

The ongoing failure of the Environment Agency and others to protect us from incinerator emissions

By Michael Ryan BSc, C Eng, MICE

The purpose of this report is to detail how the Environment Agency and their various expert advisers on health effects of incinerator emissions have chosen to act without due diligence.

The CEMEX cement works at Rugby has been burning a waste product “Climafuel”, as an alternative fuel:

The CEMEX cement plant in Rugby, Warwickshire, utilizes Climafuel®, a sustainable alternative fuel produced from non-recyclable household, commercial, and industrial waste by SUEZ recycling and recovery UK at the neighbouring Malpass Farm facility

<https://www.cemex.com/w/cemex-to-operate-fully-on-alternative-fuels-at-uk-cement-plant>

The above CEMEX works have been acting as a co-incinerator and the recent increase in the infant death rate in Rugby cannot be dissociated from the above change of fuel, given that ONS data consistently show sudden post-incinerator rises in the infant death rates of Councils exposed to incinerator emissions.

<https://www.warwickshireworld.com/health/taskforce-to-look-into-rugbys-high-infant-mortality-rate-9128636>

<https://www.healthcare-management.uk/public-health-team-leads-investigation-infant-mortality-rate>

Inquiry started into town's high infant death rate

<https://www.bbc.co.uk/news/articles/ckg59ppy4v71o>

This is a brief list of some of those who have helped me in a long journey regarding the above.

Alan Dalton, who I met on three occasions and who alerted Rt Hon Michael Meacher MP about the Environment Agency's disregard of the concerns of residents over health effects from incinerators and landfill sites in August 2001.

Dr Dick van Steenis MBBS, who I first spoke to in January 2002 and with whom I collaborated with on air pollution research for just over a decade.

Rt Hon Ruth Kelly MP, for instructing ONS to release an eight-year set (1995-2002) of the numbers of babies born with defects (live and stillborn) in each of the 303 Primary Care Trusts in England.

Chris Benfield, for writing articles about a link between incinerator emissions and birth defects in the Yorkshire Post on both 1st and 15th September 2005: <https://ukhr.eu/Yorkshire-Post-15-September-2005.jpg>

Health Protection Agency, for making a false promise to Chris Benfield regarding an investigation into a link between incinerator emissions and birth defects, as reported on the front page of the Yorkshire Post, 15 September 2005. Also, for sending me a letter in 2009 “explaining” why they hadn't examined key health data at electoral ward level around any incinerator, despite a promise made in August 2003.

<https://ukhr.eu/incineration/justinmccracken8june2009.pdf>

Office for National Statistics, for sending me a six-year set of Vital Statistics 4 (VS4) data (1998-2003) for Shropshire's electoral wards in 2005, which enabled me to plot the infant death rates at electoral ward level around the Ironbridge Power Station and seeing much higher rates in the downwind electoral wards, compared with those upwind of the power station. Also, for sending me VS4 data for all electoral wards in England & Wales (1993-2014), enabling me to map infant death rates at electoral ward level around incinerators and other major point-sources of industrial PM2.5 emissions.

Norman Baker MP, for asking this Parliamentary Question in 2007:

To ask the Secretary of State for Health what assessment he has made of the correlation between the presence of a functioning incinerator and the incidence of infant mortality in that area. (155374)

[Mr. Bradshaw](#)

In November 2005 the Health Protection Agency issued advice on the public health impact of Municipal Solid Waste Incineration and this is available on their website at:

www.hpa.org.uk/chemicals/ippc/incineration_posn_statement.pdf.

This information has also been placed in the Library.

Emissions from modern waste incinerators in the United Kingdom are subject to stringent health controls.

<https://hansard.parliament.uk/Commons/2007-09-17/debates/0709175000014/InfantMortalityIncinerators>

Note that Justin McCracken, CEO of Health Protection Agency had earlier admitted (in an email to me in April 2008) that they hadn't examined the rates of illness or the rates of premature deaths at all ages at electoral ward level around any incinerator and compared upwind-v-downwind wards. The Dorking Advertiser of 22 May 2008 reported the appalling lack of due diligence by the HPA with headline: "**Incinerator fury as bosses admit to no health checks: Protestors say agency is failing to protect public from illness**"

<https://www.ukhr.eu/incineration/dorking-advertiser-22-05-2008.jpg>

Mark Metcalf, whose articles in Big Issue in the North, starting in April 2010, persuaded the Health Protection Agency to promise a study into a link between incinerator emissions and infant mortality in 2011:

<https://markwrite.co.uk/wp-content/uploads/2020/03/allincinerators.pdf>

<https://www.express.co.uk/news/uk/243962/Are-rubbish-incinerators-killing-our-children>

Darren Johnson AM, Green Party, London Assembly, for requesting an electoral ward map of London showing the infant death rates, 2002-2008 ONS data in May 2010. The published report, which is no longer online, failed to show any incinerator positions and also had some false statements. The report also greyed-out the lower infant death rates, thereby removing the opportunity for those examining the report to see clearly that wards that were not exposed to

incinerator emissions had low, or even zero infant death rates recorded during the seven-year period 2002-2008.

Daniel Kawczynski MP, his parliamentary questions about the Shrewsbury incinerator and the long delay over publication of a study into a link between incinerator emissions and infant mortality, which was first reported by the Sunday Express on 1 May 2011, but not published online until November 2018. Also, for purchasing a large set of infant mortality data at Council level in England & Wales from ONS. These data, with later data, enabled me to see that infant death rates in Councils exposed to incinerators rose after incinerators started operating (42 cases) and fell after incinerators closed down (3 cases)

<https://www.express.co.uk/news/uk/243962/Are-rubbish-incinerators-killing-our-children>

Stuart Anderson MP, for his support in this matter

Steven Downes, of Inside Croydon for his articles about incinerators, including this of 15 October 2024:

<https://insidecroydon.com/2024/10/15/health-agencies-ignored-publics-concerns-on-incinerator/>

The above Inside Croydon article reports the failure in 2008 of both Dr Harry Burns, Chief Medical Officer for Scotland and also Dr Robert Maynard, of the Health Protection Agency to effectively follow-up the link between incinerator emissions and infant mortality, which they had been separately alerted to by individuals citing my research.

Some Other Journalists:

Henry Ellis (Enfield Advertiser, 25 April 2007), **Lucy Johnston** (Sunday Express 29 April 2007 and 1 May 2011), **Dhruti Shah** (Harrow Observer, 3 & 31 May 2007), **Julia Lewis** (South London Press 4 May 2007 & The Mercury, 9 May 2007), **Jonathan Bunn**, Waltham Forest Guardian, 2 August 2007), **Chris Warne**, Stroud News & Journal, 4 January 2012) **David Himelfield** (Huddersfield Examiner, 17 February 2017), **Sarah Ward** (NN Journal, 15 October 2025, re: Corby infant death spike during the notorious steelworks “clean-up”). Apologies to all those not named.

At the end of this report is a link to my six-page letter of 19 June 2024 to Philip Duffy, CEO of the Environment Agency regarding the above and also the text of the letter to me from Mr Duffy dated 9 May 2025. My MP, Stuart Anderson persuaded Mr Duffy to reply. Note that Mr Duffy failed to respond to the points I’d raised.

The Environment Agency do not examine health data, but have instead relied upon the advice of experts, such as the former Health Protection Agency (HPA) and their successors.

It’s possible that the Environment Agency (EA) was persuaded to consider health effects of incinerator emissions after the late Alan Dalton, their Regional Director for the North East wrote about the infamous Byker incinerator in his August 2001 report that he sent to Environment Minister Michael Meacher MP entitled “Just who does the Environment Agency protect?” and asking Mr Meacher to either “Back him or sack him”.

As the environment agency meets for its annual meeting today, it is embroiled in a public row with one member of its 15-strong board who has issued a “back me or sack me” ultimatum to the environment minister, Michael Meacher. Alan Dalton says his attempts to fulfill his brief of improving the agency’s protection of the public have been obstructed.

Dalton was appointed to the board of Britain's biggest quango, with its 10,500 workforce, in January 1999 by Meacher to inject new thinking, but says he has failed and attacks a "culture of secrecy and defensiveness". He says the agency has lost its way in its role of cutting air, water and ground pollution.

In a letter to the minister, Dalton says: "I am not satisfied that the environment agency is currently protecting its employees, communities and environment from damage to the best of its ability."

(Burning issues, Guardian, 12 September 2001)

<https://www.theguardian.com/society/2001/sep/12/guardiansocietysupplement10>

Michael Meacher sacked Alan Dalton by fax on 19 December 2001 and Alan Dalton's reply fax to Michael Meacher stated that he "had shot the messenger", which remains the case a quarter of a century later as the EA and their expert advisers on health effects of incinerators have failed to examine key data around incinerators which would have clearly shown that their belief that incinerator emissions don't harm health must be false, as ONS data fails to support such a claim.

Alan Dalton died in December 2003.

Environmental campaigner who helped get asbestos banned

<https://www.theguardian.com/news/2003/dec/16/guardianobituaries>

In August 2003, the then recently formed Health Protection Agency (HPA) made a reassuring but empty promise to check health data around incinerators:

"The health protection agency (HPA), responsible for public health in England and Wales, yesterday conceded that there was public concern about the health risks from use of mobile phones, industrial chemicals and pollution from landfill sites and incinerators. Unveiling its first five-year plan, it recognised that exposure to chemicals and poisons was greater in poor and disadvantaged areas and that children might be at greatest risk."

(Health watchdog to monitor risks of everyday chemicals, Guardian, 6 August 2003)

<https://www.theguardian.com/politics/2003/aug/06/publicservices.health>

On 10 January 2008, the Dorking Advertiser reported my research showing elevated rates of infant mortality in electoral wards downwind of incinerators (2003-2005 ONS data) in Edmonton, Kirklees and Coventry.

The headline of the follow-up Dorking Advertiser (17 January 2008) article about my research had the headline: **"If it was dangerous it wouldn't be built, say incinerator bosses"**.

<https://www.ukhr.eu/incineration/dorking-advertiser-17-01-2008.jpg>

In August 2003, the HPA being aware of health concerns of those near incinerators, promised to check health data but failed to do so, as reported by the Dorking Advertiser of 22 May 2008:

<https://www.ukhr.eu/incineration/dorking-advertiser-22-05-2008.jpg>

In March 2008, I made a Freedom of Information request of the HPA's CEO Dr Pat Troop in which I asked for a list of the incinerators around which they'd examined the rates of illness and rates of premature deaths at all ages at electoral ward level and compared upwind-v-downwind wards. I sent a follow-up letter, also by recorded delivery, in which I threatened to refer the matter to the

Information Commissioner for non-disclosure. It was the response I then received from the new CEO Justin McCracken in which he confirmed that no such data had been examined around any incinerator that prompted the above Dorking Advertiser article of 22 May 2008.

In June 2009, Mr McCracken emailed me this letter in which he “explained” why the HPA hadn’t checked key data:

<https://ukhr.eu/incineration/justinmccracken8june2009.pdf>

Newspaper reports about a link between incinerator emissions and infant mortality starting in 2007 failed to persuade either the Environment Agency (EA) or their then advisors, HPA, to examine ONS data to see if there was any truth in the alleged link.

(Sunday Express, 29 April 2007, Waltham Forest Guardian 2 Aug 2007, front pages of Enfield Advertiser 25 April 2007 and Harrow Observer 3 May 2007, South London Press 4 May 2007)

<https://www.express.co.uk/news/uk/5688/Incinerator-fumes-link-to-infant-deaths>

<https://www.guardian-series.co.uk/news/1592749.concerns-infant-death-rates-chingford-green/>

The Greater London Authority were aware of the incinerator link with infant mortality in November 2006 after I’d mapped the infant death rates in London’s 625 electoral wards aggregated for the three-year period 2003-2005, City of London counted as a single ward.

<https://ukhr.eu/gla-response-nov-2006.pdf>

Dr Robert Maynard of the HPA was alerted to the link between incinerators and infant mortality in 2008, but chose to not follow-up the issue. See the letter sent to Dr Maynard here:

<https://ukhr.eu/incineration/letter-to-Dr-Robert-Maynard-HPA-14-August-2008.pdf>

The reply from Dr Maynard and the exchange of letters between Dr Harry Burns, Chief Medical Officer for Scotland and a resident who was also concerned about the link between incinerators and infant mortality can be seen here:

<https://ukhr.eu/incineration/ukhr-report-about-maynard-and-burns-october-2024.pdf>

The following Inside Croydon article of 15 October 2024 reported the above, together with similar correspondence between a Scottish resident concerned about the infant mortality link and Dr Harry Burns, Chief Medical Officer for Scotland.

<https://insidecroydon.com/2024/10/15/health-agencies-ignored-publics-concerns-on-incinerator/>

Dr Burns and Dr Maynard were both in a position to easily check ONS data to see if the concerns of their correspondents were justified, but they did not do so and a major opportunity to show the truth about the incinerator link with infant mortality was lost over eighteen years ago.

In December 2012, ONS kindly released the infant mortality rates for all London Boroughs for the period 1970-2010. These data enabled me to prepare this graph showing a post-SELCHP incinerator rise in previously falling infant death rates of Lewisham (home to SELCHP), Newham and Tower Hamlets. Prior to SELCHP starting in 1993, the infant death rates of the above three Boroughs were very close to each other and also to the Wandsworth rate. Wandsworth is rarely exposed to emissions from SELCHP and the infant death rate in Wandsworth continued the downward trend after SELCHP.

<https://ukhr.eu/incineration/selchp.htm>

Daniel Kawczynski was my former MP and he kindly purchased a long set of infant mortality data at Council level from ONS. These data enabled me to construct further graphs showing sudden post-incinerator rises in Councils exposed to emissions. Some of the graphs are in my November 2017 submission to the EFRA Committee, which started:

Written evidence submitted by Michael Ryan (IAQ0178)

“How effectively do Government policies take into account the health and environmental impacts of poor air quality?”

No government policy will be effective on the above unless and until expert advisers cease claiming that lower socioeconomic status (SES) causes higher rates of illness and higher rates of premature deaths at all ages. Exposure to air pollution has been known to be the dominant cause of both for well over a century.

<https://committees.parliament.uk/writtenevidence/83436/html/>

Other graphs are in this report about the incinerators in the London Borough of Bexley:

<https://ukhr.eu/birthdefects/UKHR-report-about-Belvedere-incinerator-February-2026.pdf>

The above SELCHP graph was the first of forty-two graphs I’ve prepared using ONS data, all showing sudden post-incinerator rises in the infant death rates of Councils exposed to incinerator emissions.

Three of the above 42 incinerators closed down and the infant death rates in the Councils where they were sited suddenly fell, just like how the infant mortality rate in Telford & Wrekin suddenly fell after Ironbridge Power Station closed down in 2015, as shown in the graph at the end of the above Bexley report. The same graph shows a sudden rise in the infant death rate of Shropshire Unitary Authority after the Harlescott incinerator started in Shrewsbury in January 2015.

Kirklees Council threatened a local action group DISC after they’d shown an electoral ward map of Kirklees which showed elevated infant mortality rates downwind of the Kirklees incinerator (2003-2005) ONS data).

<https://www.thenorthernecho.co.uk/news/4472880.legal-threats-waste-dispute/>

The same map had been shown by me in January 2007 at a large public meeting at Costessey High School, Norwich regarding a proposed incinerator in Norwich and also reproduced in the Dorking Advertiser articles of 10 and 17 January 2008, the latter article here with headline:

“If it was dangerous it wouldn’t be built, say incinerator bosses”:

<https://www.ukhr.eu/incineration/dorking-advertiser-17-01-2008.jpg>

Here’s a later electoral ward map of Kirklees showing elevated infant death rates downwind of the Kirklees incinerator.

<https://ukhr.eu/incineration/kirklees.pdf>

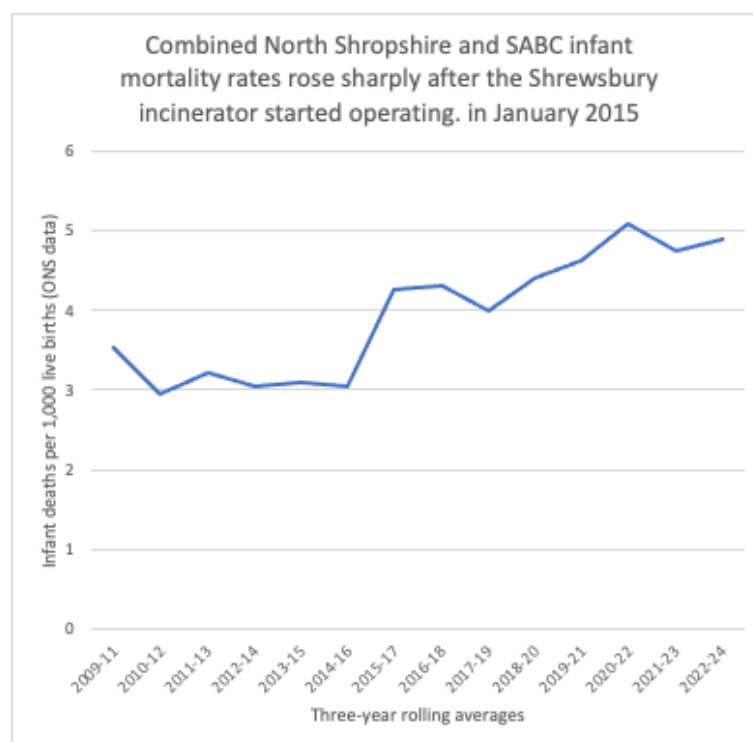
<https://www.thenorthernecho.co.uk/news/4472880.legal-threats-waste-dispute/>

Kirklees Council were keen to threaten anti-incinerator group DISC in 2009, as reported in the above Northern Echo article, but declined to give comment to David Himelfield for the following Huddersfield Examiner article of 17 February 2017:

<https://www.examinerlive.co.uk/news/west-yorkshire-news/air-pollution-linked-kirklees-baby-12615235>

The above Huddersfield Examiner article has a photograph of me outside the construction site of the Harlescott incinerator where I'm holding a placard saying: "HAPPY TO HARM YOU". Emissions from the Harlescott incinerator have a greater impact on the former Council areas of Shrewsbury & Atcham and North Shropshire, so I purchased from ONS a 16-year set (2009-2024) of infant mortality data (live births and infant deaths) for these two former areas to construct this, the forty-second graph I've prepared showing post-incinerator rises in the infant death rates of Councils exposed to incinerator emissions:

Graph of infant mortality rate in Shrewsbury & Atcham & North Shropshire



Following the above HPA promise to examine infant mortality rates around incinerators, as reported in Sunday Express, 1 May 2011, the study scope was extended and published online over seven years later in November 2018:

Fetal growth, stillbirth, infant mortality and other birth outcomes near UK municipal waste incinerators; retrospective population based cohort and case-control study

<https://www.sciencedirect.com/science/article/pii/S0160412018316398>

The above study must be flawed as the authors adjusted ONS data for deprivation, ethnicity and socioeconomic status around twenty-two incinerators, 20 in England and one each in Wales and Scotland before concluding that there was no link between exposure to incinerator emissions and infant mortality.

There was a sudden post-incinerator rise in the infant death rates of Councils exposed to incinerator emissions in twenty of the incinerators studied. The Porthleven incinerator on St Mary's (Isles of Scilly) shouldn't have been in the study as a single infant death occurred during the study period. I have no long-term data for Scottish Councils, but would be very surprised if there hadn't been a sudden post-Baldovie incinerator rise in the infant death rate of Dundee.

A second study was published which sought to confirm that infant death rates hadn't risen after incinerators started operating:

Bayesian spatial modelling for quasi-experimental designs: An interrupted time series study of the opening of Municipal Waste Incinerators in relation to infant mortality and sex ratio

<https://www.sciencedirect.com/science/article/pii/S0160412018326060>

The abstract of the above study includes this caveat:

“Based on our approach, we do not find evidence of an association of MWI opening with changes in risks of infant mortality or sex ratio in comparison with control.”

I pooled the ONS infant mortality rates in the eight Councils where the incinerators were sited and saw that ONS showed a post-incinerator rise in the infant death rates of those Councils as follows.

“Based upon my approach”, there's no doubt that ONS data show that infant death rates rose after the incinerators started operating.

	Live births	Infant deaths	Infant deaths per 1,000 live births
Year of opening (YO):	14,557	46	3.2
YO + 1 year	15,211	70	4.6
YO + 2 years	15,135	63	4.2
YO + 3 years	15,476	74	4.8

Here's my six-page letter to Philip Duffy, CEO of the Environment Agency dated 19 June 2024:

<https://www.ukhr.eu/incineration/letter-to-philip-duffy-19-06-2024.pdf>

I had two letters of acknowledgment, both with the same subject heading as mine:

Environment Agency's ongoing failure to ensure that advice received about the adverse health effects of incinerator emissions was accurate

<https://www.ukhr.eu/incineration/environment-agency-letter-26.06.24.pdf>

Philip Duffy letter to Michael Ryan of 9 May 2025

Dear Mr Ryan,

Our Ref: 26222 Your Ref: SA30256 Date: 09 May 2025

Energy from waste plants regulated by the Environment Agency 2

Thank you for your correspondence dated 19 June 2024. Please accept my apologies that you did not receive a substantive response to your letter previously.

I appreciate your concerns with regards to the potential effects of Municipal Waste Incinerators (MWI) to human health. I understand we have historically engaged with you to address your concerns in detail, most recently in November 2024.

We are responsible for making sure that the incinerators we regulate are safe, working to the best current guidelines and permit requirements, taking into account the advice of the UK Health Security Agency (UKHSA).

We regulate large MWI (also known as energy from waste or EfW plants) in England. All plants must comply with comprehensive environmental legislation including the use of best available techniques to minimise emissions. They must also meet strict emission limits for pollutants. We regularly audit and inspect EfW plants to ensure they are meeting the requirements of their permits.

Thank you for the information you have provided, we appreciate the work of citizen science and how this can help us ensure the best outcomes for people and the environment. We must be sure that any suggested link between factors is explored thoroughly before definitive conclusions can be drawn. We work closely with and regularly consult the UKHSA on new literature related to MWI health impacts, and to date their response has always been that their position is unchanged. We will follow up with the UKHSA on research in this area and it may be beneficial for you to contact the UKHSA directly, who are the experts in research and data in this field and advise us on the health impacts of incinerators.

We consult UKHSA on every permit application we receive for a new EfW plant. We will only grant a permit if we are satisfied that the proposed plant would not give rise to any significant pollution of the environment or harm to human health. I assure you that protecting the health of people, animals and the environment is of upmost importance when we perform our role as regulator.

Whilst I understand your concerns with regards to these type of incinerators, the UKHSA's current position is that modern, well run and regulated MWI are not a significant risk to public health.

I hope this helps to address some of your concerns, and would recommend discussing this in more detail with the UKHSA as well. If you would like to discuss this matter further, please contact: enquiries@environment-agency.gov.uk.

Yours sincerely

Philip Duffy

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