



Local Authority Enforcement Audit Report

Longford County Council

Date of audit 04 09 2025 Audit report Ref: LAET 2025/09/26

PURPOSE OF AUDIT

This audit was carried out in accordance with **Section 63(2)** of the **Environmental Protection Agency (EPA) Acts 1992 & 2003** and aims to assess the performance by the local authority of its statutory functions in relation to environmental protection. This report contains advice and recommendations for the local authority in accordance with **Section 63(3)(a) of the EPA Acts 1992 & 2003**.

1. SUMMARY OF FINDINGS

Longford County Council met the required standard of a Strong or Excellent result in 13 of the 19 National Enforcement Priorities (NEPs) in 2024. Greater focus is required in the areas where Moderate results were attained. Local authorities are expected to meet the required standard in each of the NEPs.

Observations were raised during the audit in relation to:

- Environmental complaint handling including delays in investigating complaints, insufficient documentation of investigations within the system, and a lack of timely and appropriate follow-up actions to ensure effective resolution, and
- Progress on the National Enforcement Priorities (NEPs) 2025–2027 in the areas of waste, water, and air/noise.

Longford County Council stated that lack of resources had impacted on the performance by the Council of its statutory environmental protection functions in 2024 and that this has been addressed. Longford County Council should continue to review the staff resources in its environmental section and ensure that this vital work is appropriately prioritised and that adequate resources are deployed to deliver its statutory functions in environmental protection.

Actions in relation to the above are required to be taken, as specified in this report.

2. SCOPE OF AUDIT & ATTENDEES

The scope of the audit included a review of Longford County Council's enforcement plan under Recommendation 2001/331/EC providing for minimum criteria for environmental inspections (RMCEI), environmental complaint handling, progress in relation to the National Enforcement Priorities (NEPs) under the Local Authority Performance Framework, and resources. During the audit a number of local authority staff were interviewed in relation to statutory environmental functions, NEPs, complaints and RMCEI inspection plans.

Representing the Council:

<u>Name</u>	<u>Position</u>
Barbara Heslin	Director of Service
Grainne Harte	RMCEI Co-Ordinator
Richard Smith	Senior Executive Officer
Rose Corcoran	Staff Officer
Liam Rabbitte	Executive Scientist
David McGovern	Environmental Technician
Anne Skelly	Environmental Technician
Shauna Gibbons	Environmental Technician
Monica Cadden	Assistant Scientist
David O'Rourke	Executive Technician
Paraic Mc Gee	Litter Warden

Representing the Environmental Protection Agency:

Maria Lenihan	Inspector
Aoife Loughnane	Inspector
Syed Faiz-ul Islam	Inspector

3. AUDIT OBSERVATIONS & RECOMMENDATIONS

3.1 Environmental Complaints Handling

Observations:

- Longford County Council has functionality on their website to allow a member of the public to make an environmental complaint.
- Longford County Council has a dynamics CRM based environmental complaints handling system and a separate Pollution Controls system. Due to some functionality issues with the CRM system, the administration team actively transfer complaints received via the CRM system and upload them onto the Pollution Controls system. This is an administrative burden for staff and the council is committed to move to the NEMIS complaints system when it goes live.
- A new Complaints Co-Ordinator is in place and work has been undertaken to close out older environmental complaints and reassign a number of open complaints.
- A review of a number of complaints, as outlined in Table 1 below, identified delays in investigation, insufficient documentation of investigative actions, and a lack of appropriate follow-up.
- Complaints referred by the EPA cannot be searched within the Pollution Controls system.

Table 1: Sample complaints reviewed				
	Reference	Subject	Finding	Action
1.	Ref. No. PC-25-2	Allegation that a company is selling smoky fuel, originating from Northern Ireland.	The complaint was received on 13/01/25 and has not been investigated to date. The audit team was informed that the staff member originally assigned to the case was on subsequent extended leave. The complaint has been reassigned.	Investigate this complaint without further delay.
2.	Ref. No. PC-23-11	Sewage ponding and overflowing adjacent to a cafe.	The complaint was received on 17/05/23 and investigated the next day. It was found that misconnections from two apartments above the café caused a blockage in the surface water pipework. The audit team was informed that no further complaints have been received and walk-byes showed no signs of ponding. However, it remains unclear whether the misconnections have been fully resolved.	Carry out the necessary follow-up to determine whether the misconnections have been rectified.
3.	Ref. No. PC-23-19/COM018765	Sewage issues at an apartment complex.	This complaint was referred by the EPA to the local authority on 04/04/24. However, no information was recorded in the complaint system regarding any actions taken by the local authority. As part of a broader effort to resolve outstanding complaints, the local authority contacted the complainant via email on 21/07/25 to confirm whether the issue had been resolved. The complainant responded confirming that the matter had been resolved.	See actions required below.
4.	Ref. No. LC-25-598/COM020744	Debris consisting of mud, rocks, branches, building materials, domestic waste, plastic, etc., all deposited in a field.	This complaint was referred by the EPA to the local authority on 24/04/25. This matter was investigated by the litter warden on the 25/04/25 who noted 'a huge pile of C&D' material and took photos. The audit team noted the presence of plastic and what appeared to be rubble in the images. The case was referred to a newly appointed Waste Enforcement Officer (WEO) on 16/06/25 for further action. The audit team was informed that upon inspection on 18/06/25, no evidence of C&D material was found. The owner of the field was not contacted in relation to the issue.	Conduct a follow-up inspection without delay to determine the current location of the construction and demolition (C&D) material, observed by Longford County Council on 25/04/25.
5.	PC-25-651	Cattle access to a stream.	During investigative monitoring the local authority noted cattle access to a stream. The farmer was contacted and instructed to install fencing to prevent further access. A timeframe was provided for the completion of this action.	On-going.

Actions Required:

1. Ensure all complaints are investigated without delay, that all investigative actions are thoroughly documented within the system, and that appropriate and timely follow-up is carried out to support effective resolution of each complaint.
2. Ensure that the actions outlined in table 1 are undertaken.
3. Take measures to ensure that the recording and management of complaints, forwarded by the EPA, can be retrieved by the Environmental Department without difficulty.

3.2 Waste National Enforcement Priorities**Observations:**

- Longford County Council met the required standard of strong or excellent in four Waste National Enforcement Priorities (NEPs) in 2024; Tackling significant illegal waste activity and Multi-Agency Sites of Interest, Construction and Demolition waste, End-of-Life Vehicles and Metal Waste and Producer Responsibility Initiatives and Local Priorities. The Council failed to meet the required standard in one Waste NEP; Household & Commercial Waste. This NEP has been split into two separate NEPS for the 2025 to 2027 cycle.
- The WERLA inspection templates were being utilised for all the waste sector inspections reviewed.

Illegal waste

- Longford County Council were the first Local authority to successfully implement CCTV. Adhering to the newly developed Codes CCTV was successfully installed at 9 sites for four weeks in 2024, with 71 incidences of dumping recorded between sites. Fines were issued and a number were progressed to district court for non payment of fines. More CCTV cameras are being in place at other blackspot locations for a period of three months.
- Longford County Council informed the audit team that they had participated in two multiagency roadside check points to date this year and hope to participate in at least one more by the end of 2025.

Construction and Demolition Waste

- The audit team was informed that the Environmental Department has not received Building Register Commencement Notifications. However, the Planning Department has now agreed to provide these notifications going forward.
- The audit team was informed that to date Resource and Waste Management Plans (RWMPs) have been reviewed by the Planning Department. However, from September 2025, the Environmental Department will assume responsibility for reviewing RWMPs for developments involving more than two houses.
- A low level of inspections relating to the segregation, recovery, and disposal of construction and demolition (C&D) waste at construction and development sites was reported in 2024. Although five inspections were planned for 2025 and six have been completed to date, a number of those focused on asbestos removal from farm shed roofs. An increase in targeted inspections of construction and development sites is required in 2025.
- The audit team was informed that there have been no Regulation 27 notifications to date in 2025.
- A construction site inspection form Ref. No. 258056 dated 13/05/25 and subsequent Section 18 Notice issued, was reviewed.
- Waste Permit Facility Inspection Form Ref. No. 258056, dated 13 March 2025, was reviewed. A follow-up joint inspection with WERLA is planned.

Household & Commercial Waste

- There is one main waste collection permit holder Mulleadys Ltd. NWCP0-09-10621-09, and no waste facility permit holder in Longford that deals with household and commercial waste. Mulleadys Ltd. also have a waste transfer station in Longford that is licensed by the Agency.
- In 2025, 9 out of 12 commercial food waste inspections were found to be non-compliant, with Longford County Council focusing primarily on fast food outlets. Inspection Form Ref. No. 258002, dated 29/01/25, was reviewed, and a follow-up letter was issued on 04/02/25, specifying a

compliance date of the 04/03/25. To date, one follow-up inspection has been conducted in relation to a non-compliant commercial food waste outlet identified in 2024.

- The Agency welcomes the initiative by Longford County Council to develop a Household Waste Compliance Notice which will require the occupier to submit evidence of waste compliance either via post, email or by scanning a QR for an online form. This notice will be issued to householders in planned areas.
- In 2024, a proactive pilot initiative was launched to subsidise the three-bin collection service for local authority tenants in two designated housing estates. While the initiative aimed to engage 50 tenants, only six from one estate opted to participate. Longford County Council plans to proceed with implementation for these six tenants, with the aim that further uptake will follow.

Producer Responsibility Initiatives (PRIs)

- 11 PRI inspections have been undertaken to date this year under WEEE/Batteries, plastic bag and the Deposit Return Scheme and 9 Tyre inspections have been completed.

Actions Required:

1. Take necessary measures to improve performance under the household and commercial waste NEPs.
2. For household and commercial waste activity a proportionate escalated enforcement approach should be taken. Where non-compliances are not being resolved, the issuing of a Fixed Payment Notice (FPN) and further action as required should be considered under the presentation of waste bye-laws.
3. Ensure that RWMPs (greater than two houses) are reviewed by the Environmental Department.
4. Ensure that the waste enforcement team review the building register commencement notifications to guide the targeted construction and development sites visits.
5. Increase inspections of construction and development sites and ensure that any regulation 27 notifications are reviewed.
6. Longford County Council are reminded that for 2025, focused action is expected under the WEEE Regulations, Battery Regulations, Tyre Regulations and the Separate Collection (Deposit Return Scheme) Regulations, as well as where local issues persist.
7. Ensure that non compliances identified are followed up and that further enforcement actions are undertaken where required.

3.3 Water National Enforcement Priorities

Observations:

Longford County Council met the required standard of strong in two Water National Enforcement Priorities (NEPs) in 2024; DWWTS/Septic Tanks and Discharge licences/Misconnections. Longford County Council scored 'Moderate' for the following water NEPs in 2024:

- Agriculture – farmyard
- Agriculture – farmland
- Local water quality Monitoring

Pressures from Agriculture – Farmyards & Farmlands

- Longford County Council has an assigned allocation of 77 agricultural inspections (GAP) in 2025 under the National Agricultural Inspection Programme. To date in 2025, 41 inspections have been completed and three cross reports have been made to the Department of Agriculture, Food and the Marine (DAFM).

Septic Tanks

- Longford County Council carried out 10 inspections in 2024 which exceeded the four inspections required under the National Inspection Plan (NIP) for Domestic Wastewater Treatment Systems.
- Longford County Council had an 94% closure rate of advisory notices for the period 2013 to 2024.
- 13 DWWTS inspections have been completed to date in 2025, with 2 advisory notices issued. There is one advisory notice open for greater than two years, and the Council has liaised with the homeowner regarding the issues.

Discharge Licences / Misconnections

- There are currently 6 discharge licences on the Section 4 discharge licence register, all ranked as category C (low risk) sites, sampled four times per year. None are identified as significant pressures on receiving waters under the Water Framework Directive.
- There is currently no system in place to manage the enforcement of Section 4 discharge licences, with no tracking of;
 - whether self-monitoring returns are being submitted by licensees;
 - compliance assessment of monitoring data, and
 - whether non-compliances are being followed up.
- Longford County Council is collaborating with Uisce Eireann on the Integrated Urban Drainage Management Plan for Longford Town, with misconnections investigations to be focused on discharges to the River Camlin.

Local Priorities and Water Quality Monitoring

- In the Water Action Plan (3rd cycle River Basin Management Plan) published in September 2024, there are three areas for action where Longford County Council is the lead organisation; Aghnaccliffe Stream, Black (South Leitrim) and Edgeworthstown. Longford County Council informed the audit team of the progress of farm inspections and investigative monitoring (SSRS surveys, walkovers, drone flyovers) being undertaken or planned in these areas.
- The Private Water Supplies register contains 13 small private supplies and 2 private group schemes. Longford County Council issued 120 letters in August 2025 to GAA clubs, Montessori schools, etc., seeking information on the source of water supply to the premises, in an effort to ensure all private supplies are registered and monitored.

Actions Required:

1. Carry out at the assigned 77 initial GAP inspections in 2025 to meet the requirements of the NAIP.
2. Ensure that the full range of enforcement actions are taken in relation to non-compliances identified during farm inspections including issuing more cross reports to the DAFM and taking prosecutions for more serious offences.
3. Implement a system to manage the enforcement of Section 4 discharge licences, to include up-to-date risk-rating of discharges, compliance status, monitoring results, self-monitoring returns, warning letters issued, and any enforcement actions taken.
4. Increase the level of misconnections work and prioritise areas where urban run-off poses a significant environmental pressure.
5. Carry out investigative monitoring to assist in characterising local water quality issues and report the details in the 2025 NEP Progress Report.

3.4 Air and Noise National Enforcement Priorities

Observations:

- Longford County Council met the required standard of strong in three of the five Air & Noise NEPs in 2024 (Solid Fuel, Air Quality Monitoring & Data Use and Environmental Noise Directive) and scored moderate in two (Air & Noise Control (including Planning) and Ongoing Air & Noise Enforcement Work).

Solid Fuels

- There are 52 retailers on the solid fuel register in Longford.
- No solid fuel inspections have been carried out to date in 2025, and no online searches to detect the sale and distribution of unapproved solid fuels. Longford County Council plans to carry out a programme of inspections during the heating season in Q4 of 2025.
- In 2024, inspections were targeted in the north of the county due to concerns about the sale of unapproved solid fuels originating from Northern Ireland. Two coal samples were found to be non-compliant with the 2% sulphur limit, however no further action was taken as the testing was carried out in a non-accredited laboratory.
- A multi-agency roadside checkpoint carried out in June 2025 was used to investigate the sale of unapproved solid fuels. No vehicles were found to be transporting solid fuel on the day.

Air Quality Monitoring & Data Use

- Longford County Council engages with the EPA Air Quality Team in relation to the monitoring station at Longford. The Council has applied for a DCEE grant for an air quality project to investigate PM_{2.5} levels and is liaising with the EPA Air Quality Team for support in acquiring the necessary equipment.
- There was one PM₁₀ exceedance recorded at Longford air quality monitoring station in 2025 (on 08/01/25) and four PM10 exceedances in 2024 (on 06/01/24, 07/01/24, 29/01/24, 09/09/24).

Environmental Noise Directive (ENDs)

- There is good collaboration between the Environment and Roads Department and DCEE on the pilot acoustic design studies programme to confirm noise levels and identify cost-effective noise mitigation measures.

Ongoing Air & Noise Enforcement Work

- There is one site (quarry) licensed under the Air Pollution Act. An inspection is planned to be carried out in Q4 2025.
- There is one site (dry cleaner) registered under the Solvents Regulations. An inspection was carried out in July 2025 and the site was compliant.
- No inspections have been carried out to date in 2025 under the Petroleum Vapour Regulations.

Actions Required:

1. Carry out solid fuel inspections in Q4 2025 to investigate compliance with the Solid Fuel Regulations. Ensure that non-compliances are followed up with enforcement action, where necessary.
2. Ensure that local air quality monitoring data is being reviewed and if exceedances are recorded, take action to target inspections and awareness raising activities in the locality.
3. Carry out inspections of sites under the Air Pollution Act, Deco Paints Regulations and Petroleum Vapours Regulations to investigate compliance with the legislation. Ensure that non-compliances are followed up with enforcement action, where necessary.

3.5 Resources

Observation:

- Longford County Council has had a number of changes of staff, new staff have joined in recently months and are at full staff complement.


Action Required

Longford County Council should regularly review the staff resources in its environmental section and ensure that this vital work is appropriately prioritised and that adequate resources are deployed to deliver its statutory functions in environmental protection.

4.0 FOLLOW-UP ACTIONS

Longford County Council shall take action to address the observations raised in this report and submit a report to the EPA by the **21/11/25**. The report should provide details of the actions taken (or planned) to address the various recommendations, including timeframes where appropriate. These actions may be checked and verified by the EPA during future audits/inspections. This report is issued without prejudice to the right of the EPA to take any further action which it may in future decide is appropriate, whether under Section 63 of the EPA Acts 1992 and 2003 or otherwise.

Report prepared by:



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Reviewed by:



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Date:

25/09/25

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25/09/25