

From: EIR Compliance

To:

Subject: 20250425 - EIR - Data Supplied

Date: 25 April 2025 15:27:00

Reference Number: **EIR**

Dear

We refer to your request for information submitted to Yorkshire Water dated 26 March 2025:

"Yorkshire Water Environmental Information Request: PFAS Monitoring and Risk Management"

Included with this email is our response to your questions:

- 1. The date when Yorkshire Water first began testing for PFAS in either treated drinking water or untreated/raw water sources.**

Initial analysis began in January 2022 in raw waters, the investigation programme has been developed over time and now comprises raw and treated water

- 2. A list of all water treatment works and abstraction points where PFAS testing has been carried out since testing began. Please confirm whether each site is currently undergoing testing, is scheduled for future testing, or has ceased testing. Also confirm the frequency of PFAS testing at each listed site.**

Sampling for PFAS chemicals is undertaken on all of our water supply. As a minimum, the combined raw inlet, or individual points where no combined point exists, have been continuously monitored for PFAS on a rolling basis since laboratory analysis was available. Raw water analysis is supplemented with water treatment works outlet sampled on a risk assessed basis. Although the frequency

of PFAS sampling may increase or decrease, we will not cease monitoring any supply to our customers.

After careful consideration in regards to the abstraction points, we are writing to inform you that your request for environmental information has been partially refused in accordance with the Environmental Information Regulations (EIR) 2004. 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. In applying this exemption, we must consider the potential harm that could result from releasing the requested information and weigh it against the public interest in disclosure. We have to treat disclosure of information under the Environmental Information Regulations (EIRs) as disclosure to the 'world at large'. Whilst we appreciate it would be beneficial to obtain this data for your research, we have to consider the wider public interest in disclosure, based on this. It is our belief that disclosing information could potentially pose a risk to national security. This is because safeguarding national security includes the protection of potential targets, even if there is no evidence that an attack is imminent. The information you have requested form part of the Critical National Infrastructure (CNI) of this country and could be perceived as a potential target for such an attack. In addition to this, 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 our 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.

Sub-catchments investigations have been prompted where potential for risk has been identified.

We do not have a specific report confirming the frequency for every site and as a result cannot provide it. As such for the purpose of EIR we applied exemption 12(4)(a), a public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received. The level of monitoring is built into our scheduling processes and based upon risk assessments of catchments and the nature of sample data that has been achieved to date, the frequency of collection varies between weekly and quarterly.

3. Copies of PFAS-related risk assessments for each water treatment work and abstraction point assessed under your PFAS risk management processes.

We are working to the Drinking Water Inspectorates (DWI) 3 Tier risk assessment. Tier 1 is the lowest risk and Tier 3 is the highest risk. It is only at Tier 3 that there is an indication that assessment of public health risk should be undertaken. We can confirm none of the water supply systems in Yorkshire are at Tier 3.

We do not have specific PFAS related risk assessment document. As such for the purpose of EIR we applied exemption 12(4)(a), a public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received.

4. Identification of any specific locations or areas that have been designated by Yorkshire Water as higher risk for PFAS contamination. Please confirm the criteria used to determine this higher risk classification.

We are working to the Drinking Water Inspectorates (DWI) 3 Tier risk assessment. Tier 1 is the lowest risk and Tier 3 is the highest risk.

The Drinking Water Inspectorate (DWI) define the Tier 3 level as occurring when any treated water sample or more than one raw water sample exceeds 0.1 ug/l.

We can confirm none of the water supply systems in Yorkshire are at Tier 3.

5. For each site tested, please confirm with a simple "yes" or "no" whether PFAS levels equal to or exceeding 100 ng/L have ever been detected, whether in treated or untreated water.

No samples of supply to customers have exceeded 0.1 ug/l.

6. Please confirm whether any such exceedances have been reported to the Drinking Water Inspectorate and whether you have received any feedback, findings, or reports from the DWI regarding PFAS issues at any Yorkshire Water sites.

There have been no exceedances.

7. Please confirm whether Yorkshire Water has ever been subject to any formal regulatory action, investigation, or finding of negligence in respect of PFAS monitoring or risk mitigation under any applicable public law or regulatory framework.

There has been no finding of negligence against Yorkshire Water. However, like all water companies Yorkshire Water has signed a formal legal Undertaking regarding investigation of PFAS risks. This Undertaking commits Yorkshire Water to carry out a series of investigations in order to better understand the potential for risk in our supply systems, and if necessary address PFAS risks in the period 2025 – 2030.

8. All Yorkshire Water results from all and any testing in respect of chemicals, contaminants and or specially PFAS or the like. All PFAS testing results ever obtained by Yorkshire Water.

We wrote to you on the 8 April 2025 to request further clarification in relation to this question. As we have not yet received the clarification, we are at this time refusing your request for information following Regulation 12(4)(c) of the Environmental Information Regulations (EIR) 2004, for this question within the scope of which your request has been considered.

We welcome you to submit a new request which includes the requested clarification below, this would be treated as a new EIR request:

- Please can you confirm if the timeframe for the request, for example are there any particular calendar years that you are interested in or since a specific date?
- Are there any specific locations that you are interested in?
- Are you interested in results from all water sources tested by Yorkshire Water?
- Are there any specific chemicals or contaminants for which you require test results?

8.1 The PFAS np/l Yorkshire Water deem acceptable and safe whether that is 100np/l or far under.

We follow all available guidance provided to the industry from our regulator the DWI.

We have responded to this on the interpretation that 100np/l, is 100ng/l in relation to this question as np/l is not a standard unit of measurement for PFAS.

8.2 Reasoning behind Yorkshire Waters deemed safe level of PFAS np/l in answer to point 8.1 above.

The risk associated with PFAS presence is not fully understood, and there is insufficient evidence to directly link any health impacts to the water supply. However, it remains appropriate to proceed on a precautionary basis, as the evidence base is likely to improve over time. There is official guidance from the DWI to the industry on risk Tiers and we are adhering to this guidance.

9. Reasoning as to why the water testing results in point 8, particularly PFAS and other contaminants testing results, are not published on Yorkshire Water website given customers in the area are paying for services for water consumption and usage.

We do not hold the information you seek in relation to this question. As such for the purpose of EIR we applied exemption 12(4)(a), a public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received.

In consulting with the business on this request, we can inform you that the business is continually reviewing publicly available information to ensure transparency, your feedback has been shared with our teams on the publication of PFAS data.

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