



# Local Authority Enforcement Audit Report

## Meath County Council

Date of audit 03 09 2025 Audit report Ref: LAET 2025/09/22

### 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

Meath County Council achieved a Strong or Excellent rating in all 19 NEPs in 2024.

Observations were raised in relation to:

- Environmental Complaints Handling; and
- Progress with the National Enforcement Priorities (NEPs) 2025-2027 in the areas of waste, water, and air/noise.

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

Meath County Council stated that lack of resources is impacting on the performance by the Council of its statutory environmental protection functions in 2025. Meath County Council should, therefore, 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.

### 2. SCOPE OF AUDIT & ATTENDEES

The scope of the audit included a review of Meath 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>
Gerry Boyle	Acting Director of Service Environment & Climate Action
Kitty Foyle	Senior Executive Officer
David Keyes	Senior Executive Engineer and RMCEI Co-Ordinator
Ciara Coughlan	Assistant Scientist
Frances Hughes	Senior Staff Officer & Environmental Complaints Co-ordinator
Deirdre Flood	Staff Officer & Environmental Complaints Co-ordinator
Conor Mulligan	Environmental Technician
Emmet Conboy	Executive Chemist
Marian Cummins	Assistant Scientist
Eimear Reilly	Assistant Scientist
Annina Niskanen	Assistant Scientist
Norbert McMahon	Executive Engineer
Michael Kenny	Environmental Technician
Ann Ennis	Assistant Scientist

### Representing the Environmental Protection Agency:

Maria Lenihan	Inspector
Aoife Loughnane	Inspector
Thomas Wallace	Inspector

## 3. AUDIT OBSERVATIONS & RECOMMENDATIONS

### 3.1 Environmental Complaints Handling

#### Observations:

- All complaints received are reviewed by staff, categorised by priority for specific response times and triaged to relevant environmental staff for investigation. Meath County Council was informed of an updated Environmental Complaints Procedure for Local Authorities which requires that complaints are acknowledged and forwarded to relevant personnel immediately. This Environmental Complaints Procedure will be communicated to local authorities in October 2025.
- A CRM system is in place to track complaint investigations. Monthly checks are carried out within the enforcement teams to redistribute complaints amongst staff if needed and to discuss progress with the cases. For complaint status there is a 'closed unresolved' field. Meath County Council explained the reasoning for this and gave an example of where an illegal dumping complaint is received and investigated, the waste is removed but the offender could not be identified.
- The Meath County Council website has an application to 'Submit your query or communication using the form below' and is considered an online option to make an environmental. However, this form does not specify that environmental complaints can be reported here and the fields available are not intuitive to make an environmental complaint.
- The CRM complaints system and waste file index in place for tracking complaints do not reference EPA referred complaints and it took time to locate some EPA referred complaints on the CRM system.

Table 1: Sample complaints reviewed				
	Reference	Subject	Finding	Action
1.	Ref. No. 316736	Air pollution query.	It was recorded that the issue did not persist and that the complaint was resolved. However, it remains open in the system, with no details of the investigation undertaken.	Review open complaints and if the issue is resolved close the complaint on the system. Ensure that the details of investigations are recorded.
2.	Ref. No. 312082/COM020041	Chemical like smell in residences.	The source for the odour could not be identified after a detailed investigation, however the odours did not persist. Complainant was informed to contact Meath County Council if the odour persisted.	No action required.
3.	Ref. No. COM020671 & COM021365/326138)	Alleged unauthorised ELV waste site.	The site was investigated and a Section 14 Direction was issued. The complaint files did not reference the other complaints relating to the same site.	Linkage is required in complaint files related to the same site.
4.	Ref. No. COM014402	Alleged unauthorised development.	The site was investigated and a Section 4 discharge licence required.	On-going investigation.
5.	Ref. No. COM020881	Odour and associated spreading of waste material.	The site was investigated and an update was provided to complainant.	No further action.

#### **Actions Required:**

1. Review the existing environmental complaints procedure in line with the new Environmental Complaints Procedure for Local Authorities that will be issued in October 2025.
2. Put in place a dedicated online environmental complaint form that is easily accessible on the local authority website.
3. The detail of investigations undertaken and any actions undertaken must be recorded and kept up to date in all environmental complaint files on CRM. Update complaint Ref. No. 316736.
4. The CRM system complaint status category 'closed unresolved' should be amended to 'closed', unless this field is required at a local level.
5. If multiple complaints are received and are active for one site then there should be a link in the complaint and case file identifying the other relevant complaint(s) and case file(s). The waste file index in place should record the EPA complaint reference number to allow for retrieval of EPA referred complaints.

## 3.2 Waste National Enforcement Priorities

### Observations:

- The annual return (AR) validations of the Permitted Waste Collectors and Facilities on the NWCPO were reviewed. Progress was evident across a number of sites and collectors, with the data reviewed and returned to the collector/site in some cases. Meath County Council have followed up with the operators who have not yet submitted the ARs. It was noted that a number of ARs were recorded as 'Submitted' on the NWCPO portal but had not yet been validated by Meath County Council. This work should be completed as soon as possible.
- During the audit, a sample of inspections carried out by the inspectors were reviewed. Inspections are mostly entered on a tablet during the inspection. It was noted that in some instances a version of the WERLA waste inspection templates were used but it was not always the up to date version, as this could not be easily updated on the tablets. The 2025 Governance process NEP *Recording and reporting of Environmental Inspections, Compliance and Enforcement Data* states that relevant WERLA templates should be used.
- The fields from the inspection forms on the tablet are exported to waste audit excel spreadsheets. It was noted that there are fields such as the date for follow-up inspections. However, there is no field to track if the follow-up inspection was carried out or if satisfactory action or follow-up was carried out. During the audit, it appears that the follow-up had been carried out in the cases reviewed but there is no system to track this.

### Construction & Demolition (C&D) Waste

- A strong risk-based approach to the construction and demolition enforcement was demonstrated, with interaction with planning in relation to the Resource and Waste Management Plans, which are reviewed by the environment section. A high level of construction site inspections was carried out so far in 2025, selected in a risk-based manner based on the data in the planning and local intelligence, with follow-up inspections where issues were observed.
- Article 27 notifications are being desktop assessed, with site inspections carried out at the site of origin or destination if issues were identified. Samples were presented where a case was deregistered and the inspection report for ART27-3831 was reviewed. Collaboration with other local authorities was also shown.

### Household & Commercial waste

- Household surveys were carried out in July, where an area was surveyed on bin collection day to identify what households were putting out bins. The relevant waste collectors were contacted regarding the households who did not present a food bin on collection day to ensure that the 3 bin system is being offered. Although a high compliance rate was identified from the surveying, resource constraints have impacted the follow-up on non-compliant households in this area in 2024 and in 2025.
- In 2024 the use of a Section 34C register was reviewed by Meath County Council to target inspections in areas with low compliance for the use of a 3 bin system or alternative. However, this work was not progressed. While it is an enforcement focus to follow up with the waste collectors to ensure that the 3 bin is provided, this was demonstrated in the case of an area where the 3 bin was not being offered. The areas where households are not using the 3 bin system or an alternative need to be identified, and follow-up enforcement action is required where recurring non-compliance is observed. Meath County Council indicated that a Fixed Penalty Notice has never been issued for these types of non-compliances under the waste presentation Bye-laws.
- Follow-up with the non-compliant commercial waste sites, outstanding in 2024 are being progressed in 2025 with re-inspection and correspondence issued. It may be useful to review the commercial waste segregation template letter against the relevant legislation, as under the waste presentation Bye-Laws a Fixed Penalty Notice can be issued to non-compliant commercial sites.

**Actions Required:**

1. The up-to-date versions of the WERLA inspection templates should be used during inspections.
2. Systems are required to track the date for inspection follow-up and to record if adequate follow-up was taken at non-compliant sites.
3. The Permitted Waste Facility and Collector Annual Returns which have been submitted must be validated on the NWCPO portal as soon as possible.
4. 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 waste presentation Bye-laws.

**3.3 Water National Enforcement Priorities****Observations:****Pressures from Agriculture – Farmyards & Farmlands**

- Meath County Council has an assigned allocation of 318 agricultural inspections in 2025 under the National Agricultural Inspection Programme. To date in 2025, 170 inspections have been completed and approximately 10 cross reports have been made to the Department of Agriculture, Food and the Marine (DAFM).

**Domestic Waste Water Treatment Systems (Septic Tanks)**

- Meath County Council carried out 82 inspections in 2024 which exceeded the 63 inspections required under the National Inspection Plan (NIP) for Domestic Waste Water Treatment Systems.
- Meath County Council had an 86% closure rate of advisory notices for the period 2013 to 2024, 67 advisory notices are currently open and Meath County Council are actively progressing the close out of these advisory notices.

**Discharge Licensing / Misconnections**

- Meath County Council has 45 discharge licences and the risk rating tool for these licences was examined. 13 licences have been classified as risk category B, while the remaining 32 fall under category C. Meath County Council informed the audit team that inspections are unannounced, category B sites are inspected quarterly and category C sites inspected biannually. Licensees are also required to undertake self-monitoring of the discharges and submit the results to Meath County Council.
- A Section 4 discharge has been identified as a significant pressure on one waterbody in Meath, the Nanny (Meath)\_30. Meath County Council is actively engaging with the operator of an unlicensed site regarding the trade effluent discharge to this waterbody. A programme of works is currently underway to address compliance issues, and the waterbody's status as a significant pressure will continue to be monitored.
- A Section 4 discharge licence file (Ref. No. 04/6) was reviewed. A warning letter was issued on 09/08/2024, after which the licensee ceased discharging. During this period, effluent was tankered to an authorised facility, and waste dockets were provided to confirm its removal. Improvement works were carried out at the on-site wastewater treatment plant, and the licensee resumed discharging treated effluent. However, recent monitoring results indicate continued non-compliance with the licence conditions. Meath County Council informed the audit team that they are maintaining a watching brief on this discharge licence.
- The audit team was informed that progress on addressing misconnections has been hindered by resource constraints. Efforts should be prioritised in areas where urban runoff poses a significant environmental pressure, such as Ashbourne. Furthermore, the misconnections work outlined in the 2024 NEP Progress Report should be advanced in 2025.

## **Local Priorities and Water Quality Monitoring**

- Meath County Council completed the WFD and bathing water monitoring programmes in 2024.
- Investigative monitoring was undertaken for WFD characterisation and to select catchments to target actions, including farm and septic tank inspections.
- In the Water Action Plan (3<sup>rd</sup> cycle River Basin Management Plan) published in September 2024, there are 13 areas for action where Meath County Council is the lead organisation. Meath County Council informed the audit team that 11 areas of action have been progressed and demonstrated good proactive work being undertaken in this area.
- The Private Water Supplies Register and Compliance Monitoring Programme were examined during the audit. The register contains 153 entries (151 small private supplies and 2 private group schemes). Meath County Council is actively monitoring private water supplies and is currently not using the EPA Compliance Monitoring Programme template.
- There are currently two Boil Water Notices in place on private water supplies, one of which was recently issued to a GAA club.
- A discussion was held regarding ongoing compliance issues at Basketstown Landfill (W0010-02), specifically concerning the management of leachate, which has led to the contamination of both surface water and groundwater. The landfill continues to be a significant pressure on the adjacent surface water body.

### **Actions Required:**

1. Carry out at the assigned 318 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. Carry out 63 septic tank inspections in 2025 in order to meet the requirements of the National Inspection Plan (NIP) for Domestic Waste Water Treatment Systems (DWWTS).
4. Ensure there is a focused effort on closing out advisory notices for DWWTS failures, in particular those open more than two years.
5. Consider implementing a master tracker (or multiple trackers) to record and monitor key information for the management of Section 4 discharge licences. This should include risk-rating, compliance status, monitoring results, self-monitoring returns, warning letters issued, and any enforcement actions taken.
6. Consider establishing a formal procedure to guide the escalation of enforcement actions for non-compliant section 4 discharges, ensuring consistency, transparency, and timely decision-making.
7. Misconnections work should be prioritised in areas where urban runoff poses a significant environmental pressure and particular focus should be given to progressing the work identified in the 2024 NEP Progress Report.
8. Consider the use of the EPA Compliance Monitoring Programme template for the planning and monitoring of private water supplies.
9. Ensure that all necessary measures are undertaken to address the cause of contamination of the water supply to the GAA club currently on a boil water notice. Additionally, appropriate signage must be in place to clearly inform users that the tap water is not safe for consumption unless boiled beforehand.
10. Regarding Basketstown landfill W0010-02 address the actions specified in EPA Site Visit Reports Ref. No. SV31697 and Ref. No. SV30592 and EPA Compliance Investigation Ref. No. CI000567.

### **3.4 Air and Noise National Enforcement Priorities**

#### **Observations:**

##### **Solid Fuels**

- The register of solid fuel retailer/merchants and distributors was examined during the audit. There are 149 entries on the register, 14 of which are producers.
- According to NEMIS, Meath County Council reported 77 solid fuel inspections in Quarter 1 2025, with a further 5 inspections completed in Quarter 2. The retailer inspection forms were not available to view during the audit.
- To date in 2025, there has been no multi-agency roadside checkpoints carried out to investigate the sale of unapproved fuels.
- No fuel sampling is being carried out by Meath County Council in 2025. The fuel sampling programme is being undertaken by the Department of Climate, Energy & the Environment.

##### **Air Quality Monitoring & Data Use**

- Meath County Council engages with the EPA Ambient Air Quality Monitoring Team in relation to the air quality monitoring station at Navan.
- The PM<sub>10</sub> exceedance at Navan air quality monitoring station on 07/01/24 was discussed. Meath County Council confirmed that they carried out targeted solid fuel inspections following the exceedance.

##### **Environmental Noise Directive (ENDs)**

- Meath County Council achieved a strong score for this NEP in 2024, with low noise road surfacing being used and the completion of the active travel scheme on the R135 in Ashbourne.

##### **Ongoing Air & Noise Enforcement Work**

- The compliance rate for sites under the Petroleum Vapours Regulations was not clear in the 2024 NEP Progress Report and could not be confirmed during the audit.

#### **Actions Required:**

1. Ensure that inspection templates are used for solid fuel inspections and saved centrally on Meath County Council's IT system.
2. Ensure that non-compliant solid fuel producers are being followed up with enforcement actions where necessary.
3. Identify the compliance rate for sites under the Petroleum Vapours Regulations.

### **3.5 RMCEI Plan review meetings**

#### **Observations**

- Meath County Council currently have monthly review meetings of the RMCEI plan.
- A high level of inspections are planned at the start of the year across the waste area. It was noted during the inspection that resource constraints via staff vacancies have impacted this work area in 2024 and 2025, where some areas have not received the required follow-up. Meath County Council should consider reviewing the level of planned inspections for 2025 to ensure activities for focus receive the required enforcement effort and follow-up. For instance the planned frequency of inspections at the Permitted Waste Facilities, particularly the lower risk rated sites, should be considered and the scale of activity planned around activities such as the household waste collectors and the PRIs should be reviewed.

#### **Actions Required:**

1. Due to resource vacancies in the waste area the planned inspections for 2025 should be reviewed to ensure that inspections and follow-up can be achieved under the waste activities for focus as reported under the NEPS and the Local Authority Work Programme 2025. Inspections under the activities for focus must be prioritised and supported.

### 3.6 Resources

#### Observation:

- Meath County Council have a number of vacant positions in the areas of waste, water and air and the audit team were informed that this is impacting on the work required in 2025.

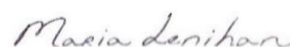
#### Action Required

Meath 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

Meath County Council shall take action to address the observations raised in this report and submit a report to the EPA within **2 months** from the date of issue of this report. 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:

19/09/25

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19/09/25