

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 Offaly 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	09/10/2025
Local Authority	Offaly County Council
Representing the Local Authority	David Murphy, Brendan King, Mark Mahon, Mark Maken-Finlay.
EPA Inspectors	Michelle Roche, Derval Devaney.

Report Detail	
Audit Specification	2024 Regulated Private Drinking Water Supply Compliance Monitoring Programme and Regulated Private Drinking Water Supply Register
Issue Date	04/12/2025
Prepared By	Michelle Roche, Inspector, EPA

> Report Main Findings and Recommendations

The audit of Offaly 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.

1. The Private Supply Register for 2024 was not in accordance with the requirements of the Regulations and did not contain up-to-date and accurate data regarding treatment, volume and population.
2. Offaly County Council did not monitor all Private Water Supplies for all Group B parameters as required in 2024. Sampling for the full list of Group B parameters was not undertaken for 65% of Private Water Supplies.
3. There was a lack of pre-determined sample planning by Offaly County Council to ensure samples are spatially and temporally distributed and, where appropriate, representative of the water supply zone year.
4. A significant manganese exceedance (615 ug/l) detected on the Clondelara Group Water Scheme in October 2024 was not investigated and the HSE were not consulted for health advice.

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



Register of Private Drinking Water Supplies

1.1

	Answer
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)?	No
Observation	
<ol style="list-style-type: none"> 1. Offaly County Council currently has 48 regulated Private Water Supplies in its functional area, including 14 Private Group Water Schemes (PRGs), 4 Public Group Water Schemes (PUGs) and 30 Small Private Supplies (SPSs - supplies serving a commercial or public activity such as hotels, schools and restaurants, etc.). 2. A complete and dedicated Register in accordance with Regulation 14(5) is not in place. Offaly County Council has a Register of PRGs, however it is not complete. PUGs and SPS are not included in the register. 3. For the PRGs listed on the Register it did not include: <ol style="list-style-type: none"> a. the treatment type for every Private Water Supply. b. the volume/population for every Private Water Supply. c. the source for every Private Water Supply d. the address of the Private Water Supply water treatment plant. <p>It is important that this information is accurate to inform if certain parameters are required to be monitored under the Group A or Group B monitoring frequency.</p>	

1.2

	Answer
Is the Private Supply Register maintained and kept up to date as required by Regulation 14(7), and does it contain all that is required by Regulation 14(5) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)?	No
Observation	
<ol style="list-style-type: none"> 1. Population/volume figures for PRGs are included in the private supply register, however this information has not been reviewed in recent years to ensure accuracy. The frequency of monitoring is based on the supply's population/volume and as such it is important that this information is accurate. 2. Offaly County Council are taking a number of steps to improve the information on their register and has: <ul style="list-style-type: none"> • Written to all group water schemes with a data collection form attached for the scheme to complete and return to the local authority. No such data capture campaign has been initiated for SPSs. • Liaised with the HSE to increase the number of SPSs on the register. • Considered recruiting a GIS specialist with a view to using GIS mapping capabilities for identification of private supplies and monitoring locations. 	



2024 Compliance Monitoring Programme

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. Offaly County Council does not have an appropriately complete annual predetermined Compliance Monitoring Programme.2. The local authority has a compliance monitoring programme in place which identifies the number of Group A and Group B samples required for the year, however sample locations are not pre-determined until a few weeks before the sampling event. The plan does not include details of treatment type for all water supplies.	

2.2

	Answer
Are sampling events evenly distributed for each water supply zone 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 monitoring returns provided to the EPA show sampling was often carried out at the same time of year throughout 2024, and therefore not evenly distributed as required. For example, in Killeigh/Cloneygowan PRG six samples were taken across September, October and November 2024 and Rosderra Meats SPS had both Group A samples taken in November and December 2024.2. The pre-determined compliance plan did not contain dates that sampling is to take place, to ensure sampling events are evenly spread throughout the year. Sampling dates are not pre-determined until a few weeks before the sampling event.	

2.3

	Answer
<p>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>???</p>	No
Observation	
<p>1. Offaly County Council had shortfalls in its 2024 compliance monitoring, relating to both Group A and Group B sampling;</p> <ul style="list-style-type: none"> a) Group A monitoring was carried out for all Private Water Supplies however it was not carried out at the required frequency for all SPS. Five SPS had only one Group A sample taken in 2024. b) One SPS was not monitored at all during 2024. Offaly County Council thought the business, a creche, had connected to the public mains, however this was later found not to be the case. Two Group A samples have been taken to date in 2025. c) Required monitoring of Group B parameters was only carried out in 17 of the 48 Private Water Supplies. This resulted in a shortfall of 65% of Group B samples in Private Water Supplies as a whole in 2024. d) Required Group B monitoring was carried out in all PRGs, however no Group B monitoring was carried out for PUGs, and only three SPS had adequate Group B monitoring. 	



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	
<ol style="list-style-type: none">1. Information provided by Offaly County Council to the EPA via the EDEN portal does not reflect what is in Offaly County Council's records as follows:<ol style="list-style-type: none">a) There was no volume/population or treatment listed in EDEN for 12 SPS.b) SPS in EDEN were named as OY01, OY02, etc. The SPS register in Offaly County Council named the SPS as the commercial or public activity name, e.g. OPW Clonmacnoise. This naming convention gives greater information on the nature of the SPS and the public health risk associated with the supply.2. Some parameters' monitoring categories (Group A or Group B) were incorrectly categorised on the 2024 compliance monitoring returns submitted to the EPA. For example, iron was regularly categorised as a Group A parameter when it is only required to be categorised as a Group B parameter where it is not used as flocculant. This results in incorrect monitoring frequencies being implemented.3. The parameter 'colour' was incorrectly tagged as 'true colour' in the 2024 EDEN return for all supplies, resulting in a shortfall being detected in the EDEN Shortfall report. Colour should be tagged as either 'colour' or 'apparent colour' in EDEN as per Section 3.8 of the EDEN-MDS Information Note issued by the EPA.	



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. A significant manganese exceedance (615 ug/l) was detected on the Clondelara Group Water Scheme in a sample taken on 29/10/2024. The exceedance was not investigated by Offaly County Council and the HSE were not consulted for health advice. The same sample also had exceedances for colour, nickel and turbidity.2. At the audit Offaly County Council did not appear to be aware of the exceedance, which was identified by the EPA auditors.	



2024 Monitoring Programme Audit Recommendations

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

1. Private Supply Register

- a) Establish a Private Water Supply register which records all relevant information pertaining to each Private Water Supply as required by *14(5) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*. Ensure that the register is accurate, up-to-date, and appropriately maintained in accordance with the requirements of the Regulations. Ensure documentation relating the upkeep of the Register is maintained.

2. Compliance Monitoring Programme

- a) Put in place a pre-determined Compliance Monitoring Programme before the start of each year which meets the requirements of Regulation 13 of the *European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*. Include predetermined sampling locations in the Compliance Monitoring Programme in accordance with *Regulation 13(6)*.
- b) Review the temporal and spatial distribution of sampling for compliance monitoring for Group Water Schemes (PRGs and PUGs). A formal and structured method of assessment should be developed and implemented by Offaly County Council to ensure that sampling represents the entire water supply zone as accurately as possible. The spread of sample days, times and locations 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)*.
- c) Ensure that all regulated private supplies are monitored 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)*.

3. EDEN

- a) Ensure data on regulated private water supplies entered into the EPA's database, EDEN, is accurate, correctly categorised and updated annually. The results of all Group A and Group B compliance samples required to be taken should be uploaded to EDEN to ensure there is no annual shortfall in compliance monitoring.

4. Exceedances of Parametric Values

- a) Consult with the HSE regarding failures for manganese, nickel, colour and turbidity at Clondelara Group Water Scheme on 29/10/2024, investigate the cause and take a re-sample without delay. Where manganese fails the parametric value Offaly 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.