United Utilities
Water for the North West

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-918
Date: 24/08/2026
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).

Your request:

Please disclose any environmental information demonstrating how United Utilities has verified that low-flow events have not been inaccurately reported, whether historically or currently, and any audits, reviews or investigations undertaken to identify or rule out such misreporting.

This includes, but is not limited to:

- internal or external audit reports;
- investigation reports;
- compliance reviews;
- whistleblowing investigations (where they relate to environmental information);
- correspondence with the Environment Agency or Ofwat concerning low-flow reporting or monitoring;
- risk assessments;
- governance papers; and
- documents describing any changes to procedures or controls introduced to prevent or detect inaccurate reporting of low-flow events.

I request this information for the period April 2007 to April 2011.

Our response:

We have provided the following data:

Appendix A – No flows 2010 2011
Appendix B – OSM OMS Overview (June 2011)
Appendix C – UU OMA Report April 2010
Appendix D – UU OMA Report June 2011
Appendix E – UU OMA Report September 2012

In addition to the above, the below may be helpful in evaluating this information.

What was the OSM duty pre December 2009?

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Before OSM was introduced (pre 2009), compliance monitoring was carried out directly by the Environment Agency (EA). This meant that the EA decided when and where samples would be collected, without any involvement from water companies. If a scheduled sample could not be taken because there was little or no flow at a site, the EA would record the event and retain the supporting evidence within its own water quality systems.

As a result, for the period before responsibility transferred to water companies in December 2009, no/low-flow events were not verified or recorded by companies, as this information was managed entirely by the EA.

Operator Self-Monitoring (OSM) was introduced by the EA in 2009 and became operational from late December that year. Under OSM, the legal responsibility for routinely sampling treated effluent and reporting compliance results transferred from the EA to water companies. If for any reason a no flow event occurred then evidence would need to be provided to verify any such event.

What is a no/low flow event?

A no/low flow event happens when there is too little, or no, effluent flowing from a wastewater treatment works (WwTW) or water treatment works (WTW) discharging site at the time a routine water quality sample is due to be taken. These events can occur during normal operational practices for reasons, such as intermittent discharges from batch processes (processes that discharge periodically), low flows at very small treatment works, or situations where flow is being recirculated within the site as part of the process.

What was the duty for water companies post December 2009?

During the period covered by this request, United Utilities was responsible for collecting samples and recording any no/low-flow events in 2010 and 2011 as set out above, following the introduction of Operator Self-Monitoring (OSM).

Appendix A provides the date, time, site name and monitoring point for all no/low-flow sample visits during this period. The table below summarises the number of no/low-flow events recorded in 2009, 2010 and 2011 alongside the total number of OSM samples collected in each year and percentage of no flow events.

At that time, the EA required a single site visit to confirm and record a no/low-flow event. Each event was supported by photographic evidence, which was submitted to the EA for review as part of the reporting process. We no longer hold copies of these photographs as they exceed the retention time of six years required by Defra.

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Calendar Year	Number of No/low-flow samples	Total number of OSM samples	Percentage (%)
December 2009	2	461	0.4
2010	91	3,282	2.7
2011	62	3,404	1.8

Procedures and controls

We have enclosed a copy of our Operator Self-Monitoring (OSM) Quality Management System (QMS) documentation from this period as Appendix B.

The purpose of the OSM QMS was to ensure that United Utilities consistently met OSM requirements and reported monitoring data in line with published standards. It also supported the company's aim of achieving the highest levels of Operator Monitoring Assessment (OMA) compliance, as assessed and audited by the EA.

The QMS set out the procedures and controls used to plan, track, record, review and, where necessary, improve the collection and management of OSM data. Its overall purpose was to provide assurance that monitoring activities were carried out correctly and that the data submitted to the EA was accurate and reliable.

The document includes specific sections covering management responsibilities and accountabilities, document and record control, internal audits and review processes, notification requirements, and the transfer of data to the EA through the Generic Operator Returns (GOR) web service in XML format. It also outlines the timetable for annual data submissions to the EA.

Audit and assessment by the Environment Agency

At the end of each annual reporting period, the EA carried out a formal Operator Monitoring Assessment (OMA) audit to review how companies were delivering their Operator Self-Monitoring (OSM) responsibilities.

We have enclosed the EA 2010 OMA audit (Appendix C), in which United Utilities achieved a score of 97%. Although this audit was completed before OSM sampling had been fully implemented, it provides an early view of the EA's assessment of the systems and controls we had put in place to support the new requirements.

We have provided the EA audit summaries from June 2011 (Appendix D), covering the 2010 reporting period, and September 2012 (Appendix E), covering the 2011 reporting period. United Utilities achieved audit scores of 98% in 2011 and 100% in 2012, which was above the pass mark of 60%.

In addition to the EA's audits, our internal assurance arrangements were strengthened by working with the United Kingdom Accreditation Service (UKAS). As an independent third-party accreditation

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body, UKAS assessed our compliance with both ISO 17025, the recognised standard for testing and calibration laboratories, and the Environment Agency's MCERTS requirements for organisations carrying out water sampling and chemical testing. The findings of these assessments were reported directly to the EA.

Additional information requested

Our whistleblowing procedures are publicly available and in our annual report, whistleblowing policy and codes of conduct. As the requested period is 15 years ago, we have no records of any whistle blowing contacts from this period, therefore under EIR 12(4)(a) we are unable to provide you with a copy of this information, as it is not held.

Finally, we can confirm that there was no direct correspondence with Ofwat concerning low/no flow reporting during this period. Therefore, in line with Regulation 12(4)(a) of the EIR, we are unable to provide you with a copy of this information, as it is not held.

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,

[redacted]
EIR Team
United Utilities

We'd love to hear your feedback on how we handled your request! If you have a moment, please complete our short survey here – your input helps us improve our service.