



Public Health Association
AUSTRALIA

23/02/2024

Supporting Documentation: Health Technology Assessment Policy and Methods Review Consultation 2

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being for all. PHAA seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

PHAA greatly appreciates the opportunity to participate in the second and final round of consultation for this Review. PHAA strongly supports the six options to report on environmental impacts as part of the Health Technology Assessment (HTA) and we urge the Reference Committee to include these options in the final Review recommendations.

The clear intention for the options to align with the new National Health and Climate Strategy (NHCS) is welcome and, if implemented, we believe that these additional considerations to the HTA process will be one part of achieving a core NHCS objective (see table 1.0). The NHCS has made decarbonising the health system a key objective and has specifically highlighted emissions footprinting of health technology products as one of the actions to achieve this objective.¹ The proposed options could have a positive impact towards reducing health system emissions in multiple ways, for example:

- public emissions reporting provides clinicians and patients with the ability to include environmental impact as part of their considerations. Such decision making could ultimately incentivise development of safe, low emissions technology and further decarbonise the health system;
- international standard setting (including decarbonising supply chains) of health technology emissions for the product's life cycle will further reduce these emissions globally; and
- including reporting of environmental impacts in the assessment of cost-effectiveness by Australian HTA bodies supports mechanisms of accountability and industry review of processes that exacerbate climate change.

Ultimately, a society-wide transition to a low carbon economy is required to mitigate the worst impacts of climate change, and thus it is the government's role to lead, inform, regulate, monitor, enforce, and to motivate behaviour change by individuals and corporations. Incorporating environmental considerations is one positive step towards motivating this necessary change.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Terry Slevin'.

Adj. Professor Terry Slevin
Chief Executive Officer
Public Health Association of Australia

¹ <https://www.health.gov.au/sites/default/files/2023-12/national-health-and-climate-strategy.pdf>

Table 1.0 Alignment with NHCS:

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 included in the NHCS. But, 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 <i>“Establishing a national health system emissions reduction trajectory”</i> Action 4.12, 4.13, 4.14 <i>“Reducing emissions from desflurane” “nitrous oxide” and “respiratory inhalers”</i> 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 <i>“Considering the role for emissions footprinting of health technology products”</i>	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 <i>“Reporting of estimates of health system greenhouse gas emissions... Where practicable, estimates will be disaggregated by... source...”</i>	Ensures health technology is part of a comprehensive assessment of the emissions footprint of the Australian health system, and contributes to Australia’s overall National Climate Risk Assessment.
Alignment with international best practice in comparable jurisdictions	Action 5.1 <i>as above</i> Action 4.17 <i>“Promoting green procurement and sustainable resource use”</i>	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 tech products	Action 5.1, as above	As above

Copy of PHAA survey responses to the Health Technology Assessment Policy and Methods Review - Consultation 2.

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

Q1. Overall, to what extent could the options (if implemented) address the issues that relate to them? (Rank from 'Completely address' to 'address little to none')

Mostly addresses the issue(s)

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."

Q2. If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? (Rank from 'very negative' to 'very positive')

Very Positive

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

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.² However, PHAA acknowledges that most emissions reductions must be made by the highest emitting sectors including energy, stationary energy, transport and agriculture³ to reach Australia's Paris Climate Agreement target.

Rapid reduction of emissions would mean mitigating the global temperature increase to well below 2°C above pre-industrial levels and limit it to 1.5°C above pre-industrial levels. Achieving this would drastically

² <https://www.health.gov.au/sites/default/files/2023-12/national-health-and-climate-strategy.pdf>

³ <https://www.csiro.au/en/research/environmental-impacts/climate-change/climate-change-qa/sources-of-co2#:~:text=Energy%20production%20is%20the%20largest,cent%20of%20the%20total%20emissions>

reduce the worst impacts to health, the environment, food sustainability, infrastructure, and the list continues.⁴ 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.

Q3. 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.

Q4. How confident are you that the reform options (if implemented) will make health technology assessments better overall? (Rank from 'not at all confident' to 'very confident')

Very confident

⁴ <https://www.un.org/en/climatechange/paris-agreement>