

From: EIR Compliance

To:

Subject: 20251208 - EIR

Date: 08 December 2025 09:53:11

Attachments: LBBC alkaline hydrolysis consent Y-478-19C.pdf

Reference Number: **EIR**

Dear

I refer to your request for information submitted to Yorkshire Water dated 10 November 2025 which is set out below.

1. "1. A copy of the **Trade Effluent Consent** issued by Yorkshire Water to **LBBC Ltd / Resomation Ltd** (or any operator acting on their behalf) that permits discharge of effluent arising from **alkaline hydrolysis (water cremation)** activities to sewer.

1. 2. All **supporting technical information** relied upon in granting that consent, including: sampling plans, laboratory analyses, assessment reports (including work attributed to **Middlesex University**), and any internal technical memoranda or decision records.

3. Any **method statements or conditions** relating to neutralisation/pH correction, concentration or mass limits (e.g., COD/BOD, TSS, TN, phosphorus, metals), monitoring frequency, composite/grab sampling requirements, and reporting obligations linked to that consent.

Date range: Please search **1 January 2018 to present.**"

We have adopted the numbering contained in your request for ease of reference. Please see the data below.

1. **A copy of the Trade Effluent Consent issued by Yorkshire Water to LBBC Ltd / Resomation Ltd (or any operator acting on their behalf) that permits discharge of effluent arising from alkaline hydrolysis (water cremation) activities to sewer.**

Copy attached to this email.

2. All **supporting technical information** relied upon in granting that consent, including: sampling plans, laboratory analyses, assessment reports (including work attributed to **Middlesex University**), and any internal technical memoranda or decision records.

In 2019 we worked with Resomation Ltd, the University of Middlesex and the University of Sheffield to conduct a robust scientific study to assess whether it would be technically acceptable to issue a trade effluent consent. The results of the study gave us no reason not to consider the trade effluent as acceptable. Following the study LBBC Ltd, the parent company of Resomation Ltd, applied for a trade effluent consent, which was subsequently granted after going through our assessment process. Any further consent applications will be assessed through our normal processes, based on the knowledge we have gained from the study.

Amongst the analytical data collected is the following

parameter	range
Chemical oxygen demand	11,000 to 54,000 mg/l
COD/BOD ratio	1.7 to 1.9
Oil/grease	887 mg/l to 15,800 mg/l
Total solids	600 to 3,500 mg/l
Settleable solids	20 to 2,380 mg/l
Ammonia	5.3 to 272 mg/l (maximum value out of normal range)
pH	9.0 to 9.5 (adjusted prior to discharge)

Temperature	< 43.3 o C (heat recovered and used to warm water for next cycle).
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Mean case concentrations for several parameters (e.g. chemical oxygen demand (COD)) were associated with large standard deviations indicating some variation between cases. This has been attributed to differences in sex, age, body mass and whether, or not, embalming techniques were employed.

Analysis of samples showed no presence of residual human DNA. This agrees with the analysis undertaken in the USA

Further analysis of the fats, oils and grease content indicate that the saponifiable (i.e. soap fraction) component was the major contributor and so would not separate out in the sewer negating the possibility of blockages.

3. Any **method statements or conditions** relating to neutralisation/pH correction, concentration or mass limits (e.g., COD/BOD, TSS, TN, phosphorus, metals), monitoring frequency, composite/grab sampling requirements, and reporting obligations linked to that consent.

We wrote to you on the 27 November 2025 for clarification in relation to this question.

We require further information to establish the information you require in relation to this specific question.

To provide the information that you require to respond to this, we require the following clarification:

1. Could you clarify what you mean by your question so we can make sure we provide the right data?

2. If the neutralisation question relates to the neutralisation of the trade effluent prior to discharge we do not specify how this should be achieved. We just specify the allowable pH range.
3. If the question is about analyses then the lab we use uses standard and published methods.

There has been no discharge from the site in question and so no analysis has been carried out. Sampling frequency would be decided in the same way as any other trade effluent discharge with volume, strength, load, constituents taken into account along with consideration of the receiving sewage works and sewerage system.

We are at this time refusing your request for information following Regulation 12(4)(c) of the Environmental Information Regulations (EIR) 2004, within the scope of which your request has been considered. We welcome you to submit a new request which includes the clarification above. This would be treated as a new EIR request.

Date range: Please search **1 January 2018 to present**.

No discharge from the site and so no data is available related to the consented discharge. The other data we have from the trial we carried out in 2019 is summarised in the table above. 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.

I 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