

Submission on the Review of the South Australian Public Health Act 2011

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Healthy planet, **healthy people.**

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Doctors for the Environment Australia (DEA) is an independent self-funded, non-government organisation of medical doctors and students in all Australian States and Territories. DEA works to address the diseases - local, national, and global - caused by damage to our natural environment. We are a public health voice in the sphere of environmental health with a primary focus on the health harms of pollution and climate change.

The South Australian Public Health Act 2011

DEA is pleased to comment as a 'relevant health organisation' on the operation of the *South Australian Public Health Act 2011*.

DEA notes that the review is intended to consider if, in the first 5 years since commencement of the Act, the objects as set out in S4(1)(a)-(j) have been achieved, including if the powers, structures and tools established under the Act have been effective in providing the framework to achieve the objectives in promoting, preserving and protecting the public health of South Australians.

DEA also notes that the overarching objective of the Act is 'to promote and to provide for the protection of the health of the public of South Australia and to reduce the incidence of preventable illness, injury and disability'.

In particular, the objects of the Act are:

- a) to promote health and well-being of individuals and communities and to prevent disease, medical conditions, injury and disability through a public health approach; and
- b) to protect individuals and communities from risks to public health and to ensure, so far as is reasonably practicable, a healthy environment for all South Australians and particularly those who live within disadvantaged communities; and
- c) to provide for the development of effective measures for the early detection, management and amelioration of risks to public health; and

- d) to promote the provision of information to individuals and communities about risks to public health; and
- e) to encourage individuals and communities to plan for, create and maintain a healthy environment; and
- f) to provide for or support policies, strategies, programs and campaigns designed to improve the public health of communities and special or vulnerable groups (especially Aboriginal people and Torres Strait Islanders) within communities; and
- g) to provide for the prevention, or early detection, management and control, of diseases, medical conditions and injuries of public health significance; and
- h) to provide for the monitoring of any disease or medical condition of public health significance in order to provide for the prevention or early detection of any such disease or medical condition and for the protection of individuals and the community from the threat of any such disease or medical condition and from public health threats more generally; and
- i) to provide for the collection of information about incidence and prevalence of diseases and other risks to health in South Australia for research or public health purposes; and
- j) to establish a scheme for the performance of functions relating to public health by the State and local governments.

In particular, DEA notes and supports object (b) which calls for a healthy environment for all South Australians.

For the purposes of this submission, DEA would like to comment on three critical elements of the administration of the act and associated activities:

- The State Public Health Plan
- The role of Chief Public Health Officer
- Health in all policies approach

State Public Health Plan

The *State Public Health Plan* is a key guidance document for all public health activities in South Australia. The plan provides a useful and accessible reference point for health and other sector organisations.

In accordance with the Act, the *State Public Health Plan* should:

- comprehensively assess the state of public health in South Australia;
- identify existing and potential public health risks and develop strategies for addressing and eliminating or reducing those risks; and

- identify opportunities and outline strategies for promoting public health in this State.

DEA has previously prepared submissions on the *State Public Health Plan*, including:

- *Review of the State Public Health Plan 2013 – South Australia: A Better Place to Live*²
- *Summary framework for consultation: DRAFT State Public Health Plan 2019- 2024*³
- *Draft State Public Health Plan (SA) 2019-2024*⁴

A link to each submission is included with the references.

Of note, DEA is concerned that the original plan *South Australia: A Better Place to Live (2013)* and the draft *State Public Health Plan (SA) 2019-2024* do not sufficiently address environmental threats to health, particularly climate change, and as such do not fulfil all objects of the Act. In response, DEA has provided a range of recommendations, the details of which may be found in the aforementioned submissions.

A summary of key recommendations is as follows:

- Climate change should be an urgent, cross-cutting priority for public health in South Australia, given the direct and indirect health impacts already being experienced and the growing threat of severe weather conditions across the state.
- While an urgent response to climate change is required to address the negative health impacts of climate change, mitigation will also offer a range of health co-benefits, for example through increased physical activity with active transport, and improved air quality.
- The development of a sustainable, resilient and 'green' health system is essential to support mitigation of climate change, promote health co-benefits, and facilitate adaptation to inevitable challenges.
- A focus on vulnerable groups is critical to protect our community against the health impacts of climate change as well as other determinants of environmental health.
- Strong partnerships between the health and other sectors are essential to ensure the health of our environment, and hence that of the people of South Australia.

Chief Public Health Officer

DEA highlights the importance of the Chief Public Health Officer (CPHO) role, as distinct from the Chief Medical Officer, to ensure continued leadership and oversight of all issues relevant to public health in the

community. In particular, the CPHO is well-placed to identify, investigate and manage emerging threats to public health, such as climate change, and to ensure that the health and other sectors work together to address the range of environmental determinants of health. DEA is willing to continue to work with, and support, the office of the CPHO to further develop the *State Public Health Plan* and other means of administration of the Act, so that all objects are achieved in a timely manner.

Health in all policies approach

The Act highlights the importance of disease prevention and calls for the assurance of a healthy environment for all South Australians, particularly those belonging to disadvantaged and otherwise vulnerable groups. Given the range of environmental determinants of health, such as air quality, water security, weather and climate, and urban design, health must be considered and prioritised across all sectors and all levels of government.

An example of particular concern to DEA is air pollution, with vehicular emissions a major source in South Australia. Traffic pollution is a significant risk to human health, and robust action to reduce vehicular emissions, for example by improving access to public transport, strengthening air quality regulations, and electrification of the public bus fleet, is urgently required. Clearly, such action will not result from application of the *SA Public Health Act 2011* alone. Instead, health must be considered in all policies and legislation, and in the planning and monitoring of activities across all sectors. DEA notes SA health's policy on this approach⁵, and calls for its continued application, along with an all-of-government commitment to public health. These steps will be essential for the health and wellbeing of South Australians, and for the health of our environment.

References

¹ <http://www.parliament.sa.gov.au/Committees/Pages/Committees.aspx?CTId=5&CId=348>

² Review of the State Public Health Plan - South Australia: A Better Place to Live <https://www.dea.org.au/wp-content/uploads/2018/02/SA-Health-Review-of-the-State-Public-Health-Plan-submission---2-18.pdf>

³ Submission on the summary framework for consultation: DRAFT State Public Health Plan 2019-2024 <https://www.dea.org.au/wp-content/uploads/2018/06/DEA-Comment-SA-public-health-plan-summary-framework-for-consultation-06-18.pdf>

⁴ Draft State Public Health Plan (SA) 2019-2024 <https://www.dea.org.au/wp-content/uploads/2018/10/Draft-SA-State-Public-Health-Plan-2019-2024-submission-10-18.pdf>

⁵ Health in All Policies: The South Australian Approach <https://www.sahealth.sa.gov.au/wps/wcm/connect/4034df0043aee36bb5f7fded1a914d95/HiAPIInformationPamphlet-Jun2011.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-4034df0043aee36bb5f7fded1a914d95-mwMTh3o>