Submission to the Government of South Australia: SA Health on the Review of the State Public Health Plan - *South Australia: A Better Place to Live*

February 2018
Introduction

Doctors for the Environment Australia (DEA) is a voluntary organisation of medical doctors in all Australian states and territories. We work to address local, national and global health effects caused by damage to the earth’s environment.

The medical profession has a proud record of service to the community. This record not only includes personal clinical care, but also involvement in global issues that threaten the future of humanity. We aim to use our scientific and medical skills to educate governments and industry, the public and our colleagues to highlight the medical importance of our natural environment. In effect we function as a public health organisation.

The State Public Health Plan 2013

DEA is pleased to comment on the State Public Health Plan 2013; responses to each of the questions posed are detailed below:

1. How familiar are you with the State Public Health Plan and its purpose?

DEA is very aware of the State Public Health Plan 2013, having made a Submission to the South Australian Department for Health and Ageing South Australian Public Health Plan South Australia: A Better Place to Live on 7 March 2013\(^1\).

In particular:

- The Plan highlights the dependence of health on social, economic and environmental factors; the latter in particular is closely linked with DEA’s objective (among others) to promote ‘a healthy natural environment for good human health’.
- DEA applauds the Plan’s emphasis on the need for a ‘health in all policies’ approach, as well as a focus on the needs of vulnerable groups, to prevent and manage the impacts of climate change on health.
2. The State Public Health Plan’s vision is South Australia: A better place to live (p51). What feedback do you have about this vision?

The 2013 DEA Submission\(^1\), noted above, stated:

*The Plan is aspirational in its vision and is based on the Principles of the SA Public Health Act 2011, which are strongly supported by DEA: the precautionary principle; proportionate regulation principle; sustainability principle; principle of prevention; population focus principle; participation principle; partnership principle; and equity principle (DEA Submission to the South Australian Department for Health and Ageing South Australian Public Health Plan South Australia: A Better Place to Live on 7 March 2013, page 2).* 

Given the emphasis on place, the Plan’s vision South Australia: A better place to live could be further strengthened by highlighting the links between place and health, and hence the importance of a healthy environment.

3. The State Public Health Plan is supported by four strategic priorities (p52). These are

- Stronger and Healthier Communities and Neighbourhoods for All Generations
- Increasing Opportunities for Healthy Living, Healthy Eating and Being Active
- Preparing for Climate Change
- Sustaining and Improving Public and Environmental Health Protection

What feedback do you have about these strategic priorities? Are there any additional priorities you would like to see included in the future?

In addition to the feedback DEA provided in 2013, we make the following observations:

The inclusion of ‘Preparing for climate change’ as one of the four strategic priorities is welcomed. However, preparation for, and responses to, climate change will also require actions relevant to each of the other three strategic priorities. Hence, an alternative approach would see climate change acknowledged as an overarching consideration relevant to all public health planning and decision-making in South Australia, rather than as a standalone issue.

Indeed, while the four strategic priorities are designed to complement one another, key opportunities for integration have been missed. These are
highlighted in the following comments on each of the four strategic priorities:

**Stronger and healthier communities and neighbourhoods for all generations**

- The emphasis on the importance of healthy and health-promoting environments, particularly for children, is commended, and aligns with DEA’s mission and objectives.
- However, the role of healthy environments, particularly with regard to access to green and open space, active transport, physical activity, and the need for climate change mitigation and resilience-building, could be more comprehensively addressed when discussing opportunities for health in planning.

**Increasing opportunities for healthy living, healthy eating and being active**

- Physical activity is a key and commendable focus of this strategic priority. However, it could be further strengthened by acknowledging links to healthy environments, for example through the promotion of active transport (walking, cycling, use of public transport) and opportunities to increase green space, both of which have co-benefits for health and the climate.

**Preparing for climate change**

- Pleasingly, the Plan highlights climate change as a shared responsibility, and acknowledges the need for consideration of public health implications and necessary responses. It also considers the need for increased resilience within communities, with a particular focus on the built environment i.e. infrastructure.
- However, short, medium and long-term planning opportunities are not comprehensively addressed. For example, opportunities for links with strategic priority 1, to which planning is central, are missed. In particular, the need to consider climate change in all planning and decision-making, within both the health and other sectors, could be emphasised further.
- There is also an opportunity here to address the carbon footprint of the health sector in South Australia, through ‘greening’ measures that both increase sustainability and support resilience.
- ‘A touch of green is good for us’ (page 72) does highlight the health benefits of green space and green infrastructure, which could be further strengthened by a comment on links to strategic priorities 1 and 2.

**Sustaining and improving public and environmental health protection**

- This strategic priority acknowledges several public health protection services and strategies of relevance to the relationship between the
environment and health; for example, communicable disease control, emergency management/disaster planning, and air quality management.

- However, this strategic priority should highlight the implications of climate change for air quality, and in particular the opportunities for health co-benefits of greenhouse gas emission mitigation strategies. The next State Public Health plan should advocate for a national Environmental Protection Agency (EPA) to strengthen air quality regulations.
- Given the increasing risk of extreme weather events due to climate change, and their potentially catastrophic implications, climate change should be addressed urgently and comprehensively by emergency management and disaster planning activities.

4. **What aspects of the Plan have been useful to your work?**

DEA has used the many positive features in the current State Public Health Plan in our advocacy, particularly with State politicians, to call for greater and more urgent action in responding to the health challenges and opportunities posed by climate change. The Plan has been particularly useful given the significance assigned to climate change as one of four strategic priorities.

5. **What aspects do you believe were not useful and how this could be improved?**

This question has been addressed in many of the comments above.

6. **What aspects do you believe are missing from the Plan that you would like to see included in the new Plan?**

DEA commends the inclusion of climate change adaptation as a key consideration in public health planning for South Australia. However, adaptation alone is not sufficient, and the immediate and ongoing implementation of effective mitigation measures is required to prevent continued climate change and associated health impacts. Fortunately, measures to reduce carbon emissions also have co-benefits for the health of communities.

The 2013 DEA Submission\(^1\) also highlighted the need to consider climate change mitigation when addressing health impacts:

...the Draft State Public Health Plan... focuses on adaptation without highlighting the importance of addressing both adaptation and mitigation. To quote from the Lancet article...: "any adaptation..."
interventions must sit alongside the need for primary mitigation: reduction in greenhouse gas emissions”\(^2\).

As stated in the draft Plan, adaptation will play an important part in helping communities cope with a changing and more unpredictable climate and severe weather events. However, immediate implementation of effective mitigation measures is required to prevent a predicted rise in temperature that will lead to significant health impacts (DEA Submission to the South Australian Department for Health and Ageing South Australian Public Health Plan South Australia: A Better Place to Live on 7 March 2013, page 3)\(^1\).

Therefore, the new Plan requires discussion of climate change mitigation as well as adaptation, with both affording opportunities for building resilience to climate change and the establishment of sustainable practices, with benefits for health.

Additional comments relevant to aspects we believe are missing from the current Plan, and which are essential to include in the new Plan, are as follows:

- The Plan contains inadequate acknowledgement of the urgency of action required to address climate change and its associated health impacts, and hence is a missed opportunity to educate the public and decision-makers.
- The Plan is insufficient to facilitate co-ordination and collaboration between the health and other sectors and fails to emphasise the need to consider climate change and health in all planning and decision-making processes. This is of particular importance given the opportunities to promote the co-benefits of mitigation and sustainable practices for health and the climate.
- The Plan makes little comment on the increasing risk of extreme weather events in context of climate change, and hence fails to address the urgent need for comprehensive disaster management strategies which address climate risks.
- It would be useful to highlight gaps in existing knowledge around the health implications of climate change and other environmental challenges in South Australia, and hence opportunities for research, collaboration and innovation.

In addition to the inclusion of the aspects noted immediately above, many of our recommendations made in March 2013 remain valid for the development of the next State Public Health Plan.
Doctors for the Environment Australia recommendations for the next State Public Health Plan

1. Climate change should be recognised in the State Public Health Plan as an urgent and over-arching consideration for all public health planning and decision-making in South Australia, rather than as one of a number of stand-alone strategic priorities.

2. The current focus on climate change adaptation must be broadened in acknowledgement of the urgency and priority of mitigation, with clear strategies outlined for various government, community and business groups.

3. The Plan should intentionally facilitate collaboration and co-ordination between health and other sectors, to promote the health co-benefits of climate change mitigation by adopting a ‘climate and health in all policies’ approach. The proposed Port Augusta concentrated solar thermal (CST) power station is a good example of this approach to develop sustainable ‘climate-smart’ practices across multiple sectors, which will help to both mitigate risk and increase resilience in the face of an increasingly unstable climate system.

4. The State Public Health Plan should have an increased emphasis on the health co-benefits of climate change mitigation through promotion of physical activity, access to green space and active transport, and on the need for the development of individual and community resilience.

5. The Plan should highlight and build on the significant contributions the SA Government has already made towards reducing the carbon footprint of health care delivery in South Australia (for example through the commitment to source all energy for government health services from the proposed CST power plant at Port Augusta).

6. Comprehensive emergency management and disaster planning activities should be accorded urgency in the Plan in response to the increasing risk of extreme weather events due to climate change.

7. The Plan should highlight the implications of climate change for air quality and its impact on health.

8. Advocacy for the establishment of a national Environmental Protection Agency should be included in the Plan.

9. The Plan should make an attempt to identify gaps in existing knowledge and opportunities for research, collaboration and innovation in responding to the implications of climate change for health. This research will provide improved data and information around implications of climate change for health, to raise awareness, guide planning and decision-making, and promote urgent mitigation responses.
10. The Plan should include a reference to the need to develop systems for key partners, in particular local government, to have ready access to expert resources and references to support advocacy and actions in responding to climate change. Annex 1 lists a number of DEA references and resources which are freely accessible from the DEA website: www.dea.org.au.

DEA members in South Australia, with access to DEA’s expert Scientific Committee, are willing to provide input to the Chief Public Health Officer during the drafting of new State Public Health Plan, including contributions towards the development of monitoring and evaluation indicators.
References


Annex 1

We have included here a list of the most recent and relevant DEA Policies and Fact Sheets, many of which are extensively referenced, that could be used to inform the development of the next South Australian Public Health Plan. While some of these Policies and Fact Sheets are targeted at Federal Government Submissions and enquiries, all are relevant to the development of the next South Australian State Public Health Plan.

**Climate Change and Health in Australia Fact Sheets**

**Bushfires and Health in a Changing Environment: Fact sheet**

**Severe storms, floods and your health fact sheet**

**Heatwave Fact Sheet**

**Air Pollution Policy**

Globally, air pollution is an increasingly important public health problem. Nationally, ambient (outdoor) air pollution contributes significantly to morbidity and mortality. Reductions in fossil fuel combustion to mitigate climate change have the potential to also benefit health by reducing concentrations of air pollutants which contribute to respiratory and cardiovascular disease and premature mortality. June 2017.

**DEA Adaptation Policy**

The Australian government needs to effectively plan for and manage the inevitable health consequences of climate change, just as it would for any other national health emergency. January 2017.

**Discussion Paper on the Review of Australia’s Climate Change Policy**


**Unconventional Gas Development – DEA Position Statement**

DEA supports a moratorium on UGD until the health and environmental consequences are adequately understood and the appropriate monitoring and regulations are in place to protect human health. April 2015.

**Current and future impacts of climate change on housing, buildings and infrastructure submission**

Submission to the Senate Enquiry into current and future impacts of climate change on housing, buildings and infrastructure (with an emphasis on a Health in All Policies approach). August 2017.

**Submission to the Better Fuel for Cleaner Air Discussion Paper**


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Submission to the Ministerial Forum on the Vehicle Emissions Discussion Paper\textsuperscript{xi}

We recommend that the health costs be built into the deliberations of the Ministerial Forum for we believe they will influence the current need for more stringent controls, urgency and the prevention of ill health from pollution. April 2016.

Submission on the SA Environment Protection (Air Quality) Policy 2016\textsuperscript{xii}

Globally air pollution is an increasingly important public health problem. In a high growth scenario, the Australian Bureau of Statistics (ABS) predicts Australia’s population could be approaching 40 million persons by mid-century. How that growth is managed in terms of housing, transport, and industry will have an important bearing on air quality. A large dividend in health costs will be realised and greenhouse gases mitigated if air pollution is minimised. A report published by WHO and the Climate and Clean Air Coalition in October 2015 concludes that a reduction of short-lived climate pollutants (particulates, ozone, and methane) can not only help slow global warming but save 3.5 million lives globally each year. January 2016.

Submission to the SA Government on Developing a New Climate Change Strategy for South Australia\textsuperscript{xiii}

Climate change is a priority issue for DEA. As the first Lancet Commission on Climate Change and Health stated in 2009, “climate change is the greatest threat to human health of the 21st century”. The consultation papers for “Developing a New Climate Change Strategy for SA” make very little reference to health. DEA believes health is central to any strategy around climate change as affirmed by the Lancet publications cited above. Our foremost recommendation is to prepare this consultative document urgently. October 2015.

\textsuperscript{xi} https://www.dea.org.au/submission-to-the-ministerial-forum-on-the-vehicle-emissions-discussion-paper-healthy-planet-healthy-people-dea
