United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000

unitedutilities.com

Our ref: EIR/ID649
Date: 18/02/2026
Email: EIRRequests@uuplc.co.uk

Dear [redacted],

Thank you for your request for environmental information. We appreciate your interest, and we want to let you know that your request has been carefully considered in accordance with the Environmental Information Regulations (EIR).

We have answered each of your questions in turn below, with your requests being set out (***in bold italics***) and our responses set out immediately below.

We write in response to your email dated 24 September 2025 (the "Response") regarding our request for information under the Environmental Information Regulations 2004 ("EIR 2004").
To assist our client with understanding the Response, please provide a copy of permit XP3233HP and any supporting permit documents
A copy of permit XP3233HP can be found in Appendix 1.

Further to our previous request, we write to request information relating to leachate that is transferred directly to Davyhulme (as opposed to leachate received by tanker). In particular, please provide:
a. A record of all landfill leachate received at Davyhulme directly in the last three years. Please include details of the date of delivery, the source of the waste, the volume of the waste delivered, and any authorisation documents
As requested, we have provided a spreadsheet (Appendix 2), which provides the required details for all the sites which discharged landfill leachate via trade effluent consents to the sewer network draining to Davyhulme WwTW.
Copies of the trade effluent consents for the traders listed within Appendix 2 can be obtained from the trade effluent consent register, which is available on the United Utilities website at the following link Trade effluent consent register.
b. Of the accepted waste deliveries, please indicate which of these was classified as hazardous by the landfill operator prior to delivery
The Hazardous Waste (England and Wales) Regulations 2005 operate under section 62 and 62a of the Environmental Protection Act 1990. Similarly, the List of Waste Regulations are also linked with the EPA. These cover the classification and assessment of wastes.
Trade Effluent discharged to the foul sewer is not captured by the Hazardous waste or List of Waste Regulations and falls under a different act of parliament: the Water Industry Act 1991. Accordingly, the criteria for assessing effluents produced by traders is different. While certain considerations, such as the control of flammable substances to protect sewer infrastructure and ensure worker and public safety, may overlap with hazardous waste principles, trade effluent is not regulated on a hazardous/non-hazardous basis. Instead, it is controlled through the exclusion or limitation of

substances that pose flammability risks.
Therefore, 'hazardous waste' is not a classification used to determine if trade effluent is suitable for discharging to sewer. Trade effluent consent to discharge permits provide conditions and limits to control declared substances with the intention of protecting the health and safety of United Utilities employees, the sewer network, treatment processes and the environment.

c. A record of any known testing (including a description of the type of testing) undertaken by either the landfill operator or STW/WWTW, at the landfill leachate source, prior to discharge to the sewerage network. If undertaken, please provide a copy of the results of that testing.
Testing of landfill leachate sources generally falls into two categories: testing undertaken prior to and during the application for consent to discharge, and ongoing testing carried out to demonstrate continued compliance consent limits and conditions.
Onsite testing undertaken as part of the initial consenting process, during which the trader is not discharging to the sewer, is typically carried out by the trader rather than directly by United Utilities. Any contaminants expected or identified during this sampling are disclosed on the trade effluent application form, and this information is then used to inform the assessment described above and to determine appropriate consent limits and conditions.
I can confirm that we have received no trade effluent applications for new landfill sites discharging within the Davyhulme catchment in the last three years, therefore we do not hold the information you have requested and are unable to provide you with a copy of this. As per Regulation 12(4)(a) of the EIR, public authorities may refuse to disclose information to the extent that it does not hold the information when an applicant's request is received.
Our Trade Effluent team routinely monitors trader effluent discharges for compliance against the conditions stipulated in the trade effluent consent. The results of this routine monitoring can be found in Appendix 2.

4a. Clarification of how waste is classified as hazardous and non-hazardous (including any definitions used). Please provide any guidance documents used for the classification (in addition to or instead of the Waste Categorisation Technical Guidance WM3. Please also confirm whether or not per- and polyfluoroalkyl substances (PFAS) chemicals' concentration is considered when determining if the waste is hazardous or non-hazardous;
As set out above in question 3B, hazardous waste is not a term used for classifying trade effluent discharges to sewer. Pollutants and substances present within trade effluent discharge are declared by the trader on its discharge notice during the application process. For reference a copy of this form can be found on Ofwat's website via the following link Form-G-02-clean.pdf

The declared substances are then assessed and limited through a risk-based process which evaluates concentrations, their potential impact on the sewer network, worker safety, and the downstream wastewater treatment works' ability to treat them without breaching regulatory obligations. Common parameters such as pH, suspended solids, oils and greases, ammonia, COD and temperature are restricted because they can cause blockages, toxic atmospheres, equipment damage, or overload biological treatment systems. Consent limits for these substances are determined based on network capacity and treatment capability.
Where a notice declares substances identified in the Trade Effluent (Prescribed Processes and Substances) Regulations 1989 or arises from a prescribed industrial process, the application undergoes enhanced scrutiny based on background concentration assessment, mandatory hazard evaluation, potential prohibition, and strict consent conditions, supported indirectly by Environment Agency (EA) hazardous pollutant frameworks to ensure the compliance and safety of the receiving sewer network.
The regulation of PFAS is evolving rapidly, with the EA and Health and Safety Executive (HSE) currently reviewing risks and considering stricter, broader restrictions on PFAS. In lieu of any formal

limits, guidance or direction from the regulations, UUW will review each case considering PFAS when declared by a trader.

4b. Confirmation of whether the on-site testing includes any testing for PFAS chemicals and, if so, which types of PFAS.

Routine onsite testing conducted at wastewater treatment works or at trader sites does not routinely include PFAS analysis. PFAS testing is not mandated, not part of standard operational monitoring, and requires specialist laboratory techniques that are not widely available.

However, PFAS monitoring is currently being undertaken within the Chemical Investigations Programme (CIP), a jointly directed initiative by the EA and UK Water Industry Research (UKWIR) involving all major water and sewerage companies across England and Wales. The programme is designed to support regulatory obligations, and evidence needs arising from the Water Framework Directive and associated environmental programmes. The CIP is a longstanding, regulator led research initiative established to investigate emerging contaminants and improve understanding of their occurrence, behaviour, and removal within wastewater treatment process. The programme has progressed through multiple phases (CIP1–CIP3) since its inception in 2010, and the current phase, CIP4, is ongoing.

Under this programme, sampling has included analysis for a defined suite of PFAS substances (for example, including but not limited to PFOS and PFOA). This work is investigative in nature and is separate from routine operational or compliance monitoring at wastewater treatment works.

UKWIR has supported the coordination of Chemical Investigation Programmes across the industry; however, outputs from previous programmes have not included the publication of site-specific PFAS analysis data. PFAS forms part of the current CIP4, which is ongoing. Data from this programme is still under investigation and has not yet been published by UKWIR.

Completed reports and outputs from the national UKWIR Chemical Investigation Programme – can be accessed on UKWIR website Water Chemicals Investigation Programme.

4c. A record of any known testing (including a description of the type of testing) please provide a copy of the results of testing. Confirmation as to whether Davyhulme discharges wastewater into surface water that is in or adjacent to any European Protected Sites

Davyhulme Wastewater Treatment Works (WwTW) discharges treated final effluent into the Manchester Ship Canal. The final effluent from the works is subject to a permit, set by the Environment Agency (EA). The results for the analysis (testing) of the final effluent from Davyhulme WwTW are available on the EA's Water Quality Explorer portal, which can be found at the following link Map Explorer | Water Quality Explorer.

The Manchester Ship Canal is not designated as a European Protected Site (such as a Special Area of Conservation or Special Protection Area) in the immediate vicinity of the discharge point.

5a. Please provide confirmation of whether UU receives waste from Jamesons Landfill site at any of its STW/WWTW. If so, for the last 12 months, please provide: a record of all waste received from Jamesons; ii) any record of waste testing carried out at Jamesons that UU holds; and (iii) any record of testing undertaken by UU prior to accepting waste from Jamesons.

I can confirm that Transwaste Recycling and Aggregates Limited (permit reference: 726T2-7-126) hold a consent to discharge granted in September 2023 permitting the discharge of trade effluent derived from the treatment of leachate from landfill operations at Jameson Road Landfill Site. This waste is then treated at Fleetwood WwTW.

As requested, Appendix 3 sets out the waste received from Jamesons landfill site for the last 12 months. You will note that analysis for Perf Sulfonate (PFOS) and Perfluorooctanoic acid (PFOA) were undertaken on the 28 May 2025 and Perf Sulfonate (PFOS) on the 18 September 2025, this analysis was undertaken on an ad-hoc basis with an unaccredited methodology and was not taken as part of the routine trade effluent monitoring or as part of CIP4.

Before the consent to discharge was permitted to Transwaste Recycling and Aggregates Limited, the site was previously occupied and operated by Suez Recycling and Recovery Lancashire Limited (permit reference: 726T2-7-84). The current application, therefore, represented a change in owner/operator and not a change in activity.
Contaminants declared on the trade effluent application form by Transwaste Recycling and Aggregates Limited in conjunction with sample data collected while Suez Recycling and Recovery Lancashire Limited operated the site were used to determine the appropriate consent limits and conditions for this discharge.

5b. please provide confirmation of the measures UU intends to take to prevent contamination of wastewater or sludge produced at UU STW/WWTW in light of the reports provided in the article regarding the leaching of PFAS from waste held at Jamesons.
Prior to the reports on Jamesons that you are referring to, United Utilities was already committed to understanding the presence, concentration, and variability of PFAS within sludge by engaging in relevant research and monitoring and by working with the water sector, research organisations and regulators in the delivery of key research projects through UKWIR.
One of these ongoing research projects is examining the potential impacts of PFAS in biosolids upon environmental and human health, with a second project identifying specific types of trade effluent and tankered waste that represent the highest risk for specific substances in biosolids.
The report on Jamesons trade waste highlights the need to continue research in the absence of proven viable sludge treatment technologies, so that regulators are able to generate robust, science based regulation to prevent contamination in sludge.

5c. Please also provide a description of UU's testing of the water quality in the affected area, including but not limited to, details of any testing done in relation to PFAS and provide us with a copy of the results.
To ensure that water is compliant with Water Supply (Water Quality) Regulations and safe to drink, Water Companies collect samples daily from water treatment works, service reservoirs and customer properties. These samples are tested in an accredited laboratory using approved methods to ensure that the water quality meets the requirements set in the Regulations.
Within the Regulations, there is a list of parameters which companies must monitor for, where the monitoring should occur (e.g. at a customer's property) and the maximum level which is acceptable in drinking water; these levels are known as a Prescribed Concentration or Values (PCV) or more simply the 'regulatory standard' or 'legal limit.' It is however worthy of note, that PCVs are set based on several factors and most exceedances of the regulatory standard would not be considered a risk to health. A full list of the parameters that Water Companies must monitor for, including the PCVs, can be found on the Drinking Water Inspectorate's website by following this link: Drinking Water Standards and Regulations - Drinking Water Inspectorate. All of the results of these regulatory samples are made available to the public through our website as described below.
You can view the latest water quality data for the water supplied any specific postcode area, at any time, on our website at https://www.unitedutilities.com/help-and-support/your-water-supply/. If you input the postcode on the website, the results of samples that have been taken in the last 12 months from your local area can be viewed. The report covers a rolling 12-month period and is updated weekly.
Although there is no regulatory standard for PFAS, the Drinking Water Inspectorate has issued guidance to water companies and requires monitoring to be carried out for 48 different types of PFAS. The samples are taken from our raw water sources and the treated water leaving our water treatment works. The Drinking Water Inspectorate classifies each source into a Tier, with Tier 3 being highest risk sources with Tier 1 being lowest risk and where all PFAS results are less than 0.01 ug/l. We can confirm that the Water Treatment Works supplying this area is in Tier 1. Further information on PFAS can be found on our website at: PFAS - Drinking Water | United Utilities -

Corporate
In additional to taking samples, treatment processes at our water treatment works are monitored continuously 24 hours a day 7 days a week. Should there be a slight deterioration in the quality of the water the water treatment works shuts down automatically before any standards are breached, and an alarm is sent to our 24/7 control centre. We then send an engineer to investigate the shut down and restart the water treatment works. This ensures that the water we supply from our treatment works meets the required standards and is safe to drink.

We hope that this response answers your request. However, if you're not satisfied with how we've handled it, you can request an internal review. To do this, please write to us at Environmental Information Office, Haweswater House, Lingley Mere, Warrington, WA5 3LP or email us at EIRRequests@uuplc.co.uk, addressing your request to [redacted], and explaining why you're unhappy with our response. We'll be very happy to review your request and ensure we've done everything we can to assist you.

Any request for an internal review should be made within 40 working days of receipt of this response, and we will reply within 40 working days from receipt of the request for internal review.

Many thanks