Written submission from the Scottish Directors of Public Health (SDsPH)

Background

The Scottish Directors of Public Health have a statutory responsibility to protect and improve the health of the people across Scotland. As such they have a clear interest in the relationship between sustainable/unsustainable development and health and their impact on resilience. We welcome therefore the opportunity to provide comments on the draft Climate Change Plan.

The SDsPH believe that the sustainable development action is one of the most important public health opportunities through which substantial and achievable gains for population health can be made, and the goal of sustainable development is necessary for ensuring that the basic needs and quality of life for everyone are met, now and in the future.

Comments

Generally the SDsPH endorse the specific comments made by the Scottish Managed Sustainable Health Network (SMaSH).

We applaud the ambitious emission targets set for some sectors although seek assurance from the Scottish Government that the necessary resources and technologies are available to meet these targets and these technologies have been proven to be safe and effective at scale. In this respect we are aware of, and support, the written evidence supplied by the NHSScotland Sustainability Steering Group on this point. The SDsPH, though the SMaSH network, will continue to support NHS sustainability managers and facilities colleagues to reduce carbon emissions on the NHS estate.

We were pleased to see that the draft plan recognises that mitigation and adaptation actions may have negative and positive consequences in other areas especially health. This position aligns with the Paris agreement, which the Scottish Government welcomed. At Paris in 2015, the Conference of Parties (COP 21) finally recognised climate change as a health issue due to the many impacts now and in the future. It also acknowledged the many co-benefits to human wellbeing and resilience in mitigation and adapting to climate change (para 109).¹ This statement has been previously welcomed by the SDsPH and we would wish to see all actions carried forward under then plan to actively seek health co-benefit.

We suggest that the plan requires that in meeting the climate change duty, all the identified sectors must consider the positive and negative health consequences as result of mitigation or adaptation actions. This could in part be accomplished through a formal requirement for health impact assessments (HIA) to be undertaken during the planning phase of mitigation actions. In addition, health outcomes should be captured whilst monitoring the effectiveness of mitigation activities. These requirements would ensure that the co-benefits to health are identified and optimised, and threats to health from climate change mitigation actions are recognised and managed appropriately. We would hope this will be reflected in the evaluation and monitoring framework of the Climate Change Plan. It is important that
the anticipated health consequences as a result of mitigation or adaptation actions are monitored and reported. Additionally there should be flexibility in the plan and monitoring framework to allow information on unexpected health consequences to be recorded.

The SDsPH would welcome the opportunity to work with the Scottish Government on planning for and monitoring of the positive and negative impacts on health from climate change mitigation and adaptation actions.

1 Adoption of the Paris Agreement (2015): Enhanced Action Before 2020, para 109

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