

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 all local authority's monitoring functions of regulated private drinking water supplies. This audit was carried out to assess the performance of Waterford City and 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	11/10/2024
Local Authority	Waterford City and County Council
Representing the Local Authority	Paul Johnston, Niall Kane, Dawn Wallace.
EPA Inspectors	Pat Chan, Derval Devaney, Lisa Noone.

Report Detail	
Audit Specification	2024 Regulated Private Drinking Water Supply Compliance Monitoring Programme and Regulated Private Drinking Water Supply Register
Issue Date	15/01/2025
Prepared By	Derval Devaney, Inspector, EPA

> Report Main Findings and Recommendations

The audit of Waterford City and County Council's Register and Compliance Monitoring Programme identified significant improvements since the EPA's audit of this local authority in 2023. A Register is now in place and the local authority demonstrated its concerted efforts in identifying additional regulated private water suppliers within its functional area. The EPA welcomes these changes and the resources now assigned to this sector. While there was no predetermined compliance monitoring plan in place for 2024, there was a draft plan put in place for 2025 and the local authority indicated that it is actively seeking staff to progress its supervisory role in this area.

Notwithstanding the above, there remain several shortcomings in relation to the local authority's monitoring functions over regulated private drinking water supplies:

1. Waterford City and County Council did not have an annual predetermined Compliance Monitoring Programme in place for 2024.
2. There was a lack of pre-determined sampling locations selected by Waterford City and County Council, to ensure samples are spatially and temporally distributed and representative of the water supply zone throughout the year.
3. There are gaps in information submitted by Waterford City and County Council to the EPA's EDEN portal on regulated private supplies within its functional area.

> 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 Waterford City and 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.

Waterford City and 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 European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)?	No
Observation	
<ol style="list-style-type: none">1. Since the EPA's 2023 audit, Waterford City and County Council has compiled a Private Water Supply Register.2. It was acknowledged that a lot of work was carried out by Waterford City and County Council during 2024 to identify private water suppliers that falls under its remit within its functional area. Twenty-eight additional small private water suppliers were identified and added to its Register during that process.3. Some details required by Regulation 14(5) of the European Union (Drinking Water) Regulations 2023, such as volume of water supplied per day (m³ or population equivalent), type of treatment in place, the supply zone code was omitted from the Register for some private water supplies.	



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. Waterford City and County Council did not have an annual predetermined Compliance Monitoring Programme in place for 2024.2. Sampling locations were not randomly selected and pre-determined by Waterford City and County Council at the start of the year and were not entered into a pre-determined Compliance Monitoring Programme for 2024.3. The Health Service Executive (HSE) undertook Group A compliance sampling of private supplies on behalf of Waterford City and County Council during 2024. The sampling locations were selected by the HSE.	

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. There was no. pre-determined compliance plan for 2024 containing the date/month that sampling is to take place, to ensure sampling events are evenly spread throughout the year.2. The water supply zones for all private group water schemes were not mapped, and the sampler is not provided with a map of the water supply zone to inform it if a sample is representative of the water supply.3. The sampling locations for each Group Water Scheme were not mapped to verify an even distribution of samples.	



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> ?	Yes
Observation	
<ol style="list-style-type: none">1. Where 2024 sampling results detected failures, Waterford City and County Council consulted with the HSE to determine risk to human health.2. Waterford City and County Council's consultation with the HSE resulted in some 'Do Not Consume' Notices being issued to supplies, thereby protecting the health of those consumers.3. The audit identified that a formal procedure should be put in place relating to reporting and escalation where there is a parametric failure detected. Such procedure should ensure a continued consistent approach to the response to failures and that appropriate follow up actions continue to be taken without delay (e.g. emergency re-samples, consultation with the HSE, prompt issuance of health advice to the water supplier).	



4.1

	Answer
Was 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. There are gaps in the information provided by Waterford City and County Council to the EPA via the EDEN portal as follows:<ol style="list-style-type: none">(i) At the time of the audit there were 53 regulated private supplies listed in EDEN assigned to Waterford City and County Council; 3 have its scheme type categorised as a private group water scheme (PRG), 48 as a small private water supply (SPS) and two are not categorised at all.(ii) Details relating to supplies are omitted such as the source of supply, volume distributed or population served, treatment in place.2. Waterford City and County Council stated it is in the process of actively liaising with the private water suppliers and plans to update its Register and EDEN once up to date information is obtained.	

**2024 Monitoring Programme Audit Recommendations**

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

1. In agreement with the HSE and relevant laboratory, put in place a procedure for the notification and communication of exceedances, between the laboratory, Waterford City and County Council and the HSE.
2. Continue to record all relevant Private Water Supply information for the purposes of the register 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.
3. (i) 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 sampling locations chosen represent the entire water supply zone as accurately as possible.

(ii) Specify when sampling is to take place (day/month) in the predetermined Compliance Monitoring Programme.

(iii) The spread of sample days, timing, and location 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)*.
4. (i) Ensure the water supply zones for all Group Water Schemes are mapped and samplers have access to maps to ensure sampling locations are in accordance with the pre-determined compliance monitoring plan and represent the water supply being sampled.

(ii) Review the temporal and spatial distribution of sampling for compliance monitoring of Group Water Schemes. A formal and structured method of assessment should be developed and implemented by Waterford City and County Council. The process should include documenting sampling locations (using an Eircode or Grid Reference) during each sampling event and electronically mapping the locations on the Water Supply Zone map annually.
5. Ensure that 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)*.
6. Ensure information on regulated private water supplies is entered into the EPA's database and that data is accurate, correctly categorises private water supplies and is 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.