

From: EIR Compliance

To:

Subject: 20260505 – EIR – Data Supplied

Date: 01 May 2026 15:22:00

Attachments: EIR – Distribution mains by area.csv

EIR – Trunk mains by area.csv

EIR – Age of material.csv

Reference Number: EIR

Dear

We refer to your request for information submitted to Yorkshire Water dated 2 April 2026:

1. *“Maps, GIS data, or location descriptions identifying PVC water mains installed before 1980, including street-level or postcode-level detail where available*
2. *The total length of pre-1980 PVC pipes currently in service in these areas, broken down by installation period (pre-1960, 1960–1970, 1970–1980) if recorded.*
3. *All vinyl chloride monomer (VCM) testing results from tap water, consumer premises, or distribution network endpoints since 2010, including sampling locations, dates, and concentrations detected.*
4. *Any internal risk assessments, technical reports, or correspondence with the Drinking Water Inspectorate concerning VCM leaching risk from PVC infrastructure.*

5. *Your current policy or methodology for assessing VCM compliance—specifically whether this is based on direct measurement or theoretical calculation.”*

Included with this email are the response to your questions.

1. Maps, GIS data, or location descriptions identifying PVC water mains installed before 1980, including street-level or postcode-level detail where available

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 considered 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 refused your request for location in response to this question in the form of maps, GIS data at street level / postcode we have provided the further information you requested in relation to the PVC pipes below.

2. The total length of pre-1980 PVC pipes currently in service in these areas, broken down by installation period (pre-1960, 1960–1970, 1970–1980) if recorded.

Please see attached files titled ' EIR 1296 – Distribution mains by area csv, EIR 1296 – Trunk mains by area csv and EIR 1296 – Age of Material'.

Length by age laid (in metres): As we took over the water and sewerage network from regional authorities in 1989, and many mains were laid prior to this, from the information recorded within the attached, we understand that there are some errors with the accuracy of the data as we understand that plastic was not invented in some of the years where our records show it was laid. We have provided you the information we hold within our systems.

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.

3. All vinyl chloride monomer (VCM) testing results from tap water, consumer premises, or distribution network endpoints since 2010, including sampling locations, dates, and concentrations detected.

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. 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.

4. Any internal risk assessments, technical reports, or correspondence with the Drinking Water Inspectorate concerning VCM leaching risk from PVC infrastructure.

Following on from our response to question 3, 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). As a result, this is not a subject that has been discussed with the DWI and we do not hold any internal risks assessments or technical reports. 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.

5. Your current policy or methodology for assessing VCM compliance—specifically whether this is based on direct measurement or theoretical calculation

Following on from our earlier responses, 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. 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.

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