

Proposed study of the downwind health effects of incinerators

Presentation for Halton Health
Policy and Performance Board

June 2010

Introduction (1)

- Ineos Chlor have obtained planning permission to build Europe's largest Incinerator in Runcorn, Cheshire.
- Their application for an Environment Permit is currently under consideration by the Environment Agency.
- A team of local residents (Halton Action Group Against The Incinerator - HAGATI) have spent 3 years studying the planned Incinerator and have identified many flaws and discrepancies both in the plan and the permitting process.

Introduction (2)

- There are many reasons why the Incinerator is considered inappropriate.
- This presentation considers a means of addressing one of the most important concerns – The health effects of Incinerator emissions
- We are seeking funding for a low cost (circa £10,000) study intended to determine whether or not there are any negative health effects.
- Although this has arisen as a result of the Ineos Chlor proposal it is relevant to ALL large Incinerator proposals

Public Perception of Incinerators

- Incinerators produce around 300 harmful chemicals and their compounds. Many of these are unregulated or inadequately regulated.
- Residents have an understandable perception that Incinerators close to their homes are harmful to their families health.
- Whether residents belief is unfounded is irrelevant to their concerns. They are entitled to be convinced that adequate measures are taken to protect them from harm.

Suspect Re-assurances

- Re-assurances from Incinerator applicants with commercial interests are immediately suspect.
- Where data and theoretical models provided by applicants to permitting agencies are demonstrably flawed and / or not validated by those agencies then permissions granted and assurances given by agencies are also flawed.

Conflicts of Interest

- In hard economic times it is feared that organisations may pursue commercial interests which may not be in the public interest.
- It's also feared that permitting and regulating authorities may be swayed by political policies addressed at other pressing issues.

Subtle effects

- It is not claimed that the applicants or permitting authorities fail to act with integrity.
- However, where the harmful effect of decisions are not immediately apparent but may be subtle & only arise after many years it's possible that this, together with the likely absence of personal accountability may influence decisions.
- Also, decisions made in haste, under pressure, and / or made without adequate evidence are inherently dangerous.

Planning & permitting regulations

- In order to have a degree of fairness, planning & permitting applications are treated individually & without reference to other similar & possibly competing proposals.
- Although this is fair to applicants it can result in a situation as in Cheshire where two extremely large Incinerators have planning permission and two more are proposed & may, under current regulations , be granted permission.

Combined effect

- It may be considered quite safe to permit an Incinerator to operate with emissions within limits considered 'safe'
- It's unlikely to be safe to permit FOUR Incinerators to emit FOUR times the 'safe' limits in close proximity.
- It's also unlikely to be safe to allow even the 'safe' level of emissions in an area with an existing heavy burden of pollution, deprivation , and poor health.

Consultation

- When planning applications or Environmental Permit applications are made various consultations take place.
- These consultations include local authorities, health authorities, and various other agencies.
- However ALL these agencies refer to the Health Protection Agency (HPA) for advice so the consultation is effectively with just ONE agency

Health Protection Agency

- The HPA are effectively the single agency consulted.
- This agency is subject to Government policy decisions irrespective of the integrity of its officers.
- The HPA stated policy on Incinerators is provided to all consultees as follows

HPA Policy

- Letter from McCracken HPA Chief executive 8/6/09 follows :
- “The HPA considers that modern *well run* incinerators are *likely* to pose only a very small and *probably* undetectable risk to health “
- Despite the use of ‘*well run*’ ‘*likely*’ and ‘*probably*’ this is taken by consultees as proof of the safety of all Incinerator proposals. It does not give residents the confidence they are entitled to expect.

HPA – Further comments

- The HPA Chief Executive also states
- “ The reason we have not studied rates of illness or premature deaths around any Incinerator is that the number of people around an incinerator is too small to detect an impact on health.”
- This seems akin saying that as the world is known to be flat there’s no point in checking if it’s not.

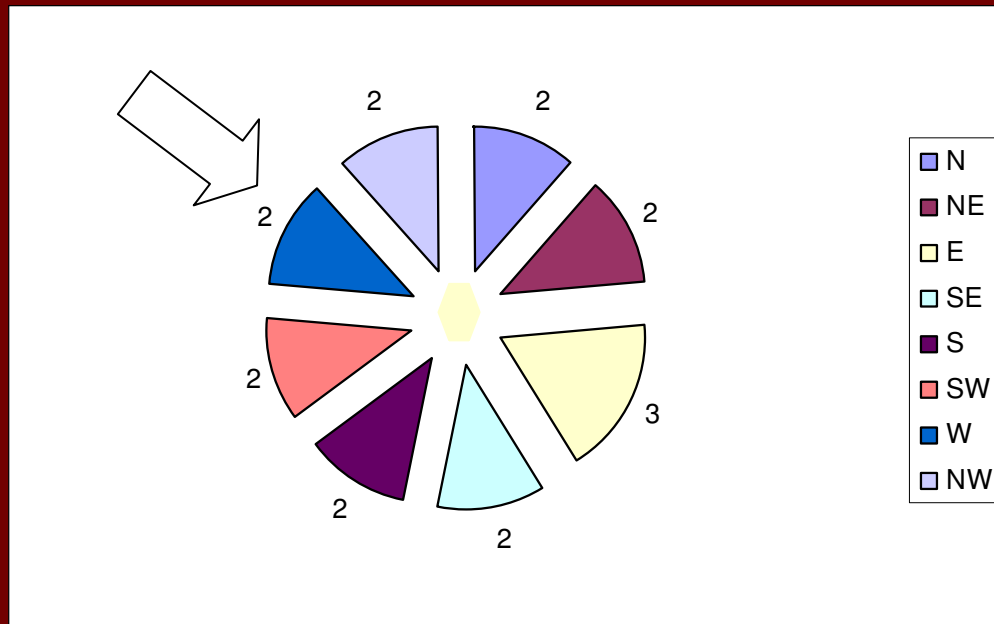
Studies of Health effects

- There have been no adequate studies of health effects downwind of Incinerators
- Why have the responsible agencies not undertaken such a study ?
- Studies which have taken place are considered flawed
- These include
 - the basis used by 'official' studies
 - the basis used by Michael Ryan

Official studies of Health around Incinerators

- These look at the health statistics in the 360 degree area around Incinerators so:

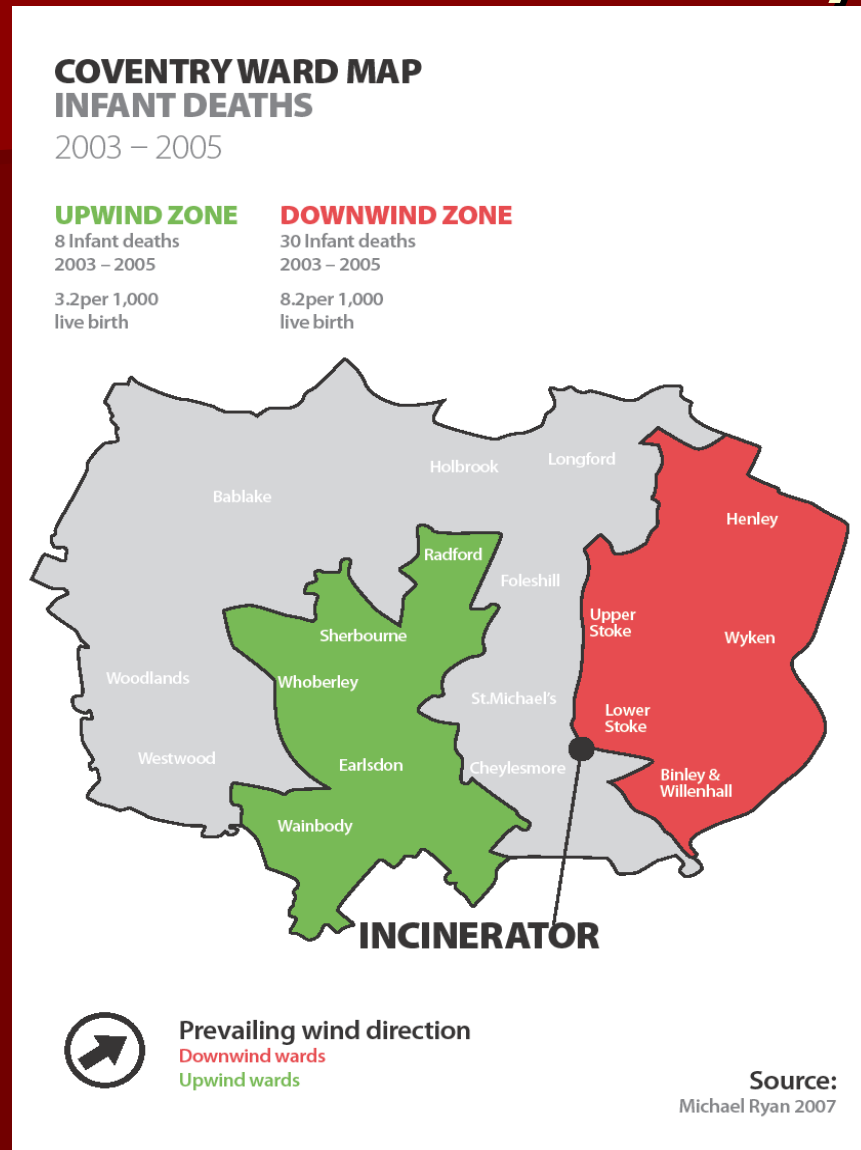
Wind direction



This produces say, 8 segments with total value of 17 effects producing an average of 2.13 against a national average of, say 2. – considered a ‘small’ effect.

BUT downwind value of 3 is 50% above national average and upwind value !!!!

Michael Ryan's report



This is one of several illustrations Mr Ryan produced and appears to demonstrate that infant deaths downwind of this Incinerator amount to 8.2 per 1,000 live births against an upwind value of 3.2 per 1,000 live births

Reasons permitting authorities give for not accepting Mr Ryan's reports

- No account was taken of socio-economic & other confounding factors
- The methodology & data used had not been subject to peer review
- No scientific journals had accepted the findings for publication
- The population samples used were too small to produce significant results

Proposed Study (1)

- After meeting with HPA & Lancaster University agreement was reached on the format of a study which would answer all the criticisms levelled at Michael Ryan's report
- The study will consider all Morbidity & Mortality & not just infant deaths and include a number of UK Incinerator locations to ensure sample sizes are sufficient to produce meaningful results

Proposed Study (2)

- Distinguished Professor Peter Diggle of Lancaster University will produce the study to exacting professional standards
- His independence and credentials are undisputed. (He has previously worked with the HPA on health issues and published numerous studies)
- The study will be low cost (in the region of £10,000)
- The results, whatever they might be, will demonstrate either that there is a health issue with Incinerator emissions or will re-assure residents living downwind of Incinerators that they are safe.

A WIN / WIN Situation !

Conclusion

- There is no doubt that the proposed study will be beneficial whatever its conclusion
- The cost involved is minimal
- Obtaining funding has stalled largely due to HPA influence who, despite initial support, have now reverted to their published policy
- We are seeking your assistance in obtaining all or part funding.
- We appreciate you may not be able to provide funding but your expression of support will assist us in obtaining funding from elsewhere.
- Please therefore indicate your support for commissioning this study.