

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). As your request contained several specific questions, this response, restates each part of the request (in bold) and then follows this with our response.

**Please provide the following environmental information:**

**In one spreadsheet, please provide the following information for all farm sites to which you sent sewage sludge to be stored covering the period 1st January 2010 (or as far back as you have data) to 1st March 2026.**

**1. The name of the farm**

Under Sludge Use In Agriculture Regulations 6(1) we (as do all sludge producers) maintain a register of sludge produced, supplied to agriculture, composition etc. This is open to regulators for annual inspection. Unfortunately, the specific information required is deemed to be personal information, and sensitive as this could make an individual customer identifiable, and as such cannot be disclosed under the EIR. This approach is in line with UK GDPR and Regulation 13 of the EIR. Whilst we understand this may not be the outcome you want, we have a duty to protect both our domestic and commercial customer' personal details in line with the Regulations, and disclosure of these records would breach this.

**2. The S3 waste registration number (if applicable)**

All S3 waste registrations are available through public domain websites maintained by the Environment Agency and Cyfoeth Naturiol Cymru (Natural Resources Wales). These can be accessed using the following links:

- [Waste Exemptions](#)
- [Natural Resources Wales / Check for a permit, licence or exemption \(Public Register\)](#)

**3. The address and post code of the farm**

As with point 1, this information is also deemed to be personal information, and sensitive as this could make an individual customer identifiable, and as such cannot be disclosed under the EIR. This approach is in line with UK GDPR and Regulation 13 of the EIR.

**4. The address and post code of the facility from which the sludge was produced and**

## **transported**

The addresses for our current export facilities are captured in appendix A, and as part of our accreditation certificate for the Biosolids Assurance Scheme (BAS) located at [CERTIFICATES : Assured biosolids](#)

### **5. The date the sludge was transported to be stored**

The export of Biosolids is a significantly complex operation involving anything up to an average of 20,000 vehicle movements per year. Our sludge export operations operate five days per week, as a minimum, with export duration to any one store (stockpile location) reliant on a number of factors such as.

- The cropping regime and associated prioritisation
- Intended spreading dates and application availability
- Intended incorporation availability
- The spread of requirements across a range of crops associated to one stockpile.
- The volume of biosolids deliverable per day based on distance, access and site output.

Given these complexities we consider that providing this information is manifestly unreasonable in line with Regulation 12(4)(b) of the EIR. In total, we estimate that this would take around 13 days to complete for one year, meaning that for the full 16 years' worth of data, it would take us 208 days. As such, we currently deem this task to be manifestly unreasonable in line with Regulation 12(4)(b) of the EIR. In the spirit of transparency, and in line with Regulation 9 of the EIR, we could look to provide you with some of the requested information if this related to a shorter timeframe, such as the last six months.

### **6. How much was sludge transported to be stored (in tonnes)**

This information based on the total exported annual volume on a TTDS (per thousand tonnes of dry solids) basis is available for each year and is contained in [United Utilities - Annual Performance Reports](https://www.unitedutilities.com/corporate/about-us/performance/annual-performance-reports/) <https://www.unitedutilities.com/corporate/about-us/performance/annual-performance-reports/>

### **7. The type of sludge treatment that was used**

All our sludge is treated to a standard suitable for use in agriculture through advanced anaerobic digestion, anaerobic digestion of lime treatment. Please refer to appendix A or our BAS certificates available for each certification period at [Assured biosolids](#)

### **8. The sludge test results**

Average sludge quality information is reported to the Environment Agency annually as part of our Environmental Performance Assessment submission, an example of which you can find here: [United](#)

[Utilities EPA data report 2024 - GOV.UK](#). Please also see a copy of the results in Appendix B.

**In a separate spreadsheet, please provide the following information for all farm sites for which you helped spread sewage sludge on fields covering the period 1st January 2010 (or as far back as you have data) to 1st March 2026:**

**1. The name of the farm**

Please refer to our response to question 1.

**2. The S3 waste registration number (if applicable)**

Please refer to our response to question 2.

**3. The address and post code of the farm**

Please refer to our response to question 1.

**4. The date in which the sludge was spread on the fields**

Spreading dates are recorded for all spreading events related to each, individual stockpile. The complexity of this data is significant due to the potential for multiple spreading dates to be logged against each individual stockpile, due to:

- Different crops and their associated application windows in relation to a single stockpile.
- Different incorporation windows based on crop planting regimes.
- Weather conditions at the time of intended application and incorporation leading to multiple spread dates.
- The work rates associated with the application equipment relative to the size of the stockpile.

The application of biosolids is a significantly complex operation involving thousands of individual recorded spreading events per year. To disclose the requested information, it would take our Agricultural Services Team approximately 100 hours per each requested year to compile the multiple spread dates associated to each permitted stockpile and collate the information into the spreadsheet you have provided. In total, we estimate that this would take around 13 days to complete for one year, meaning that for the full 16 years' worth of data, it would take us 208 days. As such, we currently deem this task to be manifestly unreasonable in line with Regulation 12(4)(b) of the EIR. In the spirit of transparency, and in line with Regulation 9 of the EIR, we could look to provide you with some of the requested information if this related to a shorter timeframe, such as the last six months.

**5. The area over which the sludge was spread (in hectares)**

The figure for the total hectareage to which sewage sludge was applied is submitted annually as part of our Environmental Performance Assessment submission which can be viewed via the link in our



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response to 8. Please see a copy of the historical results in Appendix B. Please note that redactions have been made in line with Regulation 13 of the EIR and UK GDPR to remove personal data such as address details.

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](mailto: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.

Kind regards



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.