

Dear [REDACTED]

Thank you for reaching out with 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 a number of specific questions, this response, restates each part of the request (in bold) and then follows this with our response:

**I am writing to formally request information under the Environmental Information Regulations 2004 (EIR 2004) relating to your company's approach to grease management equipment approvals.**

**As a manufacturer of EN 1825-compliant biological grease traps, we have repeatedly seen cases where these systems are rejected in favour of mechanical Grease Removal Units (GRUs) that do not meet equivalent standards or operational capacity. These decisions appear to be made without transparent technical justification and, in our experience, frequently result in undersized, underperforming units being installed.**

We completely understand your concerns, therefore our [REDACTED], and [REDACTED] would like to meet with you to discuss this separately.

**Please provide the following:**

1. **List of commercial premises or foodservice sites in the United Utilities service area (2022–2025) where:**
  - **A mechanical GRU has been approved or installed**
  - **An EN 1825-compliant grease trap or biological hydro trap has been rejected or not approved**

I can confirm having liaised with our Wastewater Team, that we do not hold a comprehensive list of the information you require, therefore in line with Regulation 12(4)(a) of the EIR, I am unable to provide you with a copy of this as it does not exist.

2. **Any guidance documents, internal specifications, or policy statements used to assess or approve:**
  - **GRU systems (e.g. [REDACTED], etc.)**
  - **Grease traps sized in line with BS EN 1825-2**

For context, for equipment to be an effective means of grease management, we consider it to be an

indication of good practice that passive grease traps are designed, installed, operated and maintained in accordance with BS EN 1825 and grease removal units comply with the American standard, PDI G101. Unfortunately, whilst we hold copies of these standards, for licensing reasons, we are prohibited from sharing them, and they must be purchased from the relevant standards body. I would therefore recommend you contact the British Standards Institution (BSI) for a copy of the British Standards, and the American Society of Mechanical Engineers (ASME) for a copy of the American Standards. You can read more about this on our website: [Grease Management Equipment - good practice standards information](#).

3. **Copies of any performance data, discharge sampling, or compliance reports held by United Utilities for GRU installations, specifically showing:**
  - **FOG (Food, Oil, and Grease) concentrations at point of discharge**
  - **Maintenance records or waste transfer arrangements**

I can confirm that United Utilities do not sample discharge from FSE's and FOG is identified by visual inspection and CCTV surveys.

With regards to your request for performance data/compliance reports, I am able to provide the attached document titled 'Appendix 1', which is what we use to monitor the inspection and maintenance of units in FSE we visit. Please note that this is not a list which contains details of all FSEs in our region. Our inspection of FSEs is usually in response to an identified problem with FOG, therefore we only have details for those FSEs we inspect. The attached database is updated following visits to reflect what we have found upon inspection. Please note that we have redacted any commercially sensitive information such as property names or addresses, in line with Regulation 12(5)(e) of the EIR, and any personal information in line with Regulation 13.

The term 'compliant' in the attached database is used for internal purposes and is used purely to describe whether or not an FSE has a unit that is in accordance with the British or American Standards. Additionally, it's important to note that as our attention is normally drawn to an FSE following a problem within the sewer, we often identify FSE's with no or poor FOG management equipment and processes.

For some additional context, I have included an explanation of what each column in the database represents below:

- **Requesting Department** – - who has requested the inspection.
- **Incident Type** – -why the inspection took place, for example, there may have been flooding which prompted us to carry out a visit.
- **Engagement Status** – - what stage of the inspection we are up to
- **Date Engagement Status Logged** – the date that we first began inspecting the FSE.
- **Business Type** – the type of business i.e. café, fast food outlet, hotel etc.
- **Capacity of FSE** – the size of the establishment.
- **RAG Status** – this is what we use to track the risk level. Each colour is explained below:
  - Amber – sites where grease management equipment is installed but appears undermaintained
  - Blue – sites with no grease management equipment or grease management equipment that appears to not be maintained or functioning as intended
  - Green – sites with what appears to be effective grease management equipment which appears to be maintained as intended
  - Red – site where we're looking to escalate action
- **Compliance Status** – refers to whether the grease management equipment within a

property complies with the British or American Standards.

- **Compliance Date** – is the date we confirm that grease management equipment within a property complies with the British or American Standards.
- **Cluster Compliant Status** – is the compliance status for the cluster (area) as a whole.
- **Cluster Compliant Date** – is the date when the cluster (area) became compliant
- **Cluster Compliant Percentage** – is the percentage of the cluster (area) which have grease management systems that are operating as intended
- **Date of Request Received** – date we sent this across to ECAS for investigation
- **Date of Incident** – date when it happened (internal dates)

4. **Internal communications or policy references from 2022 to present containing terms such as:**

- “PDI G101”
- “GRU”
- “400-litre trap”
- “██████”
- “biological trap”

We have completed a search of all emails relating to ██████ from 2022-2025, have determined that the information within these was not environmental in nature, therefore we are unable to disclose these in line with Regulation 2(1). For context, the definition of environmental information under Regulation 2(1) concerns information regarding the state of the elements such as “air, atmosphere, water, soil, land, landscape, natural sites, biological diversity” and also concerns factors that affect or are likely to affect those elements. These factors could include substances, energy, noise, radiation or waste, emissions, discharges and other releases into the environment. The emails we reviewed contained personal information (staff names, contact details etc), commercially sensitive information (third party company names, addresses, quotes from other companies etc) and information which if disclosed, could impact security or public safety (information relating to the location of our Water Treatment Works (WTW)).

Whilst we were able to complete a search for emails relating to your company name, we are unable to complete a search for the other terms you have requested, and I’d like to explain why. At present, we deem the task to be manifestly unreasonable as the terms referenced are used commonly across the business – not just in the Network Protection Team. Where this is the case, we are required to review each email individually and determine whether it:

- Contains any environmental information
- Is relevant to the request
- Relates to your business
- Does not contain any commercially sensitive, legally privileged or personal information

As there are circa 11,000 emails, we estimate that this would take more than 18 hours to complete a thorough review, and we therefore engage Regulation 12(4)(b) of the EIR. The process of reviewing and redacting this volume of emails would place unreasonable burden on our resources, diverting significant time and effort from our core functions. While we acknowledge the public interest in transparency, we believe that in this case the disproportionate effort required outweighs the public interest in disclosure.

Whilst we haven’t been able to share all of the information you requested, we hope the response explains why this is the case. However, if you are not satisfied with our response, as per our normal process, 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.

As explained at the start of this response, we completely understand the concerns you have raised and would really like to work constructively with you to resolve these. Therefore, our [REDACTED], and [REDACTED] would like to meet with you to discuss this as well.

Many thanks

[REDACTED]

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.