

[REDACTED]

From: EIR
Sent: 30 April 2026 12:50
To: [REDACTED]
Subject: [REDACTED]
Attachments: Anglian Water Sludge Treatment Centres (STCs).xlsx

Dear Requester

Thank you for your request for information about sewage sludge, which we received on 2 April 2026. Your request has been considered under the Environmental Information Regulations 2004 (EIR).

You requested:

1. Information for all farm sites where sewage sludge is stored from 1 January 2010 to 1 March 2026
2. All farm sites that Anglian Water has helped spread sludge from 1 January 2010 to 1 March 2026

EIR Response: Partial Provision & Partial Refusal of Requested Information

Please find attached:

- Anglian Water Sludge Treatment Centres (STCs).xlsx

Item 1 is held by Anglian Water, and is partially provided and refused as an exception to disclosure has been applied.

The name of the farm.

The exception applied is:

regulation 12(3) and regulation 13 of the EIR, the information is the personal data of a person other than the applicant.

The information requested relates to identifiable individuals, and it could lead to an individual being indirectly identified or identifiable and therefore would contravene the UK GDPR or the DPA 2018 legislation.

‘To the extent that the information requested includes personal data of which the applicant is not the data subject and as respects which either the first or second condition below is satisfied, a public authority shall not disclose the personal data’.

The ‘first condition’ referred to above is further explained in Regulation 13(2)(a):

‘...in a case where the information falls within any of paragraphs (a) to (d) of the definition of ‘data’ in the Data Protection Act 2018, that the disclosure of the information to a member of the public otherwise than under these Regulations would contravene any of the data protection principles...’.

It is the view of Anglian Water that the information requested is personal information and its disclosure would contravene the first data protection principle of the Data Protection Act 2018.

The S3 waste registration number

S3 exemption registrations are available from the searchable Environment Agency public register <https://environment.data.gov.uk/public-register/view/search-waste-exemptions>

The address and post code of the farm

The exception applied is:

regulation 12(3) and regulation 13 of the EIR, the information is the personal data of a person other than the applicant.

The use of this exception has been explained above.

The address and post code of the facility from which the sludge was produced and transported

Please attached Anglian Water Sludge Treatment Centres (STCs).xlsx. tab STC information.

The date the sludge was transported to be stored

Anglian Water operates daily, with sludge exports happening 5 days per week at a minimum.

How much sludge was transported to be stored.

Is reasonably accessible. All of our sludge exports can be found on our website in the annual performance reports. For example in 2025 this is reported as 'Total sewage sludge disposed' in the 2025 annual performance report (APR) <https://www.anglianwater.co.uk/siteassets/household/about-us/our-strategies-and-plans/anglian-water-annual-performance-report-2025.pdf> in line 8 of table 8a on page 327 of the report.

The type of sludge treatment used

Please see attached Anglian Water Sludge Centres (STC).xlsx tab STC information.

The sludge test results

Please see attached Anglian Water Sludge Centres (STC).xlsx tab analytical result.

Anglian Water has provided data for the last 5 years. 2021 to 2025.

Data from 2010 to 2020 has not been provided under Regulation 12(4)(b) of the EIR, the request is Manifestly unreasonable

Regulation 12(4)(b) says that a public authority may refuse to comply with a request if the request for information is 'manifestly unreasonable'.

The Information Commissioner has issued public guidance on the application of regulation 12(4)(b). This guidance contains the Information Commissioner's definition of the regulation, which is taken to apply in circumstances where either the request is 1) vexatious, or 2) where the cost or burden of complying with the request would be too great. Anglian Water considers that circumstance 2) is applicable to this request.

The 2004 Regulations do not contain a limit at which the cost of complying with a request is considered to be too great. However, the Information Commissioner's guidance suggests that public authorities may use the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 as an indication of what Parliament considers to be a reasonable charge for staff time.

The Data Protection (Appropriate Limit and Fees) Regulations 2004 stipulate that a cost estimate must be reasonable in the circumstances of the case. The limit given for local government is £450 or 18 hours work. Included within the limit the authority can consider the time taken to:

- (a) determine whether it holds the information
- (b) locate the information, or a document which may contain the information
- (c) retrieve the information, or a document which may contain the information, and
- (d) extract the information from a document containing it.

For the purposes of the 2004 Regulations, a public authority may use this hourly charge in determining the cost of compliance. However, the public authority is then expected to consider the proportionality of the cost against the public value of the request before concluding whether the request is manifestly unreasonable.

Additionally, the Information Commissioner's guidance on Regulation 12(4)(b) states that the cost of considering exempt information can be taken into account:

“Under FOIA the cost of considering whether information is exempt cannot be taken into account under section 12 (the appropriate costs limit) but can be taken into account under section 14(1) (vexatious requests). This is because section 12 limits the activities that can be taken into account when deciding if the appropriate limit would be exceeded. This is not an issue under the EIR. The costs of considering if information is exempt can be taken into account as relevant arguments under regulation 12(4)(b).”

The Information Commissioner has confirmed the use of the Data Protection (Appropriate Limit and Fees) Regulations 2004 is appropriate as a starting point under the 2004 Regulations, but also notes that all of the circumstances of the case must be taken into account to determine whether a request can be deemed manifestly unreasonable on the grounds of cost under the 2004 Regulations. Including:

- (a) the nature of the request and any wider value in the requested information being made publicly available;
- (b) the importance of any underlying issue to which the request relates, and the extent to which responding to the request would illuminate that issue;
- (c) the size of the public authority and the resources available to it, including the extent to which the public authority would be distracted from delivering other services; and
- (d) the context in which the request is made, which may include the burden of responding to other requests on the same subject from the same requester.

The information requested is detailed and time consuming to collate, due to the information being archived, and the testing parameters changing over time.

It is acknowledged that Anglian Water is a significant sized organisation, however, its primary role is the provision of drinking water and sewerage services to members of the public not providing information. To extract and collate the data would be time consuming. The request would inevitably distract the team members from delivering sewerage services.

Whilst it is difficult to fully assess the time estimate for complying with the request. It would take many hours. This would create a disproportionate burden on Anglian Water and its resources.

Item 2 is held by Anglian Water, and is partially provided and refused as an exception to disclosure has been applied.

The name of the farm.

The exception applied is:

regulation 12(3) and regulation 13 of the EIR, the information is the personal data of a person other than the applicant.

The use of this exception has been explained above.

The S3 waste registration number

S3 exemption registrations are available from the searchable Environment Agency public register <https://environment.data.gov.uk/public-register/view/search-waste-exemptions>

The address and post code of the farm

The exception applied is:

regulation 12(3) and regulation 13 of the EIR, the information is the personal data of a person other than the applicant.

The use of this exception has been explained above.

The date the sludge was spread on the fields

Spreading is seasonal and limited to agricultural cropping patterns. It is typically carried out in February to April and June to August. During those periods days of spreading are weather dependant.

Under Regulation 12(4)(b) of the EIR, the request is Manifestly unreasonable, we are not provided the information of when sludge was spread.

The use of this exception has been explained above.

The information requested is detailed and time consuming to collate.

The area in hectares that the sludge was spread.

Anglian Water has provided data for the last 5 years. 2021 to 2025.

2025 21,372 Hectares

2024 18,216 Hectares

2023 19,508 Hectares

2022 20,351 Hectares

2021 18,266 Hectares

Data from 2010 to 2020 has not been provided under Regulation 12(4)(b) of the EIR, the request is Manifestly unreasonable

The use of this exception has been explained above.

The information requested is detailed and time consuming to collate.

IMPORTANT: The information supplied to you continues to be protected by the Copyright, Designs and Patents Act 1988. You are free to use it for your own purposes, including any non-commercial research you are doing, and for the purposes of news reporting. Any other re-use (for example, commercial publication) would require the permission of the copyright holder. It is important that this data is not published for security reasons.

If you are unhappy with the service you have received in relation to your request and wish to request an internal review, you should email EIR@anglianwater.co.uk or write to:

General Counsel, Anglian Water Services, Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon PE29 6XU

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

If you have any queries about this email, please contact us via EIR@anglianwater.co.uk .

Yours sincerely

EIR Team

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Email EIR@anglianwater.co.uk