



CMA Submission to the Department of Health and Aged Care National Health and Climate Strategy - July 2023

To: Health.Climate.Consultation@health.gov.au

Complementary Medicines Australia (CMA) express strong support for the establishment of the National Health and Climate Strategy, which seeks to safeguard the health and wellbeing of Australians from the detrimental effects of climate change. This initiative holds the potential to transform our nation's response to climate change while focusing on emissions mitigation, public and preventive health, and enhancing community resilience, all of which are vital aspects of a "Health in all Policies" approach.

CMA is pleased to provide comment on the Australian Government Department of Health and Aged Care, National Health and Climate Strategy Consultation Paper, dated 27 June 2023.

Q1. How could these objectives be improved to better support the vision of the Strategy?

Emissions Mitigation for a Sustainable Future:

A cornerstone of the National Health and Climate Strategy must be a robust focus on emissions mitigation. By transitioning to a low-carbon and sustainable economy, we can significantly reduce the health risks associated with climate change. Embracing renewable energy sources, promoting energy efficiency, and supporting sustainable practices are pivotal steps towards mitigating greenhouse gas emissions and creating a healthier environment for all Australians.

The objectives for a Sustainable Future would be further strengthened by policy approaches to sustainable packaging and toward addressing the challenges associated with therapeutic product packaging, while upholding public health and regulatory standards.

Therapeutic goods packaging demands stringent requirements to ensure the safety and integrity of the products they contain. By proactively exploring pathways to embrace more sustainable packaging options, the industry showcases its willingness to adapt and evolve in response to the global climate crisis. Furthermore, the government's consideration of mandatory design standards for packaging and product stewardship obligations is a signal for the right policy platform to be established for therapeutic product packaging.

The policy development should acknowledge the intricate challenges associated with therapeutic product packaging and the imperative to find innovative solutions that align with

global standards. Given that the Quality Use of Medicines requires products to be used over an extended timeframe, it is crucial to consider the potential consequences of reduced shelf lives, which may lead to increased product waste, higher packaging volumes, or incorrect usage.

Drawing insights from the European Union Directive on Packaging and Packaging Waste (revised on 20.11.22), it is evident that the EU recognises the need to ensure the efficient functioning of the internal market for packaged therapeutic goods while mitigating the adverse impacts of packaging and packaging waste on the environment and human health. As a result, derogations have been granted until 31 December 2034 for the immediate packaging of medicinal products, contact-sensitive plastic packaging of medical devices, and in vitro diagnostic medical devices (Salini and Burkhardt, n.d.).

Comprehending the critical functional and public health role of therapeutic goods packaging, an aligned approach to that of the EU is strongly recommended. Such an approach would allow for the implementation of changes that align with national packaging goals and product stewardship initiatives, allowing the industry to address environmental concerns without compromising public health or product integrity.

The development of a policy that considers the intricacies of therapeutic packaging and aligns with global standards is a progressive step towards sustainable practices in Australia. With the support of the government's potential policy measures, we can move closer to achieving a sustainable future, where both public health and environmental preservation are prioritised hand in hand.

Preventative Complementary Medicines and Climate-Induced Health Challenges:

In the context of climate change, the role of preventative complementary medicines is of paramount importance to safeguard public health. The National Health and Climate Strategy should prioritise investing in public health initiatives that promote awareness of climate-related health risks and educate communities on preventive measures, with a specific focus on incorporating complementary medicines.

By dedicating resources to research on climate-health impacts, the strategy can explore the potential of preventative complementary medicines in mitigating climate-induced health challenges. Complementary medicines, when used in conjunction with conventional healthcare approaches, can contribute to enhancing resilience and minimising vulnerability to climate-related health threats.

Moreover, emphasising preventative health measures aligns with the strategy's goal of reducing the burden on the healthcare system and saving costs in the long run. By promoting

the integration of complementary medicines in preventive care, the strategy can contribute to a more holistic approach to public health, wherein individuals are empowered to take proactive steps towards safeguarding their well-being amidst the changing climate.

Addressing public health in the context of climate change is of paramount importance. The National Health and Climate Strategy should embrace the potential of preventative complementary medicines as a crucial aspect of addressing climate-induced health challenges. By incorporating research, and education with preventative complementary medicine approaches, the strategy can foster resilience, enhance well-being, and reduce the impacts of climate change on public health, thereby building a stronger and healthier nation.

Actions Beyond the Health System: Building Resilience in Communities:

A successful National Health and Climate Strategy should acknowledge that health outcomes are heavily influenced by social determinants, and climate change exacerbates existing disparities. To foster community resilience, it is vital to take actions beyond the health system. We must empower communities with the resources and knowledge necessary to adapt to climate change and cope with its impacts effectively.

This entails supporting climate-resilient infrastructure, implementing green spaces, and investing in disaster preparedness and response strategies. By encouraging sustainable urban planning, protecting and expanding natural ecosystems, and promoting community engagement, we can create healthier, more equitable environments for all Australians.

Health in all Policies Approach:

The "Health in all Policies" approach forms the bedrock of the National Health and Climate Strategy, ensuring that health considerations are integrated into all relevant policies. By fostering collaboration across government departments, local authorities, and diverse stakeholders, it can develop cohesive and effective strategies that holistically address climate change's health implications.

Q2. How could these principles be improved to better inform the objectives of the Strategy?

The principles of the above objectives could be further improved by consideration of the following.

Population health and prevention:

Supporting population health and prevention in the context of climate change requires a comprehensive and multi-faceted approach that integrates public and preventative health principles at all levels of society and within the health system.

Emphasising preventative health through the integration of complementary medicines is essential for addressing climate change within the health system and society as a whole. This approach recognises the significance of disease prevention and wellness promotion across all life stages, complemented by robust secondary and tertiary prevention measures, which collectively contribute to effective mitigation and adaptation strategies.

Incorporating complementary medicine approaches into the principles enhances the focus on preventative health. By embracing these practices, individuals and communities are empowered to take proactive steps in safeguarding their well-being and resilience in the face of environmental challenges.

The recognition of the interconnectedness between climate change, biodiversity loss, and access to natural medicines poses significant challenges for the Australian complementary medicines industry, which relies on nature's diversity and ecosystems. Currently, natural medicines serve as the primary healthcare for a staggering 80% of the global population (www.who.int, n.d.).

However, the changing climate and the consequent impact on natural systems are jeopardising the quality and availability of essential medicinal resources. Human-induced modifications to air, water, and land have accelerated these adverse changes. As a result, the natural systems and capital that underpin our agricultural systems, as well as the ingredients vital for our present and future products, are at serious risk.

In light of these challenges, it is essential for the industry and member states to heed the World Health Organization's call to strengthen knowledge generation, collaboration, and sustainable use of traditional and complementary medicine resources. We must also be mindful of biodiversity preservation and adhere to international treaties concerning endangered species.

The responsibility lies with us, to take a responsible, measured, and effective approach to safeguarding natural systems. Consumers expect us to lead in preserving the resilience of our supply chains.

As a result, we must all contribute to mitigating the adverse effects of climate change and its impact on biodiversity. It is crucial to embed proactive measures into our business models to adapt to these changes effectively. By doing so, we can ensure the continued availability and sustainability of natural medicines while also fostering a resilient and environmentally responsible industry.

Well-being Across the Lifespan:

The pursuit of population health and prevention encompasses all stages of life, from prenatal care to healthy aging. A focus on promoting well-being at each life stage allows for early interventions, healthier life trajectories, and better management of chronic conditions. It also fosters resilience in the face of climate-related health challenges that may disproportionately impact certain age groups.

The principles of the objectives could be further improved by consideration of the following.

Partnership-based working across all levels of government and beyond:

Responding to climate change's health impacts requires collaboration across sectors. A holistic approach involves engaging not only the healthcare system but also various stakeholders, including government agencies, industry and environmental organisations, community groups, and policymakers. This multi-sectoral cooperation allows for a more comprehensive understanding of the interconnected factors affecting health and climate change.

Empowering communities with knowledge and resources is crucial for effective population health and prevention. Climate change awareness and education can help individuals make informed decisions about their health, adopt sustainable practices, and participate in local initiatives that protect both human and environmental well-being.

Addressing population health and prevention in the context of climate change requires a commitment to equity and social justice. Vulnerable populations, including low-income communities, marginalised groups, and those with limited access to healthcare, are often disproportionately affected by climate-related health challenges. A focus on equitable access to resources and healthcare services is essential to ensure no one is left behind.

Through ongoing research and collaborative efforts, evidence-based approaches can be established to incorporate complementary medicines into climate change response and preventative health initiatives. By doing so, we strengthen the foundation for a healthier and more resilient future, wherein individuals and communities are equipped with the tools to adapt to environmental challenges and thrive in the face of changing conditions.

By embracing these principles, the health system and society can forge a robust and inclusive response to climate change, fostering population health and prevention efforts that effectively mitigate risks and adapt to the evolving challenges posed by our changing climate.

Q3. Which of the various types of greenhouse gas emissions discussed above should be in scope of the Strategy's emission reduction efforts?

In the context of emission reduction efforts in the health system to combat climate change, all greenhouse gas emissions should be in the scope of the Strategy's focus.

To effectively address climate change, it is essential for emission reduction efforts to target all significant greenhouse gas emissions across various sectors and supply chains. This includes measures to reduce emissions from energy production, transportation, agriculture, waste management, and manufacturing processes.

To align with the Australian Government's emission reduction targets, the Strategy's efforts should encompass all scope 1, 2, and 3 emissions. These targets aim to reduce national emissions by 43% below 2005 levels by 2030 and achieve net zero national emissions by 2050. It is crucial for the Strategy to address emissions across all scopes and implement measures that contribute to meeting these national goals, reflecting the country's commitment to the Paris Agreement.

Q4. What existing First Nations policies, initiatives, expertise, knowledge and practices should the Strategy align with or draw upon to address climate change and protect First Nations country, culture and wellbeing?

To effectively address climate change and protect First Nations country, culture, and wellbeing, the National Health and Climate Strategy should align with and draw upon existing policies, initiatives, expertise, knowledge, and practices within Indigenous communities.

Some key areas to consider include:

1. Recognition of Indigenous Knowledge: The Strategy should recognise and value the deep knowledge and practices of First Nations communities related to environmental stewardship, land management, and sustainable living. Drawing upon Indigenous knowledge can lead to more contextually appropriate and culturally sensitive climate change responses.

2. Connection to Country: Indigenous communities have a strong and sacred connection to their traditional lands. The Strategy should acknowledge and respect the significance of this

connection and involve First Nations people in decision-making processes related to climate adaptation and mitigation strategies.

3. **Cultural Land and Water Management:** Traditional land and water management practices have sustained First Nations communities for thousands of years. The Strategy should incorporate and support Indigenous land and water management practices, to mitigate the impacts of climate change and foster ecosystem resilience.

4. **Indigenous Health and Wellbeing:** Health and wellbeing are integral to Indigenous culture. The Strategy should address climate change impacts on First Nations' physical, mental, emotional and spiritual health, considering the interconnectedness of these aspects in Indigenous communities.

5. **Community-Led Initiatives:** The Strategy should prioritise community-led initiatives and decision-making processes, ensuring that First Nations communities have the autonomy to address climate change in ways that align with their cultural values and priorities.

6. **Cultural Heritage Protection:** Climate change can threaten Indigenous cultural heritage sites and practices. The Strategy should include measures to protect and preserve these vital aspects of Indigenous culture.

7. **Climate Change Adaptation and Resilience:** Indigenous communities have historically demonstrated resilience and adaptation to environmental changes. The Strategy should draw upon this expertise to build adaptive capacities for climate change impacts.

8. **Partnerships and Collaboration:** Collaboration with Indigenous organisations, Elders, and Traditional Owners is critical. The Strategy should foster partnerships that empower Indigenous communities and ensure that their voices are heard in all aspects of climate policy development and implementation.

9. **Indigenous Health and Climate Research:** The Strategy should support and promote research initiatives that explore the specific impacts of climate change on Indigenous health and wellbeing, as well as traditional knowledge systems and practices.

10. **Education and Capacity Building:** The Strategy should invest in education and capacity-building initiatives to empower First Nations communities to participate actively in climate change responses, sustainable practices, and disaster preparedness.

By aligning with existing policies, initiatives, expertise, knowledge, and practices, the National Health and Climate Strategy can foster a more inclusive, culturally appropriate, and effective approach to addressing climate change while preserving and protecting the unique heritage and wellbeing of First Nations communities.

Q5. What types of governance forums should be utilised to facilitate co-design of the Strategy with First Nations people to ensure First Nations voices, decision-making and leadership are embedded in the Strategy?

To ensure First Nations voices, decision-making, and leadership are embedded in the National Health and Climate Strategy, the Australian Government should utilise specific governance forums that facilitate co-design and meaningful engagement with Indigenous communities.

By utilising a co-design approach, the National Health and Climate Strategy can be enriched by the meaningful engagement of First Nations people, ensuring that their voices, values, and leadership play a central role in shaping policies and initiatives related to climate change and health in their communities.

6. Beyond the schemes already noted above, is your organisation involved in any existing or planned initiatives to measure and report on health system emissions and/or energy use in Australia?

Complementary Medicines Australia acknowledges the significant threats that climate change and biodiversity loss pose to global access to natural medicines, which are vital for healthcare worldwide. We fully appreciate the importance of nature's quality and biodiversity to our industry. The changing climate, largely driven by human activities, is directly impacting the natural systems that provide essential ingredients for complementary medicines.

As an industry that takes its responsibility seriously, we are committed to safeguarding and sustaining these vital ecosystems. In line with our proactive approach to environmental stewardship, CMA advocates that by 2025, our members will voluntarily assess their greenhouse gas emissions and establish clear reduction targets. These actions are essential steps toward mitigating our industry's environmental impact and enhancing the resilience of our supply chains.

CMA is proud to state its active participation in the groundbreaking NSW government's first sector-specific Net Zero Emissions Leadership Accelerator Program, in collaboration with Accelerate Zero and NSW Sustainability Advantage. In May 2023, we commenced this exciting initiative, extending a warm welcome to our valued members from across the value chain.



CMA is dedicated to embarking on a transformative industry capacity-building pathway, geared towards accelerating the journey towards a Net Zero Emissions future. Through this unique partnership, we are committed to leading the charge in sustainable practices within our industry and contributing to a greener and more resilient future for all. It is strongly recommended that similar programs be offered by Governments across other States and Territories.

Q7. What additional data and information is required to support targeted emissions reduction efforts within health and aged care?

The comprehensive collection and analysis of data and information within the Strategy will pave the way for effective planning, implementation, and monitoring of targeted emissions reduction efforts. By leveraging this valuable insight, healthcare and aged care facilities can make informed decisions, track their progress, and continuously enhance their environmental performance.

An essential aspect of the strategy is to include a robust plan for enhancing the health system's capacity and capability to drive significant progress in addressing climate change. Viewing funding and resourcing for health and climate change action as an investment, rather than a cost, will underscore the long-term benefits of improved public health, sustainability, and resilience for our communities and the planet.

Q8. What do you think of these proposed focus areas for emissions reduction? Should anything else be included?

Questions 8-25 are commented in the context of the above answers.

References:

www.who.int. (n.d.). WHO establishes the Global Centre for Traditional Medicine in India. [online] Available at: <https://www.who.int/news/item/25-03-2022-who-establishes-the-global-centre-for-traditional-medicine-in-india#:~:text=Around%2080%25%20of%20the%20world>.

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