

Response

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Yes, I consent to my identified submission being published

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What is your name?
Lily Pratt

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Please select the type of individual(s) or organisation(s) you represent. Please select all that apply. - Selected Choice
Industry association / Peak body

8.1
What is the name of your organisation? - My organisation is called: - Text
Public Health Association Australia

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

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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

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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:
The proposed options do well to address their related issues. If implemented, the options would also be world leading. For environmental impacts to be included as not only part of the HTA process, but also, for the emissions data of health technology products to be publicly available would directly address the challenge and opportunity to safely decarbonise Australia's health system. Such information would enable patients and clinicians to make low emissions decisions on medicines and medical technologies when other factors, such as clinical outcomes and cost effectiveness, are equal. Ultimately, this could influence industry competition towards sustainable, low carbon technologies.
Also, reducing the health system's carbon emissions is a key objective of Australia's National Health and Climate Strategy. Implementing these options directly corresponds to several of the Strategy's actions, in particular, action 5.1 'Considering the role for emissions footprinting of health technology products The Australian Government will, in consultation with industry and other relevant stakeholders, review options for including public reporting and consideration of environmental impacts, starting with greenhouse gas emissions, of health technologies, in collaboration and alignment with international best practice in comparable jurisdictions.'

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
A core goal of the PHAA is to see an effective response to climate change and its impact on health. The National Health and Climate Strategy (NHCS) is an important conduit to mitigating climate change as well as beginning the process of adapting to the change that is already occurring. Reducing health system emissions is a core objective of the NHCS and emissions footprinting of health technology products are specifically outlined as one action to achieve this objective.
If implemented, these options play a key part in the larger effort to reduce the health system's emissions. The health system is responsible for 5.3% of Australia's emissions, so reducing emissions in the sector is an important factor in reducing Australia's total emissions. However, PHAA acknowledges that most emissions reductions must be made by the highest emitting sectors including energy, stationary energy, transport and agriculture to reach Australia's Paris Climate Agreement target.
Rapid reduction of emissions would mean mitigating the global temperature increase to well below 2A°C above pre-industrial levels and limit it to 1.5A°C above pre-industrial levels. Achieving this would drastically reduce the worst impacts to health, the environment, food sustainability, infrastructure, and the list continues. Implementing the evidence informed actions of the NHCS to protect the health and wellbeing of Australians is not only a positive outcome for PHAA, but is a positive outcome for all.

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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", action 5.2 of the National Health and Climate Strategy (NHCS) must be included in the international standards for carbon foot printing. This means also collaborating to decarbonise international supply chains.
'Health technology safety assessment must also factor climate safety. HTAs must include environmental considerations 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.
'Environmental considerations within HTAs must 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.

