



**CONSERVATION
COUNCIL** ACT REGION

Submission to ACT Health

ACT Preventive Health Action Plan 2023–2025

July 2023

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

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Introduction

The Conservation Council ACT Region welcomes the opportunity to provide comment to ACT Health about the consultation draft of the Preventative Health Action Plan 2023-25. The Council supports the updating of this plan and the inclusion of active living and healthy homes as enablers of health in the community.

The Council supports “equitable approaches to prevention” to ensure maximum participation by Canberrans of all abilities and socio-economic backgrounds, complemented by targeted actions for vulnerable populations.

While the Preventative Health Action Plan lists actions and responsible government agencies, it contains no measurable targets, timelines or indication of funding for actions. What progress has been made since the previous plan? The mid-term review read more like a survey of community attitudes than a measure of progress. The plan needs to be more transparent about timing and funding of actions to provide for accountability. It should make stronger connections to other government strategies, identifying co-benefits to bolster the case for actions and committed funding.

In particular, the World Health Organization describes climate change as “the single biggest health threat facing humanity”¹. Although some climate risks are acknowledged in the actions, outcomes and brief discussion of “emerging challenges”, climate measures could be strengthened as a central pillar of the action plan.

Climate change

The Community Survey Report on the mid-term review of the ACT Preventative Health Plan 2020-23 by Pollinate found that climate change is the fourth highest concern of Canberrans in terms of preventing long-term health issues, of higher concern than cancer! Canberrans also regard protecting the environment, green spaces and active travel investment as top tier issues for a healthy future.

The dynamics between climate change and public health are complex but growing increasingly important. There are many benefits for public health by taking strong mitigation actions to prevent further deterioration of Earth’s climate. Direct health impacts of climate change are felt through extreme heat, storm destruction, water restrictions and bushfire smoke, as well as its influence on diseases and mental health. As the climate becomes more volatile, this will affect fresh food production and outdoor activities both employment related and recreational, and people’s vulnerability to climate factors, such as through hot housing, socio-demographic issues and complex health issues, will increase. All of this will increase the patient burden on healthcare facilities which will simultaneously be subject to climate impacts on staff, supply chains and infrastructure. (See figure 1)

¹ World Health Organization, 2021, ‘Climate change and health’, <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

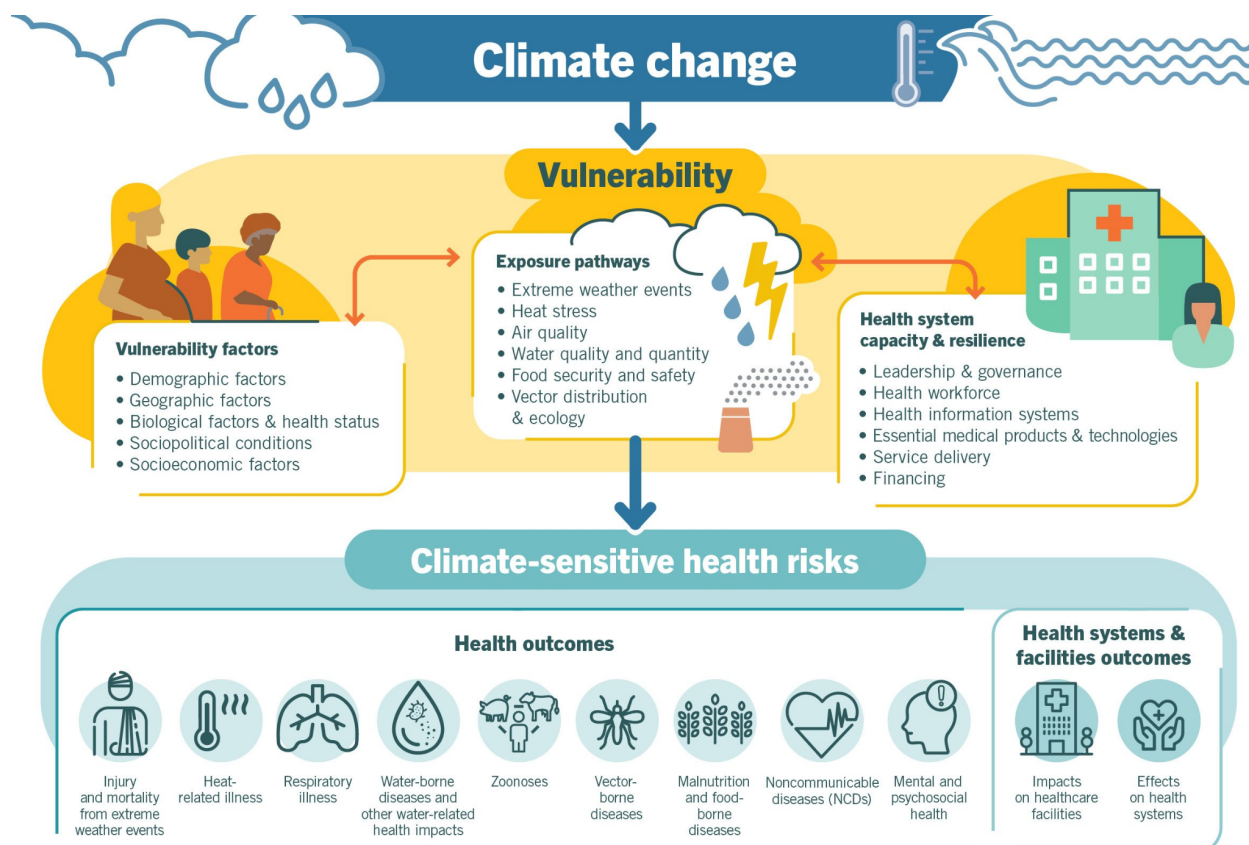


Figure 1: An overview of climate-sensitive health risks, their exposure pathways and vulnerability factors. Climate change impacts health both directly and indirectly, and is strongly mediated by environmental, social and public health determinants. World Health Organization.

“The risk of experiencing an adverse health outcome occurs at the intersection of exposure and vulnerability, consisting of sensitivity and adaptive capacity. Exposed individuals and communities most at risk are those with high sensitivity and low adaptive capacity, as influenced by the social determinants of health.”²

It is good to see some consideration of climate change as an “emerging challenge in prevention”, however, the Preventative Health Plan needs to draw a stronger connection between health and climate. The health impacts of a changing climate are no longer an emerging area, as the consequences have and are already impacting the health of people in our Territory, as is highlighted by the smoke impacts of the 2019/20 bushfires. The public health impacts of climate change need to figure more strongly as justification for greater investment in the actions that will deliver the multiple co-benefits of reducing emissions, improving health, improving the amenity of our city, and building climate resilience. These actions include:

- improving the energy efficiency (including full electrification) of all housing, particularly social housing,
- vastly upgrading public transport and active travel infrastructure, and electrification of transport (including reducing the dominance of private motor vehicles),

² Covert, H. H., Abdoel Wahid, F., Wenzel, S. E., & Lichtveld, M. Y. (2023). Climate change impacts on respiratory health: exposure, vulnerability, and risk. *Physiological Reviews*. <https://doi.org/PRV-00043-2022>

- densifying the population within the current urban footprint to ensure efficient access to services, and
- protecting and regenerating natural spaces in and around the city.

These and other measures to tackle climate change and public health will also have the benefits of improving Canberrans' quality of life and free up household budgets for other better living measures.

As well as preventative measures, the healthcare system needs to be preparing for likely climate impacts on the health and wellbeing of Canberra's population, such as extreme heat and bushfire smoke events. A good example of a preventative health plan that responds directly to climate-related threats is the Victorian [epidemic thunderstorm asthma program](#) developed following the 2016 storm crisis.

The healthcare system must undertake climate mitigation actions such as electrification of all facilities and transport. And, as learned through the COVID-19 epidemic, it must prepare for potential climate impacts on staff, supply chain vulnerabilities, buildings and infrastructure, energy system resilience (e.g. be self-reliant through solar and battery systems) and so on.

Enabling active living

The Conservation Council encourages the uptake of active travel and reducing reliance on private motor vehicles. Achieving the Plan's objective of "more adults and children using active modes of transport" requires serious, substantial, committed and scheduled investment in Canberra's walking and cycling network and public transport services.

The ACT Government's current active travel plan has no timelines and a tiny budget in comparison to the funding it commits to building roads.

The Council recommends adopting Pedal Power ACT's [four-point plan for active travel in Canberra](#).³

In promoting active travel and behaviour change, the ACT Government is welcome to point Canberrans to the Council's Make the Move project which helps Canberra families explore alternatives to private car travel.

Shifting people out of private cars directly improves their health through cardiovascular activity, and has the co-benefits of reducing air pollution (from petrol exhausts and other particulates from vehicles), reducing carbon emissions, improving road safety for cyclists and pedestrians, and reducing the need for car parking which could then be converted to public recreational uses.

The walkability of our neighbourhoods is also important, to encourage walking (and rolling) for access to local shops, schools, services and transport, as well as for recreation such as jogging, cycling and dog-walking. Many of Canberra's residential streets have poor standard or no footpaths, forcing pedestrians onto roads where traffic may be travelling at up to 50km/hr. There is also a distinct lack of prioritised pedestrian "zebra" crossings, even outside schools and shops

³ Pedal Power ACT, 2023, 'Pedal Power launches four-point plan for active travel in Canberra', https://www.pedalpower.org.au/all_news/four-point-plan/

– an “island” alone does not give pedestrians safe right-of-way.⁴ This presents a significant safety risk particularly for children, the elderly and less mobile people, as well as making pedestrian journeys slower waiting for gaps in traffic. This is a huge deterrent for many people to take up more active travel and recreation.

The Preventative Health Plan must propel a reprioritisation of pedestrians above motor vehicles, with serious funding and systematic city-wide planning for such works. Living Streets Canberra has provided many submissions with recommendations for urgently upgrading paths and lighting and slowing traffic.⁵

Active travel must be supported by increased investment in public transport services, particularly increased frequency of suburban routes to provide more flexibility in travel times and reduce the duration of trips through shorter connection wait times. No amount of “promotion” of active and public transport will shift people’s behaviour until the safety and convenience of active and mass modes is comparable in efficiency to private car travel.

Participation in sport and outdoor employment

There are obvious health benefits to individuals from participating in sports at any level. However, there are also health risks, including from weather. The Preventative Health Plan acknowledges the need for tree canopy shade to reduce urban heat along active travel routes. This consideration needs to be expanded to all outdoor sports that are becoming increasingly vulnerable to extreme weather conditions as the climate heats up.

The Preventative Health Plan should connect to the [CBR Next Move Sport and Recreation Strategy 2023-28](#), and both need to contain more concrete actions to build resilience to climate change that will ensure the safety of players and spectators and continuing participation in sport for health and recreation. Improving the environmental sustainability and carbon footprint of sports facilities is a worthy ambition, but both plans need to be more explicit about how sports will continue to be played into a warming future, eg building shade canopies over sports grounds, shifting the dates of sports seasons, investing in the construction of climate-controlled indoor facilities, hot weather heatstroke prevention plans and education, maintenance of safe and usable sports grounds through drought, enabling comfortable active travel for participants and fans, and so on.

Participation in community sports is also a great vehicle for communication about health, climate and active travel. The Conservation Council recommends adopting the Climate Council’s recommendations in it’s report ‘[Game, set, match: calling time on climate inaction](#)’.

Although some elements of sport, such as [FrontRunners](#), are clearly at the forefront of climate action in sports, climate resilience does not appear to be a mainstream concern in the sports industry more broadly. For instance, although the [2023 SportNXT conference](#) was billed as “one of the most prestigious sports thought leadership summits...identifying threats and opportunities confronting the sports industry”, the agenda contained zero mention of climate change either from a mitigation or adaptation perspective.

⁴ Vignali, V., Pazzini, M., Ghasemi, N., Lantieri, C., Simone, A., & Dondi, G. (2020). The safety and conspicuity of pedestrian crossing at roundabouts: The effect of median refuge island and zebra markings. *Transportation Research Part F: Traffic Psychology and Behaviour*, 68, 94-104. <https://doi.org/10.1016/j.trf.2019.12.007>

⁵ Living Streets Canberra, 2023, ‘Submissions’, <https://livingstreets.org.au/submissions/>

These same climate resilience considerations need to also be applied to all outdoor employment to ensure the health and safety of those workforces (eg road works, construction, landscaping, utilities maintenance etc). Providing more air-conditioned community refuges and safe transport, and introducing higher standards for building air-tightness and energy efficiency (including commercial buildings) could help reduce disruption to economic activity while keeping the population safe.

Protecting and improving nature for wellbeing

The connection between wellbeing (physical and mental) and access to nature is well understood. Biodiverse urban green spaces are also critical for provisioning ecosystem services including water management, noise reduction, removal of air pollution, cutting wind speeds, balancing humidity, and reducing urban heat. Studies also find that people are more attracted to better quality, pleasant outdoor spaces, and that recreation for health and fitness increases with access to larger parks.⁶ It is not enough to mow the grass and plant a few inappropriate trees.

It is therefore vital that the objectives of the Preventative Health Plan are closely linked to urban planning and development standards as well as protection and regeneration of Canberra's nature parks and reserves. The Plan should also connect to the new human right to a healthy environment to be introduced into the ACT Human Rights Act this year.⁷

As the city densifies with more apartment buildings, suburb level planning must include protection and upgrade of all existing pocket parks, recreational gardens and sports grounds, including investment in recreational landscaping, native plantings for greater biodiversity and habitat, tree canopy growth and artificial shade over playgrounds, paths for walking, jogging and cycling, picnic and barbeque facilities, and water features. Green corridors (such as along Athllon Drive through Mawson) need similar protection and improvement for active travel, habitat connection and access to nature reserves. Making more green space available for local food production could also provide families with access to healthier nutrition and self-sufficiency.

Such upgrade of existing green spaces needs to be systematic and Canberra-wide. Some suburb's parks have received upgrades (eg Chifley shops playground) while other suburbs (such as Fisher) have been neglected for decades.

A circular economy for reducing environmental pollution

Human health is often not explicitly considered in descriptions of a circular economy, however there is a clear correlation between the impacts of industry on the environment and resulting human health. Drawing a stronger connection from wasteful consumption to preventative health would help strengthen the imperative for investment in a circular economy.⁸

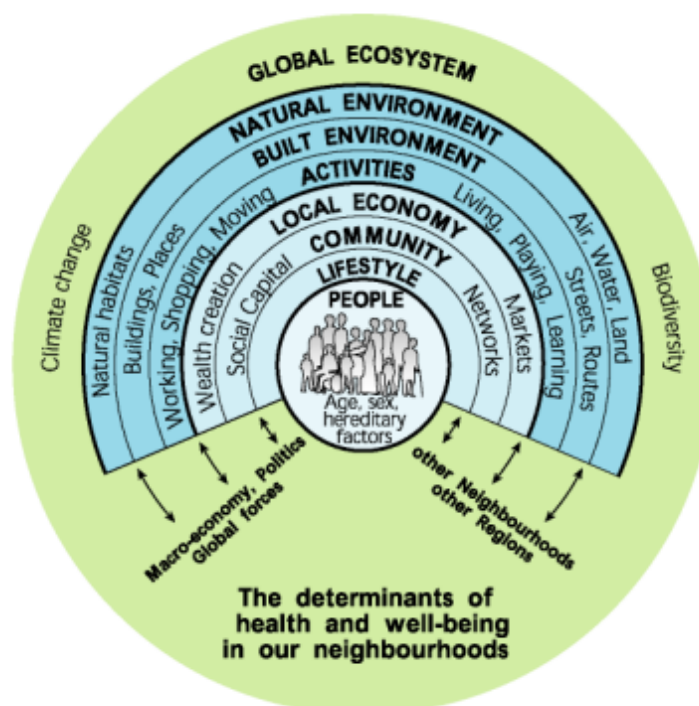
⁶ Jabbar, M., Yusoff, M.M. & Shafie, A. Assessing the role of urban green spaces for human well-being: a systematic review. *GeoJournal* 87, 4405–4423 (2022). <https://doi.org/10.1007/s10708-021-10474-7>

Foreground, 2017, 'Garden cities no more: Australia's leafy urban centres are under pressure', <https://www.foreground.com.au/parks-places/garden-cities-no-australias-leafy-urban-centres-pressure/>

⁷ Human Rights Law Centre, 2022, 'ACT Human Rights Act win: the right to a healthy environment', <https://www.hrlc.org.au/reports-news-commentary/right-to-a-healthy-environment-act>

⁸ World Health Organization, 2019, Assessing the health impacts of a circular economy, <https://apps.who.int/iris/bitstream/handle/10665/346222/WHO-EURO-2019-3504-43263-60634-eng.pdf>

More complete models of a circular economy (such as “doughnut economics”⁹) are helpful in placing human health as a central goal of civilisation within the functional limits of the planet on which we are dependent, with all human (economic) activity as subservient to those two. This is consistent with WHO’s determinants of health and wellbeing (figure¹⁰).



Building an effective circular economy, locally and nationally, is critical to reducing environmental damage and pollution and the need for landfills or incinerators that leach toxins into our landscapes. Implementing the circular economy principles of designing out waste, keeping materials in use, and regenerating nature, through measures such as regulating against the creation of toxic materials, mandatory product stewardship schemes, investment in recycling etc, can all help to reduce air and water pollution from industry that impacts public health.

Governments could also limit advertising that promotes poor nutrition and consumption of material goods and replace with it communications about active living.

As with climate action, the healthcare system needs to implement circular sustainability, such as eliminating single-use plastics and non-recyclable materials by working with supply chains through procurement policies and contracts.

Healthy homes

There is strong evidence that poorly designed and under-insulated homes are both expensive for residents to heat or cool and that extremes of temperature in such dwellings cause or exacerbate a range of health conditions, which disproportionately affect low-income households,

⁹ Doughnut Economics Action Lab <https://doughnuteconomics.org/about-doughnut-economics>

¹⁰ World Health Organization, 2019, Assessing the health impacts of a circular economy, <https://apps.who.int/iris/bitstream/handle/10665/346222/WHO-EURO-2019-3504-43263-60634-eng.pdf>

young children and the elderly.¹¹ Cold weather is more deadly in Australia than most people realise, but as global warming intensifies, the incidence of heat stress and heat related deaths are likely to rise. Fortunately, homes can be made more energy-efficient and any measure implemented to keep homes warmer in winter will also keep them cooler in summer.

Improving energy efficiency (including electrification of all gas appliances) helps families reduce their energy costs and improve their comfort and health, and also reduces direct emissions and demand for energy.¹² The ceiling insulation standard is a good program that needs to ratchet up in coming years to encompass other mandatory energy efficiency measures including electrification of all gas appliances. The Government should implement a more strategic and systematic plan to upgrade all public housing by 2030 and introduce mandatory energy measures (insulation, draft-stopping, double-glazing, curtains, electrification, solar PV etc) for rental housing to address the unresponsiveness of landlords and property agents to tenant needs.¹³ The ACT needs to advocate for 8-star energy efficiency for new buildings under the National Construction Code. Tree planting programs should extend to the gardens of public and rental housing to provide ecosystem services to residents.

Again, the Preventative Health Plan could make stronger connections between existing programs for energy efficiency, health, living infrastructure (urban greenery) and climate strategies to provide for greater accountability against health outcomes.

Outdoor air quality

Air pollutants are contributed by wood-burning fires, vehicle traffic, dust, bushfires and pollens.

Again, there are co-benefits for health, family budgets, biodiversity and the climate in tackling each of these particulate contributors. Reducing the controllable elements will help build resilience to those factors that are outside the control of the ACT Government and community.

The Conservation Council supports the recommendations of the ACT Commissioner for Sustainability and the Environment to phase out wood fires.¹⁴ particularly to establish a target date for the replacement of wood heaters with electric alternatives in all ACT suburbs (excluding rural areas), as is being done for fossil gas, with financial support for public, low-income and rental households. Community education programs need to spell out the environmental harm caused by sourcing firewood, the impact on the climate, and the impacts on neighbours' health from burning wood either inside or outside suburban homes, as well as communicating the cost-saving benefits of using heat pump (reverse-cycle air-conditioning) technology instead. Electric fireplaces that simulate wood fires are a much cleaner and safer alternative for those families emotionally attached to the idea of a fireplace.

As discussed previously, electrification of vehicles should be accompanied by a mode shift out of private vehicles to active and public transport for a range of co-benefits.

¹¹ Daniel L and Baker E, 2017, 'Forget heatwaves, our cold houses are much more likely to kill us', The Conversation, <https://theconversation.com/forget-heatwaves-our-cold-houses-are-much-more-likely-to-kill-us-83030>

¹² Sustainability Victoria and University of Technology Sydney, 2022, 'The Victorian Healthy Homes Program Research Findings', <https://assets.sustainability.vic.gov.au/susvic/Report-Energy-Victorian-Healthy-Homes-program-research.pdf>

¹³ Better Renting, 2020, 'Home-baked: housing, heat, and health', https://d3n8a8pro7vnm.cloudfront.net/betterrenting/pages/181/attachments/original/1580794943/Home_Baked_Housing_Heat_Health_2.8.pdf

¹⁴ Office of the Commissioner for Sustainability and the Environment, 2023, 'Can Canberra "burn right tonight" or is there "no safe level of air pollution"?', <https://envcomm.act.gov.au/wp-content/uploads/2022/08/OCSE-Wood-Heaters-Report-A40588031.pdf>

Tree-planting, landscaping and regeneration programs (by Government and housing developers) should require pollen-dense exotic trees and forbes to be replaced with native trees and grasses that are less triggering for allergies.¹⁵ This would have the co-benefit of improving biodiversity and native habitat, as well as shifting the character of Canberra's vegetation to support our "bush capital" image, as has been done alongside light rail on Northbourne Avenue.

Mitigating climate change through urgent emissions reductions across all sectors and industries is the only feasible means of mitigating future bushfire risks. However, improving the energy-efficiency and airtightness of homes and buildings will provide Canberrans with refuge from dust storms and bushfire smoke.

The Conservation Council and the Weston Creek Community Council also support the Commissioner's recommendation to install air quality monitoring stations across Canberra, with mobile applications to provide Canberra residents with real-time information about air quality so they can make informed decisions about their daily routines to manage respiratory health conditions and improve their quality of life. More widespread data collection would also enable more targeted responses to sources of air pollution (such as particular suburbs with high pollen-tree counts) and allow greater preparedness by the healthcare system to respond to air pollution events.

Transparency and accountability

Although it seems like a stretch from preventative healthcare, improving the transparency of our democratic system feeds into our life satisfaction and wellbeing.¹⁶ Trust in Government and institutions influences people's receptiveness to information about health and all the other measures and programs mentioned in this submission, as well as people's willingness to seek timely healthcare for illnesses.¹⁷ Decades of political bickering and dithering over climate change and dependence on fossil fuel revenues has set Australia back.¹⁸ People's disillusionment over one aspect of government, colours their trust in governments generally, with potentially poor outcomes for individual health¹⁹ as well as uptake of other programs such as electrification.

All programs need to have timelines, targets and committed funding, as well as transparent data collection, monitoring and reporting. Funding sources must be transparently identified, and vested commercial interests and their lobbyists (such as fossil fuel, gambling, weapons, tobacco, alcohol and "big pharma" companies) must be declared or excluded from election campaigns, public funds and research programs.

¹⁵ Australasian Society of Clinical Immunology and Allergy, 2022, 'Pollen allergy', <https://www.allergy.org.au/patients/allergic-rhinitis-hay-fever-and-sinusitis/pollen-allergy>

¹⁶ ACT Government, n.d. 'Governance and institutions', ACT Wellbeing Framework, <https://www.act.gov.au/wellbeing/explore-overall-wellbeing/governance-and-institutions>

¹⁷ Menadue, J, 2016, 'Vested interests and the subversion of the public interest', Independent Australia, <https://independentaustalia.net/politics/politics-display/vested-interests-and-the-subversion-of-the-public-interest.9330>

¹⁸ Griffiths K and Wood D, 2020, 'Vested interests, money and the democratic deficit', Grattan Institute, <https://grattan.edu.au/news/vested-interests-money-and-the-democratic-deficit/>

¹⁹ Birkhäuser J, Gaab J, Kossowsky J, Hasler S, Krummenacher P, Werner C, Gerger H., 2017, 'Trust in the health care professional and health outcome: A meta-analysis', PLoS One. 12(2):e0170988. doi: 10.1371/journal.pone.0170988