

From: EIR Compliance

To:

Subject: 2025119 – EIR

Date: 19 November 2025 12:39:05

Attachments: PVC pipes.pdf

Reference Number: **EIR**

Dear

We refer to your request for information submitted to Yorkshire Water dated 22 October 2025, which is listed below.

"Please provide information held by your company concerning vinyl chloride monomer (VCM), also known as chloroethene, in drinking water supplies.

This request includes:

- 1. Monitoring data or test results, including the type of water tested (groundwater, surface water, or tap water) as well as the sampling date, location, quantification and detection limits, and any other relevant associated information, for vinyl chloride monomer (VCM) in water supplies.*
- 2. Information on VCM monitoring and detection strategies, including: sampling protocols (frequency, locations, triggering criteria), analytical methods used (detection limits, laboratories), risk assessment methodologies for identifying high-risk areas or pipe sections, and any changes to monitoring approaches over time.*
- 3. Information regarding plans or measures to manage VCM contamination in drinking water, including (but not limited to): communication strategies for informing consumers, flushing protocols, pipe replacement prioritisation criteria, risk mitigation measures, or any other corrective actions taken or planned.*
- 4. Information on the inventory, location, and replacement programmes for PVC pipes installed before 1980 in water distribution networks.*

Please include records held for the period 1998 to the present.

If any part of this request is considered too broad, I would appreciate your advice and assistance in refining it as required under Regulation 9 of the EIR. In the meantime, I would be grateful if you could release any information that can reasonably be provided (especially regarding point 1)."

Monitoring data or test results for VCM in water supplies

Yorkshire Water does not carry out testing for chloride monomer (VCM), also known as chloroethene in any of its water supplies.

Our monitoring programmes are designed to meet the requirements of the Water Supply (Water Quality) Regulations 2016, and we also follow guidance issued by the Drinking Water Inspectorate (DWI).

While we conduct additional background scanning on our raw water sources and test for some related organic compounds, chloroethene is not among the parameters required or monitored under the current regulatory framework.

As such, no data, sampling results, or associated records for VCM (chloroethene) in drinking water supplies are held by Yorkshire Water. The data protection team have conversed with the business and have established we do not hold any of the requested data. As such for the purposes of paragraph 12(4) a public authority may refuse to disclose information to the extent that (a) it does not hold that information when an applicant's request is received.

Monitoring and detection strategies

Our monitoring strategies are based on the parameters included in the Water Supply (Water Quality) Regulations 2016, supplemented by DWI guidance.

We operate a comprehensive sampling programme covering groundwater, surface water, and distribution systems, with frequency and scope determined by statutory and risk based assessments.

Since chloroethene is not a parameter included in these regulations, we do not have specific sampling protocols, analytical methods, detection limits, or laboratory data for this compound.

Monitoring approaches are periodically reviewed to align with updates to the regulations and national guidance. Any future inclusion of chloroethene as a regulated parameter would result in corresponding updates to our sampling and analysis strategies. The data protection team have conversed with the business and have established we do not hold any of the requested data. As such for the purposes of paragraph 12(4) a public authority may refuse to disclose information to the extent that (a) it does not hold that information when an applicant's request is received.

Plans or measures to manage VCM contamination

As chloroethene is not currently subject to mandatory monitoring, and no detections have been reported, we do not have specific management or mitigation plans in place for VCM contamination.

No specific VCM-related actions or strategies are in place or planned at this time.

Inventory, location, and replacement of PVC pipes installed before 1980

We hold records of PVC pipes laid before 1980 within our network, a spreadsheet containing this inventory is attached.

We do not have a dedicated replacement programme based on pipe material type. Our replacement strategy is performance-based, focusing on mains that are prone to repeated bursts or are causing interruptions to customer supplies. When a main meets the criteria for renewal, it is replaced irrespective of material.

As we took over the water and sewerage network from regional authorities in 1989, and many mains were laid prior to this (before computers were invented), the confidence in the date laid of some of its assets has been derived from data mapping projects, where there is an error band based on the confidence we have of when the main was actually laid. This is why we end up with some default ages where there may be a confidence grade of + or - 20 years either side of the estimated date laid. The mains laid in the last 30 years will have an accurate date laid value.

In accordance with section 12(5) paragraph (a) of the EIR, a public authority may refuse to disclose information to the extent that its disclosure would adversely

affect international relations, defence, national security or public safety. Whilst we understand that for the purposes of public interest it would be beneficial to obtain this information we also have to consider whether it would be in the wider public interest to disclose the information. When weighed against the potential risk to national security and public safety for our clean water infrastructure.

Disclosure of details relating to the location of the PVC pipes presents a significant risk to public safety and the national security of Critical National Infrastructure (CNI). Safeguarding national security includes the protection of potential targets, even if there is no evidence that an attack is imminent. The clean water network form part of the CNI of this country and could be perceived as a potential target for such an attack. Having considered your request in line with the above, it is our belief that releasing a detailed map showing the location of PVC pipes could potentially pose a risk to national security. We also have to consider the guidance issued to us by DEFRA on what we can make available in the public domain in relation to Critical National Infrastructure (CNI). We recognise the importance of transparency and accountability, and we have carefully considered whether the public interest in disclosure outweighs the potential harm. However, we believe that in this case, the public interest in maintaining the exemption outweighs the public interest in disclosure. The potential risks associated with releasing the information are too significant to justify its disclosure, as such we will not be disclosing the information to you. Whilst we have partially refused your request for location, we have provided the further information you requested in relation to the PVC pipes.

We trust that the provision of this data satisfies your request. In accordance with the Environmental Information Regulations 2004, if you are not satisfied with this reply to your request you can ask for an internal review. A request for an internal review must be submitted within 40 working days by contacting the Data Protection Team.

Thank you for contacting Yorkshire Water.

Yours sincerely,

Data Protection Team

Email: EIR@Yorkshirewater.co.uk