

***Your Health is Your Wealth* Policy Framework**

EPA Submission to the public consultation

Background

Environment has a strong influence on public health (both in terms of promoting good health through contact with a high-quality local environment and through risk of ill-health from exposure to any adverse environmental factors).

Environment & Health is an important European and National issue for both policy makers and regulators and the direct connection between environmental quality and human health was highlighted as a priority in the EU Sixth Environmental Action Plan. Concern for human health has traditionally underlain much of the political priority given to environmental issues within the EU and the Member States. It is one of the primary drivers for policy actions that target air quality (CAFÉ- Clean Air for Europe), water quality (Water Framework Directives), soil quality and chemicals (REACH, endocrine disruptors, persistent organic compounds, and dioxins). In this context, it is clear that the concept of 'pollution' embraces the potential for harm to both human health and nature.

Within Ireland, Environment & Health is an area of significant public interest and involves a wide number of organisations from both health (e.g. Department of Health, HSE, the Health Research Board and the Institute of Public Health) and environmental (e.g. Department of the Environment, EPA, RPII) perspectives.

Environmental Protection Agency

Under its environmental protection mandate, the EPA delivers direct and indirect benefits to human health through a number of its responsibilities. These include controlling emissions from licensed facilities; maintaining a supervisory function over local authorities with regard to the provision of 'safe and secure' drinking water; and monitoring ambient air quality in Ireland. Other activities with relevance include licensing release of GMOs; reporting bathing water quality; and a significant funding programme for research in the Environment & Health area.

The legislation that establishes the EPA specifically provides for the protection of human health and the natural environment. Under its licensing regime, the EPA is required to only grant a licence or revised licence for an activity if it is satisfied that any emissions from the activity will not cause significant environmental pollution. In the EPA Acts, environmental pollution is defined as:

The direct or indirect introduction to an environmental medium, as a result of human activity, of substances, heat or noise which may be harmful to human health or the quality of the environment,...

The Report of the Review of the Environmental Protection Agency, published in June 2011, states that '*Of all the concerns about environmental matters, it is the potential for impacts on human health that gives rise to most anxiety*'. This finding is reflected and confirmed in the day-to-day contacts between EPA staff and the general public.

It is clear therefore that, in legislation and in public opinion, a strong connection is recognised between environmental quality and the potential implications for personal health. In this context the EPA is pleased to take the opportunity to highlight some priority issues for consideration in the preparation of the *Your Health is Your Wealth* policy framework. These are presented in the following sections:

Public Health Policy Framework

As part of the National Health Strategy (Department of Health, 2001) there was a commitment to adopt a National Environmental Health Action Plan (NEHAP) by June 2002. The aim of the NEHAP was to assess the potential impact of sectoral policies on the environmental health of the population and identify cost-effective ways to address them in such areas as water quality, chemicals, housing and waste management.

A draft NEHAP was subject to consultation among government agencies involved in environmental health in 2002, but the plan has not been finalised.

The OECD Review 2010 Review of Ireland's Environmental Performance states that, with regard to a NEHAP '*...the completion of a national environmental health action plan could provide a framework for setting priorities and improving integration of environmental protection and public health.*' The OECD review notes that such a plan should identify sectors where the greatest health benefits can be achieved and the most cost effective means of achieving them. It also notes that in light of reducing public sector budgets, the need for such a plan is all the more important.

The publication of a NEHAP would play a pivotal role in addressing the broad area of environment & health in Ireland. In its absence, the current approach offers a timely opportunity to highlight issues and prioritise actions in this area.

The EPA welcomes the Your Health is Your Wealth Policy Framework and its stated intention to build a long-term (2012-2020) vision for the health and well-being of the population. Environment & Health issues should be clearly addressed in this framework both in terms of: 1) assessing, correcting and preventing factors in the environment that can affect health, and 2) maximising the potential benefits associated from contact with a high quality local environment.

Organisational Interactions

Continued and expanded collaboration with Public Health Authorities is important for a wide range of EPA functions including enforcement, licensing and air and water quality assessment. Further development of these relationships would allow for improved interaction between the EPA and other authorities that have a public health remit. Specifically:

- a) The recently published Review of the Environmental Protection Agency contained a number of recommendations specific to Environment and Health and in particular recommended that "an additional specialist Advisory Committee is needed to address the issue of the interface between the environment and human health". Using the provision of Section 41 of the EPA Act, it is the intention of the Agency to establish a Health Advisory Committee, including public health authorities, to advise the Agency in the carrying out of its functions, where there is an interaction between Health and the Environment.
- b) The public health authorities are statutory consultees of the EPA in relation to its regulatory functions, and are also statutory consultees in relation to the national SEA process. It is via these platforms that the public health authorities can influence decisions where public health data or health concerns suggest an intervention is warranted.
- c) The large numbers of people involved and the wide spread of functions in the public health area can present difficulties for other bodies seeking to engage with the appropriate parts of the system. In the UK, bodies such as the Health Protection Agency, Health Protection Scotland and Public Health Wales are mandated to support the environmental regulators by providing expert guidance on health impacts - and so protect the public health from environmental hazards.

EPA considers that:

- a) ***Active engagement by DoH in the EPA's Health Advisory Committee (and other similar working arrangements across the range of bodies working in this area) will be critical to delivering on both public health obligations and public service performance targets.***
- b) ***Input to consultations from public health authorities supports the EPA in making informed determinations as to whether or not to grant a licence, and as to the nature of any conditions that may be specified therein. To maximise 'added-value' in this process, submissions should focus on***

highlighting health issues such as where sensitive populations are proximate to a proposed facility or where health statistics indicate existing environmental burdens/stressors.

- c) ***A clearly identified and resourced national environmental health / health protection unit should be established, either within existing health organisations or established as a separate body, to provide an integrated approach to protecting public health through the provision of support and advice to others.***

Assessment of Health Impacts of Facilities

Currently assessments undertaken by EPA as part of its formal regulatory activities on project/development proposals (whether under the EIA, Waste or EPA Act legislation) already include health and nature impacts. The EPA uses a standards based approach in assessing the potential health impacts of proposed activities, in its monitoring of industrial licensee's performance, waste disposal and water quality. This approach to health protection as part of the IPPC and Waste Licensing process is similar to that of the Environment Agency, UK, whose position statement on Environment & Health states that they "*seek advice and help from health professionals whenever needed as we are not medical experts*". As statutory consultees of the EPA, the Health Authorities can bring forward information or concerns regarding a project that might influence the EPA in relation to the acceptance of a proposal for an area or the setting of ELVs.

The Report of the Review of the Environmental Protection Agency states '*that there is a strong case for HIA, where appropriate, to become a formal requirement of the licensing process carried out by the EPA...*'. The EPA is currently progressing research into the assessment of Health Impacts within the IPPC Licensing Process by EU Environmental Regulators, to order to assist addressing this recommendation of the Review.

The EPA considers that the public health authorities have the expertise as well as the ethical and legal mandate to gather and interpret health data and so the EPA does not envisage a lead role on this, so long as the public health authorities exist and their statutory role survives. The national policy framework on public health could play an important role in this regard and should include improvement of baseline environmental health data and environmental health information systems at national and local level.

North-South Linkages

Both 'Environment' and 'Health' were identified as key areas for North/South Co-operation. A clear example of this cooperation is the joint funding by Ireland and NI health departments of the Institute of Public Health in Ireland (IPH). The IPH has developed a level of expertise in a number of area including HIA.

Cooperative working through the North South Ministerial Council has delivered good progress on resolving issues over illegal waste disposal that have had significant impacts on the environment and *inter alia* on human health. Ongoing interaction between EPA and NIEA has facilitated sharing of expertise and information allowing more effective regulation and enforcement of legislation in key areas including water quality.

To date, real benefits have arisen through addressing issues on an all-island basis. EPA supports this approach and, where appropriate, considers that these linkages should be further developed.

Research

Environment and Health is recognised as an important topic under the EPA's STRIVE research programme. Projects supported through STRIVE generate data and make assessments of on high-priority / emerging issues for Ireland such as air pollution, provision of clean water, nanomaterials. Research in this area is strongly driven by legislation and binding international agreements which require informed, evidence-based responses.

The ongoing Forfás-led Research Prioritisation Exercise categorises research in areas including *Population Health* and *Environment & Health* to 'needs driven sectoral research' and highlights the important role that research makes in helping the Government to deliver on policy objectives over and above potential commercial impacts of the research.

Under the Environment and Health theme, approximately 40 projects have been initiated, representing an investment by the EPA of over €8.5m. Strategic planning for this programme includes wide consultation and interaction with bodies including the HRB and the HSE. Recently completed projects with HSE involvement include: '*Comparative Population Health Status Study of a Semi-Rural Irish Community before and after Licensing of a Waste Incinerator*' and '*Enhancing human health through improved water quality*'.

Well planned and managed environment-health research offers a very effective way to respond to respond to emerging issues. The EPA considers that maximum value is realised from this work when there is close co-operation between Public Health Bodies and EPA – both in terms of strategic planning and assisting/participating in research projects (including data provision).

Role of Environment in Promoting Health and Wellbeing

Much of the focus in this area is on identifying and managing the environmental threats to human health. There is a growing body of evidence on the importance of interconnections between the environment and human wellbeing and how the natural environment plays a role in promoting health.

Research confirms an association between contact with the natural environment and prevention/treatment of conditions including stress, depression and obesity. This approach can offer an effective complement / alternative to more traditional medical interventions such as 'Green Prescriptions' which enable health professionals to prescribe physical activity and contact with the natural environment to their patients.

The EPA welcomes the Green Prescription Programme being piloted by HSE in Donegal and recommends that appropriate consideration be given in the policy framework to fully exploiting the real benefits that accrue to the population through contact with an attractive, high-quality environment.

Incident Response

The Department of the Environment are responsible for coordinating major emergency planning. A major emergency is an incident, which, usually with little or no warning, causes or threatens, death or injury, serious disruption of essential services or damage to property, the environment or infrastructure beyond the normal capabilities of the principal emergency services (An Garda Síochána, the Ambulance Service and the Fire Service) in the area in which the event occurs. There is an agreed Framework for Major Emergency Management approved by Government enabling An Garda Síochána, the Health Service Executive and Local Authorities to prepare for and make a co-ordinated response to major emergencies resulting from events such as fires, transport accidents, hazardous substances incidents and severe weather.

The EPA is not on the National Steering Committee for major emergency planning, but has worked with the Committee on emergencies, as necessary

The Department of Health also have a specific Public Health Emergency Plan. The purpose of this plan is to assist all health agencies in the State, including the Department of Health and Children (DoHC), the Health Service Executive (HSE), Health boards and the Eastern Regional Health Authority (ERHA), the National Disease Surveillance Centre (NDSC), hospitals, primary care and General Practitioners (GPs) in enhancing their readiness to respond to a public health emergency in an integrated, co-ordinated manner.

As a lesson from the recent underground fire at the Kerdiffstown landfill site, the importance of defining contacts and responsibilities is very apparent. Early and clear communication to the public regarding health

risks is critical for all significant incidents - including those which may not fall under the definition of a 'major emergency'.

The EPA considers there should be a more formalised coordination of roles and better integration of Environmental Professionals (be they at the Local Authority or the EPA) and medically trained Public Health Professionals during all stages of an emergency response. This means working closely during monitoring design, environmental data gathering, impact modelling and impact interpretation. The aim should be to provide clear and timely public health messages during the course of the emergency and the recovery phase.

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Johnstown Castle Estate
November 2011