From: EIR Compliance To: **Subject:** 20251021 - EIR - Internal Review Response **Date:** 21 October 2025 16:15:00 Attachments: eir-pfas-treated-data.csv EIR - PFAS Raw Data.csv **EIR Reference: EIR** Dear We refer to your email dated 11 September 2025 in relation to our response to EIR. We have logged your internal review reference as EIR **Original request:** You original request was made on the 31 August 2025 and recorded as EIR: "I am writing to request information regarding the presence of PFAS ("forever chemicals") in drinking water supplied by Yorkshire Water. Specifically, I would like to know. 1. Whether PFAS levels detected in Yorkshire Water's treated water are compliant with current legal standards.

2. What actions are required or recommended if PFAS are detected at low levels

3. Any publicly available guidance or data on PFAS monitoring, testing methods,

below regulatory thresholds.

and frequency in England's drinking water."

Our response to EIR:

We responded on the 11 September 2025 with the below response.

Question 1 response:

While there are currently no direct legal standards for PFAS chemicals, we are dedicated to providing water that is safe and wholesome for all our customers. The Drinking Water Inspectorate has issued guidance for the industry that includes a tiered classification system for PFAS.

We can confirm that none of our supply systems fall into Tier 3, which is the level where health protection measures would need to be considered. This means that none of our water supplies are considered a health risk. Most of our water systems are classified as Tier 1, the lowest tier. A small number of our supply systems are in Tier 2, and we are working towards investigation interventions to reduce PFAS levels in these areas.

Question 2 response:

Please refer to our response for point 1. In addition to this, Water Companies_are expected to immediately address any supply system that enters Tier 3 of the DWI system. For supply systems within Tier 2 we are expected to take steps to reduce PFAS levels on a proactive and systematic basis.

Question 3 response:

In response to request for our PFAS data we have provided the data under EIR.

Guidance is available publicly via:

https://www.dwi.gov.uk/pfas-and-forever-chemicals/

https://dwi-production-files.s3.eu-west-2.amazonaws.com/wp-content/uploads/2025/03/24141825/DWI_PFAS-Guidance_Mar_2025.pdf

Your request for an internal review EIR:

You contacted us on the 11 September 2025 to request an internal review advising:

"Thank you for your response to my request under the Environmental Information Regulations 2004 (reference EIR).

While I appreciate the information provided, I do not believe it fully addresses my request. In particular.

- 1. You confirm that "a small number" of Yorkshire Water's supply systems are classified as Tier 2, but you have not specified which supply systems these are, or how many customers are affected. Please provide this information.
- 2. You have not listed which specific PFAS compounds were detected in Tier 2 systems, nor their measured concentrations. Please provide this in a clear, accessible format.
- 3. You state that "investigation interventions" are being taken to reduce PFAS levels in Tier 2 systems, but do not give details. Please specify:

What actions are being taken;

The expected timescale for these actions;

How progress will be monitored and reported.

4. You confirm there are no direct legal limits for PFAS in drinking water, only guidance tiers. Please clarify whether Yorkshire Water intends to adopt any stricter standards in line with those set in the EU or US, where lower thresholds for PFAS are already in place.

Internal review response EIR:

In reviewing your original request for information against our response, we consider that we provided the information you requested. We understand that

within your internal review you have requested further detailed information. Please find this below.

Tiers are classified as based on the results below:

Tier 1 is < 0.010 ug/l

Tier 2 is between 0.010 ug/l and 0.100 ug/l

Tier 3 is > 0.100 ug/l

In response to your specific request for information we can confirm that seven water treatment works (WTW) are within Tier 2 (this is from the latest review completed on the 02/10/2025). Those WTWs can provide water to 17 water supply systems and therefore could impact around 863,826 customers. Please note the tier status of WTWs are not static and are subject to change. The WTW's currently in Tier 2 are:

Albert WTW

Blackmoorfoot WTW

Fixby WTW

Headingley WTW

Kirkhamgate WTW

Loftsome Bridge WTW

Longwood WTW

We have information publicly available via our EIR disclosure log in relation to PFAS, we have included a copy of this for ease of reference. Within here you will be able to identify in column A the component name, this confirms the component we have tested for and the associated results. By filtering the results using the guidance above you will be able to identify the components with the data that is readily available. As per the Drinking Water Inspectorate (DWI) guidance Yorkshire Water currently monitors for 48 different PFAS compounds which can be identified in column A of the spreadsheet. WTWs are classified as tier 2 if they have had two

or more tier 2 detections of the same PFAS compound within the last 12 months or one or more treated water tier 2 detection in the last 12 months.

We can confirm the investigation intervention being taken to reduce PFAS levels in Tier 2 systems are clearly defined by the DWI in their latest guidance published in March 2025. On page 7 – table 1 of the guidance it states the actions that are required by each water company should PFAS concentrations increase into tier 2 level. Actions include increased PFAS monitoring frequency, review of the catchment risk assessment. Once the source of the PFAS has been identified then appropriate mitigation can be developed which may include catchment management, direct or indirect treatment or process-controlled blending. There is no set timescale for completion of such investigations. This is because there are many contributing variables that can impact PFAS concentrations especially when investigating Total PFAS and historic PFAS contamination. Over the next 5 years Yorkshire Water are committed to investigating and understanding PFAS concentrations in Yorkshire and to develop mitigation methods where required.

The DWI regulate water companies on drinking water quality and outline the monitoring requirements and regulatory standards for drinking water. Yorkshire Water follows the latest guidance from the DWI for PFAS which was published in March 2025. The DWI works closely with the UK Health Security Agency, the Environment Agency and government to adopt the most up to date information regarding standards and toxicology and carry out their own research to inform their decision making. Their latest research is published on their website. We would like to clarify that we will follow all DWI guidance should it be modified in the future.

If you are not satisfied with the outcome of the internal review you have the right of appeal to the Information Commissioner who can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Web: http://www.ico.org.uk

Thank you for contacting Yorkshire Water.

Yours sincerely,

Data Protection Team

Email: EIR@Yorkshirewater.co.uk