

National Health and Climate Strategy Consultation

Submission

31 July 2023

Contents

1. Introduction	3
2. Summary of recommendations	4
3. Measuring aged care associated emissions.....	5
4. Mitigating emissions.....	5
5. Adaptation.....	6
5.1 Home care and CHSP providers.....	6
5.2 Residential care and retirement living	7
5.3 Flood and weather emergencies.....	8
6. Health in All Policies	9
7. Contact.....	9

About ACCPA

Aged and Community Care Providers Association (ACCPA) is the national Industry Association for aged care providers offering retirement living, seniors housing, residential care, home care, community care and related services.

ACCPA exists to unite aged care providers under a shared vision to enhance the wellbeing of older Australians through a high performing, trusted and sustainable aged care sector. We support our members to provide high quality care and services while amplifying their views and opinions through an authoritative and comprehensive voice to the government, community, and media.

Our sector serves to make better lives for older Australians, and so do we.

1. Introduction

The Aged Care and Community Care Providers Association (ACCPA) welcomes the Government's commitment to the development of Australia's first National Health and Climate Strategy.

ACCPA also welcomes the opportunity to provide feedback to inform the development of the National Health and Climate Strategy and is pleased to note that the aged care sector has been included as an integral part of this consultation process.

According to the World Health Organisation (WHO), climate change is the greatest global health threat facing the world in the 21st century¹ with increased average temperatures contributing to more severe hot weather, storms, floods, and fires. In just over a century, ACCPA notes that Australia's climate has warmed by over 1 degree Celsius.² Consequently, we have seen that warmer temperatures have increased the frequency of extreme weather events, such as heatwaves, bushfires, floods, and droughts.

In addition to the impact of flooding and extreme weather events that may cause displacement, older people (many of whom have complex care needs) are more vulnerable to the effects of climate change. For example, they are more prone to dehydration, heat stress, infections and exacerbation of heart and lung disease.³ Furthermore, the accumulated health effects from climate change not only puts pressure on the already stretched health system and aged care facilities, but also the associated workforce.

ACCPA supports action and initiatives that will address the challenges of climate change and the Government's commitment to net zero emissions by 2050.

This submission has been prepared from an aged care perspective in response to the objectives of the proposed Strategy which include:

- *Measurement* (Measure and report on health system greenhouse gas emissions, so progress in reducing emissions can be tracked and quantified);
- *Mitigation* (Accelerate the reduction of greenhouse gas emissions from the health system);
- *Adaptation* (Strengthen the resilience of the health system and communities to anticipate and respond to the health impacts of climate change); and
- *Health in All Policies* (Maximise the synergies between good climate policy and public health policy by working across policy areas to lessen the impact of climate change on the social and cultural determinants of health and wellbeing).

¹ WHO <https://www.ccacoalition.org/en/news/who-director-general-climate-change-defining-issue-public-health-21st-century>

² BOM State of the climate 2022 <http://www.bom.gov.au/state-of-the-climate/>

³ VIC Government Better Health Channel <https://www.betterhealth.vic.gov.au/health/healthyliving/climate-change-and-health>

2. Summary of recommendations

- R1.** Include older people in actions and initiatives to address climate change.
- R2.** Undertake a pilot project to sample a selection of aged care services and related emissions and identify possible mitigation strategies for further funding support.
- R3.** Allocate appropriate funding to support the development, implementation, and evaluation of the Strategy and the accompanying action plans.
- R4.** Develop a roadmap for the Strategy that clearly articulates a timeframe for achieving each milestone and roles and responsibilities of stakeholders tasked with implementation.
- R5.** Support aged care providers, through additional funding, to develop a comprehensive strategy around environmental sustainability.
- R6.** Consider how the design of the new in-home aged care program currently being developed by the Government might incorporate funding for older people to consider adaptation of their homes to support their health and wellbeing.
- R7.** Incentivise aged care providers (through providing financial supports) to pursue projects that will mitigate emissions.
- R8.** Provide aged care services with guidance to correctly classify and recycle wastes.
- R9.** Enhance prevention activity by providing more funding for allied health to support Short Term Restorative Care.
- R10.** Support the use of telehealth for those receiving aged care services, where clinically appropriate.
- R11.** Consider aged care needs as part of state/territory emergency planning.
- R12.** Embed the health and climate policy into the Primary Healthcare 10-Year Plan and the National Health Reform Agreement.

3. Measuring aged care associated emissions

Older people need to be included in initiatives to address climate change to ensure that their specific needs are addressed and to support a national policy framework that sets out cross sector interventions and policies to improve the quality of life of older people.

This means the Strategy not only needs to consider the impact of climate change in the context of residential care, but also older people in the community receiving home care packages and the Commonwealth Home Support Programme (CHSP).

Importantly, the aged care sector must be supported (financially)/prepared for, to manage, the health impacts of climate change (see Recommendation 6 and 8).

While ACCPA notes that the carbon footprint attributed to health care was 7% of Australia's total⁴, we are not aware of any specific data/information on the carbon footprint attributed to the Australian aged care sector.

We believe there is a need for this Strategy to address aged care greenhouse emissions specific data so appropriate mapping exercises could be conducted to identify where the gaps are, so appropriate/targeted mitigation strategies could be developed in areas that require improvement.

- R1.** Include older people in actions and initiatives to address climate change.
- R2.** Undertake a pilot project to sample a selection of aged care services and related emissions and identify possible mitigation strategies for further funding support.

4. Mitigating emissions

ACCPA recognises that health and the aged care sector are significant contributors to climate change as large consumers of energy, water, and products. They also generate huge volumes of waste.⁵

However, any mitigation strategies to reduce carbon emissions must align with the primary goals of aged care and should always be undertaken in a manner that does not undermine quality of care. For residential care, the primary goals include:⁶

- The provision of a comfortable and safe home for the person;
- The provision of aged care services necessary to meet the care needs of the person;
- Facilitating (not necessarily providing) appropriate health care for the person; and
- Giving regard to and treating every person with dignity and respect.

ACCPA supports the proposed areas of focus for the Australian health care system (as noted in the consultation paper) to reduce emissions, which include built environment and facilities;

⁴ The Lancet <https://www.thelancet.com/journals/lanplh/article/PIIS2542-51961730180-8/fulltext>

⁵ ANMF <https://www.anmf.org.au/professional/professional-issues/climate-change>

⁶ AACC Submission to DHAC on A New Residential Aged Care Accommodation Framework Dec 2021

travel and transport; supply chain; medicines and gases; waste; and prevention and optimising of care.

However, for this to work, ACCPA believes that the strategy will:

- need to be properly funded (such as to support aged care facilities to implement energy upgrades and/or transport subsidies for home care workers)
- need to clearly articulate a roadmap for various deliverables (with timeframes for each deliverable), as well as roles and responsibilities of stakeholders with responsibility for implementation (of action plans)
- need to be accompanied by an evaluation framework that is developed in consultation/collaboration with the relevant stakeholders to ensure regular monitoring and reporting of progress in delivering the Strategy.

Importantly, ACCPA believes that environmental sustainability in aged care is dependent on developing the necessary culture within the organisation and that aged care providers, which will need to be supported/funded in order to develop a comprehensive strategy around environmental sustainability.

- R3.** Allocate appropriate funding to support the development, implementation, and evaluation of the Strategy and the accompanying action plans.
- R4.** Develop a roadmap for the Strategy that clearly articulates a timeframe for achieving each milestone and roles and responsibilities of stakeholders tasked with implementation.
- R5.** Support aged care providers, through additional funding, to develop a comprehensive strategy around environmental sustainability.

5. Adaptation

In discussing adaptation in aged care, it is important to note that aged care providers, through various reforms and compliance requirements, are already being asked to facilitate innovation in care models.

To ask the sector to transition into climate adaptation will take further financial and staff resources. In order to ensure this does not detract from the valuable resources directed to resident care, aged care providers must be adequately supported to adapt to climate change (and to mitigate gas emissions), where appropriate.

5.1 Home care and CHSP providers

The Royal Commission into Aged Care Quality and Safety showed clearly that older people in Australia want to age in their home if they can. Over 1 million older people in Australia will be transitioning to the new in-home aged care program (also known as Support at Home) from 1 July 2024 (a combination of those receiving home care packages and CHSP).

ACCPA believes the proposed Strategy should consider how the design of the new in-home aged care program (which is still under consideration by the Government) might incorporate or align with new funding or a grant program for older people to consider adaptation of their homes to support their health and wellbeing (e.g., efficient energy heating and cooling systems).

ACCPA notes there is already a home modifications component to the in-home aged care program – eligibility criteria could be adapted to allow for climate-related considerations as a decision of the Government. This approach could benefit both the older person during times of climate extremes and the visiting workforce supporting their care.

- R6.** Consider how the design of the new in-home aged care program currently being developed by the Government might incorporate funding for older people to adapt their homes to support their health and wellbeing.

5.2 Residential care and retirement living

ACCPA notes that there are a number of early adopters that have successfully reduced their carbon emissions. Regis, for example, has been able to reduce energy consumption by about 20% per year (saving almost 375,000kWh) by implementing energy upgrades to reduce the company's environmental footprint.⁷

NSW provider Warrigal is a leader in embedding environmental sustainability into its strategic plan and organisational culture and is the winner of multiple sustainability awards since its journey began in 2008.⁸ Following an energy audit, Warrigal introduced a range of energy efficiency programs including upgrading to LED lighting and replacing older T8 fluorescent lights with less energy demanding T5s. The organisation has also installed cold water laundry systems utilising ozone technology and recommissioned their Heating, Ventilation and Air Conditioning (HVAC) systems to support more efficient energy use.

A commitment to review and identify ways to reduce energy consumption and waste, and to implement an environmental sustainability design standard for new and upgraded buildings, will be key in supporting the aged care sector in mitigating emissions.

However, incorporating design of new builds or renovations of residential aged care facilities to be energy efficient and mitigate emissions is an expensive undertaking (noting many residential aged care facilities are ageing buildings). Given the financial sustainability challenges in residential aged care, capital investment is a big consideration for Boards - the aged care sector should therefore be incentivised to pursue projects that will mitigate emissions.

Waste management represents a significant cost to the aged care sector, as well as contributing to indirect carbon emissions. ACCPA believes correctly classifying waste is a key way to reduce negative environmental impacts (a study conducted in the United States

⁷ Sustainability Australia <https://www.sustainability.vic.gov.au/energy-efficiency-and-reducing-emissions/in-a-business/success-stories/aged-care-homes-cut-power-bills-by-20-after-energy-upgrades>

⁸ Australian Ageing Agenda <https://www.australianageingagenda.com.au/features/smart-choices-aged-care-goes-green/>

found that 92 per cent of waste from an operating theatre was misclassified as biohazardous and could have been disposed of in the general waste or recycling streams instead⁹).

Recycling programs are also a common aspect of efforts to increase sustainability in healthcare facilities, and are included in government plans in NSW, Victoria and the ACT, as well as guidance from the WHO's European arm.¹⁰ To this end, aged care facilities should be supported (through guidance) to correctly classify wastes and should be incentivised to adopt recycling programs.

Additionally, health care associated emissions are increasing because of an ageing population and changes in the way care are being delivered.

One clear pathway for reducing emissions is by keeping people healthy and out of the health system through prevention, which includes taking measures to keep people healthy and avoid the onset of illness, disease, or injury. In this context, Short Term Restorative Care has been shown to improve health outcomes for older people (thus reducing the need for complex care),¹¹ and should be given a higher priority. Furthermore, technological innovations such as e-health, live data sharing and teleconferencing can also increase efficiency in healthcare systems, thereby alleviating environmental impacts.

- R7.** Incentivise aged care providers (through providing financial supports) to pursue projects that will mitigate emissions.
- R8.** Provide aged care services with guidance to correctly classify and recycle wastes.
- R9.** Enhance prevention activity by providing more funding for allied health to support Short Term Restorative Care.
- R10.** Support the use of telehealth for those receiving aged care services, where clinically appropriate.

5.3 Flood and weather emergencies

Importantly, and considering flooding is a key issue, ACCPA believes aged care facilities should not be built in flood prone areas, where possible.

This issue was evident in recent events in QLD, VIC, NSW and SA where vulnerable aged care residents have had to be evacuated due to flooding. In Brisbane, for example, the affected home's residents — some of whom had severe dementia — were left in rooms in the higher floors for more than 24 hours without electricity before they could be evacuated.

All aged care providers (including home care and CHSP providers) that may be impacted by flood and weather emergencies must have emergency management plans. These should consider how safe and quality care of residents will continue to be delivered, and where this

⁹ Windfeld ED and Brooks MS. Medical waste management – a review. Journal of Environmental Management 2015 ;Nov (63):98-108.

¹⁰ World Health Organisation Regional Office for Europe. Environmentally sustainable health systems: a strategic document. Copenhagen: WHO Europe, 2017

¹¹ From Dr Tim Henwood's presentation on innovative approaches for SRTC in community aged care, Southern Cross Care

will occur should potential evacuation be required; and how providers will access additional disaster management supports, as required.¹²

Importantly, where appropriate, providers should be supported to continue to deliver appropriate care in accordance with their emergency risk management plan and relevant aged care programs, and provide regular advice to staff, family and care recipients.

R11. Consider aged care needs as part of state/territory emergency planning.

6. Health in All Policies

ACCPA agrees that existing inequities mean some groups are at a disproportionately increased risk of adverse health impacts from climate change. This includes the First Nations people, culturally and linguistically diverse (CALD) communities and people living in rural and remote areas.

The Strategy should emphasise the need to address the implications (impact on disadvantaged groups) through joined up policy – a Health in All Policies approach.

In addition to Transport Policy, Housing Policy, and Food, Agricultural Policy as noted in the consultation paper, ACCPA believes Climate and Health Policy should be incorporated into the Primary Healthcare 10-Year Plan, to mitigate emissions because of primary care activities.

Additionally, the policy (particularly issues relating to roles and responsibilities) should be embedded in the National Health Reform Agreement so that appropriate funding and accountability for mitigating emissions could be equitably allocated across state and territories.

R12. Embed Health and Climate Policy into the Primary Healthcare 10-Year Plan and the National Health Reform Agreement.

7. Contact

If you have any further questions or would like to discuss, please contact us at policy@accpa.asn.au (attn: Mohamad Mahat, Senior Policy Advisor).

¹² Department of Health and Aged Care https://www.health.gov.au/sites/default/files/documents/2022/03/health-support-for-aged-care-in-flood-affected-regions_0.pdf