



21 February 2024

We make this submission as the co-leads of the Health System Resilience and Sustainability Theme of the Healthy Environments and Lives (HEAL) NHMRC National Research Network. HEAL notes that **including environmental impacts in HTA is an urgent priority for reform in Australia which is on the front line of health impacts and damages due to climate change.**

The HTA review is an opportunity for major reform. It is timely that the **frame for all reimbursement decisions be expanded to health outcomes, financial impacts and environmental impacts.** HTA has long done the first two, now is the moment to expand the field of view. This approach aligns clearly with the business community and NGOs which have adopted ESG - Environmental, Social and Corporate Governance.

**Healthcare, including in Australia, has a very large carbon footprint.** HEAL believes that responsibility for cutting healthcare carbon emissions must rest with DOHAC and must not be seen as being as the responsibility of other sections of government or the economy.

The carbon emissions information provided by HTA applicants will be of **direct use to clinicians in clinical decisions**, as well as helping to inform reimbursement decisions. **Healthcare decarbonisation is desired by consumer groups.** *Health Care Consumers Association ACT, Health Care Consumers QLD, and Health Consumers NSW have all expressed a vision and desire to decarbonise healthcare e.g. Health Care Consumers Association ACT HCCA identifies climate change as a 2023-2024 priority.*

Comments on specific sections of the options paper:

1. **Section 2 (HTA funding and assessment pathways) re Funding.** Business as usual carries a risk to government that the public funds deployed (via PBAC or MSAC) following a positive HTA outcome may be used (and be seen to be used) to **reimburse/subsidize products that add to healthcare's carbon footprint and worsen global warming and climate change – with consequent health and economic damages to Australians.**
2. **Section 2 (HTA funding and assessment pathways),** WRT the proposal to calibrate level of appraisal required to the level of risk, the **definition of risk should be expanded from 'uncertainty and potential financial impact' to 'uncertainty, potential financial impact and potential environmental impact'**
3. **Section 5.3 Environmental considerations.** We **strongly support the proposals described in Section 5.3.** We urge the committee to recommend that **options 1-6, be commenced without delay.** A requirement for this evidence as part of future HTA applications will provide significant motivation for companies and other sponsors to begin planning to collect data for LCA studies which will be of value to clinicians, consumers and the Australian population.

Yours sincerely,

**Professor Alexandra Barratt,**  
University of Sydney





**Adj Assoc Professor Rebecca Haddock**  
Australian Healthcare & Hospitals Association



**Professor Sotiris Vardoulakis**  
University of Canberra – HEAL Network Director