



ENVIRONMENTAL PROTECTION AGENCY

AER DRAFT GUIDANCE DOCUMENT:

ANNUAL ENVIRONMENTAL REPORT:

**STANDARDISED REPORTING GUIDANCE FOR ALL IE, IPC
(EXCLUDING INTENSIVE AGRICULTURE) AND WASTE
LICENCES**

For use in reporting of:

- 1 Summary information on Environmental Management and Performance in the Annual Environmental Report**
- 2 Interpretation of Licence specific reports required for inclusion in the Annual Environmental Report**

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For EPA-licensed facilities, please note the following updates for 2018 AER reporting:

- The AER can be completed using the templates available on the EPA website at <http://www.epa.ie/pubs/advice/aerprtr/aerguid/>.
- Use of the templates is not mandatory for 2018 data reporting.
- There is no requirement to include a copy of the PRTR return in the AER.

The completed AER should be saved as a **PDF file** and uploaded through the **EDEN portal** as a **Return**.

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General Introduction

This document is addressed to operators in the IE, IPC (with the exception of the intensive Agriculture sector) and Waste sector required to submit an Annual Environmental Report to the EPA as part of their EPA Licence requirements. It replaces Guidance Note for Annual Environmental Report, published in 2013. Separate guidance has been developed for the urban waste water discharge authorised and intensive agriculture facilities.

The Annual Environmental Report (AER) is a requirement for all EPA licensed facilities. The Environmental Protection Agency is currently standardising the content of AER's to collect only relevant, interpreted data. The content of the AER should give a concise summary of the environmental performance of the site for the reporting year as well as a record of on-going improvements on the licensed site.

The goals of AER standardisation are as follows:

- provide inspectors with a concise environmental performance and compliance report
- to reduce the reporting burden on licensees where feasible
- provide EPA with facility and sectoral outcomes
- provide the public with a clear environmental performance report

This guidance document is intended to assist in standardising the reporting format of the Annual Environmental Report (AER). The proposed format for reporting annual environmental information is contained in a series of templates prepared by the Agency. We encourage licensees to provide only the information requested in these templates. Full reports e.g. noise, groundwater, ELRA etc should be uploaded through the EDEN reporting portal (support information on this process is available at <https://www.edenireland.ie>) as well as retained on-site so as to be available if requested by inspectors during audits or inspections. If a report is not required to be addressed under the AER template, then this should be submitted to the Agency by way of a Licensee Return, some examples include but are not exclusive to; Ash analysis, Summary of Meat and Bonemeal (MBM), Biomass and Peat usage for the year, peaking plant operational hours, Quality Assurance Level (QAL) or Annual Surveillance Testing (AST) reports. **It is the licensee's responsibility to ensure that all information required by the agency is submitted either as part of the AER or as a licensee return on EDEN.**

Examples of material **not required** in the AER are outlined in Table 1 below.

Table 1

The following is a non-exhaustive list of items which **the EPA does NOT want to be included in the AER;**

- Full analysis, testing and sampling reports
- Photos
- Calibration certificates
- Detailed history of Environmental Management Programme initiatives
- Training certificates
- Handwritten checklists
- Graphical displays of information (unless requested)
- Requests for approval e.g. for alteration or reconstruction in respect of the activity as stated in condition 1 of your licence.

Definitions:

“Reporting Year”

The AER “Reporting year” runs from the 01st of January to 31st December of the year directly preceding the Annual Environmental Report submission deadline e.g. in 2019 the AER returns will be submitted for the reporting year 01st January to 31st December 2018.

“Previous reporting year”

This refers to the 01st January to 31st December of the year before the “Reporting year” e.g. in 2019 templates, “previous reporting year” refers to 01st January to 31st December 2017.

Chapter 1 Introduction to AER and Annual Reporting of Environmental Information

1.1 *Annual environmental information reporting:*

The requirements for reporting of Annual Environmental Information ¹arise under the terms of individual EPA licences issued under the EPA Acts 1992 – 2008, the Waste Management Acts 1996 – 2008, the Waste Water Discharge (authorisation) Regulations S.I. 684 of 2007 and other legislation.

The annual reporting of environmental information by licensed facility operators requires submission of an electronic “pdf”² copy of the AER as a return via the EDEN portal.

The reporting obligation will not be satisfied until the EPA has verified the AER for content and published it on the EPA website.

1.2 *Guidance for collating and reporting annual environmental information*

The EPA has developed a series of Guidance Documents to assist facility operators in making their Annual Environmental Information returns.

These guidance Documents are all available on the EPA website www.epa.ie.

1. Reporting Guidance Requirements
2. [PDF AER Guidance](#)
3. [Sector Specific Guidance](#)

Reasons why the EPA will reject an AER

¹ This applies to Annual Reporting only; this does not supersede or render inapplicable the requirements in the facility licence for other regular reporting, e.g. returns of monitoring data, progress reports, waste records etc.

² Electronic, fully searchable/read-only, PDF Formatted Text and Graphics (also known as PDF Normal).

When the AER is submitted electronically the document will be checked before it is published on the EPA website. If there is a problem with the AER it will be rejected and the facility will be sent an email from the database stating the reasons why the AER has been rejected. Reasons for rejecting the AER include the following:

- The **AER is not legible** – e.g. print is faint, blurred, blackened out, too small, print layout has not been adjusted before creating a PDF, pages up-side down, sideways and not in the correct order.
- **Pages/Sections missing** – No cover sheet with facility name and reporting year included, No Table of Contents, Appendices not attached.
- Contains GDPR restricted information (e.g. 3rd party data)

Any queries on the layout of the AER should be directed to the Office of Environmental Enforcement – Licence Enforcement Administration at 053-9160600 or edensupport@epa.ie.

How to use this guidance:

Relevant guidance documents to assist in compiling information and templates are linked **within** this document. The guidance and templates are identifiable as blue underlined text. When you click on the link the document will open.

Saving Excel templates as PDF document for submission

For facilities that choose to submit their AER using the templates provided, submission will require that they complete the templates in excel format and save the completed documents as PDF. The templates are available as one excel workbook with individual templates on tabs along the bottom of the workbook. This workbook will need to be saved as PDF (please ensure all tabs are selected along the bottom of the workbook i.e hold down shift key and click on tabs so that all are highlighted before saving as PDF).

Before you PDF your excel templates CHECK that all data is visible in the cells and if it is not increase the cell size to make it legible.

To submit, log on to the EDEN portal and follow normal procedure for uploading the AER PDF as a return.

Chapter 2: Sector specific report summaries and templates

Templates linked in the text below contain questions and tables which must be completed and submitted. Instructions for completing individual templates are contained within the excel worksheets. **Please note there is a requirement for licensees to interpret results, when they are being reported. This is facilitated through the additional information and comment boxes within the templates.**

Please note **not** all facilities will need to complete all templates or all parts of every template.

Please read the questions within the templates carefully to determine which sections of the template you need to complete. Templates have been designed so that most commonly completed sections are at the beginning of the template and more detailed licence specific information is asked for in consecutive sections; however it is the responsibility of each facility to check their licence and complete the sections relevant to them.

Please note additional information may be requested by the EPA Inspector for the site.

Templates can be downloaded by clicking on the link; [AER summary templates for IE, IPC and Waste](#)

Facility Information Summary

The Facility Information summary will be required of all facilities regardless of sector and shall include the following:

- The licence register number
- The name and location of the site;
- NACE code and Class of Activity; A **brief** description of the activities/process at the site for the reporting year. This should include information such as production increases or decreases on site, any infrastructural changes, environmental performance improvements which were measured during the reporting year;
- National Grid Reference (6E, 6N)

The brief description of site activities section should be used to summarise and highlight any relevant information contained in the monitoring results or licence reports.

Emissions to Air

The Agency has produced a series of auxiliary guidance documents specific to air monitoring and improving the quality of results these are available [here](#).

Periodic (discontinuous) monitoring is monitoring which is undertaken by the licensee at a frequency outlined in the licence e.g. quarterly, biannually, monthly etc. A summary of this data is to be reported in Table A1 of the template. Volumetric flow should also be recorded in the emissions table (Table A1).

Continuous monitoring is monitoring which is undertaken by the licensee on a continuous basis using in-situ monitors. A summary of this data should be recorded in Table A2 of the template.

The template contains a table to record Abatement system bypasses Table A3 and the Agency Protocol for the Bypass of Air Emissions Abatement Equipment is linked within the template.

Where a facility has a limit of emissions of volatile organic compounds due to the use of organic solvents in certain activities³ they are required to complete Tables A4 and/or A5.

How to report results: tabulate all parameters monitored at licenced emission points in the format provided so that compliance with the licence is demonstrated. Where all emission points have the same ELV and are in compliance with such, it is acceptable to report them together in one row, it must be clear that you are referring to a number of equivalent emission points. Where different ELV's apply or one emission point is not compliant this must be reported separately.

Continuous and Non-continuous Monitoring:

³<http://www.epa.ie/pubs/legislation/air/solvents/euinstallationsandactivitiesusingorganicsolventsregulations2012.html>

Where monitoring returns are submitted separately to the Agency, only annualised data for each parameter should be input/ recorded in the AER.

Where monitoring returns are only submitted on an annual basis, as part of the AER, the monthly averaged data (e.g. where the licence stipulates monthly monitoring) should be input/recorded, for each licensed parameter. Where quarterly/biannual or other frequency is a licence requirement, AER monitoring data should be reported as such.

The percentage change in mass emission from the previous year should be calculated and a reason for the change should be incorporated into the comment box. All monitoring returns shall be maintained on site and uploaded through the EDEN portal.

Emissions to Water/Wastewater

In cases where a site does not have licenced emissions to water or wastewater, only the monitoring of surface /storm waters should be reported by completing Table W1 where required by the licence. A summary of contamination issues noted during visual inspections of surface water bodies should be recorded in Table W2 if this is a licence requirement.

A licenced emission of process effluent, if generated by the facility, should be reported under direct emissions to sewer or direct emissions to water in Table W3 depending on the exit route of the effluent e.g. if effluent drains to foul sewer it is reported as an emission to sewer, if it drains to a water course or surface water drain it is reportable as an emission to water.

Continuous monitoring is monitoring which is undertaken by the licensee on a continuous basis usually using in-situ monitors. This should be recorded as a summary of the average emissions in Table W4 of the template.

Where abatement systems are in place for emissions to water or wastewater please record any bypass in Table W5 of the template

Continuous and Non-continuous Monitoring:

Where monitoring returns are submitted separately to the Agency, only annualised data for each parameter should be input/ recorded in the AER.

Where monitoring returns are only submitted on an annual basis, as part of the AER, the monthly averaged data (e.g. where the licence stipulates monthly monitoring) should be input/ recorded, for each licensed parameter. Where quarterly/biannual or other frequency is a licence requirement, AER monitoring data should be reported as such.

The percentage change in mass emission from the previous year should be calculated and a reason for the change should be incorporated into the comment box.

For parameters such as pH and temperature there is not a requirement to report percentage change in mass emissions as it is not possible to report mass emissions for these parameters.

All monitoring returns shall be maintained on site and uploaded through the EDEN portal.

Chapter 3: Licence Specific Report summaries and templates

Bund/Tank/Pipeline integrity testing

Testing of all underground pipes, all tanks, bunding structures and containers including firewater retention structures should be carried out according with licence conditions. Guidance has been published by the Agency in relation to [Storage and Transfer of Materials for Scheduled Activities](#).

Please answer all questions and complete the Bund/Pipeline summary template as required. **The template requires that only new bunds and test failures are reported i.e. that a site reports by exception rather than including all bund and pipeline tests in the template.** Sites will still be required to demonstrate that all structures are within the test period specified by the Agency. A written record of all integrity tests and any maintenance or remedial work arising from them shall be maintained by the licensee on site and reported through the EDEN portal and shall not be required as part of the AER.

Groundwater/Contaminated Land

Groundwater and soil monitoring information should be reviewed and representative results presented in the tables provided in this template. A realistic number (one or more) up-gradient and down-gradient monitoring wells which are most illustrative of the groundwater situation on site will be required for reporting in the groundwater section. **Please note an interpretation of the results is a requirement of the AER and should be included in the section provided, or as an additional section inserted into the AER if additional space is required.**

Where monitoring indicates exceedance of groundwater (and/or soil) standards/generic assessment criteria (GAC) or an upward trend in results for a substance, then the Groundwater Monitoring Guideline Template Report at the following [link](#) should be completed and submitted separately through EDEN as a licensee return unless otherwise instructed by the EPA.

More information on the use of soil and groundwater standards/GAC and risk assessment tools is available in the [Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites](#) (EPA, 2013) and associated [Guideline Template Reports](#). The guidance and guideline template reports should be referred to and used when reporting to the EPA on contaminated land and groundwater issues at sites.

Environmental Liability Risk Assessment ELRA/Closure Restoration Aftercare management Plan CRAMP/Restoration Management Plan RMP/Financial Provision FP

This is a complex assessment of a site and the AER requires only the summary information requested in the template as an annual update to the ELRA and CRAMP/RMP. If any additional information beneficial to the assessment of this aspect of the facility is necessary please include the information in the additional information section. Guidance on Environmental Liability Regulations is available [here](#).

The full ELRA, CRAMP, RMP, FP documents should be uploaded via the EDEN portal for assessment and a copy maintained on site for review at site inspections.

Environmental Management Programme (EMP)/Continuous improvement

This section should contain on-going and completed projects that address the most pressing or significant environmental issues or environmental risks on site and the measures in place to mitigate these issues/risks. Assessing the significance of environmental aspects and impacts will help in decisions on what the key environmental issues are on the site, and how to make effective use of resources by focusing on areas of high risk or most benefit.

A clear link should exist between environmental objectives and targets and issues highlighted by on-going monitoring and testing on site.

- An objective outlines the overarching aims of the site with regards to improving environmental performance. A selection of objectives is available in the dropdown list within the template.
- A target is specific to one environmental issue which has been identified as significant on site; you may have several targets within one objective. Targets should be SMART i.e. Specific, Measurable, Achievable, Realistic and Timebound.

Noise

Where noise monitoring is a licence requirement for the facility please answer the questions and complete the table in the noise template. Please refer to [Guidance note for Noise:NG4](#) to assist in completing this template. The AER requires a summary of the interpretation of the noise monitoring report and the full noise monitoring report should be uploaded through the EDEN portal and a copy maintained on site for examination during site inspections.

Resource Usage/Energy Efficiency/Waste Reduction

The AER requires that the resources used on site are reported, this includes fuel, electricity and water. A demonstration of measures to conserve energy and resources is also required in this template. A supporting guidance note on [Energy Efficiency auditing](#) has been produced by the Agency.

A comparison of resource usage to overall site production is desirable if available to account for increases and decreases in production and other variables on site. Where the energy efficiency audit is updated annually this template requires that only updated information is reported.

Summary of Complaints/Incidents

Guidance on what classifies as an incident and how to report them can be found here [classification of incidents](#). A summary of complaints and incidents for the site must be reported in the AER. Incidents can now be reported electronically through the EDEN portal.

Waste

This template is divided into four sections A, B, C and D.

- Section A all licensees to include a separate waste management record
- Section B of the waste template is to be completed by all licensees
- Section C is to be completed by all waste licenced facilities **except landfills** and
- Section D is to be completed by licenced landfill facilities only.

Section A - A copy of your Waste Management Record for **waste transferred off site** should be included in the AER. There is a separate tab in the AER template for the Waste Management Record.

Section B - Table 1 requires details of waste accepted onto the site for recovery, disposal or treatment.

Section C – Requires details specific to management of a waste facility such as odour management, nuisance control etc.

Section D - Table 2 to Table 7 to be completed by landfills only. If leachate is removed from site and testing is required as part of the facility licence this information should be entered in Table 6.

Pollutant Release and Transfer Register (PRTR)

From January 2019, please note that Pollutant Release and Transfer Register (PRTR) reporting of annual mass emissions and waste transfers will be completed using the new Environmental Performance Reporting (EPR) online application, which is available through the EDEN portal. There is no requirement to complete a separate excel PRTR workbook or include a copy of the PRTR in your AER.

Any queries on the layout of the AER should be directed to the Office of Environmental Enforcement – Licence Enforcement Administration at 053-9160600 or edensupport@epa.ie.