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To: Medworth <Medworth@planninginspectorate.gov.uk>
Subject: Medworth

The Planning Inspectorate

Mr Andre Pinto

Lead Examining Inspector

Mrs Claire Megginson

Examining Inspector

6 July 2023

Dear Mr Pinto,

MVV Medworth EN010110– Bad Faith DCO Application

My warmest congratulations to you, Mrs Megginson and your team for your extraordinary attention to detail, persistence and patience in forensically teasing out truths and facts from the mountain of misleading obfuscation (commercially confidential) offered by MVV.

This is my fifth submission to the Planning Inspectorate about this misguided scheme; I hope they are considered together in support of my contention that this MVV application is being made in bad faith. Points made repeatedly hopefully will be accepted, in the best UN tradition, not as repetition but as emphasis. The last series of hearings in May and June crystallised concerns that I would like to draw to your attention, with your permission. Please note that I reference the MVV scheme as a **giant burner** simply because that is all it will do from the outset; 50mw energy production is uncertain and likely sporadic, the CHP component is a fiction and Carbon Capture is a taxpayer-funded dream.

Plymouth

Mr Carey consistently invites favourable comparisons of his noxious Wisbech scheme with his existing Devonport burner in Plymouth. There must be a faulty algorithm at work here. Wisbech is to Plymouth as an HGV is to a golf cart.

Plymouth is a **City** with a population of 264,695, a population density of 8,600 per square mile and only 36 miles from Exeter and 193 miles from London. It is the **30th most populated built-up area in the UK** and second only to Bristol in the southwest. It therefore provides a large residual waste catchment area for Devonport that presumably complies with the proximity principle. Wisbech by contrast is a small Georgian Heritage market town, the capital of the Fens. Its numerous listed buildings are identified here [REDACTED]

[REDACTED] Generous estimates put the population at 32,000 which is distributed in Wisbech town and dispersed across several villages in Wisbech district. Comparatively, its waste output is negligible. **Rural Wisbech is 8.2 times smaller than Plymouth but is to be saddled with a gigantic burner more than 2.6 times larger than Devonport.**

Wisbech **lacks the capacity** to host or sustain the Medworth gigantic burner. Devonport's capacity is 245,000 tonnes; the Medworth scheme promises to produce 645,000 tonnes of CO2 by burning 645,000 tonnes of waste. Let me add UNSORTED waste. Mr Carey on behalf of MVV Umwelt responded in writing (March 27, 2020) to my question about waste sorting, “ *Residual waste is that left over after residents and businesses have separated out those materials that can be recycled (paper, card, glass, metal and plastic)... It would be stored in an enclosed bunker prior to incineration with no additional sorting beyond that done by individuals and businesses at home or work.*” So medical waste, commercial and industrial waste, batteries that catch fire, lead, asbestos...anything really **will** be burnt. Who knows? Not you, not MVV, not Wisbech and certainly not the Environment Agency. You have heard testimony, with which Mr Carey concurred, that Devonport burns everything including recyclables. And **the resultant toxic mix has no name because no one knows how toxins combine during combustion.** Shall we call it 'Death'. And who cares? Not the Applicant who assures us it is safe – so breathe in! A time bomb for our overstretched NHS..

Proximity

It was astonishing to hear that 'local' is as defined by the Applicant. I had no idea my 'local' could extend across the East of England as well as the East Midlands! And nowhere in that vast area were any suitable alternative sites identified. Extraordinary. As Mr Carey has had to fend off accusations of violating proximity and waste hierarchy principles, he has skilfully changed tack now to emphasise, repeatedly, the 'regional' nature of the project – often adding that this is government policy. He is unable to identify any direct benefit to Wisbech. In the letter cited above, Mr Carey states “*The east of England region is recognised as having a capacity gap in terms of residual waste management treatment facilities (source: Suez, Mind the Gap 2017-2035; 2017).*” A very convenient but hardly objective source. Is this the same Suez I mentioned in my previous submission to you, responsible for the expanding EfW facility in Suffolk that is now searching for new sources of waste to sustain energy production capacity? Their predicament indicates a **waste gap**, pointing to a definite **overcapacity of EfW facilities**, in this region and across England. Today 6/7/23 the BAEF - Boston Alternative Energy Facility in Lincolnshire, 28.6 miles from Wisbech and 61 miles from Norwich - was **awarded a DCO.** The energy production capacity of BAEF is almost twice that of MVV Medworth, at 102mw: "The Order, as applied for, would grant development consent for the construction, operation, and maintenance of an energy recovery facility with a gross electrical output of 102 megawatts (MW), and associated development including an ash processing building, two carbon dioxide processing units, a lightweight aggregate manufacturing facility, electrical substation, wharf facility to receive waste refuse derived fuel (RDF) and import clay and sediment and export lightweight aggregates, supporting buildings, facilities and infrastructure, and temporary construction compounds."(PIN) No additional EfW facility is needed in this region, and definitely not in Wisbech.

I have been unable to identify any regional energy or energy-from-waste policy of HM Government. **This is NOT a regional project.** This **playdough NIP application** has been squashed from National 'UK' significance into 'England' then further squeezed into 'Regional' – then nudged again into a zone 1 & 2 straightjacket that MVV are wriggling desperately to shed. It is a misguided project whose size alone allows it the designation of NIP. It is not born of any regional policy or need – just a strategy to avoid local planning, and seeks to override county development management plans. Indeed, policy pronouncements clearly indicate that waste management is a matter for local councils – as lately circulated by the Environment Agency.

But Mr Carey is attempting to **condition us** into believing that his scheme is beneficial despite the extraordinary detriment locally in the Fens. It is only one of his many misleading statements: another is that EfW produces less CO2 than landfill. Yet another is that MVV will only burn residual waste – we all now know that they burn everything at Devonport, including recyclables. More mendacious were the statements that MVV did consider and investigate alternative sites. Two years later the truth

waste HGVs, bottom ash and fly ash lorries. It was reassuring finally to hear mention of **diversionary routes**; however the idea that MVV voluntarily will contact the council and deal with repairs in the event of a diversion, or that diversions will occur only on **prescribed routes is utterly risible. They will only do what they are forced to do.** Discussion has focused on road capacity but do not forget the two small bridges, one of which would struggle with HGV traffic. So it is important to identify and pin down each and every possible route that could (and would) be used.

The Applicant commented that, possibly during construction? lorries would not increase congestion during peak times as they would travel immediately before and after peak periods. Surely that merely extends the peak periods? This further sacrifices amenity: where previously residents might have had a bit of peace and quiet with minimal traffic before 8am and after 6pm, now the Applicant proposes to extend that odour, dust, vibration, noise, diesel and petrol pollution and disruption from dawn to midnight.

And **HGV congestion will lead to diversionary choices by other regular or visiting road users, thereby extending the impacts temporally, spatially and cumulatively.** This has a severe impact on **bus routes**; for example recent repairs at the corner of Weasenham Lane and Cromwell Road so disrupted traffic all along Cromwell Road for many days that the EXCEL bus from Peterborough to the town centre did not travel along that road but went through the villages instead to stay on schedule. Bus 68 was also affected. This was very inconvenient, particularly for users of the Eye Hospital who are not allowed to drive after consultations. Taxis refused the journey as traffic was mostly at a standstill. When the Applicant discusses alterations to roads or repairs they need to zone in on the actual **ripple effects town-wide** particularly to elderly or disabled residents and loss of footfall to businesses.

The proposed movement of extra wide construction loads from Lowestoft Port to Wisbech will entail prolonged disruption, including preparations and making good: *“There would be a requirement for verge and footpath overrun and potentially the removal of some trees...which if required would be replanted following the works. Traffic management under police escort may be necessary prior to movements as it is likely that there will be locations where the full extent of the carriageway will be required for AILs to transit, especially on single carriageway sections of the road network. The exact requirements will be determined when AIL delivery requirements are confirmed and an appointed haulage contractor confirms the street furniture removal requirements, escorts, movement timings and other logistical details prior to delivery. (MVV)”* The roads around Wisbech are all single lane so the disruption will be unimaginable. Bus routes will be disrupted or cancelled completely for that period. As an illustration, recent roadworks in Friday Bridge caused the Bus 56 to be cancelled for a week or more – the only direct bus from Wisbech to March Railway station, the nearest station to Wisbech. MVV-generated disruption will hamstring those many residents – young and old - who do not drive, and impede access to the villages, schools, employment and rail services.

Diversionary routes will encompass all of Wisbech. I have mentioned before the shallow foundations of Fen Georgian and Victorian houses. The soils on high water tables make them particularly susceptible to **vibrations**: *“Traffic-induced vibrations are a frequent problem with buildings. When a heavy vehicle such as a bus or a truck strikes an irregularity in a road surface, an impact load is generated which, in turn, gives rise to vibrations that travel through the soil. Soil - particularly its type and stratification - is but one factor influencing the transmission of vibrations. They are usually worst in areas underlain by a thick but soft clay soil layer. (2000)”* Wisbech roads have many 'irregularities', notably repair patches, sinkholes and potholes. North Cambs Hospital along Cromwell Road will be affected by the plume, and by odour, noise, petrol and diesel fumes, dust and vibration, particularly the Pathology Lab which is sited along Cromwell Road (imagine the needle for your blood tests wobbling as endless HGVs thunder past on diversion). The hospital facilities operate with open windows for many months of the year. Who will monitor air quality here? Who will compensate us for damage to buildings, listed or otherwise caused by the cumulative effect of so

much additional vibration? Construction traffic could last 4 years, and operations traffic at least another 45 years. Wisbech is not a blank slate.

I noted how often the **'data' conveniently is broken down into easily disregardable points**. HGV movements are taken separately or sequentially, not cumulatively, so can more easily be designated as moderate or low effect. Adverse impacts are assessed separately and dismissed. Consider: our coastline is being demolished, *inter alia*, by the frequency and magnitude of waves **over time**. So 4 or 16 HGVs per hour is dismissed as insignificant, and someone gets to cross the street. However, 24/7 pounding by 350 fully loaded (no mention of the weight of each) HGVs and high numbers of additional lorries for construction and residue for 40 +4 years – a minimum of **16,060 days non-stop - will** produce intolerable levels of vibration, noise, odour, dust and toxicity. That could amount to **385,440 hours of ADDITIONAL pollution**. Wisbech is not a blank slate; existing pollution and high traffic levels will be compounded and exacerbated to grind Wisbech into the grave.

Particulates

Professor C. V. Howard. MB. ChB. PhD. FRCPath. is finally being vindicated by the acknowledgement that particulate matter is a definite and growing hazard to human health. Parliament, the W.H.O., even the UK Government now recognise that limits must be established, monitored and enforced.

Professor Clive Ballard advises that “*„Particulate matter is a risk to stroke and respiratory health. Two recent and very comprehensive reports in the British Medical Journal provide clear evidence of the impact of particulate matter in the air on health. Firstly, a meta-analysis of more than 2000 studies showed a clear and significant risk of stroke associated with particulate matter. This risk was seen with as little as 7 days exposure, and also had a significant impact on related hospitalizations. Secondly, a report combing the findings of studies across more than 200 countries demonstrated a link between exposure to particulate matter and an increased risk of asthma and Chronic Obstructive Pulmonary disease – explaining a substantial 20% of the risk. In addition to the impact on the health of individuals, the added health burden and increased rate of hospitalization also has significant implications for health resources and cost”*.

Most assumptions about the safety of modern incinerators are based only on emissions which occur during standard operating conditions and fail to account for the very high releases of dioxin and heavy metals that arise during start-up and shutdown of incinerators. Of equal concern is the likelihood that these dangerously high emissions will not be detected by present monitoring systems. Mr Carey indicated that shutdowns will happen frequently, either by design or from power failures. No emissions report to the EA will include these figures. **The Committee on Climate Change now has called for a complete moratorium on new EfW facilities**. Their recommendation should apply to this DCO.

Plume

Professor V Howard, in calling for a new Clean Air Act, reminds us that “*We have swapped big soot-particle “pea-soupers” for an invisible “photo-chemical smog” consisting primarily of smaller ultra-fine particles (UFPs). Normal face masks offer no protection from UFPs. Nor are you protected if you stay indoors: UFPs pass easily inside buildings. Living near major roads incurs a higher exposure. Pedestrians and cyclists, who are exercising, can receive even higher UFP exposures. And car ventilation systems blow a UFP aerosol straight in the faces of passengers.”*

The entire area of Wisbech – town and district – will be subjected to unrelenting, incessant toxic emissions from the MVV plume. And **pity the poor school children out on their playing fields** – activity designed to improve health. MVV's few measures of air quality, that seek to record the bare minimum, fail to recognise that this plume will affect real lives and livelihoods. **The people of Wisbech are all Significant Receptors. The A1 agricultural land is a Significant Receptor. Our**

water supply is a Significant Receptor. Our biodiversity is a Significant Receptor. *De minimis* 'Professional judgements' - that conveniently find no or 'only moderate' effects or impacts, on one street but not another, this building but not that one - would of course alter immediately were they to be the beneficiaries of the toxic emissions, if they lived near the MVV giant burner or had children in a school 300 or 750 metres away. All those tables and matrices would look very different. But we know *fishermen never say fish stink*.

Perspective

And that's what it's all about. Perspective.

I was struck by the elaborate explanations of visuals, of whether some poor soul on their terrace would be able to see the MVV monstrosity over their trellised wall. **It depends where you stand.** I sat recently in a ground-floor room with large windows through which I could see a large hedge (about 8ft high) and the top windows, roofline and chimneys (about 20-25 ft high) of the houses opposite across a wide street. I am no expert, but I am convinced that a structure 53 metres high (174 ft) – not forgetting the two chimneys each at 95metres (311 ft) that the Applicant was reluctant to mention – would be unmissable across flat land and low-lying buildings. The chimneys are the height of Big Ben and 30 metres taller than Ely Cathedral spire which is readily visible a long way across the flat fens, on foot, by vehicle or by train. It would block views of anything else. But as the Applicant suggests, it might depend where you stand, which window you use, front garden or rear...where you walk, or drive, and whether that was a sensible or efficient route for you to take – after all, MVV tables and matrices are 'evidence' of a no-effects, no impact giant burner, and those tables, matrices and judgements are never wrong. A commonsense conclusion would be that the massive structure would cause a Highly Significant – and very unwelcome - change...to the character of the landscape, to the FEEL of the town, to the amenity of neighbours, residents and tourists. I have yet to discover Georgian residences that are 174 ft tall. But Mr Carey says tourists will visit especially to see his mega-burner, not the historic Brinks, Crescent or Museum. Perhaps they will – as an outstandingly crass example of the current democratic deficit.

Of course, if you are standing in London or Devon, the mega-incinerator is a file folder. It exists as a series of schemes to: **get** a fictional need crafted on paper; **get** planning permission; **get** toothless environment permit; **get** taxpayer payouts, **get** profits to Mannheim. **Getaway.** Job done. No problem.

If you stand in Mannheim, Germany or Australia where **coin-operated shareholders** are based, then the **burner is invisible – and so is Wisbech.** We are not even a spec on the map unless the **scale** is adjusted - which is precisely the difficulty with MVV Medworth. The burner is too large, too polluting, too close to residences – in violation of WHO and PHE guidelines – and is unnecessary. We do not exist as people or livelihoods worthy of consideration. Why should Wisbech breathe. This is business and balance sheets are the priority, so burn baby burn...

Policies or Politics

The government is more in debt than ever, and the country is reeling from a cost-of-living crisis – yet **incineration is not taxed.** Why not. Why do they get a free ride? Why ignore the '**polluter pays**' principle? Why is it always the poor taxpayer with nothing to gain who has to dig deep? Incinerators currently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, the Stockholm Convention and the Environmental Protection Act. The foetus, infant and child are most at risk from incinerator emissions: their rights are being ignored and violated. In February 2014 the EU Commission began proceedings against the UK (and other countries) for failure to meet air quality targets for nitrogen dioxide set by the EU Air Quality Directive. In May 2018 the European Commission referred the UK to the Court of Justice of the EU (CJEU) “for failure to respect limit values for nitrogen dioxide (NO₂), and for failing to take appropriate measures to keep exceedance periods as short as possible.” On 4 March

2021, the CJEU found that the **UK had failed to fulfil its obligations** under the provisions of EU Directive 2008/50/EC. So more than 10 years ago this situation was out of control, but the EA continued to issue permits despite its inability to recognise, monitor or enforce violations.

EA guidance currently indicates that incinerators emitting PM10 and PM2.5 over 1 tonne should report, but evidence exists that this stipulation is routinely flouted. PM10 and PM2.5 monitoring and reporting should be made mandatory for incinerators, and EA guidelines should be strengthened and enforced. A limit value must also be placed on PM 1 ultrafine particulate emissions that are so easily absorbed into the bloodstream. Incinerators must be required to develop and implement accurate systems to measure -accurately and regularly without manipulation - the particulate matter they release, and that requirement should be in place for this DCO. MVV is using old technology to the extreme detriment of all 'receptors'.

Parliament now recognises the dangers of PM2.5 and ultrafine particulates and the Committee on Climate Change and National Infrastructure Committee have called for an end to incinerator emissions and a moratorium on any new EfW facilities. This DCO application should be rejected. The UK Environment Act 2021 requires the Government to set legally binding environmental targets for England in four priority areas including air quality, as well as an additional target on fine particulate matter (PM2.5), as this is considered to be the **air pollutant of greatest harm to human health**. In March 2022 the established targets were: an annual mean concentration target – a target of 10 micrograms per cubic metre ($\mu\text{g m}^3$) to be met across England by 2040; and a population exposure reduction target – a 35% reduction in population exposure by 2040 (compared to a base year of 2018). If this DCO is approved this year, MVV will be allowed to continue applying current emissions targets, despite the new targets being in force 10 years into MVV's 40 year lifespan. **MVV cannot filter out PM2.5 or ultrafine particulates**. Refusing this misguided DCO application will ensure that an additional 650,000 tonnes of CO2 are not emitted and these targets can more easily be met.

Professor C. V. Howard. MB. ChB. PhD. FRCPath, in 2005, highlighted **incineration unsustainability**. *“Waste destroyed in an incinerator will be replaced. That involves new raw materials, manufacture, transport, packaging etc etc. In contrast, reduction, reuse and recycling represent a winwin strategy... Incineration destroys accountability and this encourages industries to go on making products that lead to problematic toxic wastes. Once the waste has been reduced to ash, who can say who made what? The past 150 years has seen a progressive 'toxification' of the waste stream with heavy metals, radionuclides and synthetic halogenated organic molecules. It is time to start reversing that trend.”* He has also urged that the medical profession receive adequate training in the many medical detriments of incineration.

A response to my letter of 24th August 2020 to the SoS DEFRA indicates that *“... The National Planning Policy Framework (NPPF) is clear that development in areas at risk of flooding should be avoided...Planning policy is clear that **if there are better sites in terms of avoiding flood risk, or a proposed development cannot be made safe and resilient from flooding, it should not be permitted.**”*

Wisbech is at risk of flooding. History and Insurance companies are agreed on that, and they currently appear to be a more reliable assessor of flood risk than the EA. **Many better sites exist across MVVs waste catchment area, ie., the whole of England.**

Promises Promises – 'In Principle'

Unless every protection that can be afforded to Wisbech is nailed down and embedded in concrete in the DCO, every thing currently being agreed 'in principle' or heavily caveated will not be honoured. That is the point of an application in **Bad Faith: promise them anything but don't put it in writing**. MVV is anxious to avoid the PIN 'trespassing' into areas that they consider to be the remit of the Environment Agency. They are aware that the EA are toothless and nothing will be monitored or enforced. They will argue 'best available' technology based only on their budget, not on their duties,

responsibilities and actual availability - hence their continued use of outdated old filtering equipment. MVV have chosen SNCR (Selective Non-Catalytic Reduction) which allows nitrous oxides to pass through their system and into the plume for deposition across Wisbech and A1 agricultural land. The use of their bag-house fabric filtration system does even less to prevent small particulates (nano-metre size) to be trapped by the treatment system than other available treatment regimes. Perhaps if the facility were to be located near Highgrove or Chequers, or MVV's Directors, better solutions would have been identified.

Mr Carey repeatedly reminds us of MVV's experience with toxic giant burners since the 1960s, yet their equipment *re.* particulates and heavy metals filtering has not progressed. And more recent major German vehicle (VW) emissions international scandals indicate that their statements merit close scrutiny. The Applicant consistently interprets obligations according to the strict letter not the spirit of the guidelines, advising that in the end it will depend on SoS Grant Shapps's interpretation of their evidence not the PIN's recommendation. Mr Carey's claim that they will be good neighbours invites ridicule: Mr Carey is a promising man.

Wisbech has witnessed promises on 'levelling up', Garden Cities, CO2 emissions and climate change, railway reconnection; the promises come thick and fast especially in election years. There is sufficient evidence now that electricity generation from waste incineration produces higher CO2 emissions than either gas or coal, requires secure landfill for hazardous fly and bottom ash, and is more of a problem than landfill. It is shocking that PHE and the EA have not yet opposed additional incineration or even commissioned or advocated for research to establish additional evidence on health impacts. Instead, Pontius Pilate-like, they ignore the issue or say there is no evidence against – AND THEREFORE THE ACTION/PROJECT CAN PROCEED! Whatever happened to the **precautionary principle**? But they have said next to nothing on sewage contamination of our beaches and watercourses nationally, so where's the surprise. Thus arises the suspicion that these public bodies exist to facilitate big business (perhaps subsequently joining their ranks, as suggested on the BBC) rather than to protect the public. More worrying is the **Environment Agency's inability to identify, monitor or prevent toxic emissions or local health impacts of emissions from mammoth burners** such as MVV Medworth. The local, *ie.* Wisbech, EA officers admit to being 'resource poor' and unable to monitor or control existing odours from such local food factories as Nestle Purina. When the toxic odours and particulates from MVV's monstrous burner is added to the emissions soup 24/7 along with the dust and fumes of the 350 daily heavy duty waste lorries, Wisbech is likely to suffer from collective respiratory failure.

PIN(to)

Much of the Applicant's 'study area' still is designated as DROUGHT status since summer 2022. And much of it is prime agricultural land, heavily dependent on uncontaminated reliable water supplies. **Anglia Water (Love every drop) should be requested to inform the PIN of the rationale for its U-turn**, to squander scarce water on this crass unnecessary project. They do not own the water; they merely have the temporary rights to distribute it. There must be a public interest component to their actions and some accountability via PIN submissions. MVV would struggle to operate effectively in the future as water stores are reduced or rationed. Evidence abounds that reservoirs can and do run dry.

Neither the Applicant nor the Environment Agency wants to engage with the adverse impacts and health effects of this gigantic burner. The strategy of '**scoping out**' contentious issues is reminiscent of Pontius Pilate: PHE says waste is a matter for the EA as the lead agency, the EA says waste is a matter for local authorities - and MVV '**cannot envisage any problem**'. So who will step up to rid Wisbech of this monstrous affliction? Will it be the Prime Minister, who when campaigning for his post, claimed to be passionate about climate change and the environment. What will he tell his daughters - who "*ask me (him) daily 'what are you doing about climate change?'*" – if he approves this monstrosity producing 645,000 tonnes of CO2 annually for 40 years. Will it be the NHS, who

could proactively protest, not just for pay, but also against unnecessary burdens to their respiratory, cardiovascular, cancer and mental health services by supporting calls for an urgent moratorium on new EfW facilities and elimination of emissions from existing burners? Will it be the NFU - and major Supermarkets - joining us in urging for **Food Security by protecting our A1 agricultural land** and associated agri-businesses from cumulative toxic contamination? Will our teachers at the 25 or so schools and the College of West Anglia, on behalf of themselves and their students? A unit of Cambian Wisbech School is located approximately 200m to the northeast of the proposed Site. TBAP Unity Academy lies approximately 500m to the northeast, with the Thomas Clarkson Academy approximately 750m also to the northeast. Residential areas of Wisbech lie further to the north and the east. Elm Road Primary School and Ladybirds Nursery School must be prime targets too, tucked away behind Thomas Clarkson Academy; they are 'scoped out' of the data, along with all the nearby residential Care Homes - but not out of the pollution and misery. Indeed, the Applicant avoids using the word 'school' at all, just 'receptors' and numbers.

Wisbech, with its limited resources, has fought valiantly to resist this toxic imposition. I would like sincerely to thank WisWin, UKWin, Cambridge Friends of the Earth, our elected and legal representatives, the newspapers and all friends of Wisbech who have lent their support. In my 25 years in Wisbech, I have never been so proud.

The Applicant on many occasions have referred to themselves as '**the undertaker**'. Never has a designation been more apt. The health and wellbeing of Wisbech's children rests with the PIN - you and your team, Mr Pinto. Help them to breathe, to live. Help them to have a future.

Please persuade the Secretary of State to reject this Bad Faith DCO application.

With thanks,

Dr U Waverley

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