



NATIONAL TFS OFFICE

WASTE SHIPMENT INSPECTION PLAN 2023 – 2025



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



Philip Caird



+353 (01) 222 4276



philip.caird@dublincity.ie
waste.enforcement@dublincity.ie

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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 Waste Shipment Regulation, WSR) 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. The National Transfrontier Shipments of Waste Office (NTFSO) is aware that the WSR is currently under review. Any subsequent update of this document will incorporate any changes to WSIP requirements as required by Member States.

This document will set out the NTFSO's WSIP for 2023 - 2025 and an evaluation of the NTFSO's WSIP for 2020 - 2022. The WSIP for 2023 - 2025 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). In 2020 the national waste management policy has been guided by the Waste Action Plan for a Circular Economy. This is Ireland's new roadmap for waste planning and management. The plan shifts focus from waste disposal and looks instead to how we can preserve resources by creating a circular economy. The National Waste Management Plan for a Circular Economy covering the period 2023 - 2029 is currently in draft form and undergoing a stakeholder consultative process.

In line with the previous policy 2012 – A Resource Opportunity, Ireland is 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.

1.3 The National TFS Office

Regulation 4 of the Waste Management (Shipments of Waste) Regulations 2007 designates Dublin City Council (DCC) as the national competent authority for the purposes of the WSR. The NTFSO was

established by DCC in 2007 to ensure compliance with the requirements of the WSR and the 2007 Regulations.

In addition to the WSR and the 2007 Regulations, 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

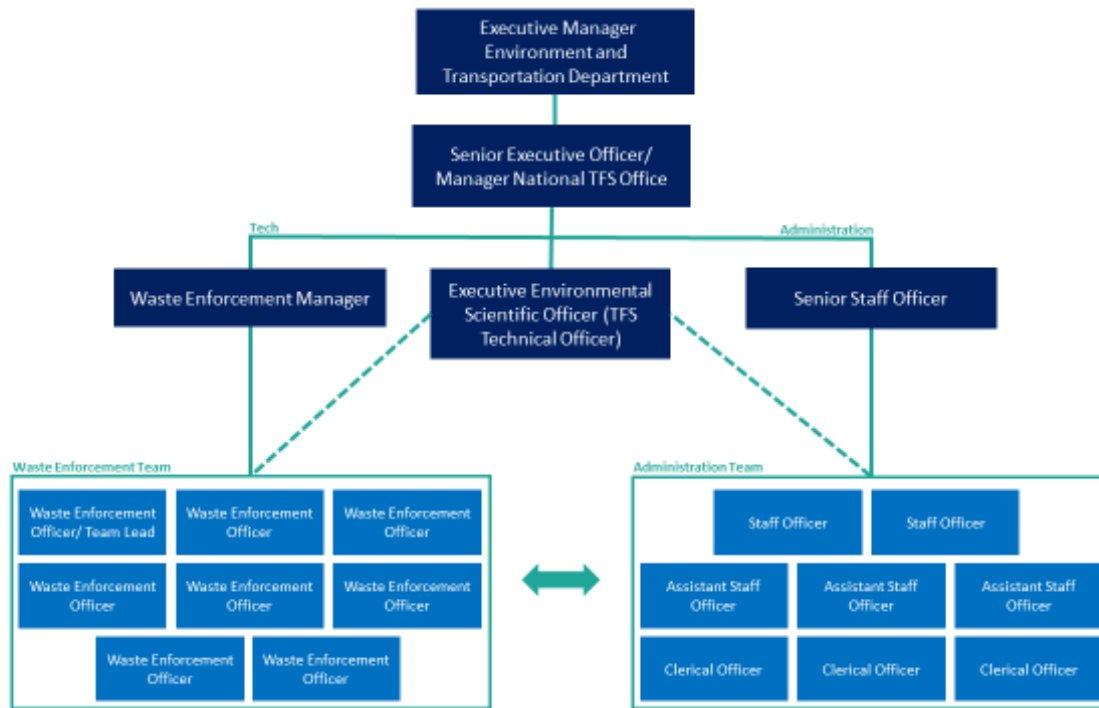
The NTFSO WSIP 2023 - 2025 applies to the geographical area covering all 26 counties of the Republic of Ireland incorporating a population of approximately 5.1 million people. The country consists of an area of 70,273 km², a coastline estimated by Ordnance Survey Ireland to be 1,448 km and a land boundary 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 WSR focuses on the origin, transportation and destination of all waste shipments and on the growing number of registered waste brokers and dealers. 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 Senior Executive Scientist (TFS Technical Officer), one 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 WSR is carried out by DCC’s Waste Enforcement Unit (WEU) of the NTFSSO, consisting of a Waste Enforcement Manager and eight Waste Enforcement Officers (WEOs). The primary objective of the WEU is to ensure compliance with the WSR 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 WSR. 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. WEOs for the NTFSO operate out of two offices, the primary office being located in Dublin City Council offices at Smithfield, Dublin 7 and an ancillary office located at the port of Cork.

To ensure efficient use of resources within the WEU, each WEO is assigned a number of Local Authority Municipal Areas (Counties). Each WEO is then responsible for the routine and non-routine inspections in the assigned 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 authority area. 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 International Restrictions on Plastic Waste Shipments and Challenges posed by the Basel Plastic Waste Amendment* or *'Plastic Waste Shipments Project'* for short 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 DCC's annual budget.

[Charging Structure for Amber and Green Listed Waste | Dublin City Council](#)

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 available human resource. 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 2023

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

	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec	Total
*Rostered days	155	147	169	154	162	153	155	169	162	155	162	162	1905
Annual Leave	16	16	16	16	16	16	17	16	16	16	16	17	194
Public holidays	8	8	8	8	8	8	0	8	0	8	0	16	80
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	42	34	42	42	42	42	35	42	34	42	34	51	482
Total available Inspection days	120	109	114	116	110	115	140	117	133	125	125	123	1423

* 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 2021 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
Waste Characterisation Survey: Cone and Quartering	Chemical Safety Awareness 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 WSR. 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. The NTFSO routinely takes part in multi-agency regulatory activities with these authorities and the Environmental Protection Agency (EPA) when required.

In February 2020, an initiative was launched by An Garda Síochána with the support and approval of the Department of Environment, Climate and Communications (DECC) 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 (MoU) 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 MoU was updated in 2014.

The NTFSO have also entered into a MoU 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 International Restrictions on Plastic Waste Shipments and Challenges posed by the Basel Plastic Waste Amendment* or *‘Plastic Waste Shipments Project’* for short. They have gathered waste plastic statistics for exports from the EU, analysed Customs data and presented these findings at an IMPEL conference and meetings. The publication of the Basel guidance document was a key achievement in this project during the previous WSIP. The NTFSO will end their leadership role of this project at the end of 2023, but will continue to contribute as a project member.

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. • NTFSO Brexit Guidance. • China Project Interim Report. • NTFSO Pre-Consent Application. • IMPEL – A Guide for Inspectors: Enforcing National legislation on plastic waste shipments. • NTFSO Basel Plastic Notice 	<ul style="list-style-type: none"> • DCC IS – WRMS Upgrade. • Industry Contact Group. • National Waste Enforcement Steering Committee. • Waste Capacity Steering Group. • DECC Waste Advisory Group. • National Hazardous Waste Management Plan. • National Waste Data Network. • Textiles Working Group. 	<ul style="list-style-type: none"> • Asian Network Basel Action Network. • SWEAP Best Practice Meeting: Ljubljana and two online meetings. • Brussels LIFE Smart Project Conference. • IMPEL conference and NCP Meeting Malta. • Basel COP 2022, Geneva 	<ul style="list-style-type: none"> • Customs. • NIEA. • NWCPO. • LA’s. • An Garda Síochána • Brokers of Farm Plastic, Plastic and Tyres. • Customs Brexit Impact. • DECC – TFS Operations. • IPR MRF Site Visit. • UK HMRC Fiscal Liaison Officer. • UL/UN University – Used EEE Exports. • Waste export industry 	<ul style="list-style-type: none"> • Decommissioning of Off-Shore Oil and Gas Platforms, Aberdeen. • Rotterdam SWEAP Best Practice. • Antwerp SWEAP Best Practice. • Belfast SWEAP Best Practice.

4. Objectives of the Waste Shipment Inspection Plan

4.1 Primary Objective

Developed in line with Ireland's current national policy, as set out in the EPA's RMCEI 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 establishment of Annual "outputs" (i.e. Annual Inspection Plan Targets). This is achieved by setting measurable intermediate targets (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 positive 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 detect, minimise and eliminate any potential areas of international waste shipments that pose a risk to human health and the environment.

4.2 Identifying Priorities for the Duration of the Plan

The NTFSO WEU proposed waste inspection priorities for 2023 have been linked to the National Waste Enforcement Priorities and WERLA Work Program, to which the NTFSO contributes. It is the view of the NTFSO that working closely with other authorities and stakeholders will result in better compliance with the WSR. National waste enforcement priorities that fall outside the scope of the WSR 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 as well as complaints received in the NTFSO.

The risk-based approach was applied to all waste types and the following priority waste types were identified for 2023:



The priority waste types highlighted above dictated 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 2007 Regulations, 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.
- Compliance assistance with Industry where appropriate.

4.5 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 the environment 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 baselines are set annually. New targets and baselines will be added to this plan in Appendices D and E at the end of 2023 and 2024 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 2020-2022 were impacted by national health advice around the management of Covid-19. During stages of lockdown in 2020 and 2021, inspections were carried out remotely where appropriate.

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. 2022 enforcement data has been used to set baselines for measurable performance in 2023. 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 2023. 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 2023

Planned Routine Inspections 2023		
Inspection Type	No. of planned inspections	No. of days assigned
Checkpoints	15	11.5
Port Inspections	210	210
Facility Inspections	150	337.5
Facility Spot-Checks	30	22.5
WTF Inspections	138	103.5
Broker & Dealer Verifications	30	15
Broker & Dealer Audits	0	0
Custom Scan Inspections	25	75
Monitoring Operations	26	104
Cone and Quartering	10	25
Total:	634	904

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, ongoing 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 (2020-2022). 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 wastes and priority selection.

Table 5. Non-Routine Enforcement Activities 2020-2022

Non-routine Enforcement Activities	2020	2021	2022
TFS Investigations	293.5	235.5	192.75
Court	0	1	2.5
Training	9.5*	100.75**	53.25
Other	190	182.75	68.75
Total No. of days:	493	520	317.25

**Low volume of training course in 2020, primarily due to the Covid-19 pandemic.*

***High volume of training of new TFS Officers in the Dublin and Cork Offices resulting from low volume of training in 2020.*

5. Enforcement Activities

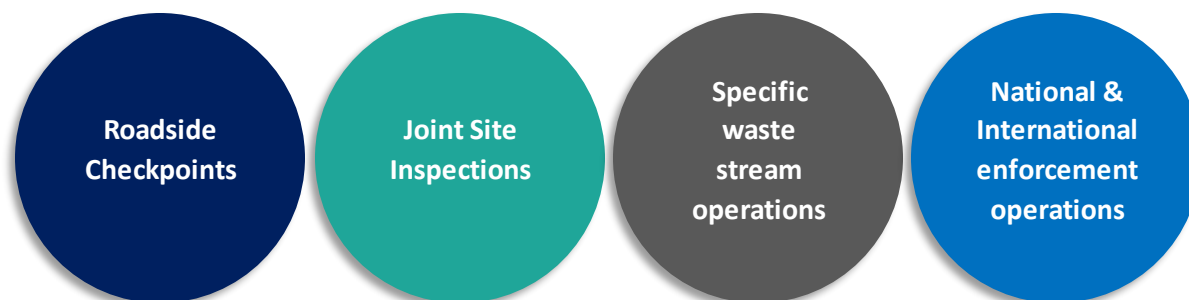
Waste enforcement activities regarding TFS shipments can be regarded as pro-active or re-active in nature. The NTFSO's Operational Plan for 2023 is based on the following enforcement activities:

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, EPA, NWCPO, An Garda Síochána, Social Welfare, The Road Safety Authority, Revenue Customs Service, the Health and Safety Authority and other relevant enforcement bodies as appropriate to carry out concerted actions throughout the year.

DCC is the Waste Enforcement Regional Lead Authority (WERLA) for the Eastern Midlands Waste Region. The NTFSO has developed a close working relationship with the Eastern Midlands WERLA and with the other lead authorities for the Southern and Connaught/Ulster WERLAs. 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 matrices 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 enforcement. 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 comes 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 include the following:



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 WSR and the Data Protection Acts. Records of inspections, audits or incidents are maintained under supervision of the relevant WEO and may be used for the preparation of court files. WEOs are obliged to give evidence before the courts for such cases and must be in a position to verify the accuracy of all relevant files and notes.

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 - 2023 Outcomes Table, Proposal of Priorities and Inspections Table

2023 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 Waste Tyres.	Physical port Inspections Paperwork verification Inspections Facility inspections at sites of origin Facility spot checks at sites of origin.	Reduction of illegal shipments of this waste type that may contribute to environmental pollution in developing countries To reduce the volume of unreported tyre exports to the NTFSO. To reduce the number of exports by unregistered Brokers & Dealers	Reduce illegal shipments. Reduction in the number of unregistered Broker/Dealers Increase in Reduction in unreported GLW reports	Baseline: A total of 14 Inspections of waste tyre shipments in 2022, 6 (43%) of these shipments were recorded as non-compliant. 4 (66%) of these non-compliant shipments required a direction letter. 2 (33%) 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. 2 (33%) of these non-complaint shipments required a return to origin fee.	Target: Reduce the non-compliance rate from 43% to 25% within the reporting year (2023). 85% of all non-compliant inspections requiring direction to be closed out 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.					Baseline: 4 (66%) of non-compliant inspections which required direction were closed out within the reporting year.	
	Shipments of Waste Plastic	Physical port inspections Paperwork inspections and verifications Facility Inspections at sites of origin or destination. Facility spot check inspections Cone & Quartering inspections at identified waste facilities.	Increase verifications of recovery facilities. Progressive improvement in the quality of plastic waste for export as a GLW.	Reduction in the number of high contaminated shipments through cone & quartering inspections. Reduction to be visible on the second visit. Reduction in the number of unauthorised brokers & dealers.	Baseline: As cone & quartering was a new inspection type starting in 2022, we have a limited baseline. Four facilities had a C&Q inspection in 2022 on plastic waste intended for export. The contamination results were 5.5%, 5.49% 6.59% and 0.84% respectively. 145 plastic exports inspected in 2022. 19 (13%) shipments were non-compliant. 8 (42%) of the non-compliant shipments result in a fee being issued.	Target: Reduction in contamination percentage on C&Q inspections on the second visit. Reduce the non-compliance rate from 13% to 10% within the reporting year (2023). Reduce the number of unregistered Brokers & Dealers from 21% to 15%.

					<p>4 (21%) of the non-compliant shipments results in a Return to Origin.</p> <p>4 (21%) of the non-compliance was in relation to an unregistered Broker & Dealer</p> <p>1 of the non-compliances has been recommended for legal action.</p>	
	Scrap Metal & ELV's (Cross Border) *	<p>Physical port inspections</p> <p>Paperwork inspections and verifications</p> <p>Facility inspections</p> <p>Facility spot checks</p> <p>Multi-agency site inspections</p>	<p>Increase verifications at recovery facilities.</p> <p>Reduction in the number of unauthorised broker and dealers exporting scrap metal.</p>	<p>To reduce the number of non-compliance letters in relation to the export of scrap metal.</p> <p>Reduction in waste leakage as ELV's are reused and/or exported illegally.</p>	<p>Baseline: 62 exports of scrap metal and ELVs were inspected in 2022.</p> <p>9 (14.5%) shipments were non-compliant.</p> <p>1 shipment resulted in a fee being issued.</p>	<p>Target: Reduce the percentage of non-compliance rate from 14.5% to 11% within the reporting year 2023.</p>

	<p>Construction & Demolition Waste* (Cross-border movements)</p>	<p>The NTFSO has set aside 104 days for monitoring and investigations of alleged illegal movements across border, this is to include the monitoring of C&D movements.</p> <p>Paperwork inspections and verifications</p> <p>Roadside checkpoints on import/export routes</p>	<p>Reduce illegal landfills involving the cross border movement of waste.</p> <p>Disrupt illegal waste activity and take appropriate enforcement actions.</p> <p>Reduce illegal cross border dumping of C&D waste.</p> <p>Reduction in skip waste crossing the border that is not covered by notification.</p>	<p>To reduce the number of unregistered brokers/dealers handling C&D waste</p>	<p>Baseline: 80 days were assigned to monitoring cross border shipments in 2022.</p> <p>Total of 39 exports were inspected on the M1 motorway in 2022.</p> <p>11 (28%) of these exports were C&D waste.</p>	<p>Target: Disrupt illegal waste activity and take appropriate enforcement actions.</p> <p>Increase days assigned to monitor cross border shipments from 80 to 104 for 2023.</p> <p>Increase joint operations with the NIEA on C&D waste streams.</p>
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2023 Proposal of Priorities

The NTFSO's WEU proposed waste inspection priorities for 2023 have been linked to the National Waste Priorities and WERLA Work Programmes where possible. However, two of the five national waste priorities do not have direct links to waste shipments, so specific action plans have been set in line with current NTFSO issues and priorities. The NTFSO's WEU have adopted the following areas resulting from the ongoing review of intelligence gathered in the field throughout 2022 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 NTFSO's WEU.

Review of 2022 TFS Enforcement Activities

- **Waste Plastics** (Export and cross border movements): One major investigation in waste plastics in 2022 and a number of minor non-compliances identified. This waste stream will therefore remain as a TFS enforcement priority for 2023.
- **End of Life Vehicles and Scrap Metal** (Exports and transiting waste shipments): a large investigation into the transport of ELV's was carried out in Q1 2022 where a high non-compliance rate was observed within this waste stream. It is therefore noted to be an area of focus with ongoing issues and will remain a TFS Enforcement priority for 2023 in line with National Waste Enforcement Priorities. The NTFSO continued to work in cooperation with Fingal Co. Council and Dublin City Council Waste Enforcement Units together with An Garda Síochána and other relevant statutory bodies on a major national investigation into the illegal trade in catalytic convertors.
- **Construction & Demolition Waste:** has continued to be a problematic waste stream in the border region with Northern Ireland for a number of years. The NTFSO had two successful prosecutions heard in 2022 in relation to this waste stream. It will remain as a TFS Enforcement priority for 2023 in line with National Priorities.
- **Unauthorised Sites:** A number of unauthorised sites were inspected from a multi-agency perspective in 2022. The majority of the unauthorised sites were carrying out illegal breaking of vehicles for export. Although it is not a priority for 2023, the TFS enforcement team will continue to carry out unauthorised site inspections with local authorities.
- **Targets:** Overall inspection targets for 2022 were achieved. The cumulative target was exceeded by 38 inspections, 645 versus 607.

Proposed Quarterly TFS Waste Enforcement Priorities 2023

1. **Quarter 1: Waste Tyres**

There will be an increase in port inspections and facility inspections of waste tyres in Q1 of 2023. The TFS enforcement team will also run a verification project with Circol ELT to establish any unreported exports of waste tyres.

2. **Quarter 2: Waste Plastic**

The TFS enforcement team will continue with cone & quartering inspections in 2023 with the objective to tackle and reduce contamination levels in plastic waste exports. There will be an increase in port and facility inspections in plastic waste in Q2 to reduce the number of unregistered brokers & dealers.

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

Intelligence gathered has shown a large number of small operators 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, but not restricted to unauthorised sites. 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.

4. Quarter 4: Construction & Demolition Waste (Cross-border movements):

The focus of the TFS enforcement team will be on reducing illegal C&D waste shipments. This will be done through enforcement actions against unregistered brokers/dealers and unauthorised skip truck movements. Joint operations with the NIEA on the verification of recovery operations declared on notifications and the monitoring of C&D fines generated from these notifications will continue.

Planned/Actual Inspections 2022-2023

The table below illustrates the routine inspections planned for 2022, and the numbers achieved versus those planned for 2023.

Type of Inspection/ Audit	Planned Inspections for 2022	Actual Inspections for 2022	Planned Inspections for 2023
Checkpoints	15	16	15
Port Inspections	200	203	210
Facility Inspections	150	156	150
Facility Spot Checks	38	33	30
WTF Inspections	125	131	138
Broker/Dealer Verifications	20	35	30
Broker/Dealer Full Audit (1yr)	1	0	0
Cone & Quartering	15	12	10
Customs Special Unit Scan			
Inspections	25	33	25
Cross-border Monitoring	20	23	26
Total	607	642	634

Appendix D – Review of 2023 Outcomes & 2024 Inspection Plan

To be updated by February 2024 to show new Outcomes table, new priorities and inspection targets (layout as per Appendix C)

Appendix E – Review of 2024 Outcomes & 2025 Inspection Plan

To be updated by February 2025 to show new Outcomes table, new priorities and inspection targets (layout as per Appendix C)

Appendix F – List of Abbreviations

DCC	Dublin City Council
DECC	Department of the Environment, Climate and Communications
EC	European Commission
ELVs	End-of-Life Vehicles
EPA	Environmental Protection Agency
EUROSAI	European Organisation of Supreme Audit Institutions
WSR	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 Law
MSW	Municipal Solid Waste
NIEA	Northern Ireland Environment Agency
NTFSO	National Transfrontier Shipments of Waste Office
RDF	Refuse Derived Fuel
SAI	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
WTF	Waste Transfer Form

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