

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 Mayo 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	17 th July 2025
Local Authority	Mayo County Council
Representing the Local Authority	John Condon, Olivia Feeney, Michael McDermott
EPA Inspectors	Lisa Noone (lead auditor), Derval Devaney (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	Lisa Noone, Inspector, EPA

> Summary of Key Findings

The audit of Mayo County Council's Compliance Monitoring Programme found a number of shortcomings in relation to the assessment of the quality of Private Water Supplies during 2024, for which Mayo County Council should take appropriate action, as outlined below:

1. Samples taken for compliance monitoring purposes were not equally distributed across the supply and representative of the quality of the water consumed throughout the network. Notably, schools and community centres were avoided due to the possible presence of header tanks, and delis were also avoided due to the possibility of tap contamination. This is not in accordance with *Regulation 7 and 13(8) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*.
2. Exceedances of parametric values were not appropriately followed up by Mayo County Council.
3. A risk assessment was carried out by Mayo County Council to exclude the monitoring for pesticides from the compliance monitoring programme for certain Small Private Supplies, however this risk assessment has not been completed in accordance with the requirements of *Regulation 11* and the criteria outlined in *Schedule 2 Part 3 (2) of S.I. 99 of 2023*.
4. Mayo County Council has not identified potential small private supplies (SPSs) that may serve vulnerable populations - such as crèches, nursing homes and schools - for possible inclusion in its Private Supply Register.

> 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 Mayo 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 Mayo 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, Mayo County Council staff were interviewed to ascertain the principles and methodology for establishing its Private Supply Register and Compliance Monitoring Programme.



		Answer
1.1	Does the Private Supply Register contain all that is required by Regulation 14(5) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)?	Yes
Observation		
<ol style="list-style-type: none"> 1. In 2024, Mayo County Council had 135 regulated private water supplies on its current Register, made up of 65 public group water schemes (PUGs), 41 private group water schemes (PRGs), and 29 small private supplies (SPS; supplies serving a commercial or public activity such as hotels, crèches, schools, and restaurants, etc.). 2. There are two separate registers in place, one for PUGs and PRGs, and another register for SPSs only. 3. There were some gaps in information for treatment type and source for a number of PUGs on the register. 4. Mayo County Council does not include commercial premises' populations in the overall population data for PUGs or PRGs. In those instances, the Council should be basing the frequency of compliance sampling on the volume supplied as opposed to the population served. 		
		Answer
1.2	Is the Private Supply Register maintained and kept up to date as required by Regulation 14(7) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)?	Yes
Observation		
<ol style="list-style-type: none"> 1. Mayo County Council updates its register when new supplies are identified or when details of existing supplies change. They actively reach out to PUGs and PRGs on an annual basis to get updates on treatment, population, etc. and to gather contact details for potential sampling locations. 2. The EPA contacted Mayo County Council on 03/10/2024 via a letter to the Director of Services stating that the number of SPS registered in County Mayo is low when compared to other local authority areas of a similar size, and that they should take proactive steps to identify and register each SPS in their functional area. 3. Mayo County Council acknowledged, both in its response letter and during the audit, the need to identify and register additional supplies that may be subject to the Drinking Water Regulations. Mayo County Council liaise with other stakeholders, such as the HSE, to determine other small SPSs, such as food businesses, that should be on the register. 4. Mayo 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 newspapers outlining the need to have regulated supplies on its register for compliance monitoring purposes. 5. The Council had completed an exercise a number of years ago whereby approximately 80 creches were identified and contacted to determine the source of their supply. Mayo County Council intends to repeat this exercise for these vulnerable populations. 		



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> ?	Yes
Observation	
<ol style="list-style-type: none"> 1. Southern Scientific carry out compliance monitoring on behalf of Mayo County Council. 2. For the Compliance Monitoring Programme, the sampling locations, as well as type and number of samples (Group A/Group B) required are pre-determined by Mayo County Council in consultation with the water supplier in advance of sampling. 3. This Compliance Monitoring Programme is sent to Southern Scientific in advance to facilitate planning and coordination. 4. Proposed dates for sampling are not predetermined in the Compliance Monitoring Programme. Southern Scientific schedule the sampling events, and once complete, Mayo County Council input these dates into their Compliance Monitoring Programme. 5. A review is carried out by the Council in Q2 to ensure sampling that has taken place is evenly distributed, and that all required Group A/Group B sampling will be completed by the end of the year. 	

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. Mayo County Council has mapped the supply boundaries for all PUG and PRG Water Supply Zones and every house and business in each scheme. 2. They have also mapped all SPSs in their functional area by GPS location and Eircode. 3. During sampling events, the sample location is recorded, and Mayo County Council review the sampling locations at the end of the year once sampling is complete. 4. For Group Water Schemes, whilst sampling events were evenly spread throughout the year and covered different locations within each supply zone, many samples were taken in clusters in towns or villages. This indicated that samples were not evenly distributed, with the extremities of the network not being sampled. 5. In a document provided at the audit, Mayo County Council stated that carrying out compliance monitoring at schools and community centers should be avoided due to the possibility of header/storage tanks being in use at these premises. The Council confirmed that this is their current advice to Southern Scientific who carry out monitoring on their behalf, stating that samples taken from these locations are not representative of the water coming from the water treatment plant or the quality of water in the Group Water Scheme as a whole. 6. Mayo County Council also stated that they do not take compliance monitoring samples at delis due to possible tap contamination. 7. Mayo County Council were reminded that compliance monitoring should be carried out at the point of compliance in accordance with <i>Regulation 7</i>, and that samples taken shall be representative of the quality of the water consumed throughout the year and shall be equally distributed through the supply in accordance with <i>Regulation 13(8)</i>. 8. Mayo County Council were also advised at the audit that schools, community centers, nursing homes and creches should not be excluded from monitoring due to the populations being more vulnerable. If such properties are identified as having header/storage tanks the owner of the premises should be notified that these are not suitable for the provision of drinking water and advised of any possible remedial action that should be taken by them to ensure the supply does not cause, contribute to, or give rise to a risk of non-compliance or risk to public health. In addition, sampling procedures should be in place to ensure taps such as deli taps are prepared for sampling. 	

2.3

	Answer
Is the exclusion of a pesticide monitoring of some supplies by way of a risk assessment carried out in accordance with the requirements of Regulation 11 and the criteria outlined in Schedule 2 Part 3 (2) of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> ?	No
Observation	
<ol style="list-style-type: none"> 1. Risk assessments have been carried out by Mayo County Council for SPSs as a screening process for the exclusion of pesticides monitoring as a Group B parameter. 2. Mayo County Council is not monitoring for pesticides in a number of SPS on the basis of this risk assessment. The risk assessment includes an investigation into the location and usage of pesticides in the vicinity of the water source and three years previous data in accordance with the requirements of the previous Drinking Water Regulations, specifically Part C of the <i>European Union (Drinking Water) (Amendment) Regulations 2017 (S.I. No. 464 of 2017)</i>. 3. Under the 2023 Regulations, it is permissible to reduce the compliance monitoring frequency or exclude certain parameters, however additional criteria now must be met by the Council in accordance with the requirements of <i>Regulation 11</i> and the criteria outlined in <i>Schedule 2 Part 3 (2) of S.I. 99 of 2023</i>. 	

2.4

	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> ??	Yes
Observation	
<ol style="list-style-type: none"> 1. The audit, which reviewed a select number of supplies, did not identify shortfalls in the 2024 compliance monitoring programme. 	



Exceedances of Parametric Values

3.1

	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. Mayo 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 for certain parameters to determine risk to human health and taking additional investigative sampling to assist in determining the cause and persistence of any failure. 3. The auditors noted a manganese result of 1,175 µg/l in a SPS on 18/12/2024, this failure exceeds both the manganese parametric value of 50 µg/L as set out in the <i>2023 Drinking Water Regulations</i>, and the World Health Organization's health-based guideline value of 80 µg/L. This failure was not notified to the HSE at the time. 4. Mayo County Council use a template letter/advice to be issued to supplies where a failure to meet iron or manganese parametric values is detected. This template response does not include advice for exceedances in excess of health-based guideline limits. 5. Mayo County Council issued this letter to the SPS. At the time of the audit, the Council had not carried out re-sampling of this supply. 6. The EPA advised Mayo County Council during the audit to carry out re-sampling at this failed location, to consult with the HSE promptly with regards to this failure and review their current procedures for HSE consultation. 	



Data Handling

4.1

	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	
<ol style="list-style-type: none"> i. Some information provided by Mayo County Council to the EPA via the EDEN portal regarding private supplies differed to that which was in the register: <ol style="list-style-type: none"> a) The volume of water supplied, and the population served differed between the two datasets for some supplies e.g., EDEN data suggests that Robeen PRG supply volume is 637 m³/day, however the register contains a volume of 95.6 m³/day. b) No treatment type was provided for a number of supplies on EDEN. For example, St Johns Nursing Home has filtration, a water softener and UV disinfection in place however no treatment was provided on EDEN. ii. The parameters' monitoring categories (Group A or Group B) for some supplies were incorrectly categorised on the 2024 compliance monitoring returns submitted to the EPA. For example, the Group A parameters monitored for Belcarra PUG and Callow Lake PRG were categorised incorrectly on EDEN as Group B parameters. 	



2024 Monitoring Programme Audit Recommendations

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

1. Private Water Supply Register

- a) Prioritise identifying vulnerable populations - such as crèches, schools, and nursing homes – served by small private supplies, to ensure their inclusion in the register. Ongoing documentation relating to the maintenance of the register and the identification of new supplies should be recorded and retained.
- 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)*.

2. Compliance Monitoring Programme

- a) Ensure schools, delis and community centres are not excluded from the annual private supply compliance monitoring programme.
- b) Ensure the spread of compliance samples are evenly distributed throughout the water supply zone. The spread of sample locations within a monitoring programme should be as wide as possible to ensure that compliance samples are representative of water quality consumed throughout the supply as required by *Regulation 13(8) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*.
- c) Put in place a formal and structured method of assessment to ensure the temporal and spatial distribution of sampling for Group Water Schemes (PRGs and PUGs) is reviewed each year to ensure *Regulation 13(8)* is met.
- d) Ensure that any risk assessment used to reduce the compliance monitoring frequency or exclude certain parameters meets the requirements of *Regulation 11* and the criteria outlined in *Schedule 2 Part 3 (2) of S.I. 99 of 2023*.

3. Exceedances of Parametric Values

- a) Consult with the HSE where it is considered that a supply of water intended for human consumption may constitute a potential danger to human health, and with the agreement of the HSE, ensure that the Private Water Supply is prohibited, or the use of such water is restricted in accordance with *Regulation 15(1) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*.
- b) In agreement with the HSE, put in place an appropriate procedure for consultation of exceedances, between Mayo County Council and the HSE.
- c) Consult with the owner of a Small Private Water Supply (SPS) and the HSE if applicable, in the event that Mayo County Council identify the use of a header/storage tank for the provision of drinking water and provide appropriate advice and guidance in accordance with *Regulation 8*.
- d) Where manganese fails the parametric value Mayo County Council should:
 - i. arrange without undue delay for resamples to be taken;
 - ii. consult with the HSE where it is considered that the failure constitutes a potential danger to human health; and
 - iii. put in place an investigative monitoring programme to determine if manganese failure is an ongoing issue in the supply.

4. EDEN Database

- a) Ensure that information on regulated Private Water Supplies entered into the EPA's database, EDEN, is accurate, reflects the list of regulated supplies on the LA's register and continues to be updated annually.
- b) Ensure that Group A and Group B parameters are tagged correctly on EDEN.