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The Australian Commission on Safety and Quality in Health Care
Via email: NSQHSStandards@safetyandquality.gov.au

Dear Commissioner,

Re: Sustainable healthcare module

The Royal Australasian College of Surgeons (RACS) acknowledges the efforts of the Australian Commission on Safety and Quality in Health Care (ACSQHC) in developing a draft sustainable health care module and thank you for the opportunity to participate in the consultation process.

Our responses to the consultation questions are outlined below.

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

The Lancet Commission on Climate and Health has previously called for the health-care community to take a leadership role in advocating for emissions reductions, and to critically examine its own activities with respect to their effects on human and environmental health.

As the leading advocate for surgical standards, professionalism and surgical education in Australia and Aotearoa New Zealand, RACS supported these calls. In recent years the environmental sustainability of surgical practice has become an increasing advocacy priority for RACS, and the College had developed a dedicated Environmental Sustainability in Surgical Practice Working Party (ESSPPW).

Surgeons and other healthcare professionals will play a critical role in reducing the emissions of healthcare, as well as preparing and building resilience into the sector. We therefore support the development of a module that is available and promoted to the entire sector.

If yes, Is the Module an effective mechanism to address this issue?

Given the human health and wellbeing impacts of climate change it is unsurprising that many other Colleges and medical organisations have also begun prioritising more sustainable practices.

This shared goal and responsibility presents an opportunity for ongoing collaboration and promotion of key initiatives. However, given the diversity across the sector each organisation and profession also face their own unique challenges, and are currently at different stages in their journey towards sustainability. Additionally, the varying level of resources available to each of these groups may impact the speed in which they can advance their sustainability efforts. In this respect a module will be highly valuable in providing guidance and a framework.



Committed to
Indigenous health

While we support the development of this module, we suggest that this represents the start of the process toward developing a mandatory accreditation standard for environmental sustainability for all health services. Properly constructed, this would prove to be a highly effective mechanism for improving the environmental performance of the healthcare sector. Mandatory reporting of healthcare-associated emissions is rapidly becoming recognised as a key step to effective emissions reduction [1].

Do the actions in the Module address the key sustainability and climate-resilience concerns? If no, what additional areas should be covered?

In the October Federal Budget, the government announced funding for a National Health and Sustainability Climate Unit, and also the development of a National Health and Climate Strategy. RACS has previously joined with other Colleges in calling for these two initiatives to be developed.

It is expected that consultation on the strategy and the unit will occur in early 2023. The consultation presents an important opportunity to ensure that the ACSQHC module is consistent with and compliments the key sustainability and climate-resilience objectives of both the strategy and the unit.

Some specific suggestions on the content of the module are below:

- Of particular concern to RACS is the need for infrastructure and healthcare delivery disaster preparedness capacity with regards to prevention, preparation, management and recovery. The module could be broadened to incorporate this concept.
- Any sustainability targets must include Scopes 1, 2 and 3 emissions and must be time-bound to reflect the urgency for the healthcare sector to address its environmental footprint
- The health services should ensure that there are dedicated environmental sustainability officers employed to develop, implement and monitor their sustainability initiatives
- The health service should ensure that its facilities are adequately maintained to minimise the impact on the environment – such as through leaking nitrous oxide supply pipes and energy inefficiency
- The performance indicators for the health service organisation should include certain mandatory indicators – carbon emissions, energy use, waste management and reusable medical equipment use.
- The health service organisation should implement recommendations from Choosing Wisely Australia and report its performance (noting that the Choosing Wisely Australia website is hosted by the ACSQHC). This could be linked to the statement regarding low value investigations and treatments.

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

The statement of intent for the module is unclear. We would suggest: Health service organisations centralise environmental sustainability in their organisational governance, strategy and culture of patient care, and embed the principles of environmental sustainability into all operations and patient care.

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?

This module will help provide high-level governance and strategy frameworks that will support the education on environmentally sustainable surgical practice that RACS is developing and actively promoting amongst the surgical community. This module will help ensure that environmental sustainability becomes embedded in clinical care delivery across all surgical specialties.

As highlighted above, RACS has an established position on environmental sustainability and a working party dedicated towards progressing these issues. We recently launched an environmental sustainability webpage on the RACS website. The goal of this webpage is to inform our membership of environmental activities that RACS is involved in, and to share useful information and resources with our membership. RACS would be happy to share a link to the module on this webpage, and promote it where appropriate through our existing communication channels.

Similarly, given the growing focus on sustainability within the health sector, RACS believes it would be beneficial for the Commission to provide links via the module to relevant information and resources developed by health care organisations where possible and appropriate.

Should the Module be assessed by independent external accrediting agencies?

Yes, this module should be assessed by external accrediting agencies such as the ACSQHC or the UK Quality Care Commission.

Please provide any further comments in relation to the Module.

We recommend that the existing accreditation standards are assessed, and the principles of environmentally sustainable care incorporated as appropriate.

In summary, RACS is very pleased to support this module and hope that the above feedback is given strong consideration in order to maximise the impact of this tremendous opportunity to improve the environmental impact of healthcare delivery in Australia while maintaining excellent standards of care.

Emeritus Professor David Fletcher
ESSPWP Chair

[1] Singh H., Eckelman M., Berwick D., Sherman J. Mandatory Reporting of Emissions to Achieve Net-Zero Health Care N Engl J Med 2022; 387:2469-2476