

From: EIR Compliance

To:

Subject: 20250327 - EIR - Data Supplied

Date: 27 March 2025 14:49:00

Reference Number: **EIR**

Dear

I refer to your request for information submitted to Yorkshire Water dated 27 February 2025:

"Please could you provide me with the following data in a spreadsheet for 2023 and 2024? If you only have the data for 2023 then please share that. If you don't have data for either year, please explain why and provide data for the most recent year that you have it. If you only have a proportion of the information requested, please provide the elements that you do have.

- 1. Volume or mass of sludge produced (e.g., tonnes per year)*
- 2. Source of sludge (e.g., specific wastewater treatment works)*
- 3. Characteristics of the sludge (e.g., dry solids content, organic matter, pathogens, metals)*
- 4. Type of treatment applied (e.g., anaerobic digestion)*
- 5. Treatment location (specific treatment works or third-party facility)*
- 6. Locations where sludge is temporarily stored*
- 7. Duration times for storage*
- 8. Disposal methods (e.g., land spreading, incineration, landfill, or energy recovery)*
- 9. Specific agricultural land or forestry sites where sludge is applied, with latitudes and longitudes or other specific location data*

10. Max heavy metal concentrations in sludge

11. Max pathogen and contaminant levels"

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 for the 2024 data. For the purposes of paragraph 12(4)(d), a public authority may refuse to disclose information to the extent that the request relates to material, which is still in the course of completion, to unfinished documents or to incomplete data. We can confirm that the 2024 data is unfinished. Whilst we understand that it would be beneficial to obtain this data, we have also considered whether it would be in the wider public interest to disclose the information. When weighed against the presumption in favour of disclosure, for the purposes of transparency and accountability, there may be some public interest in providing the data. However, releasing incomplete or draft information could result in misunderstandings and potentially jeopardise the integrity of our work, the completion and validation of this information is necessary to ensure that reliable information is provided. We are currently preparing our Annual Performance Report (APR) as part of this activity, once this information has been completed we will make this information available in the public domain in July via our website.

The information we have provided in our response to your EIR request relates to the data for 2023.

1. Volume or mass of sludge produced (e.g., tonnes per year)

2. Source of sludge (e.g., specific wastewater treatment works)

In response to questions 1 and 2 please see the information readily available in the public domain via the Yorkshire Water website at <https://www.yorkshirewater.com/environment/bioresources/> or alternatively this information is also collated by OFWAT: <https://www.ofwat.gov.uk/regulated-companies/markets/bioresources-market/bioresources-market-information/>

The market information publication on our website will take you to a spreadsheet, which can be downloaded.

The OFWAT website contains a dashboard as well as a spreadsheet that covers all companies.

3. Characteristics of the sludge (e.g., dry solids content, organic matter, pathogens, metals)

Dry solids content average 22%

Organic matter average 61%

4. Average sludge quality to agricultural land 2023			
Metal	mg/kg dry solids	Nutrient	% dry solids
Cadmium (Cd)	1.6	Nitrogen (N)	5.53
Chromium (Cr)	88	Phosphorus (P)	2.44
Copper (Cu)	266	Phosphate (4)	5.60
Lead (Pb)	112		
Mercury (Hg)	0.7		
Nickel (Ni)	44		
Zinc (Zn)	831		

5. Type of treatment applied (e.g., anaerobic digestion)

<u>Treatment type</u>	<u>Conventionally treated (tonnes)</u>	<u>Percentage</u>
Anaerobic digestion	32,812	30.2%
Anaerobic digestion with lime sanitisation	49,926	46%
Advance digested (Thermally Hydrolysed)	24,945	23%
No treatment (with or without dewatering)	887	0.8%

6. Treatment location (specific treatment works or third-party facility)

Please refer to our response for question 1 and 2, these spreadsheets include the treatment locations.

7. Locations where sludge is temporarily stored

We can advise you that the Environmental Permitting Regulations 2016 allow for an exemption from the state EPR Regs, to store sewage sludge at the place at which it is intended to be used under the Sludge (Use in Agriculture) Regulations (an 'S3 exemption'). S3 waste exemptions are recorded in the public domain on a the 'Register of Waste Exemptions', you can access this public register via <https://environment.data.gov.uk/public-register/view/search-waste-exemptions>. A contract partner Robinsons undertake the s3 applications on behalf of Yorkshire Water, this contains the information that you seek which has been made available in the public domain.

8. Duration times for storage

The sludge is stored in line with the s3 exemptions rules.

9. Disposal methods (e.g., land spreading, incineration, landfill, or energy recovery)

Land spreading (including agricultural, rec, WASC)	74,397 dry tonnes
Landfill	325 dry tonnes

No other outlets for the sludge disposal other than those referenced above. As the vast majority of sludge is anaerobically digested this generates a production of gas which is reused on site or exported to grid to recover energy.

10. Specific agricultural land or forestry sites where sludge is applied, with latitudes and longitudes or other specific location data

Regulations 6 and 7 of the Sludge (Use in Agriculture) Regulations 1989 ("Regulations") require every sludge producer to maintain a register of the quantities of sludge produced and supplied for use in agriculture, including details of the amount of sludge used on each agricultural unit and the results of analysis of the sludge and the soil. The register is to be available to the Secretary of State for inspection, together with such information or facilities as he may reasonably require, including facilities for analysing the sludge or soil. The sludge producer is required to provide persons he supplies with the results of analysis of the sludge.

Looking at the request for information Yorkshire Water hold the information that you have requested on the register. When reviewing the register we acknowledge that the information captured on the register includes:

the names and addresses of the persons to whom the sludge was supplied; and
the address and area of each agricultural unit on which sludge has been used, the quantity of sludge used thereon, and the amount of each of the elements listed in the sludge table which have been added thereto;

These parts of the register documented above capture personal data. When reviewing this against your request you have expressly asked for “specific agricultural land or forestry sites where sludge is applied, with latitudes and longitudes or other specific location data” and we are satisfied that in this case that amounts to personal data.

With the above in mind, we are writing to inform you that your request for environmental information for this question has been refused in accordance with the Environmental Information Regulations (EIR) 2004. Under Regulation 12(3), this refusal is based on the grounds that the requested information constitutes personal data relating to an individual other than the applicant. Protecting the privacy and personal data of individuals is a fundamental principle, and as such, the provision of this information would contravene the data protection principles set out in Regulation 13. Regulation 13 stipulates that personal data shall not be disclosed if the release of such information would contravene any of the data protection principles in the UK GDPR or the Data Protection Act 2018.

Taking into consideration the public interest and acknowledging that the presumption is in the favour of disclosure for transparency and accountability. While we strive to provide as much information as possible in response to environmental information requests, we must also balance this with our obligation to protect personal data. Therefore, the specific details that include personal data of a person other than the applicant cannot be released.

11. Max heavy metal concentrations in sludge

All YW biosolids materials recycled to agriculture are compliant with the requirements of the Sludge Regulations and Biosolids Assurance Scheme (BAS).

<u>Determinands</u>	<u>Mg/kg DSB unless stated otherwise</u>
As	29.5
Cd	3.89
Cr	1190
Cu	443

F	381
Hg	1.53
K	2320
Mg	10100
Mo	15.8
N (%)	8.22
Ni	115.4
Organic matter (%)	73.4
Phosphorous	40600
Phosphate %	9.30146
Pb	663.9
pH	10.7
Se	33.4
Total solids/Dry solids (%)	31.7
Sulphur	20700
Zn	1500

12. Max pathogen and contaminant levels

All YW biosolids materials recycled to agriculture are compliant with the requirements of the Sludge Regulations, the Biosolids Assurance Scheme (BAS) and the Safe Sludge Matrix.

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