



DRINKING WATER INSPECTORATE

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[Redacted]
By email: [Redacted]

Our ref: EIR2025/04326
10 March 2025

Dear [Redacted] ,

REQUEST FOR INFORMATION: AMP8 Royal Oak PFAS and follow-up records

Thank you for your request for information of 26 February 2025 about AMP8 Royal Oak PFAS and follow-up records. We have handled your request under the Environmental Information Regulations 2004 (EIRs).

The EIRs apply to requests for environmental information, which is a broad category of information defined in regulation 2 of the EIRs. Public authorities are required to handle requests for environmental information under the EIRs. They give similar access rights to the Freedom of Information Act 2000 (FOIA).

Your information request and our response are set out below.

I would like to request information in relation to the following notice:

<https://dwi.gov.uk/water-companies/improvement-programmes/united-utilities-water-improvement-programmes/uut-2024-00002/>

Could you please send me the following information:

- *Reg 28(1) report of the water supply (WQ) from Royal Oak dated 21 September 2022*
- *Progress reports due for submission each January*
- *Audit strategy due for submission December 2024*

We enclose a copy of the information you requested:

- The Regulation 28(1) reports are not reports as such but are actual lines of data which we include into our Risk Assessment Database. We have extracted the rows of data into the attached file: **PFAS RA extraction from database.pdf**
- **UU_Annual_Return_01_25_Redacted.pdf**
- **Royal Oak PFAS Audit strategy December 24 FINAL_Redacted.pdf**

We have decided to redact and withhold the full names of the staff of United Utilities in the attached documents under regulations 12(3) and 13(1) and (2A) of the EIRs as the information constitutes personal data relating to persons other than you. These regulations

exempt personal information from disclosure if that information relates to someone other than the applicant, and if disclosure of that information would breach any of the data protection principles in Article 5(1) of the General Data Protection Regulation (GDPR). We consider that disclosure of this information is likely to breach the first data protection principle, which provides that personal data must be processed lawfully, fairly, and in a transparent manner. Disclosure would not constitute 'fair' processing of the personal data because those individuals would not reasonably have expected their names to be made public.

In the Audit Strategy document we have also redacted the locations where samples are to be taken as this information falls under the exception in regulation 12(5)(a) of the EIRs which relates to information whose disclosure would adversely affect international relations, defence, national security or public safety. The names of the sample location could compromise the security of the water supply and thus public safety.

In applying this exception, we have had to balance the public interest in maintaining the exceptions against the public interest in disclosure.

The main public interest argument in favour of release is the general interest to customers in the actions being taken by their supplier of drinking water to protect their supplies. It is the role of the DWI to hold the companies to account by ensuring they complete the required works, as demonstrated by the publication of the details of the Notice which was posted on the DWI website.

However, there is a stronger public interest in withholding this information. Disclosure of this information would adversely affect public safety and national security. The DWI has a duty with regard to the protection of a water treatment works. Release of information to the public about its operation and its vulnerabilities would inform certain individuals, such as terrorists, to target such infrastructures and put public safety at risk. It is vital that security measures are in place to protect public safety and critical to the delivery of an essential service to a significant population. We have therefore concluded that in all the circumstances of the case, the information should be redacted

Information disclosed in response to this EIRs request is releasable to the public. In keeping with the spirit and effect of the EIRs and the government's Transparency Agenda, this letter and the information disclosed to you may be placed on [GOV.UK](https://www.gov.uk), together with any related information that will provide a key to its wider context. No information identifying you will be placed on the GOV.UK website.

We attach Annex A, explaining the copyright that applies to the information being released to you, and Annex B giving contact details should you be unhappy with the service you have received.

If you have any queries about this letter, please contact us.

Yours sincerely

[Redacted]

DWI FOIA and EIR team

dwi.enquiries@defra.gov.uk

Annex A

Copyright

The information supplied to you continues to be protected by copyright. You are free to use it for your own purposes, including for private study and non-commercial research, and for any other purpose authorised by an exception in current copyright law. Documents (except photographs or logos) can be also used in the UK without requiring permission for the purposes of news reporting. Any other re-use, for example commercial publication, would require the permission of the copyright holder.

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Annex B

Complaints

If you are unhappy with the service you have received in relation to your request you may make a complaint or appeal against our decision under section 17(7) of the FOIA or under regulation 11 of the EIRs, as applicable, within 40 working days of the date of this letter. Please write to Vanessa Drury, Head of Information Rights via email at InformationRequests@defra.gov.uk and they will arrange for an internal review of your case. Details of Defra's complaints procedure is on our website.

If you are not content with the outcome of the internal review, section 50 of the FOIA and regulation 18 of the EIRs gives you the right to apply directly to the Information Commissioner's Office (ICO) for a decision. Please note that generally the ICO cannot make a decision unless you have first exhausted Defra's own complaints procedure.

The ICO can be contacted using the following link:

<https://ico.org.uk/make-a-complaint/official-information-concerns-report/official-information-concern/>