



## **Advisory Group on a ‘Waste Action Plan for a Circular Economy’**

**Sixth Meeting, 11:00 am, Wednesday 29 April 2020 –  
Waste Enforcement**

**Virtual Meeting via Zoom**

### **1. Welcome and Introduction**

Philip Nugent opened the meeting and welcomed all those participating. He outlined how waste enforcement in Ireland has changed significantly in the last 20 years having gone from a mainly “fire-fighting” role to its current role of managing unauthorised activities while seeking to provide a level playing field for all operators. He noted that proper enforcement would be important in terms of meeting our EU waste targets.

Two of the most important developments in terms of enforcement infrastructure in this 20 year period have been the establishment of the Office of Environmental Enforcement (OEE) within the EPA, arising from the C/494 case, and, in more recent years the establishment of the Waste Enforcement Regional Lead Authorities (WERLAs) to coordinate and drive effective enforcement.

### **2. Presentations**

David Pollard of the OEE and Nick Bond of the Southern WERLA gave presentations on their respective areas of work and the wider waste enforcement environment.

### 3. Discussion highlights and comments

- Conor Walsh, on behalf of the IWMA, raised a number of issues the IWMA has with current enforcement regime and its priorities. In particular they feel that EPA resources would be better directed towards licensing/End of Waste/By-Product areas and away from enforcement of what they feel is among the best waste management industries in the world in terms of control and compliance. An email summarising the points raised will be circulated to the Group after the meeting. In response the EPA noted that additional resources have been allocated to the Article 28 area and that they are happy to engage directly with the waste industry on enforcement matters. They agreed that overall standards are very good however they still receive complaints regarding issues such as odours which drive their site visit and enforcement activities.
- Waste collectors can currently have their permit revoked if they are not complying with the terms of their permit. The question was discussed of whether other administrative sanctions should be considered as an additional enforcement tool for those not operating within their licence/permit.
- Following Nick Bond's presentation there was discussion on whether existing local authority enforcement resources are sufficient to adequately manage their enforcement burden including complaints, inspections, enforcement of bye-laws and prosecutions. DCCAE noted that the average number of active enforcement officers on the ground is between 145/150 enforcement officers. In addition to this there are the current 15 WERLA staff which will shortly increase to over 30.
- In a discussion on the banning of cash transactions at metal recycling facilities DCCAE noted that this is under active consideration but that primary legislation would be required for its introduction. This has been implemented in a number of other jurisdictions therefore there should be information available on its impact.
- The establishment of the WERLAs in 2016 was welcomed and it was noted that they have complimented the work of the EPA and LA sector

and brought a level of consistency previously not seen. However it was felt that there is a need for greater data and intelligence sharing between all bodies involved in the sector. The WERLAs confirmed that enhanced data collation and sharing is a priority for them and that they are engaged in this.

- The potential for supply chains (public procurement/public grant approvals) assisting in compliance was discussed i.e. encourage market driven policies rather than focusing on exclusively enforcement driven policies?
- The introduction of a visible waste cost fee at the point of purchase was discussed - this fee could provide required levels of funding to enforcement sector, would support the polluter pays principle and remove financial incentives for illegal dumping.....waste collection would then be free at point of disposal having already been paid for at point of purchase.
- Are further awareness raising measures needed for householders to ensure they only use authorised collectors to dispose of their waste? In this regard DCCAE noted that a national advertising campaign was just about to commence emphasising the use of authorised collectors and outlining the impact of illegal dumping on our environment, particularly in the current Covid-19 climate.
- Niall McLoughlin of DCCAE brought the meeting to a close by thanking all involved for their contributions and reminding members that as usual any further comments would be welcomed and can be submitted to [Paula.OToole@dccae.gov.ie](mailto:Paula.OToole@dccae.gov.ie) or [Denis.Dunne@dccae.gov.ie](mailto:Denis.Dunne@dccae.gov.ie) .

#### **4. Next Meeting**

Next meeting which will discuss the issue of construction and demolition waste will take place at 11:00 am on Thursday 7 May again via the Zoom application with a discussion note to issue in advance.