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Climate and Health Alliance

Health Technology Assessment Policy and Methods Review

Climate and Health Alliance submission to Consultation 2 Options Paper

February 2024

About the Climate and Health Alliance

The Climate and Health Alliance (CAHA) is a national charity and the peak body on climate change and health in Australia. CAHA is an alliance of organisations within the health sector working together to raise awareness about the health risks of climate change and the health benefits of emissions reductions. The membership of CAHA includes a broad cross-section of health sector stakeholders representing healthcare professionals from a range of disciplines, as well as healthcare service providers, institutions, academics, researchers, and consumers.

Acknowledgement

The Climate and Health Alliance recognises Aboriginal and Torres Strait Islander People as the traditional custodians of the land on which we live and work, and acknowledge that sovereignty of the land we call Australia has never been ceded. We commit to listening to and learning from Aboriginal and Torres Strait Islander people about how we can better reflect Indigenous ways of being and knowing in our work.

We would also like to acknowledge the support of the Public Health Association of Australia, long-standing CAHA members, who co-developed aspects of our submission.

Introduction

The health sector has a uniquely symbiotic relationship with climate change. On one hand, climate change directly impacts human health, and increases both demand for health services and the stress on the people and institutions providing those services. On the other hand, the health sector is also a significant contributor to Australia's greenhouse gas emissions, making up for approximately 7% of total emissions. This relationship shows us that while the health sector is contributing to climate change, it stands to gain significantly as climate change mitigation and adaptation activities are undertaken through reduced burden of disease.

Unfortunately, Australia has a poor record on addressing the costly health impacts of climate change, despite being one of the most climate vulnerable countries in the developed world. The health sector also has an important role to play in contributing to Australia's Nationally Determined Contribution.

It is clear that action on climate change is hugely beneficial for social, environmental, cultural and economic outcomes. However, these benefits can only be achieved with urgent and decisive action, coupled with the government policy and funding to execute it. The recent launch of Australia's first National Health and Climate Strategy (NHCS) is a significant step forward in addressing the health impacts of climate change and the environmental burden of the health sector. While the NHCS needs funding to undertake its commitments and actions, it also requires a rethink of our health systems policies, systems and procedures. It will take a whole of system approach, whereby each branch and agency within the Department of Health and Aged Care (DOHAC) considers the environmental impacts of its work and seeks to redress the omission of environmental impacts on human health outcomes.

As such, the Climate and Health Alliance is pleased to contribute a submission to the Health Technology Assessment (HTA) Policy and Methods Review: Consultation 2, and look forward to further engagement on this important issue.

Consultation Questions

Based on expertise and areas of focus, the Climate and Health Alliance submission will focus on providing evidence to the Committee on options within Chapter 5.3 'Consideration of environmental impacts in the HTA'.

1. **Overall, to what extent could the options (if implemented) address the issues that relate to them?**
    a. Completely address the issue
    b. Mostly address the issue(s)
    c. Address some but not most of the issue(s)
    d. Address little or none of the issue(s)
    e. Don't know

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As such, CAHA supports the inclusion of 'Consideration of environmental impacts in the HTA' in Consultation Paper 2. This inclusion supports the implementation of Objectives 2 (Health system decarbonisation) and 3 (International collaboration) within the NHCS and are a positive step towards actioning both objectives.

2. **If implemented, overall would these Options have a positive or negative impact on environmental impact reporting?**
    a. Very negative
    b. Negative
    c. Neutral
    d. Positive
    e. Very positive
    f. Don't know

CAHA believes that overall the Options will have a very positive impact on environmental impact reporting. Further information on potential impacts and how the Options align with the NHCS are outlined below.		
Options	**Alignment with NHCS**	**Impact**
Reporting of environmental impacts, starting with embodied greenhouse gas emissions, in the assessment of cost-effectiveness by Australian HTA bodies.	Unfortunately environmental impact assessments aren't explicitly included in the NHCS. However, this can form support for climate risk assessment, which is included.	Reporting supports mechanisms of accountability and industry review of processes that exacerbate climate change.
Potential for use of these data in approval and reimbursement decisions	Action 4.3 "*Establishing a national health system emissions reduction trajectory"* Action 4.12, 4.13, 4.14 "Reducing emissions from desflurane" "nitrous oxide" and "respiratory inhalers" respectively.	Reducing greenhouse gas emissions within all levels of the health system including by reducing general use, identifying and reducing wastage, educating on appropriate use and phasing out certain products (desflurane) altogether.
Potential for public reporting of these data, to inform clinical decision-making.	Action 5.1 "*Considering the role for emissions footprinting of health technology products*"	Could be helpful in making decisions on medicines and medical technologies when other factors, such as clinical outcomes and cost effectiveness, are equal. Could influence industry competition in sustainability.
Development of guidance documents and examples to facilitate environmental impacts reporting	Action 4.1 "*Reporting of estimates of health system greenhouse gas emissions… Where practicable, estimates will*	Ensures health technology is part of a comprehensive assessment of the emissions footprint of the Australian health system, and contributes to

	be disaggregated by… source…"	Australia's overall National Climate Risk Assessment.
Alignment with international best practice in comparable jurisdictions	Action 5.1 *as above* Action 4.17 *"Promoting green procurement and sustainable resource use"*	International collaboration that shares the work to support decision making, identifying and preparing for the health technology emissions reductions opportunities and challenges of the future in alignment with AU role in ATACH. The Australian Government could develop guidelines on green procurement and sustainable resources that are aligned with International best practice.
The role of international standards for carbon footprinting of health technology products	Action 5.1, as above	As above

3. **Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.**

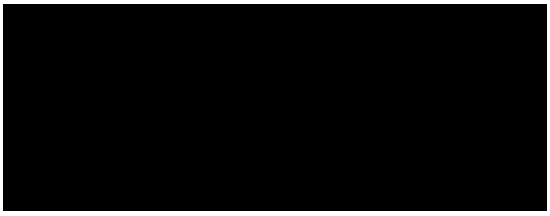
As part of 'Option 6' in the consultation Paper 2, action 5.2 of the NHCS must be included in the international standards for carbon foot printing. Action 5.2, '*collaborating to decarbonise international supply chains: In working to decarbonise health system supply chains, the Australian government will work with the international collaboration between the English national health service and the United States department of health and human services to develop aligned procurement requirements to decarbonise health system supply chains*.' Decarbonising health technology supply chains is one way of working towards achieving action 5.2 of the NHCS. However, true achievement of this action also must facilitate the development of nationally consistent standards including criteria for greenhouse gas emissions, resource depletion (air, water quality and

use, energy and material consumption), chemical, waste and end of use considerations, and toxic impact on human and environmental health and human rights.

Health technology safety assessment must also factor climate safety. HTAs must include environmental considerations in line with the NHCS to ensure the risk of increased mortality and burden of disease due to climate change is accounted for. Safety of the product alone is insufficient, the harms to health caused by the cumulation of such product's emissions in the environment must be included. Product safety also means climate safe and resilient.

HTAs to be part of a fully funded and whole of system decarbonisation effort. Decarbonisation not only requires appropriate and immediate funding, but it also requires meaningful implementation at all levels. In the case of health technology, that includes decarbonising manufacturing, transport, research, disposal, and utilisation of the product. However, at a broader level, decarbonisation is having a healthier population that relies less on health technology products.

'Option 2' must be driven by patient safety, but also encourage development of reduced emissions health technology. The inclusion of environmental considerations in these processes could be helpful in making decisions on medicines and medical technologies when other factors, such as clinical outcomes and cost effectiveness, are equal. Incentivising development of safe and low emissions technology must be part of the whole-of-system emissions reduction trajectory, and can drive market competition towards a low carbon economy.



Appendix: Climate and Health Alliance Members

CAHA membership as of November 2023.