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21st January 2021

Public Consultation on the Implementation of the UNECE Aarhus Convention and PRTR Protocol in Ireland

The EPA welcomes the opportunity to participate in the Public Consultation on the Implementation of the UNECE Aarhus Convention and PRTR Protocol in Ireland. The EPA has reviewed the Aarhus National Implementation Report 2020 and the PRTR National Implementation Report 2020 and would like to make the following observations.

National Implementation Report on the Aarhus Convention

Industrial Licensing Process – Public Participation

In relation to public participation in the Industrial Licensing Process, the role of the EPA is outlined in the most recent State of the Environment Report 2020 published in November 2020 and is set out below.

Before the EPA can decide on a licence application, the Agency must carry out a thorough assessment of the application. This includes, in many cases, an environmental impact assessment (EIA) as required under the EIA Directive, and an appropriate assessment as required under the Habitats Directive. The assessment process is multidisciplinary, involving specialists from different environmental areas such as noise, air emissions, and so forth. Prediction modelling is also undertaken to determine local environmental impacts. Public participation and consultation with statutory consultees are central elements of the EPA licence assessment process. If deemed appropriate, an IED licence may be issued with conditions to prevent, reduce and eliminate emissions into air, water and soil as far as possible. The IED promotes the use of techniques that reduce pollutant emissions and that are energy and resource efficient.

The Industrial Emissions Directive ensures that the public has a right to participate in the decision-making process and be informed of its decisions and assessments by having access to licence applications, licences and the results of the monitoring of releases. On the EPA's website each installation has a homepage from where key information can be viewed, such as the licence application, licence(s), correspondence regarding the licence application and inspection, and other enforcement reports (see Figure 10.2 for a flowchart of the licensing process).

December 2017, all applications are received on line. In 2020 there has been 715,314 page views and 394,774 unique page views of the Industrial Emissions (IE) /IPC web pages. In 2020, there were 223,503 and 118,232 page views of the wastewater and waste web pages, respectively. By the end of 2020 there were over 4,902 submissions received from the public using the user-interface.

Other relevant information available on the EPA website include

- Waste applications received since December 2004 and all Inspectors' reports and licences issued to-date at [Search for a Waste Licence](#)
- VOC applications and related documents received since January 2007 at [VOC Information](#)
- Dumping at Sea (DaS) applications and related documents received since February 2010 at [DaS Information](#)
- Waste Water Discharge applications (WWD) received since December 2007 at [Search for a Waste Water Discharge Authorisation](#)
- Historic Landfill applications and related documents received since May 2009 at [Historic Landfill Closed Landfill Certificate of Authorisation](#)
- Medium Combustion Plant Registrations issued since January 2019 <http://www.epa.ie/mcp/#/register>
- Greenhouse Gas Permits <http://www.epa.ie/climate/emissionstradingoverview/etscheme/accesstocurrentpermits/>

PRTR National Implementation Report

The EPA worked with DECC in August/September to assist in the provision of information for this report. Since we worked with DECC on this report, the EPA has launched a new PRTR GIS website and submitted the most recent report for 2019 to the Commission. As a result of this some of the links and information in the report can now be updated. The EPA has reviewed the report and recommends that the following urls be updated:

- Page 5 (top) – change the url for the Irish PRTR website from <http://prtr.epa.ie/map/default.aspx> to <https://gis.epa.ie/EPAMaps/PRTR>
- Page 7 (end – section f) – update this section to reflect new website available and include the new url <https://gis.epa.ie/EPAMaps/PRTR>
- Page 8 (middle) – the <http://www.unece.org/env/pp/prtr.html> url is mentioned twice.
- Page 8 (end) – the NPWS url doesn't appear to be working – maybe use <https://www.npws.ie/maps-and-data>
- Page 13 (mid) – propose updating the link to the PRTR guidance (<http://www.epa.ie/enforcement/prtr/operator/>) to the EPR guidance section <http://www.epa.ie/enforcement/epr/>
- Page 14 (mid) – propose updating the link to the PRTR guidance (<http://www.epa.ie/enforcement/prtr/operator/>) to the EPR guidance section <http://www.epa.ie/enforcement/epr/>
- Page 16 (top) – update the PRTR website url to <https://gis.epa.ie/EPAMaps/PRTR> and the guidance link to <http://www.epa.ie/enforcement/epr/>
- Page 18 (top) – remove the url “<http://prtr.epa.ie/Contact.aspx>”
- Page 21 (end – section 15a) – replace the <http://www.epa.ie/pubs/advice/aerprtr/> url with the EPR reporting guidance page <http://www.epa.ie/enforcement/epr/>
- Page 22 – update the url for Irish PRTR website to <https://gis.epa.ie/EPAMaps/PRTR> (2 instances).

- Page 22 – update the url for Irish PRTR website to <https://gis.epa.ie/EPAMaps/PRTR> (2 instances).

Arising from the publication of the new PRTR GIS website and the submission of the most recent report to the Commission the following further changes are suggested:

- Page 5 (top) – the text currently reads “The EPA are currently finalising a new PRTR GIS Map to display the PRTR data”. This has now gone live so we suggest this is changed to: “In November 2020, the EPA launched a new PRTR GIS Map to display the PRTR data”.
- Page 6 (end – section e) – propose removing the sentence “This section also explains the map tools and the facility report”.
- Page 6 (end – section e) – change the current Year choice from “2007-2017” to 2009-2018”.
- Page 6 (end – section e) – remove the “River Basin District” bullet point.
- Page 6 (end – section e) – in the final bullet point, clarify that the new PRTR GSI website is now publicly-available. This entire section could do with a refresh to reflect the new website rather than the old.
- Page 13 (end) – correct the date the online form was launched from February 2020 to February 2019.
- Page 14 – correct the date the online form was launched from February 2020 to February 2019 (2 instances).

Yours sincerely



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Appendix

The National Dialogue on Climate Action; role in public participation in climate action

The National Dialogue on Climate Action is a Government of Ireland initiative led by the Department of Environment, Climate and Communications (DECC) with secretariat support provided by the EPA. The NDCA was launched (for an initial 2 year pilot phase) in March 2017.

The vision of the Dialogue is to create a long- term process by which the national objective of transitioning to a low carbon, climate resilient society and economy by 2050 is communicated to all of society in a manner that creates awareness and understanding towards enabling climate actions across all of society and the economy.

The purpose of the Dialogue is to create an enduring process of widespread engagement on climate action to support the national transition objective and the Climate Action Plan (2019).

The NDCA has three key objectives that will address the spectrum of public engagement and deliberation:

- Create awareness, understanding and engagement on climate change
- Motivate and enable climate action at the level of communities and citizens
- Empower citizens to have conversations on climate action and to inform policy responses.

The operational objectives are to:

- Create structures and information flows to facilitate people gathering to discuss, deliberate and maximise consensus on appropriate responses to these challenges, and to enable and empower appropriate action.
- Establish, on a long term basis, appropriate networks for people to meet periodically to consider evidence-based inputs on the economic, social, behavioural, environmental and public aspects of climate and energy policy
- Provide regular input, through the NDCA, into the prioritisation and implementation of climate and energy policy which can be reported and monitored at local/regional/national levels

Delivery on key objectives

To support the delivery of the key objectives a series of regional and local meetings were conducted during the period 2018-2019 in support of raising awareness, engagement and climate action.

The evidence base was developed through research, workshops, seminars, climate lectures, climate conference, support of local events and social media campaigns.

Network and capacity building was an ongoing priority, which included institutional partnering, building relationships with environmental partners, the arts, culture and heritage sectors. Other relevant relationships included community groups and the youth sector.

The lessons learned from the pilot phase are now being solidified through the development of an enduring structure for the NDCA. This structure will link the local to the national level and allow for information flows between government and citizens, they will also facilitate greater public participation in climate policy decision making and design.

The NDCA continue to focus on the key objectives of awareness raising, engagement and climate action. The evidence base will continue to be developed in support of understanding audiences, messaging/framing, etc.