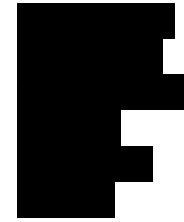


Philip Duffy  
Chief Executive  
Environment Agency Head Office  
Horizon House,  
Bristol,  
BS1 5AH



19 June 2024

By recorded delivery

Dear Mr Duffy,

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

It was very wrong of the Environment Agency (EA) to ignore the concern of the late Alan Dalton, Regional Director of the EA's North East Region (1999-2001) about how the EA ignored the health concerns of those near incinerators and landfill sites.

Environment Minister, the Rt Hon Michael Meacher MP appointed Mr Dalton to the Board of the EA, was also wrong to sack him in December 2001 after receiving Mr Dalton's August 2001 report "Just who does the Environment Agency protect?" and a request that he either "back him or sack him".

"Burning issues

**Row breaks out over role of the environment agency**

[Paul Brown](#)

Wed 12 Sep 2001 08.22 BST

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."

...continues

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

The EA was sure to have a copy of Alan Dalton's above report which contained "case studies" for the Byker incinerator in Newcastle and the Normanton landfill site near Wakefield.

The enclosed copy of the South London Press article "Health risks", by Julia Lewis (4 May 2007) has the following:

"Chris Smith, of the Government's Environmental Protection Directorate said that:  
'no permit would be issued to an incinerator operator if a health risk was likely.'"

The above article reported my research in which I'd mapped infant mortality rates (IMRs) at electoral ward level in London aggregated for the three years 2003-2005 and found elevated rates downwind of the SELCHP incinerator.

It would have been a matter of minutes for an EA employee to look at published ONS data for London Boroughs to see whether or not they had been a worsening of IMRs in Boroughs exposed to incinerator emissions after SELCHP started operating.

It would be a mistake for the EA to blame lack of knowledge of any of the above on the former Health Protection Agency (HPA) as the HPA promised in August 2003 to check data around incinerators and landfill sites because of health concerns of residents. That HPA promise might have been a belated response to the concerns raised by Alan Dalton in his August 2001 report "Just who does the Environment Agency protect?"

The enclosed News and Star article "Death fears over waste incinerator", by Paul McTaggart (21 April 2023) mentions the fifteen-fold difference in the rates of infant mortality between a group of four electoral wards clustered around the Edmonton incinerator and four Bromley wards (2002-2013 ONS data).

The article also quotes me as follows:

"I'm shocked and horrified every time I hear of a new (incinerator) plant opening, like the one in Carlisle."

And:

"They (The UK Health Security Agency) say one thing but the data show that there is an impact to health – it's a paradox. What would you rather take – someone's word, or the data?"

The EA is also quoted in the article:

"However, we are unable to refuse a permit (for an incinerator) if we cannot find any evidence that the operation of such a site may cause significant harm to the environment or human health."

If an inquiry were held into the EA's performance over the incinerator link with infant mortality, you or one of your senior officers is likely to be asked:

"Given the many news reports about a link between exposure to incinerator emissions and elevated rates of infant deaths, what action was taken to determine the truth of the matter over the last seventeen-plus years since the Enfield Advertiser three-page article of 25<sup>th</sup> April 2007 by Henry Ellis, which had the headline: "THE BABY KILLER?" over a photograph of the Edmonton incinerator?"

I've enclosed a copy of the first page of that article.

In March 2008, I used FoI to ask the HPA for a list of incinerators around which they'd examined the rates of illness and rates of premature deaths at all ages at electoral ward level around incinerators and compared upwind-v-downwind wards. Justin McCracken's reply admitted that no such data had been examined around any incinerator.

I've enclosed a copy of the Dorking Advertiser article "Incinerator fury as bosses admit to no health checks: Protestors say that agency is failing to protect public from illness", by Nicole Le Marie (22 May 2008). The enclosed Surrey Mirror article (22 May 2008): "Chill winds over fumes risk from incinerator" ends: "The HPA was unavailable for comment as the Mirror went to press".

I've also enclosed a copy of Justin McCracken's letter to me dated 8<sup>th</sup> June 2009, with subject heading "Proposed incinerator at Harlescott" and which ends:

"Furthermore, the reason we have not studied 'the rates of illness or premature deaths at electoral ward level around any incinerator', is that the number of people around an incinerator is too small to detect whether or not the incinerator is having an impact on health."

atmosphere is the one great advantage which the agricultural labourer of Wiltshire, the Connaught peasant, and the poverty-stricken crofter of the Highlands enjoy over the resident in the town. In the opinion of the writer, a smoky and dusty atmosphere as a cause of infant mortality far transcends all other influences."

The entire text of "Health and the State" is online, thanks to UCLA:

[http://archive.org/stream/healthstate00bren/healthstate00bren\\_djvu.txt](http://archive.org/stream/healthstate00bren/healthstate00bren_djvu.txt)

My late father-in-law had a copy of Black's Medical Dictionary and this sentence shows that the medical profession should have been aware that increased exposure to pollution from industrial and domestic sources was causally linked to infant mortality and also that "poverty" couldn't be blamed – otherwise all agricultural districts (with their historically low wages) would have had high rates. The cleaner air, which is mostly to be found in agricultural districts, meant lower rates of infant deaths:

"As a general rule it is lowest in agricultural districts, higher in thickly populated mining and manufacturing regions, and highest in large towns where textile industries are carried on and where female labour is largely employed."

(Black's Medical Dictionary, 1944 edition, page 471)

Fetal growth, stillbirth, infant mortality and other birth outcomes near UK municipal waste incinerators; retrospective population based cohort and case-control study  
(Environ Int 2019 Jan;122:151-158. doi: 10.1016/j.envint.2018.10.060. Epub 2018 Nov 22.)

<https://pubmed.ncbi.nlm.nih.gov/30472002/>

The above report concluded that there was no link between exposure to incinerator emissions and infant mortality, but only after adjusting ONS data for deprivation, ethnicity and socioeconomic status.

The above "adjustment of data" by the study authors was very wrong and has further delayed the truth from being more widely known. The authors, who had cited the Japanese study below, should have copied Dr Tango and others who'd found a peak decline in risk of infant death with distance from 63 municipal incinerators without adjusting data.

The conclusion of that study starts:

"Our study shows a peak-decline in risk with distance from the municipal solid waste incinerators for infant deaths and infant deaths with all congenital malformations combined."

(Risk of adverse reproductive outcomes associated with proximity to municipal solid waste incinerators with high dioxin emission levels in Japan. J Epidemiol. 2004 May;14(3):83-93.)

There was a rapid decline in the infant mortality rate in England and Wales in the 1970s following the switch to "cleaner" North Sea Gas from "town gas", which was made from coal.

The abstract of "Geographical trends in infant mortality: England and Wales, 1970-2006"

(Health Stat Q. 2008 Winter;(40):18-29.) starts:

"At national level in England and Wales, infant mortality rates fell rapidly from the early 1970s and into the 1980s"

<https://pubmed.ncbi.nlm.nih.gov/19093637/>