10 (58%) of these non-complaint shipments	Target: Reduce the non-compliance rate from 26% to 22% within the reporting year.

all waste to, from or transiting the Republic of Ireland and to remove any financial gain or advantage derived through bypassing the legal requirements of the WSR.			and exported as EEE. Reduction in the number uncertified EEE items uncovered during port inspections	the first inspection compared to previous year.	required the issuing of a monitoring fee. 3(17%) required a return to origin fee. Baseline: 14 (82%) of non-compliant inspections which required direction were closed out within the reporting year.	Target: 86% of all non-compliant inspections requiring direction to be closed out within the reporting year
	Cross border illegal activity and Construction and Demolition Waste as per National Priority*	Physical port inspections Paperwork inspections and verifications Roadside checkpoints on import/export routes The NTFSO has set aside 100 days for monitoring and investigations of alleged illegal	Reduce illegal landfills involving the cross border movement of waste. Disrupt illegal waste activity and take appropriate enforcement actions. Reduce illegal cross border dumping of C&D waste.	Reduction in the number of complaints of illegal cross-border dumping. Reduction in the number of unauthorised C&D tips. Reduce unauthorised imports/exports from permitted facilities.	Baseline: No specific baseline set out, as monitoring C&D cross border is a new project starting in 2020.	Target: Disrupt illegal waste activity and take appropriate enforcement actions. Remove any financial gain or advantage derived through the unauthorised movement of waste.

		movements across border, this is to include the monitoring of C&D movements.	Reduction in skip waste crossing the border that is not covered by notification. Reduce illegal exports/imports of C&D waste.			
	Scrap Metal & ELV's (Cross Border) *	Physical port inspections Paperwork inspections and verifications Roadside checkpoints Facility inspections Facility spot checks Monitoring Multi-agency site inspections	Reduction in the number of unauthorised broker and dealers exporting scrap metal. Reduction in the unauthorised collection of scrap metal and ELV's. Reduction in waste leakage as ELV's are reused and/or exported illegally.	To reduce the number of non-compliance letters in relation to the export of scrap metal.	Baseline: 453 waste shipment inspections (IMPEL/paperwork/physical inspections) conducted in 2019. 41 (9%) of these shipments were scrap metal shipments. 9 (21%) of these scrap metal shipments were recorded as non-compliant and 7 direction letters issued for breaches of the WSR. 7 (77%) of these non-complaint shipments were closed out within the reporting year.	Target: Reduce the percentage of non-compliance rate from 21% to 19% within the reporting year. Increase close out of non-complaint shipments from 77% to 79% within the reporting year.

	Verification of GLW export tonnages	<p>Annual verification of Broker/Dealer GLW exports</p> <p>Facility inspections</p> <p>Facility spot checks</p> <p>Physical port inspections</p> <p>Paperwork inspections and verifications</p>	<p>Reduction in unregistered Broker/Dealers exporting and/or importing waste in the Republic of Ireland</p> <p>Identification of any Brokers/Dealer incorrectly reporting GLW returns</p>	To reduce the number of non-compliance letters in relation to unregistered Brokers/Dealers	<p>Baseline: Broker & Dealer audit conducted in 2019 to verify GLW exports. Several inconsistencies were found between figures submitted by the Broker/Dealer and records obtained from waste facilities which generated the waste in the ROI.</p>	<p>Target: Disrupt illegal waste activity and take appropriate enforcement actions. Broker & Dealer audit to be conducted in 2020 and continue to verify GLW shipments within the reporting year.</p>
	Inspections on high risk waste types e.g. low grade plastic & soft mix paper	<p>Physical port inspections</p> <p>Paperwork inspections and verifications</p> <p>Facility inspections</p> <p>Facility spot checks</p>	<p>To reduce waste contamination.</p> <p>Increase the use of Article 50 requests for verification of waste shipments.</p>	To reduce the number of return to origin and repatriation requests due to waste quality.	<p>Baseline: 453 waste shipment inspections (IMPEL/paperwork/physical inspections) in 2019. 65 (14%) of these waste shipments were recorded as non-compliant (*Minor/Major breach of the WSR). 52 (80%) of these non-complaint waste shipments were closed within the reporting year.</p>	<p>Target: Reduce the non-compliance rate from 14% to 12% within the reporting year. Increase close out of non-compliant waste shipments from 80% to 84% within the reporting year</p>

					Baseline: 8 (12%) of these non-compliant waste shipments were prevented and returned to origin.	Target: Reduce the number of waste shipments requiring return to origin by ensuring compliance at waste facilities and exit ports.
	PRI Compliance & subsidies scheme is currently a concern for the NTFSO as waste is exported and/or imported in order take advantage of recycling subsidies, when recycling often does not occur*	Multi-agency projects with the NIEA and SEPA. Port inspections of low value waste material (Mixed paper and plastic film)			Baseline: N/A	Target: N/A
	Multi-Agency	Multi-agency inspections, including vehicle inspections and	Multi-agency response for sites or operators engaging in significant level of	To increase multi-agency inspections.	Baseline: N/A	Target: To liaise with other statutory agencies to discuss and agree on areas of mutual joint

		<p>multi-agency site inspections.</p> <p>Engage with WERLA, LA and An Garda Síochána and other interested agencies on multi-agency forums</p>	<p>illegal activity</p> <p>Multi- agency checkpoints</p> <p>IMPEL Operations</p>			<p>operations and co-operation for 2020 as well as to review and update on previous operations.</p>
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2020 Proposal of Priorities

To: Brian White

From: Conor Smyth

Date: 20/01/2020

Subject: Proposed NTFSO Waste Enforcement Unit Priorities 2020

The NTFSO Waste Enforcement Unit's proposed waste inspection priorities for 2020 have been linked to the National Waste Priorities and WERLA Work Programmes where possible. However Q1's focus on Food Waste is currently not a waste shipment priority, so specific action plans have been set in line with current NTFSO issues and priorities. The TFS WEU have proposed the following areas resulting from the ongoing review of intelligence gathered in the field throughout 2019 and previous years. All targets and priorities will be reviewed on a quarterly basis in line with the EPA's Review Mechanism which was adopted for the first time in 2019 by the TFS Enforcement Unit.

Review of 2019 TFS Enforcement Activities

- **Farm Plastics** (Export and cross border movements): no major issues identified in 2019, so not part of targeted inspections in 2020. Inspections will still take place at sites of generation through Facility Inspections and at Port Inspections.
- **Rosslare Europort Inspections** (Exports and transiting waste shipments). 4 port inspections to be carried out in 2020 with periodic review of manifests/stock reports to continue.
- **C&D Waste, Scrap Metal/ELVs and PRI Compliance** were noted to be areas of focus where ongoing issues were noted and these all remain as TFS Enforcement priorities for 2020 in line with National Priorities.
- **Household Plastic Film:** Tracking shipments of low grade plastic film to verify destination facilities working in conjunction with IMPEL network projects. Data/verifications have been collated and are in use by officers.
- **Targets:** Overall inspection targets for 2019 were amended from 700 to 682 in line with the review mechanism due to the significant increase in the number of complaints/investigations during the year. The unit achieved 100.2% of the annual target.

Proposed Quarterly TFS Waste Enforcement Priorities 2020

1. Quarter 1: Shipment of Used vehicles, Parts, EEE/WEEE. Article 50 & E-Manifests*

- Enforcement of the updated version of the "A Guide for the Shipment of Used vehicles, Used Vehicle Parts and Used Electrical and Electronic Equipment" which came into effect on 01/01/2020. Port Inspection Targets have been re-allocated to capture the increased number of these type of shipments that are flagged to the NTFSO for follow-up by Customs' Special Exam Unit in Dublin Port.
- Article 50: implementation of increased measures to ensure all documentary checks are carried out on shipments of waste. A template letter has been drafted with a possible brief Circular to follow, if it is felt this represents a significant change in NTFSO Enforcement procedures.
- Implement a regime of targeted intelligence-led (retrospective) follow-up inspections through use of the E-manifest. Officers to liaise with Brian Heffernan.

* DCCAE/EPA/WERLA Q1 NP of Food Waste is not a priority for the NTFSO (ongoing monitoring of the ECJ ABP ruling is in place)

2. Quarter 2: Construction & Demolition Waste (Cross-border movements), unaccounted for waste & Waste Threshold Levels (dependent on pending High Court case-stated decision)

The focus of the TFS Enforcement Team will be on unreported cross border C&D waste, skip truck movements, verification of recovery operations declared on notifications and the monitoring of C&D

finances generated from these notifications. There will be reviews of AER Reports vs TFS GLW Reports. Checkpoints and site visits will be arranged with Local Authority Enforcement staff through the relevant WERLAs with the assistance of An Garda Síochána and the NIEA where needed. Timing is in line with WERLAs' coordination of Q2 National Waste Priorities.

3. Quarter 2- Quarter 3: Scrap Metal & ELVs (Cross-border movements)

A large number of small operators are allegedly moving scrap metal/ELVs across the border in significant quantities. This material is suspected to be originating from unauthorised sites in the border counties. Checkpoints and site visits will be arranged with Local Authority Enforcement staff through the relevant WERLAs with the assistance of An Garda Síochána and the NIEA where needed. (National Waste Priority 2020 – *End of life vehicles/ Unaccounted for Waste*).

4. Quarter 4: PRI Ongoing priorities (Q1-Q4):

- PRI Compliance (Tyres and plastic subsidies). Ongoing multi-agency projects with NIEA, UKEA and SEPA et al
- Low value waste (mixed) paper & low grade plastics. GPS Tracking project to align with these waste streams.

Timing is in line with National Priorities and WERLA Work Programmes.

Planned/Actual Inspections 2019-2020

The table below illustrates the routine inspections planned for 2020, and the numbers achieved vs those planned for 2019.

Type of Inspection/ Audit	Planned inspections for 2019	Actual Inspections In 2019	Planned inspections for 2020
Checkpoints	25	24	24
Port Inspections	225	231	190
Facility Inspections	184	182	170
Facility Spot Checks	71	58	50
WTF Inspections	174	165	150
Broker/Dealer Verifications	20	23	20
Broker/Dealer Full Audit (1yr)	1	1	1
Cone & Quartering	0	0	16
Customs Special Unit Scan Inspections	n/a	n/a	21*
Cross-border Monitoring	n/a	n/a	25
Total	700**	684	667***

*Figure separated from “Port Inspections” to account for increased inspections at Customs, Dublin Port.

**Total Target amended to 682 at quarterly reviews, due to an increased volume of investigations and complaints.

***Reduction in Total 2020 numbers compared to 2019 is to account for Training a new TFS Officer in the Cork Office after the departure of an experienced TFS Officer. In addition a new Team Lead has been appointed to the unit.

Appendix D – Review of 2020 Outcomes & 2021 Inspection Plan

To be updated by February 2021 to show new Outcomes table, new priorities and inspection targets (layout as per Appendix C).

Appendix E – Review of 2021 Outcomes & 2022 Inspection Plan

To be updated by February 2022 to show new Outcomes table, new priorities and inspection targets (layout as per Appendix C).

Appendix F – List of Abbreviations

DCC	Dublin City Council
DCCAE	Department of Communications, Climate Action & Environment
EC	European Commission
ELVs	End-of-Life Vehicles
EPA	Environmental Protection Agency
EUROSAI	European Organisation of Supreme Audit Institutions
EWSR	Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste
IMPEL	European Union Network for the Implementation and Enforcement of Environmental Legislation
MSW	Municipal Solid Waste
NIEA	Northern Ireland Environment Agency
NTFSO	National Transfrontier Shipments of Waste Office
RDF	Refuse Derived Fuel
SAIS	Supreme Audit Institutions
TFS	Transfrontier Shipment
WEEE	Waste Electrical & Electronic Equipment
WEO	Waste Enforcement Officer
WERLA	Waste Enforcement Regional Lead Authority
WEU	Waste Enforcement Unit
WSR	Waste Management (Shipments of Waste) Regulations 2007
WTF	Waste Transfer Form

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