

Response

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 Yes, I consent to my identified submission being published

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What is your name?
 Chelsea Hunnisett

7
Please select the type of individual(s) or organisation(s) you represent. Please select all that apply. - Selected Choice
 Other [please specify]

7.22
Please select the type of individual(s) or organisation(s) you represent. Please select all that apply. - Other [please specify] - Text
 Peak body

8.1
What is the name of your organisation? - My organisation is called: - Text
 Climate and Health Alliance

9
Are you making feedback on behalf of your organisation?
 Your organisation

13
Please select which chapter/s you would like to provide feedback on. You may provide feedback on as many or few chapters as you wish.
 5. Futureproofing Australia's systems and processes

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Please select the topics within the chapter(s) you would like to provide feedback on. 5. Futureproofing our systems and processes
 5.3. Consideration of environmental impacts in the HTA

147
Taking all Options within this section: 5.3. Consideration of environmental impacts in the HTA into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?
 Mostly address the issue(s)

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If you would like to expand on your answer above you can do so below:
 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, 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.

149.1
If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Environmental impact reporting
 Very positive

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Environmental impact reporting
 Further information on potential impacts and how the Options align with the NHCS are outlined below.

Option 1: Environmental impact assessments aren't explicitly included in the NHCS. However, this can form support for climate risk assessment, which is included. Reporting supports accountability and industry review of processes that exacerbate climate change.

Option 2: Aligns with NHCS Actions 4.3, 4.12, 4.13, 4.14 to reduce health system GHG emissions including by reducing general use, identifying and reducing wastage, educating on appropriate use and phasing out harmful products.

Option 3: Aligns with NHCS Action 5.1. 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.

Option 4: Aligns with NHCS Action 4.1. Ensures health technology is part of a comprehensive assessment of the emissions footprint of the health system, and contributes to Australia's overall National Climate Risk Assessment.

Option 5: Aligns with NHCS Actions 4.17, 5.1 for collaboration that shares the work to support decision making, identifying and preparing for reductions opportunities and challenges of the future in alignment with ATACH. The Australian Government could develop guidelines on green procurement and sustainable resources that are aligned with International best practice.

Option 6: As above.

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In summary, considering all the draft reform options together:

How confident are you that the reform options (if implemented) will make health technology assessments better overall?
 Very confident

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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. 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.
 * 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.
 * 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.

