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Thank you for the opportunity to comment on the Health Technology Assessment Policy and Methods Review Consultation 2 Options Paper.

We strongly support and endorse all six options outlined in Section 5.3 Environmental Considerations in HTA. We provide specific recommendations on the types of information that should be considered for inclusion in **Option 1: Reporting of environmental impacts,** starting with embodied greenhouse gas emissions, in the assessment of cost-effectiveness by Australian HTA bodies.

Basics regarding input data:

1. From what is the device made? That is, all components required in the manufacture. For example, a syringe may be made of polypropylene and polyethylene co-polymers. Details of the types of plastics making up a syringe is integral.
2. What are the masses of the components of the device? In addition to composition, mass is integral to understanding the environmental footprint of a product.
3. Whence came the device? Knowing where a device is made gives an indication of transportation distance as well as the potential carbon intensity of the electricity grid required for manufacture.
4. Whether the device is reusable or single use and why the device cannot conform to circular economy principles by being reusable.

Essential qualities of appropriate life cycle assessments:

1. Process based life cycle assessment of an individual device is required. Environmentally Extended Input Output (EEIO) studies are not suitable for individual devices and should be reserved for large scale analyses of entire economic sectors.
2. Clear guidance of how the process based life cycle assessment has been undertaken is essential. The ISO 14040 Guidelines should be adhered to: https://www.iso.org/standard/37456.html
3. Clearly defined Goal and Scope of the study. That is, what is the aim of the study and what will not be examined?
4. Definition of the Functional Unit. All equipment and packaging associated with the device to provide a given function such as injecting a given volume of sterile fluid into the body. Importantly this may include extra fluids required for an intravenous preparation of a medication.
5. Clearly visualised System Boundary. What is included and excluded in the study and why
6. For single use devices, comparison with another similar product that is reusable (if relevant).

We would be happy to provide further information and advice regarding any of the above.

Yours sincerely,

Forbes McGain

On behalf of

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