



ANZCA
FPM

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The Australian Commission on Safety and Quality in Health Care
By email:

Public Consultation: Sustainable Healthcare Module

The Australian and New Zealand College of Anaesthetists (ANZCA), including the Faculty of Pain Medicine (FPM), is one of the largest specialist medical colleges in Australia. ANZCA is responsible for setting the highest standards of clinical practice in anaesthesia, perioperative medicine and pain medicine, and the training and examination of specialist anaesthetists and specialist pain medicine physicians.

As part of its commitment to contributing to a high-quality health system, ANZCA supports measures that improve environmental sustainability in healthcare and welcomes the Commission's draft Sustainable Healthcare Module. Feedback has been provided by ANZCA's Environmental Sustainability Network Executive.

Is there a need for the Module as it applies to health service organisations?

- **If yes, is the Module an effective mechanism to address the issue?**
- **If no, what alternative strategy, if any, should be considered by the Commission?**

There is a strong need for a mechanism to drive health service organisations to mitigate and adapt to the consequences of climate change. The Commission's draft Sustainable Healthcare Module is a good start in making health service organisations accountable for their impact.

The 5 actions set out in the Module enshrines the need for governing bodies to set out organisational priorities and measures of success, as well as the role of the workforce and consumers in working together to improve environmental sustainability.

We feel it should not be a voluntary module. Making this a mandatory module alongside the other standards of accreditation will demonstrate the Commission's commitment to action on climate change and the need for health service organisations to prioritise environmental sustainability.

Do the actions in the Module address the key sustainability and climate-resilient concerns?

If no, what additional areas should be covered?

Health service organisations have been slow to embed principles of sustainability. ANZCA has provided guidance to clinicians and facilities in the college's professional document [PG64\(G\) Position statement on environmental sustainability in anaesthesia and pain medicine practice](#). To improve engagement, the Commission should provide specific guidance around energy, water, medications, procurement and supply chain, transport, waste, and food.

Are the language and the format of the document appropriate? If not, please provide suggestions.

We believe the language and format are appropriate.

How will the actions in the Module support your organisation to mitigate the impacts of climate change, adapt, build climate resilience and identify opportunities to improve the sustainability of health services?

If the module becomes a mandatory component of the NSQHS standards, it will create opportunities for health service organisations to improve their sustainability. The Module will drive organisations to collaborate and potentially deliver state and territory wide strategies that support individual services to meet their responsibilities. Alongside the federal government's proposed National Health Sustainability and Climate Unit, there are opportunities for the Module to facilitate nationwide strategies to reduce the carbon footprint of healthcare.

To further support the success of the Module, the Commission should draw on the work of other organisations to create resources that support health services in achieving outcomes. For example, promotion of Choosing Wisely recommendations reduces the environmental impact of healthcare by eliminating low value care.

Should the Module be assessed by independent external accrediting agencies?

The way this Module is assessed will be crucial in driving effective climate change mitigation and adaptation, and discouraging greenwashing, the practice of making unsubstantiated claims of environmental sustainability. Effective assessment and accreditation could either occur with independent external accrediting agencies or with experts in sustainable healthcare recruited into the Commission as assessors.

Please provide any further comments in relation to the Module.

There is an opportunity to integrate the principles of the Module into the other NSQHS Standards. For example, the standards related to reprocessing of reusable equipment and devices in Standard 3 should be strengthened to discourage single-use disposable devices where safe, reusable alternatives are available.

ANZCA thanks the Commission for the opportunity to provide feedback on the draft Sustainable Healthcare Module. We look forward to the progress of this important project.

Yours sincerely



Dr Scott Ma
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