

National TFS Office Waste Shipment Inspection Plan 2017 - 2019



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1. Introduction

Regulation 4 of the Waste Management (Shipment of Waste) Regulations 2007 (WSR) designates Dublin City Council (DCC) as the national competent authority for the purposes 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). The National Transfrontier Shipment Office (NTFSO) was established by DCC in 2007 to ensure compliance with the requirements of the WSR and the EWSR. Article 50 of the 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.

The amended Article 50.2 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 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;*

This document will set out the NTFSO’s Waste Shipment Inspection Plan for 2017 to 2019 (WSIP) detailing the reasoning behind the planned inspections and the strategy employed by the NTFSO Enforcement Unit to minimise the potential environmental risks resulting from the shipment of waste. This WSIP is subdivided into Strategic and Operational Plans. The operational plan will detail

in general terms the enforcement policy, types of inspections to be carried out, number of inspections and concerted actions to be undertaken.

The Operational Plan will detail the numbers of inspections to be carried out within the coming year but it will not include specific dates or locations of these inspections nor does it include any specific details on the proposed concerted action as this would adversely affect environmental security and the effectiveness of the plan. The Operational Plan and risk assessments used in developing the plan will be reviewed every year. The Strategic Plan that forms the foundation of the WSIP will be reviewed at least every three years and updated where appropriate. Every year a review of the overall WSIP will be published containing an evaluation of the preceding year's Operational Plan.

1.1 National Waste Management Policy

In July 2012, "A Resource Opportunity - Waste Management Policy In Ireland"¹ was published by the Department of Environment, Community & Local Government. 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. The Waste Management Policy 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. As part of "Putting People First, Action

¹ <http://www.environ.ie/environment/waste/policy-and-legislation/resource-opportunity-waste-management-policy-ireland>

Programme for Effective Local Government”, the number of local authorities was reduced to thirty-one under the Local Government Reform Act 2014. Ireland is 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.

1.2 The National TFS Office

In the Republic of Ireland the Waste Management (Shipments of Waste) Regulations 2007 (WSR) gives effect to Regulation (EC) No. 1013/2006 and within the WSR Dublin City Council (DCC) is the designated Competent Authority for all wastes imported to, exported from or transiting through the Republic of Ireland. DCC has also been designated as the national Competent Authority for the implementation of The European Communities (Shipments of Hazardous Waste Exclusively within Ireland) Regulations 2011, also known as the WTF regulations.

The NTFSO is also a national representative at the European Network for the Implementation and Enforcement of Environmental Legislation (IMPEL). The primary purpose of the NTFSO is to implement measures for the supervision and control of transfrontier shipments of hazardous and non-hazardous waste and for the supervision and control of hazardous wastes transported within the country.

2. Objectives of the Waste Shipment Inspection Plan

2.1 Primary Objective

One of the primary objectives of the NTFSO's Enforcement Unit is to prevent illegal waste shipments. In doing so the NTFSO aims to protect the environment and human health from the risks associated with international transfrontier movements of waste. It is therefore the aim of the WSIP to minimise any potential risks associated with the international movement of all waste to, from or transiting the Republic of Ireland.

In line with Ireland's National Waste Management Policy, the NTFSO Enforcement Policy aims to promote compliance and enforce environmental legislation by:

- Taking a proportionate, risk-based approach to the EWSR.
- Providing advice and guidance to all stakeholders involved in the import, export and transit of waste.
- Taking enforcement action when appropriate.

The NTFSO Enforcement Policy gives guidance to its staff on how to approach enforcement and of the factors to be taken into account when determining enforcement responses to unauthorised waste activity, including whether prosecutions will be pursued. The WEU's Standard Operating Procedures (SOPs) are certified to the international standard, I.S. EN ISO 9001:2008 and I.S. EN ISO 14001:2004 and provide the Waste Enforcement Officer (WEO) with structure and guidance when implementing the Enforcement Policy. The NTFSO is of the view that working with stakeholders will result in better compliance with the EWSR and ensure the protection of the environment and human health.

In accordance with the National Waste Management Policy, the NTFSO will follow the five key principles of; **proportionality** in the application of environmental law and in securing compliance; **consistency** of approach; **transparency** about how NTFSO operates; **targeting** of enforcement action and the implementation of the **polluter pays principle**.

2.2 Delivering Outcomes

Our aim is to deliver effective, proportionate and dissuasive actions against unauthorised operators and activities through the use of our legislative powers. The NTFSO will seek to prevent illegal waste activity by taking a systematic 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 Waste Management Act 1996, the EWSR, the WSR and any associated regulations.
- Regularisation of the illegal movements of waste through the use of legal and financial incentives.
- Deter and prevent illegal waste activity to remove any financial gain or advantage derived through bypassing the legal requirements of the WSR.
- Timeliness in achieving cessation, regularisation and remediation of those illegal waste activities referred to above.
- Provision 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.

2.3 Priorities for 2017 - 2019

The NTFSO has identified a number of priority waste types and concerted actions that will form the Operational Plan of the WSIP. The WEU of the NTFSO has also identified a number of projects in the Strategic Plan that will also be the focus of the WEU throughout the duration of this WSIP. The priority waste types and concerted actions will dictate the schedule of waste inspections detailed in Section 4.5 and are anticipated to remain the same throughout the course of 2017. The strategic projects will run throughout the duration of the WSIP and beyond.

Operational Plan

Priority Waste Types

When selecting the priority waste types for 2017, the NTFSO considered the number of historical non-compliances by waste type; the suspected and alleged illegal activities by waste type; common issues with our IMPEL partners and the resources that the WEU have historically dedicated to regulating specific wastes.

The risk based approach, as detailed in Sections 9 & 12, was applied to all waste types and the following priority waste were identified for 2017:

- Refuse Derived Fuel (RDF) / Municipal Solid Waste (MSW)
- Low grade post-consumer plastic packaging
- Waste Electrical & Electronic Equipment (WEEE)
- Used & End-of-Life Vehicles (ELVs)

Concerted Actions

In line with the National Waste Management Policy and the regional Waste Management Plans published by each of the three Waste Management Regions, the NTFSO will assist with the implementation of a consistent and coordinated national approach to waste regulation and enforcement through:

- Intelligence led and coordinated multi-agency enforcement actions
- Identification and investigation of serious criminal offenders
- Securing targeted, timely and effective enforcement outcomes

The specific Concerted Actions in the WSIP are detailed in Section 4.4 and the aim is to align the NTFSO's enforcement activities with those of the regional Waste Management Plans and the Waste Enforcement Regional Lead Authorities (WERLA). The overall objective of these concerted actions is to:

“Implement a consistent and coordinated system for the regulation and enforcement of waste activities in cooperation with other environmental regulations and enforcement bodies in order to protect the environment through the prevention of illegal movements of waste exports, waste imports and waste shipments transiting through Ireland.”

Strategic Plan

Between 2011 and 2013 the Supreme Audit Institutions of the EU (SAIS) carried out coordinated audits on eight member states into the implementation of the EWSR. In Ireland this audit was carried out on behalf of the SAIS by the Office of the Comptroller and Auditor General of Ireland. The main purpose of the SAIS audit was to ascertain:

1. To what extent the NTFSO complied with the requirements arising from the EWSR
2. How the EWSR were enforced in Ireland
3. The effectiveness of the enforcement measures

In October 2013 the European Organisation of Supreme Audit Institutions (EORSAI) published its joint report on the eight national audits in the *“Coordinated audit on the enforcement of the European Waste Shipment Regulations”*. In July of 2014, the Office of the Comptroller and Auditor General of Ireland also published its report on the audit of the NTFSO in *“Special Report 84, Transshipment of Waste”*.

To address the observations detailed in *“Special Report 84, Transshipment of Waste”*, the NTFSO WEU developed an Enforcement Strategy that has been incorporated into the Waste Shipment Inspection Plan 2017-2019 and outlines the development of a number of strategic projects. These projects will continue to run through the period of the current WSIP and form the foundations that will enable the NTFSO achieve the objectives of this plan. The seven strategic projects identified below are outlined in Section 11.

1. E-manifest Project
2. Shipment of Used Goods Project
3. Information Gathering & Data Management Project
4. Waste Flows & Mapping Project
5. Risk-based Inspections Project
6. Measuring Enforcement Effectiveness Project
7. Strategy Coordination Project

These seven projects have been adopted as strategic policy actions for the NTFSO and are being developed at present. These projects are being developed by the WEU in conjunction with the NTFSO and other stakeholders. Each of the seven projects is being managed by a Waste Enforcement Officer who has assembled the project team and will manage the project throughout its lifecycle.

3. Scope of the Waste Shipment Inspection Plan

3.1 Geographical Area

The NTFSO Waste Shipment Inspection Plan 2017 – 2019 applies to the geographical area covering all 26 Counties of the Republic of Ireland incorporating a population of 4,757,976² 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 443km with Northern Ireland³ 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 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.



3.2 Legislation

The Waste Management (Shipments of Waste) Regulations 2007 give effect to the provisions of the EWSR and DCC is designated under regulation 4 of these Regulations as the national Competent Authority for all wastes imported to, exported from transiting the Republic of Ireland. DCC has also been designated as the national Competent Authority for the implementation of The European

² <http://www.cso.ie/en/census/>

³ <https://www.cia.gov/library/publications/the-world-factbook/geos/ei.html>

Communities (Shipments of Hazardous Waste Exclusively within Ireland) Regulations 2011, known as the WTF Regulations covering the internal movements of hazardous wastes.

The primary waste legislation within Ireland is the Waste Management Act 1996 and The European Communities (Waste Directive) Regulations 2011. In addition to this primary legislative framework, the function of the NTFSO is to ensure compliance with the following legislation:

- Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste (EWSR).
- Waste Management (Shipments of Waste) Regulations 2007 (WSR).
- Waste Management (Registration of Brokers & Dealers) Regulations 2008.
- European Union (Waste Electrical and Electronic Equipment) Regulations 2014.
- The European Communities (Shipments of Hazardous Waste Exclusively within Ireland) Regulations 2011 (WTF Regulations).

The NTFSO consider a shipment of waste to have commenced once it has left the waste producer's site of generation. Once a shipment has commenced it will be subject to the requirements of the EWSR. The shipment remains the subject of the EWSR throughout its transport by road, rail, inland waterway, sea or air to the destination facility. The shipment is only considered to be completed upon confirmation of its environmentally sound recovery or disposal at the intended recovery or disposal facility.

3.3 Definition of a Shipment

The EWSR defines a shipment as the *“transport of waste destined for recovery or disposal which is planned or takes place:*

- (a) between a country and another country; or*
- (b) between a country and overseas countries and territories or other areas, under that country's protection; or*
- (c) between a country and any land area which is not part of any country under international law; or*
- (d) between a country and the Antarctic; or*
- (e) from one country through any of the areas referred to above; or*
- (f) within a country through any of the areas referred to above and which originates in and ends in the same country; or*
- (g) from a geographic area not under the jurisdiction of any country, to a country”*

3.4 Classification of Wastes

Waste legislation and policy documents refer to two general waste classifications, “Amber List Waste” and “Green List Waste”. Specific waste types are assigned an internationally recognized waste code. This waste code and the physical characteristics of the waste will help determine the control procedures that apply for transfrontier shipments of a specific waste type.

“**Amber List Waste**” is defined under the provisions of Article 3 of EWSR as hazardous, contaminated or mixed waste destined for recovery or disposal. Shipments of Amber List Waste are subject to the procedure of prior written notification and consent as set out in Article 4 of the EWSR. There are strict legislative controls governing the shipment of Amber List Waste to ensure that it is tracked and monitored from the time it leaves the site of origin until it arrives at its stated destination. The purpose of the prior notification and consent procedure is to track and supervise the movement of waste, and to ensure the environmentally sound management of the waste throughout the course of the shipment.

“**Green List Waste**” is defined under the provisions of Article 3 of the EWSR as non-hazardous, non-contaminated, unmixed waste. Shipments of Green List Wastes are subject to the general information requirements as set out in Article 18 of the EWSR.

Further Information on the classification of shipments of wastes.

The responsibility for the correct classification of a waste shipment lies with the person organizing the waste shipment. Details on the classification of waste, and the Amber and Green List waste shipment procedures can be found on the NTFSO website at:

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

4. Enforcement Activities

Transfrontier shipment of waste enforcement activities can be classified as either pro-active or re-active and the NTFSO's Operational Plans for 2017 are based on the following enforcement activities:

- Multi-agency Enforcement – both re-active and pro-active in nature
- Routine Enforcement Activities – pro-active in nature
- Non-routine Enforcement Activities – re-active in nature
- Concerted Actions - re-active and pro- active in nature
- Complaint/Incident Investigations– re-active in nature
- Stakeholder Guidance – re-active and pro- active in nature

4.1 Multi-agency Enforcement

The NTFSO continues to be actively involved in promoting a multi –agency approach to enforcement and the NTFSO liaises with numerous agencies to carry out specific operations in the planning and operational stages of the Concerted Actions identified in Section 4.4 below. The agencies include, but are not limited to, the following:

- Local Authorities,
- Waste Enforcement Regional Lead Authorities,
- Environmental Protection Agency (EPA),
- An Garda Síochána - the police force of Ireland,
- Customs and Revenue,
- Port Authorities,
- Department of Social Protection,
- Road Safety Authority,
- Health and Safety Authority

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. In 2016 the NTFSO used their experience from previous multi-agency enforcement activities to assist the Eastern Midlands WERLA in the planning and operational functions of a WERLA project to establish a template for multi-agency enforcement across the region. 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:

- Roadside Checkpoints
- Joint site inspections
- Specific waste streams operations
- National & international enforcement operations

The roles and responsibilities assigned to the different agencies are outlined in Section 5.

4.2 Routine Enforcement Activities

Routine inspections carried out by the NTFSO include:

- Inspection of waste shipments at the site of origin and/or destination
- Audits at the premises/offices of waste producers
- Audits at the premises/offices of waste brokers & dealers
- Port Inspections
- IMPEL projects
- Road-side checkpoint
- WTF audits and inspections
- Audits at the premises/offices of waste collection permit holders

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 shall be recorded.

4.3 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 will be 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.

Some typical examples of non-routine enforcement activities are listed below:

- Surveillance Operations
- Investigations of Complaints
- Repatriations
- Concerted Actions
- Targeted enforcement activities with other Competent Authorities
- Facility or port inspections not accounted for in the planned routine inspections; these may arise due to a follow-up investigation, complaint or an environmental incident
- Court appearances

The NTFSO aims to ensure that a Waste Enforcement Officer (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 Regulation (EC) 1013/2006 and the Data Protection Acts.

4.4 Concerted Actions

The NTFSO liaises with IMPEL, NIEA, An Garda Síochána and other enforcement bodies to carry out concerted actions based on agreed schedules in addition to any other concerted action projects that the NTFSO may be made aware of throughout the year.

Furthermore, the NTFSO will assist Local Authorities and the EPA to carry out joint inspections at sites that are exporting waste and at the destination facilities for imported waste. In 2014, the NTFSO and An Garda Síochána established “Operation Waste” targeting specific waste streams and stolen items; this operation is still active today and focuses on the shipments of used vehicles and used electrical and electronic equipment.

The concerted actions incorporated in this WSIP are based on the priorities set out in Section 2 and seek to ensure that appropriate, targeted and timely enforcement actions are taken to meet the requirements of the national waste management policy and the priorities of the NTFSO. For operational reasons the specifics of each Concerted Action plan cannot be detailed in a public document but a summary of each is outlined below. The detailed Concerted Action plans are set out in terms of the actions required, the work area, the metric objective, the outputs to be measured, the resources required and the timelines envisaged.

Concerted Action No. 1

Two actions have been identified relating to the identification of specific transport routes.

Final Environmental Outcome:

Enhance the enforcement of regulations related to the cross border movement of waste to Northern Ireland to ensure waste brokers & dealers and waste producers are managing waste in accordance with legislation and waste movements are in compliance with regulatory requirements.

Concerted Action No. 2

Three actions have been identified relating to the activities of specific waste operators.

Final Environmental Outcome:

Enhance the enforcement of regulations related to the cross border movement of waste from **authorised facilities** in Ireland to prevent the illegal management of waste.

Concerted Action No. 3

Three actions have been identified relating to specific locations suspected to be the sources of illegal waste shipments.

Final Environmental Outcome:

Enhance the enforcement of regulations related to the cross border movement of waste from **unauthorised facilities** in Ireland to prevent the illegal management of waste.

Concerted Action No. 4

Three actions have been identified relating to operators facilitating waste shipments.

Final Environmental Outcome:

Enhance the enforcement of regulations related to the shipments of waste to ensure waste brokers & dealers and waste producers are managing waste in accordance with legislation and that waste collectors and transporters are in compliance with regulatory requirements.

4.5 Routine Inspections for 2017 (Planned)

The table below illustrates the routine inspections planned for 2017 and takes into account Concerted Actions and other Multi-Agency enforcement activities. This table does not account for the time required to plan inspections or concerted actions and multi-agency activities, nor does this table take into account the time that may be required in following up on these planned activities. As the planning and follow up resource requirements are unknown, it is anticipated that this will be accounted for in the non-routine enforcement activities detailed in Section 4.3.

Type of Inspection/ Audit	Proposed inspections for 2017
Checkpoints	25
Port Inspections	225
Facility Inspections	180
Facility Spot Checks	75
WFT Inspections	188
Broker/Dealer Verifications	180 days
Concerted Action Days	465 days*
Multi-Agency Days	66 days*
Strategic Project Days	192 days
Total	693 inspections
	903 days

*Concerted action and multi-agency days will often require two or more WEOs to attend, therefore the number of days set aside in these plans includes the number of individual WEO days assigned. Two additional as yet undetermined concerted actions have been included in the planned days to take account of events that may unfold throughout 2017.

5. Tasks Assigned to Different Authorities

The NTFSO is the sole authority within Ireland authorised to implement the requirements of the EWSR. The Customs Services provide additional support by sharing information and making X-ray scanner units available when requested. An Garda Síochána, also provides support and ensures the safety of NTFSO WEOs when required. An Garda Síochána is also the agency that coordinates and controls the operations of any roadside checkpoints. The NTFSO routinely takes part in multi-agency regulatory activities in which each agency has responsibility for their own area of jurisdiction.

The NTFSO have no role in the regulation of waste facilities as this is the responsibility of the EPA and Local Authorities. 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 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.

6. 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 detailed in the Strategic Approach in Section 11.

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.

7. Team Development & Training

All WEOs have attained a minimum qualification of a scientific degree at third level education or similar. All WEOs in the NTFSO WEU have gained regulatory experience elsewhere prior to joining the team. During a WEO's time with the team all training practices and procedures endeavour to support each individual to strive to achieve both their personal goals and the objectives of the WEU. The WEU operate a multi-layered structure in which an individual can develop from a Graduate Enforcement Officer to a Senior Enforcement Officer and on to a supervising Team Lead. The WEU maintains a training file for each officer detailing the officer's development and training needs. Each file contains a log of the roles and responsibilities that officer has achieved competency on for which they have been "signed off" by their line manager. Training needs are analysed in a number of ways as set out below.

7.1 Identification of Training Needs

Job-related training needs are identified at a number of stages:

- At recruitment stage – any immediate training needs are identified and discussed by the Waste Enforcement Manager, and are organised during the first three months of employment wherever possible.
- During the employee's induction - the Waste Enforcement Manager and employee set initial targets and objectives.
- At WEO's biannual appraisals – performance is reviewed and training needs identified.
- When setting WEU objectives and as part of the strategic planning phase an evaluation of existing available skills, competencies and identification of training needs is carried out ensure projects can be successfully completed and the WEU objectives met.

7.2 Individual Development

A structured system of regular appraisals allow individual WEOs to identify personal development needs including specific training, a course of study, or activity to improve their professional development and give them an additional skill that will benefit the WEU. Since the NTFSO's WEU was established in August 2007, both industry and legislative developments have resulted in many changes to how the EWSR is enforced in Ireland. Therefore, in 2014 the WEU completed a project to update all of its SOPs to achieve a strategic objective by obtaining certification from the National

Standards Authority of Ireland for the Quality Management Systems standard I.S. EN ISO 9001:2008 and the Environmental Management standard I.S. EN ISO 14001:2004. These SOPs now provide guidance and assurance to each team member when carrying out their daily duties.

7.3 Team Development

The WEU is made up of individuals with a wide range of scientific qualifications, skills and experience. All WEOs receive extensive training prior to taking up the position and additional training is provided throughout each calendar year. Due to the nature of the role and responsibilities of a WEO, on the job training is essential to develop the skills and experience to be effective in the role. Monthly team meetings are scheduled to ensure consistency of enforcement and to facilitate the exchange of information and ideas.

WEOs regularly work together and share technical and industry knowledge ensuring consistency in WEU's methods. Through an individual's performance review, the WEU Manager can identify common training needs for the team and plan future training programs. Changes within the waste industry, new legislation and the development of the strategic projects will also necessitate specific team training programs. The WEU have worked with external industry experts to develop bespoke training programmes to meet the needs of the team.

7.4 Health & Safety

The health and safety of staff is paramount when carrying out inspections and monitoring transfrontier waste shipments. The very nature of waste itself, the illegal activities involved, individuals encountered and the enforcement activities required in the role pose many potential risks that are not encountered by the average office worker. In accordance with national legislation the WEU has prepared a safety statement specific to the duties of a WEO and prepared risk assessments for each of the activities a WEO encounters on a daily basis. Due to the nature of enforcement work, new unanticipated potential risks can be encountered and the WEU has arranged for risk assessments to be carried out on these tasks as they arise prior to the enforcement activity commencing. WEOs are instructed to carry out all inspections and enforcement activities in accordance with the requirements of the Waste Enforcement Safety Statement and when on third-party site, WEOs must comply with that site's safety procedures.

In its commitment to the health and safety of the WEU team, the WEU management have set an objective for 2017 to attain certification for OHSAS 18001:2007 (ISO/DIS 45001), thus setting the standard for Occupational Health & Safety Management within the waste enforcement industry.

8. Structure and Resources

The NTFSO has two key functions - administration and regulation. Since the formation of the NTFSO, the regulatory function of the NTFSO has been outsourced through public tender and is currently awarded to Certification Europe Ltd. As each public tender is awarded for a period of 3 years, the operational budgets of the Waste Enforcement Unit are set and the available resources do not change over that period. Inspection plans can be prepared with some degree of confidence and medium term planning is realistic.

8.1 Structure of National TFS Office

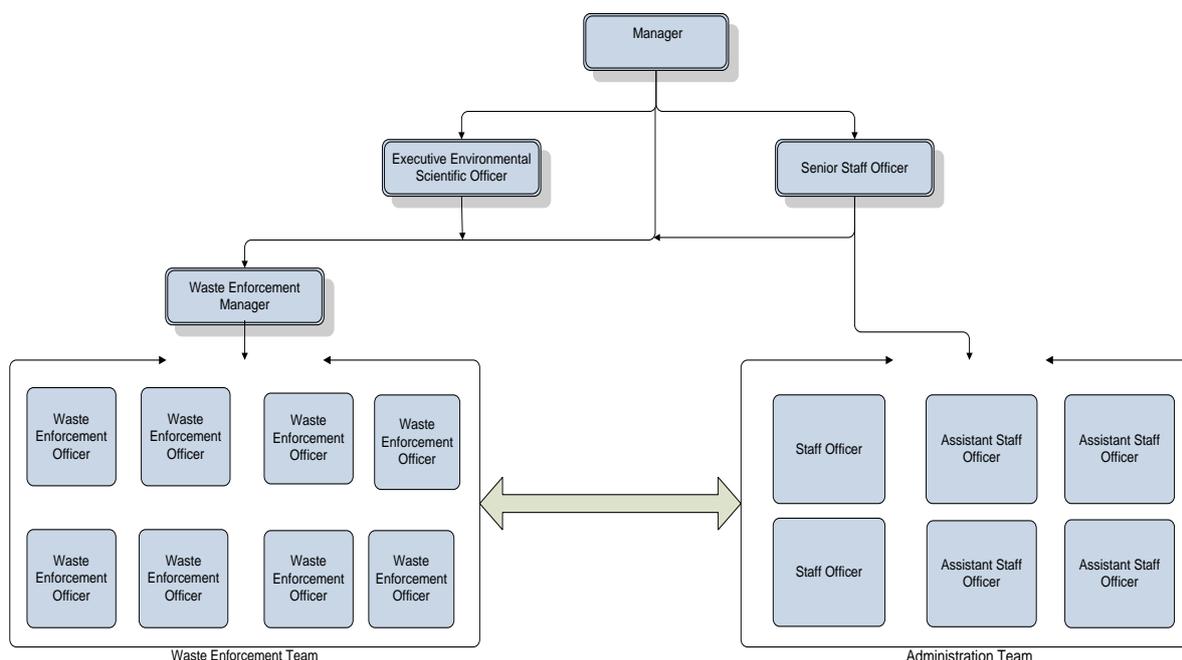


Figure 1. National TFS Office Structure

8.2 Administration Function

The administration team of eight staff consists of one Executive Environmental Scientific Officer, a Senior Staff Officers and six 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 transfrontier waste shipment reports; registration of waste brokers and dealers; invoicing; compiling statistical reports and dealing with general day-to-day queries.

8.3 Regulatory Function

The regulation of the EWSR is carried out by the Waste Enforcement Unit (WEU) of the NTFSO. Certification Europe Ltd. is contracted to Dublin City Council to provide a WEU consisting of eight Waste Enforcement Officers (WEO) for the NTFSO. The primary objective of the WEU is to ensure compliance with the EWSR by preventing illegal transfrontier waste shipments and by protecting the environment and human health from the risks associated with transfrontier waste shipments. Certification Europe Ltd. also supplies the NTFSO with a Waste Enforcement Unit Manager whose 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 transfrontier waste 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 counties. 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 counties. At the beginning of each calendar year, each WEO will set out an individual Operational Plan for each of their assigned counties. The Operational Plans contain specific details on planned routine enforcement activities and concerted actions for that county. The Operational Plans are agreed with the WEU Manager and make up the WEU's annual targets set out in this Waste Shipment Inspection Plan in Section 4.5.

8.4 Resources

Human Resources

- 1 full time administration manger
- 1 full time technical expert
- 4 full time administrative staff
- 1 part time administrative staff
- 2 part time staff specialise in the administration of WTFs
- 8 full time enforcement staff (2 based in Cork office)
- 1 part time enforcement unit manager
- 1 part time enforcement unit administrative assistant.

Financial Resources

The operation of the Administration and the Enforcement function NTFSO are resourced on a cost neutral basis through the published charging structure as set out below.

	Amber	Green	Amber + Green
Export Charges (€)			
Annual Administration Fee (fixed)	500	250	600
Tonnage Fee	2.50	0.60	
Glass		0.30	
Soil	0.30		
Bulk Shipment (a single waste shipment greater than or equal to 1,000 tonnes (for fee purposes). A notifier must declare at application/notification stage if a shipment is a bulk shipment)	0.30		
Import Charges (€)	Amber	Green	
Annual Administration Fee (fixed)per calendar year	500	500	
Shipment fee	25.00		
Repatriation Fee (€)			
Repatriation/direction to return amber or green list waste from Irish, EU or international ports	750 per returned shipment		
Registration Fee (€)			
Registration under Waste Management (Brokers and Dealers) Regulations 2008	Fee/Renewal Fee		
	200		
Refund Fee (€)			
Unused Tonnes notified; Cancelled Notifications	Administratio n of Refund Application		
	350		
Monitoring Fee (€) (from April 2012)	Amber and Green List Waste		
Investigations/Issuance of Written Directions for breaches of Amber notification procedures and consent conditions and Green List shipment procedures	350		
Waste Transfer Form Monitoring Fee(€) (from March 2016)	Fee		
Investigations/Issuance of Written Directions for breaches of Waste Transfer Form procedures	100		

Import Charges: The €25 fee applies to each shipment on a notification for Amber waste imports. No tonnage/shipment fees apply to the import of Green waste

Other Resources

Office Resources

- Dublin office
- Cork office
- Standard office equipment in both offices

Enforcement Unit

- 8 standard un-marked cars
- 2 laptops
- Mobile phones with internet access
- Digital cameras
- Standard Personal Protective Equipment (hi-visibility clothing, hard hat, boots, safety glasses, gloves etc.)
- Inspection mirrors
- Hydraulic and manual bolt cutters
- Container door straps
- Torches
- Binoculars
- Assorted tools
- First aid boxes

9. Enforcement

9.1 Enforcement Policy

Proportionality

When deciding on what enforcement action should be taken the NTFSO will consider the severity of the offence. In general terms there are two types of breach:

1. Minor breach – generally one of an administrative nature.
2. Major breach – generally one that poses a risk to the environment or human health.

The NTFSO's priority is to protect the environment and human health, any action taken will be proportionate to the severity of the breach. However, due to the nature and variety of illegal waste activities, each breach will be treated on a case-by-case basis. For example, repeated minor breaches of an administrative nature by the same offender may result in legal action or other actions been taken by the NTFSO to ensure compliance with the EWSR.

Consistency

We aim to be consistent in our approach to the enforcement of the EWSR and our response to breaches of the Regulations. Each WEO will follow the guidance set out in the Enforcement Policy and procedures laid out in the WEU's SOPs. Consideration will also be given to how similar situations were handled previously. We will continue to develop our approach to promote consistency in enforcing the Regulations by liaising with other Competent Authorities through the IMPEL Network and other national enforcing authorities e.g. EPA, An Garda Síochána and Customs & Revenue.

Transparency

To ensure compliance with the regulations, the NTFSO will engage with stakeholders to ensure they are aware of their regulatory requirements. Where appropriate we will:

- Provide an opportunity to discuss what is required to comply with the Regulations
- Issue written direction where action is required
- Issue written confirmation of any rights of appeal against formal enforcement action

The NTFSO has previously engaged with the stakeholders involved in the transfrontier shipment of used vehicles, used vehicle parts and used electrical and electronic equipment. In November 2014 the NTFSO published a *“Guide for Shipments of Used Vehicles, Vehicle Parts and Electrical Equipment”* to provide guidance and clarity in relation to transfrontier shipments of these items so that stakeholders had the required information so that they could meet the requirements of the EWSR.

Targeting

Enforcement activities are directed primarily at those that are non-compliant with the EWSR, in particular:

- major breaches of the Regulations
- consistent minor breaches of the Regulations

To ensure a targeted approach is taken to auditing and inspecting waste facilities and waste brokers and dealers, the NTFSO has developed a risk-based approach to these inspections using the following established criteria:

- Compliance record
- Exporting/importing status
- Location
- Waste quantities
- Waste type
- Motivation to Comply
- Housekeeping
- Intelligence Records

Polluter Pays Principle

Where possible the NTFSO will seek to recover its costs from those that breach the Regulations. To ensure proportionality the NTFSO apply “Monitoring Fees” and “Repatriation Fees” as enforcement tools.

The NTFSO’s Monitoring & Repatriation Fee Policy details specific incidents when these fees should be applied.

€750 repatriation fee

- A repatriation of a waste shipment.
- A direction to return a waste shipment to origin.

€350 monitoring fee

- Non-compliance with the waste shipment notification and consent procedures, which leads to an enforcement investigation and issuance of a warning/ direction letter.
- Non-compliance with the Green List Waste shipment procedures which leads to an enforcement investigation and issuance of a warning/ direction letter.

€100 monitoring fee

- Non-compliance with WTF procedures leading to an enforcement investigation and the issuance of a direction letter.

The monitoring fees are generally applied in instances where no prosecution is likely to be initiated. However, the NTFSO reserves the right to take legal action if it is warranted in certain circumstances, such as for repeated breaches of the Regulations or in relation to non-compliance with directions issued.

9.2 Other Sanctions

There are a range of other sanctions available to the NTFSO that can be employed to take action against unauthorised waste activity. Where relevant the NTFSO will use a combination of these to ensure that the objectives of the enforcement policy are met, these include:

- Where necessary NTFSO will seek to obtain an injunction against persons involved in unauthorised waste activities and to recover the costs for works it completes to cease ongoing pollution from an unauthorised waste activity.
- NTFSO may seek that the Courts apply civil penalties where there is sufficient evidence of one or more of the following:
 - Blatant disregard for or a significant degree of indifference to the civil law by the illegal operator;

- The illegal waste activity has resulted in or had the potential to result in significant real harm or detriment to the state or the community, including substantial harm to the environment, cultural heritage, economy, resources, assets or well-being of the state or its citizens; or
- It is of such a nature or magnitude that it is important to deter other potential contraveners and/or to educate the public.

9.3 Serious Enforcement Issues

Senior management of the NTFSO will be informed if any of the following circumstances arise:

- Any incidents of an illegal waste import/ export;
- Incidents or non-compliances which have significant consequences for the environment or which have the potential for such consequences;
- Repeated and persistent non-compliances with the WSR;
- Repeated and persistent non-compliances with the Waste Management (Registration of Brokers & Dealers) Regulations 2008, and
- Failure to supply information or reports over long periods without reasonable excuse or knowingly supplying false or misleading information.

Prompt action must be taken in relation to serious non-compliance issues. The WEOs are responsible for taking follow up actions and for making recommendations on appropriate enforcement actions to senior management in accordance with the Enforcement Policy. If a transfrontier shipment of waste poses an environmental risk that requires immediate action then the relevant persons will be given a verbal direction to take specific action to minimise the current environmental risk. This verbal direction will be followed up in writing at the earliest opportunity. Decisions in relation to the enforcement action in these circumstances will be taken based on the recommendation of the investigating WEO and in consultation with senior NTFSO management.

10. Monitoring and Reporting

The NTFSO realises the importance of an appropriate monitoring regime to ensure the efficient and effective delivery of the Waste Shipment Inspection Plan 2017 -2019. The outcomes of this plan will be achieved by:

- Daily Monitoring of activities.
- Routine performance management reviews with individual officers.
- Overall monitoring of operational and strategic plan delivery.

The NTFSO reviews its performance at the end of each year against the stated operational and strategic objectives. The yearly performance review will focus on the effectiveness of the enforcement actions taken and the progress of the medium term strategic projects outlined in this plan.

Appendix A - Strategic Projects

The role of the NTFSO as an environmental regulator is continually evolving as legislation changes and new EU and national policy is drafted. The enforcement strategy of the NTFSO must also adapt in line with new legislation and the changes occurring within the waste industry while taking into account how waste is shipped. The NTFSO WEOs must adapt to these changes to ensure they have the tools to be effective when enforcing the regulations. Information and interpretation of available data allows the WEU focus its limited resources on those waste shipments most in need of regulation. The Strategic Plan adopted for the period from 2015 -2017 sees the development of a number of projects to enable the Enforcement Strategy achieve its goals.

Seven projects have been selected as policy actions and will be developed over the next 3 year period, 2017 to 2019. These policy actions will be developed by the WEU in conjunction with the NTFSO, and other stakeholders. Each of the seven projects will be managed by a WEO who will put together the project teams and manage the project throughout its lifecycle. The WEU Manager will oversee each of these projects to ensure that there is continual progress as per the agreed project schedules and that each project retains its focus. The seven policy action projects are:

1. E-manifest Project
2. Shipment of Used Goods Project
3. Information Gathering & Data Management Project
4. Waste Flows & Mapping Project
5. Risk-based Inspections Project
6. Measuring Enforcement Effectiveness Project
7. Strategy Coordination Project

Each of these policy actions will be managed by a WEO involving a team of officers and NTFSO personnel and other relevant stakeholders to achieve the project's objective. The Enforcement Strategy as outlined above forms a key part of the training and development of the WEU team and these policy actions will not only benefit individual officers but will also develop the team and enhance the effectiveness and the efficiency of the WEU and the NTFSO in general.

E-manifest Project

Policy action	Develop systems and procedures in preparation for the supply of electronic copies of shipping manifests from Customs.
Targets	WEU to extract and analyse this information to inform and guide enforcement activities.
Expected Timeline	Ongoing development work in 2017 & 2018. Q1 of 2018 initial phase goes live.
Indicator	By the end of Q2 2017 complete a pilot & test prior to live role out of project to WEU in Q3 of 2017. Review and amend if required by end of 2017.
Responsibility	WEU
Key Stakeholder	DCC, Customs, IMPEL.

Shipment of Used Goods Project

Policy action	Standardisation of the national monitoring for shipments of used EEE and used vehicles through improved data management, follow-up procedures and identification of pro-active enforcement techniques
Targets	To monitor effective use of NTFSO resources. Reduce the risk from illegal waste shipments through targeted inspections on shipments and the source of these shipments. To assist regional and local authority objectives.
Expected Timeline	Q3 2017
Indicator	Q1 2017 complete review and obtain regional and national clarification of enforcement priorities and policy. Draft follow-up and enforcement procedures and following consultation with stakeholders implement these follow-up and enforcement procedures.
Responsibility	WEU
Key Stakeholder	Regional Offices, Customs & Revenue, DCCAE, Compliance Schemes, An Garda Síochána and Local Authorities.

Information Gathering & Data Management Project

Policy action	Develop systems to gather and manage information on potential illegal waste shipments to guide enforcement activities and resources.
Targets	To develop target based effective enforcement activities to optimise NTFSO resources.
Expected Timeline	Q1-Q2 2019
Indicator	End of Q2 2017 establish information and data sources and the techniques that will be used and establish IT and other resource requirements. Q3 2017 to end of Q1 In 2018 develop a data and information management system pilot so that by the end of 2018 pilot system can be developed and tested.
Responsibility	WEU
Key Stakeholder	IS DCC, Regional Offices, IMPEL

Waste Flows & Mapping Project

Policy action	Use of mapping tools to identify the road, sea and air routes used to import, export and the transit of different waste types. Further develop existing maps with NTFSO data to explore links between facilities and potential routes for different waste types.
Targets	Effective use of resources through targeted risk-based and informed enforcement actions.
Expected Timeline	Q2 2018
Indicator	By end Q2 2017 complete an evaluation of existing mapping tools and identify gaps in data when compared to NTFSO data. Evaluate existing mapping tool to ensure all WEO requirements are satisfied and adapt as required. Q 1 2018 test filters and run trials on data extracted from mapping tool. Q2 of 2018 use information to direct enforcement activities and by end of 2018 incorporate e-manifest information into mapping.
Responsibility	WEU
Key Stakeholder	IS DCC, NIEA, EPA, Regional Offices, Customs

Risk-based Inspections Project

<p>Policy action</p>	<p>Part 1. Develop a methodology to identify specific waste shipments; waste streams; destinations and exporters when shipments are awaiting onward shipment from any of the country's seaports.</p> <p>Part 2. Develop a system to identify low risk sites and evaluate the existing risk-based analysis used to set priorities when planning facility inspections and audits.</p>
<p>Targets</p>	<p>Target illegal waste shipment activities to improve effectiveness of NTFSO. Improved identification of high risk and low risk sites and activities to develop the regulatory strategies that will be applied to both. Remove the burden of unnecessary inspections/audits from compliant/low risk stakeholders.</p>
<p>Expected Timeline</p>	<p>Q4 2017</p>
<p>Indicator</p>	<p>By end of Q1 2017 identify existing information, gaps and information needed from other policy action projects and evaluate to develop a risk matrix. By end of 2017 develop risk-based inspection tool, trial inspections and review and evaluate against current random inspection procedures. Introduce risk-based port and site inspections methods for planning 2018 inspections and enforcement activities. By the end of 2018 complete review of the effectiveness of the new risk assessment method.</p>
<p>Responsibility</p>	<p>WEU</p>
<p>Key Stakeholder</p>	<p>Regional Offices, DCCAE, EPA</p>

Measuring Enforcement Effectiveness Project

Policy action	Develop a procedure to measure the effectiveness of the NTFSO's waste enforcement activities.
Targets	Improve NTFSO resource efficiency and inform future enforcement policy and activities.
Expected Timeline	Q4 2017
Indicator	By the end of 2016 complete the background stage of gathering information and evaluating existing methods used to evaluate enforcement effectiveness. In 2017 develop the methods and processes that will be used in the NTFSO used to evaluate enforcement effectiveness. In 2017 start to measure enforcement effectiveness.
Responsibility	WEU
Key Stakeholder	WEU, DCC, DCCAE.

Strategy Coordination Project

Policy action	To monitor the progress of each of the other projects No. 1 to No. 6 as detailed above.
Targets	To ensure each project remains focused on its objective and on schedule.
Expected Timeline	Q4 2019
Indicator	By end of Q1 2017 have all projects defined, project teams assigned and project plans established. Quarterly meetings with each project manager/team to ensure that the project remains focused on policy action objective and on schedule.
Responsibility	WEU
Key Stakeholder	WEU, DCC.

Appendix B – Waste Risk Assessment

In consideration of the environmental risks associated with a waste, the NTFSO rate each wastes by type in relation to effects and probabilities of an environmental risk. Each effect and probability is rated from 1 to 3 (1 being low and 3 high) under the following headings:

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 C – 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

List of Abbreviations

DCC	Dublin City Council
DCCAE	Department of Communications, Climate Action & Environment
EPA	Environmental Protection Agency
EC	European Commission
ELVs	End-of-Life Vehicles
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	Mixed Municipal Waste
NIEA	Northern Ireland Environment Agency
NTFSO	National Transfrontier Shipments of Waste Office
RDF	Refuse Derived Fuel
SAIS	Supreme Audit Institutions
WEEE	Waste Electrical & Electronic Equipment
WERLA	Waste Enforcement Regional Lead Authority
WEO	Waste Enforcement Officer
WEU	Waste Enforcement Unit
WSR	Waste Management (Shipments of Waste) Regulations 2007
WTF	Waste Transfer Form

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