

Local Authority Monitoring Programme Audit Report

Under the *European Union (Drinking Water) Regulations 2023*, the Environmental Protection Agency (EPA) is the supervisory authority in relation to Local Authority’s monitoring functions of regulated private drinking water supplies. This audit was carried out to assess the performance of Donegal County Council in carrying out its 2024 compliance monitoring programme of regulated private supplies in its functional area.

The audit process is a sample of the performance of a local authority in carrying out its monitoring functions of regulated private drinking water supplies.

Audit Detail	
Date of Audit	15 th July 2025
Local Authority	Donegal County Council
Representing the Local Authority	Michael McGarvey (closing meeting only), Joe Ferry, Aidan Smith, Patrick Gallagher, Caroline Meehan, Amy Laird.
EPA Inspectors	Derval Devaney (lead auditor), Lisa Noone (auditor)

Report Detail	
Audit Specification	2024 Regulated Private Drinking Water Supply Compliance Monitoring Programme and Regulated Private Drinking Water Supply Register
Issue Date	16 th September 2025
Prepared By	Derval Devaney, Inspector, EPA

> Summary of Key Findings

Donegal County Council was found to be performing well in its overall implementation of the 2024 Compliance Monitoring Programme.

Nonetheless, the audit identified several areas of improvement for which Donegal County Council should take appropriate action, as outlined below:

1. While Donegal County Council has contacted nursing homes, it has not yet identified other potential small private supplies (SPSs) that may serve vulnerable populations - such as crèches and schools - for possible inclusion in its Private Supply Register.
2. Donegal County Council did not monitor all private water supplies at their required frequencies for Group B parameters.
3. There is no formal methodology in place to review the temporal and spatial distribution of compliance monitoring sampling for Group Water Schemes to ensure samples are spatially and temporally distributed and representative of the water supply zone throughout the year.

> Introduction

Each Local Authority is required under Regulation 13 of the *European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)* to establish a Compliance Monitoring Programme and monitor all Private Water Supplies in its functional area, other than exempted supplies, to determine whether they comply with the standards and other requirements of the Regulations.

This audit was carried out in accordance with Regulation 30(3) of the *European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*, to assess the performance by Donegal County Council of its statutory functions in relation to the monitoring of regulated Private Water Supplies to ensure the provision of clean and wholesome drinking water.

Prior to the audit, the EPA assessed the 2024 monitoring returns submitted to the EPA by Donegal County Council to identify any areas of discrepancy between the required number of samples to be taken and analysed, and that reported to EPA. Using a questionnaire as a guide, Donegal County Council staff were interviewed to ascertain the principles and methodology for establishing its Private Supply Register and Compliance Monitoring Programme.



1.1

	Answer
Does the Private Supply Register contain all that is required by Regulation 14(5) of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> ?	No
Observation	
<ol style="list-style-type: none"> 1. Donegal County Council's 2025 private supply register lists 45 private regulated supplies made up of 2 public group water schemes (PUG), 4 private group water schemes (PRGs) and 39 small private supplies (SPS; supplies serving a commercial or public activity such as hotels, crèches, schools, and restaurants, etc.). 2. Donegal County Council enters and updates information on regulated private water supplies in the EPA's EDEN database, which it also uses as its register for these supplies. 3. During 2024, Donegal County Council monitored 52 private water supplies: 11 PUGs, 4 PRGs and 37 SPSSs. 4. The number of PUGs monitored by Donegal County Council during 2024 differed to that on the EPA's EDEN database. EDEN listed 1 PUG in existence in 2024 while Donegal County Council monitored 11 PUGs and referred to 300 plus PUGs, some of which are in the process of being taken in charge by Uisce Éireann (UÉ). 5. Donegal County Council explained that exempted supplies in some cases are monitored, however it indicated that a review of supplies is needed to determine what private supplies are regulated and to be included on its register and EDEN for EPA reporting purposes. 6. There were some gaps in information, such as the treatment type and source, for some regulated private supplies on the register. 	

1.2

	Answer
Is the Private Supply Register maintained and kept up to date as required by Regulation 14(7) of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> ?	Yes
Observation	
<ol style="list-style-type: none"> 1. The register is updated by Donegal County Council on an annual basis as a minimum and as required. 2. The EPA contacted Donegal County Council on 03/10/2024 via a letter to the Director of Services stating that the number of SPSSs registered in County Donegal is low when compared to other local authority areas of a similar size, and that it should take proactive steps to identify and register each SPS in its functional area. 3. Donegal County Council identified and wrote out to 11 nursing homes in its functional area on 19/06/2025 requesting confirmation on the source of their water supply to identify those that should be on its register and monitored for compliance with the Drinking Water Regulations. 4. Donegal County Council also liaise with other stakeholders, such as the HSE, to determine other small private supplies (SPSSs), such as food businesses, that should be on the register. 5. Additional potential SPSSs, such as those serving vulnerable groups like crèches and schools may exist and not be included on the register. Donegal County Council has yet to contact these premises to confirm their water source. Donegal County Council stated it intends to give priority to these potential SPSSs and contact these premises to determine their inclusion in the register. 6. Donegal County Council's website has a dedicated webpage regarding regulated private water supplies; what defines them and what steps are to be taken to add them to their Register. It also published a notice in local papers outlining the need to have regulated supplies on its register for compliance monitoring purposes. 	



2.1

	Answer
Have sampling locations been pre-determined for each water supply zone as required by Regulation 13(6) of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> ?	No
Observation	
<ol style="list-style-type: none"> 1. Sampling locations were not randomly selected and pre-determined by Donegal County Council at the start of 2024 and were not entered into the 2024 Compliance Monitoring Programme. 2. The Health Service Executive (HSE) undertook the sampling of private supplies on behalf of Donegal County Council in 2024. 3. The locations for sampling during 2024 were selected by the HSE based on the sampler's knowledge of the water supply zone. 4. Donegal County Council enter details of the sampler, sample type (Group A/B) and date the sample was taken into its monitoring programme once sampling is complete. 	

2.2

	Answer
Are sampling locations evenly distributed for each water supply zone and do they represent the quality of water throughout the year as required by Regulation 13(8) of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> ?	No
Observation	
<ol style="list-style-type: none"> 1. The sampling locations within a water supply zone were not always evenly distributed. For example, the same premises was used as the sampling location for all compliance samples taken on the Crownalaghey PUG and Meenabool PRG during 2024. 2. The pre-determined compliance plan did not contain the timing (date/month) that sampling is to take place, to ensure sampling events are evenly spread throughout the year. 3. It was however acknowledged that preplanning sampling dates for some supplies, such as Tory Island PRG, presents logistical challenges due to limited accessibility. Samples are typically transported to the mainland via helicopter, coordinated alongside other essential island services such as GP visits. 4. The sampling location is not always recorded (e.g., using a grid reference, GPS coordinates, or Eircode) after sampling is completed. This step should be integrated into the sampling process to enable electronic mapping of sample points and ensure an even spatial distribution across the water supply zone. 5. Donegal County Council has mapped all PUG and PRG Water Supply Zones and the location of SPSs throughout the county. 6. Samplers were not routinely being provided with maps of the Group Water Scheme Water Supply Zone. 	

2.3

	Answer
Was the required compliance monitoring for regulated private supplies undertaken during 2024 as required by Regulation 13(5) of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> ??	No
Observation	
<p>1. Donegal County Council had some shortfalls in their 2024 compliance monitoring. For example:</p> <ul style="list-style-type: none"> a) Two PRIs were not monitored during 2024. One of these was reconnected to the public water supply during the year, removing the need for monitoring under the private supply programme. Donegal County Council is to investigate whether the other private water supply is now also served by a public water supply, which would similarly negate the requirement for private supply monitoring. b) Some supplies were not monitored for fluoride in error during 2024. c) Some supplies had a significant number of Group B parameter shortfalls. Parameters such as pesticides, THMs, Metals, PAHs and Benzene for example were omitted from the 2024 sampling for some private supplies. For example, some PRGS were not monitored for up to 18 Group B parameters. d) Donegal County Council explained that due to the high cost of testing for Group B parameters, some Group B parameters are assessed only on a three-year cycle. 	



Data Handling

3.1

	Answer
Was 2024 data for Private Water Supplies reported accurately to the EPA (on EDEN) as required by Section 58 of <i>The EPA Act 1992 to 2007</i> ?	No
Observation	
<p>1. Some parameters' monitoring categories (Group A or Group B) were incorrectly categorised on the 2024 compliance monitoring returns submitted to the EPA. For example;</p> <ul style="list-style-type: none"> a) aluminum was categorised as a Group A parameter, when it was required to be categorised as a Group B parameter, as flocculant is not used in its treatment process. b) Group B parameters, such as metals, pesticides, THMs monitored were categorised incorrectly on EDEN as a Group A parameter. 	



Exceedances of Parametric Values

4.1

	Answer
Did the Local Authority consult with the HSE where drinking water constituted a potential danger to human health as required by Regulation 15(1) of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> ?	No
Observation	
<ol style="list-style-type: none">1. Donegal County Council has procedures in place for dealing with non-compliance with the Drinking Water Regulations and for issuing notices for non-compliance with the Drinking Water Regulations.2. This includes consultation with the HSE where a potential danger to human health is identified and taking additional investigative sampling to assist in determining the cause and persistence of any failure.3. In 2024, nine Small Public Supplies (SPSs) recorded manganese levels exceeding the parametric limit of 50 µg/L, with concentrations ranging from 53 µg/L to 949 µg/L. Seven of these supplies also surpassed the World Health Organization's health-based guideline value of 80 µg/L. It appears the HSE was not consulted at the time these exceedances occurred.4. The auditors noted microbiological failures in sampling events in Tory Island PRG throughout 2024. It was stated that this supply was prone to elevated THMs, and it was decided in consultation with the HSE to cease disinfection (and THM monitoring) and place the supply on a boil water notice. A long-term BWN is in place while trials are underway on the supply for further treatment as part of an upgrade programme to address quality issues.	



2024 Monitoring Programme Audit Recommendations

Donegal County Council is responsible for undertaking compliance monitoring of regulated private drinking water supplies and should implement the following recommendations without delay.

Private Water Supply Register

1.
 - a) Prioritise identifying vulnerable populations - such as crèches, schools, and nursing homes - served by small private supplies, to ensure their inclusion in the register.
 - b) Ensure that the register is accurate, current, and properly maintained, and that it records all relevant information for each Private Water Supply in accordance with *Regulation 14(5) of the European Union (Drinking Water) Regulations 2023 (S.I. No. 99 of 2023)*.
 - c) Ongoing documentation relating to the maintenance of the register and the identification of new supplies should be recorded and retained.

Compliance Monitoring Programme

2.
 - a) Specify the sampling locations in the predetermined Compliance Monitoring Programme in accordance with *Regulation 13(6) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*. Ensure that the selected sampling locations accurately reflect the quality of water throughout the entire water supply zone.
 - b) Specify when sampling is to take place (day/month) in the predetermined Compliance Monitoring Programme. The spread of sample days and the timing of samples within a monitoring programme should be as wide as possible to ensure that compliance samples are representative of water quality consumed throughout the year as required by *Regulation 13(8) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*.
3. Undertake a review of the temporal and spatial distribution of compliance monitoring sampling for both Public and Private Group Water Schemes. A formalised and structured assessment methodology should be developed and implemented. This process should include the documentation of sampling locations during each sampling event, with annual mapping of these locations within the respective water supply zones.

Compliance Monitoring

4. Ensure that:
 - a) all regulated private supplies are monitored for compliance for the required Group A and B parameters at their required frequencies in accordance with the requirements of the *European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*,
 - b) regulated supplies are categorised correctly as a private or public water supply to ensure they are monitored appropriately in accordance with the requirements of the *European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*,
 - c) fluoride is included in the accredited analysis, as required, and submitted to the EPA annually,
 - d) samplers are provided with maps of the water supply zones to verify that sampling locations align with the established compliance monitoring plan and accurately represent the water supply being assessed.

EDEN Database

5. Ensure that:
 - a) information on regulated private water supplies entered into the EPA database, EDEN, is accurate, reflects the list of regulated supplies on the LA's register and continues to be updated annually,
 - b) the results of all Group A and Group B compliance samples, required to be taken, are uploaded to EDEN to ensure there is no annual shortfall in compliance monitoring,
 - c) Group A and Group B parameters are tagged correctly on EDEN to reflect the treatment in place and the required frequency of monitoring.

Enforcement

6. Where manganese fails the parametric value Donegal County Council should:
 - a) arrange without undue delay for resamples to be taken,
 - b) consult with the HSE where it is considered that the failure constitutes a potential danger to human health, and
 - c) put in place an investigative monitoring programme to determine if manganese failure is an ongoing issue in the supply.
7. Donegal County Council should re-engage with the HSE regarding disinfection requirements at Tory Island PRG to protect public health and consider whether the existing Boil Water Notice should be re-issued.