

Manifesto for environmental health 2024



The Chartered Institute of Environmental Health (CIEH) is the professional voice for environmental health, representing over 7,500 members across the UK working in the public, private, and third sectors. We are calling on political parties, devolved administrations, and the UK government to recognise the vital role environmental health plays in all our lives.

The case for environmental health

Environmental health has a unique and critical role in improving public health, reducing health inequalities, and protecting our environment. Environmental health professionals are highly qualified experts who undergo rigorous training and continuous professional development. They possess a deep understanding of scientific principles, regulatory frameworks, and practical interventions to address key issues such as air quality, housing conditions, workplace safety, and food safety.

These professionals work within regulatory services, organisations, the military, and academia, all contributing to our vision of a safer, cleaner, and healthier environment for everyone. Their expertise ensures the implementation of effective policies and practices that safeguard public health and enhance environmental quality. For instance, their work in air quality management helps to reduce pollution, their inspections of food establishments ensure food safety, and their enforcement of housing standards improves living conditions.

Building on our rich heritage, CIEH campaigns to ensure that government policy meets the needs of communities and businesses in improving and maintaining environmental and public health standards. Our history is rooted in the Victorian era when public health reformers tackled urban squalor and disease, setting the foundation for today's comprehensive environmental health practices.

This Manifesto for Environmental Health consolidates essential policy initiatives across housing, food safety, environmental protection, workplace health and safety, and public health. We urge political parties and candidates to commit to supporting environmental health and the indispensable work of our dedicated professionals.

Environmental health professionals are not only practitioners but also thought leaders and innovators in their field. Their qualifications often include degrees in environmental health, certifications, and memberships in professional bodies such as CIEH, reflecting their commitment to excellence and ethical practice. By integrating science, policy, and practice, they provide a holistic approach to public health challenges, ensuring that solutions are effective and sustainable.

As we face complex health and environmental issues, the role of environmental health professionals becomes increasingly crucial. Their expertise in epidemiology, toxicology, risk assessment, and environmental science equips them to address contemporary challenges such as climate change, emerging infectious diseases, and environmental justice. Supporting and recognising these professionals is essential for the health and well-being of the communities we serve.

Workforce

CIEH is calling on the Government to prioritise public health by adequately funding local authorities' Environmental Health teams with sufficient ring-fenced funding for Environmental Health apprentices and trainees.

Environmental Health Practitioners (EHPs) form part of the core public health workforce – playing a unique and often hidden role within preventative public health protection.

Having been on the frontline of fighting a worldwide pandemic, demonstrating their skills in public health protection, EHPs are core in navigating everchanging and unprecedented times. Now, with an increasing cost of living and growing inequalities, central government investment is essential in retain existing EHPs within local Environmental Health teams, but also in the recruitment and training of the next generation of EHPs ensuring safer, cleaner, healthier environments for all.

Recent research published by the Local Government Association showed that local councils are increasingly relying on agency staff whilst permanent-contract employees leave for better pay elsewhere. With an estimated £20.7 million being spent on environmental health agency staff in the 2022/23 financial year¹, the increased use of agency staff to supplement permanent workforce shortages is not only financially unsustainable but is a less effective solution in respect of delivering local statutory services.

Similarly, CIEH's 2021 workforce survey in England² revealed that 56% of local authorities reported that they had vacancies in their Environmental Health teams that were left unfilled for 6 months or more. The top reasons for the vacancies point to a lack of available EHPs who are fully qualified and experienced.

To properly protect public health, alleviate the pressure on the NHS and reduce lost productivity to the economy, sustained investment in our environmental health workforce is crucial.

Enhance integration of Environmental Health within the Public Health workforce

Environmental health provides the strong financial and societal value essential to the economic and health-related prosperity of the UK. By alleviating pressures on the NHS through the enforcement of high environmental health standards, as well as reducing lost productivity through the prevention of avoidable illness, our members ensure the safe and reliable health standards that are the bedrock of a thriving economy.

The UK Government should increase funding to support regulatory and Environmental Health functions in local authorities.

Environmental health professionals were essential in providing support and guidance to the public, to Directors of Public Health and to the Government, as well as being responsible for the enforcement of the UK's COVID-19 response. CIEH members were pivotal in providing unique resource and perspectives to tackling the pandemic and keeping the public safe. Their contributions included conducting contact tracing, ensuring compliance with health regulations such as social distancing in businesses and public places, and communicating quarantine information to the public, thus demonstrating their flexibility and critical role in public health emergencies. These efforts were vital in controlling the spread of COVID-19 and demonstrated the indispensable role of environmental health professionals in protecting public health.

¹ Local Government Association, Local Government Capacity Survey – Environmental Health Research Report, 2023

² CIEH, Environmental health workforce survey report: local authorities in England, 2021

The UK Government should include environmental health professionals in all public health development plans and consultations on health policy frameworks at all levels of government.

Today, health inequalities are rising and growing poverty levels are exacerbated by the cost-of-living crisis³. With an NHS waiting list of over seven million people⁴ it is no surprise that the nation's health is one of the public's top concerns going into the next election⁵. Given these challenges, it is more important than ever, that the Government recognise, support and enhance the unique and often hidden role that environmental health professionals play in preventative public health protection.

Currently, there is no recognised head of the environmental health profession within the UK Government. This absence means that the strategic oversight and integration of environmental health into broader public health initiatives are often fragmented and inconsistent. Environmental health professionals play a critical role in safeguarding public health, but their contributions can be overlooked without a dedicated leadership position.

The UK Government should establish a new role in England of a Chief Environmental Health Officer, to sit alongside the Chief Medical Officer, and work with the UK Health Security Agency to prevent future pandemic outbreaks.

Poor housing conditions

The death of Awaab Ishak due to a respiratory condition caused by prolonged exposure to the mould in his family's housing association flat was deeply concerning. This tragic case illustrates the need for more awareness and better resourcing of the crucial role played by environmental health professionals in tackling poor housing conditions in all types of tenure and thereby reducing ill health and saving lives.

Local authority involvement in tackling poor housing conditions prevents deaths every day. It also does a great deal to reduce the time people live with disabilities and ill health whose root cause is inadequate housing.

We have welcomed, in principle, the UK Government's commitment to make privately rented homes meet a Decent Homes Standard and to halve the number of non-decent homes across all tenures by 2030. We are concerned, however, that the Decent Homes Standard that was set out in a consultation would add another layer of complexity to the regulatory system, especially as it overlaps with existing standards. We would like to see the various standards being consolidated to provide clarity for landlords, tenants, and local authorities. We are also concerned that the Government is creating an additional layer of enforcement obligations for which local authorities do not have enough overall resources or enough environmental health professionals.

Alongside calling for proper funding for local authorities and environmental health teams, CIEH is calling for the whole regulatory system to be simplified so that tenants are aware of their rights under the system of laws that are designed to protect them.

³ The Royal Society of Public Health, *Unusual Suspects*, 2024

⁴ British Medical Association, *NHS backlog data analysis*, 2024

⁵ The King's Fund, *Public Satisfaction with the NHS and Social Care in 2022, 2023*

National registration scheme for the private rented sector

In 2022 21% of private rented homes in England were non-decent – the highest proportion of all the tenures⁶ – yet local authorities have limited knowledge of landlords and the properties in their local areas. There is no statutory requirement for landlords to declare their interests and bad landlords exploit this to the detriment of their tenants. Registration schemes already operate in Wales, Scotland and Northern Ireland. The UK Government proposed reforms in the private rented sector in England in its Renters (Reform) Bill, on which the CIEH submitted written evidence to a parliamentary committee⁷. One of the proposals was the introduction of a new Property Portal. This, coupled with a National Ombudsman to which tenants could seek redress for any issues, represented a step in the right direction. We were seeking clarity, however, on how it would be implemented in practice.

We strongly disagree with suggestions that national landlord registration would remove the need for selective licensing schemes (which involve designated areas where privately rented properties have to be registered with the local authority). Licensing provides a means for local authorities to inspect privately rented housing using enforceable conditions and to identify and resolve problems without the need for tenants to have complained. National landlord registration would not replace this service. It should be used as a tool to support the use of licensing schemes by local authorities.

CIEH wishes to work with the UK Government on the introduction of national landlord registration. The UK Government should ensure that national landlord registration is used as a tool to support the use of licensing schemes by local authorities.

Removing unnecessary barriers to the use of licensing

We believe the UK Government should remove unnecessary barriers to local authorities using licensing schemes to improve housing standards.

There is currently a peculiar disconnect in the Housing Act 2004 licensing legislation whereby local authorities can introduce selective licensing schemes to address poor property conditions but cannot include a directly enforceable requirement relating to property condition as a condition of the licence itself. We are therefore recommending that section 90 of the Housing Act 2004 should be amended to enable local authorities to use licence conditions to improve property conditions⁸.

We are also recommending that sections 60 and 84 of the Housing Act 2004 should be amended to increase the maximum duration of discretionary licensing schemes, which include selective licensing schemes and additional licensing schemes for houses in multiple occupation with less than five occupiers, from five to ten years⁹. This would allow local authorities to advertise longer term posts and to include training of new staff in discretionary licensing schemes. It would also provide more time for local partnerships formed through such schemes to become embedded and effective and for the schemes to deliver sustained improvements in property conditions and management.

The UK Government should remove unnecessary barriers to local authorities using licensing schemes to improve housing standards. In particular, it should enable local authorities to use licence conditions to improve property conditions and should increase the maximum duration of discretionary licensing schemes from five to ten years.

⁶ Department for Levelling Up, Housing and Communities, English housing survey 2022-23: headline report, December 2023

⁷ CIEH, Written evidence submitted to the Renters (Reform) Public Bill Committee, November 2023

⁸ CIEH, Written evidence submitted to the Renters (Reform) Public Bill Committee, November 2023, p. 9

⁹ CIEH, Written evidence submitted to the Renters (Reform) Public Bill Committee, November 2023, pp. 8-9

Ensuring the safety and security of the UK food supply

When the UK was a member of the EU, it was subject to several measures to protect public and environmental health, with over 50 separate EU Directives and Regulations that governed food standards in the UK. Since the UK is no longer a member of the EU, it is no longer bound by these regulations with respect to food standards. However, despite this, it remains imperative that we ensure the highest possible food standards. We welcome the inclusion within the Agriculture Act of a requirement for a report to be presented to Parliament focusing on the impacts that future trade deals could have on the food and farming sector. However, it does not provide the assurances that current food standards will be maintained in any future free-trade deals. Free trade deals with non-EU countries could present several potential risks to UK food safety and standards, including beef hormones, bovine somatotropin used in milk production, genetic modification of crops, the use of chlorinated disinfectants to reduce bacterial contamination of poultry carcasses, as well as food containing a wider range and levels of food additives¹⁰.

CIEH urge the UK Government to commit to maintaining and improving our high food standards in any future trade deals.

Full recognition of Environmental Health's role at our borders

Environmental health professionals are rigorously trained to enforce food safety laws, yet they lack the formal recognition afforded to their veterinary colleagues under current regulatory frameworks. This discrepancy undermines the efficiency and effectiveness of our food

safety measures, particularly at critical points such as post-mortem inspections.

We are advocating for amendments to relevant legislation which currently does not acknowledge the professional parity between Environmental Health Practitioners and veterinarians. This amendment is crucial to enhancing the UK's capacity to manage food safety and align with best practices post-Brexit.

Environmental health professionals possess the qualifications, professional competency as well as the skills and knowledge that are essential for the thorough enforcement of food laws. It is imperative that their role is recognised formally within the regulatory framework to ensure that food safety enforcement is not only maintained but strengthened.

Therefore, we recommend that the UK Government revises the relevant legislation to explicitly include environmental health professionals as recognised equivalents to veterinarians in delivery of official controls on products of animal origin (POAO). Such recognition will streamline food safety processes, supplement the veterinary workforce at our borders¹¹, and enhance the nation's ability to safeguard public health.

Additionally, we urge the Government to consider the long-term benefits of such regulatory alignment. By formalising the equivalence of environmental health professionals and official veterinarians, the UK can ensure a more robust, efficient, and responsive food safety system.

The UK Government should remove unnecessary barriers that prevent the full utilisation of environmental health expertise in the delivery of official controls on POAO. Specifically, it should amend the relevant legislation to reflect the essential role that environmental health professionals play in maintaining food safety standards and public health. Such amendments would provide the legal backing necessary for environmental health professionals to operate

¹⁰ Food Research Collaboration, *Feeding Britain: Food Security after Brexit – Food Research Collaboration, 2018*

¹¹ Food Standards Agency, Food Standards Scotland, FSA and FSS call for immediate action to address vet workforce challenges, 2023

on an equal footing with veterinarians in respect of POAO checks, thereby enhancing the overall effectiveness of the UK's food safety regime.

Action should also be taken to ensure local authorities allocate sufficient resources to food regulation.

Enhancing food safety and standards

2.4 million people suffer from food-borne illnesses across the UK every year¹², with an approximate annual cost to the UK economy of £9bn¹³. Across the food industry, environmental health professionals play an essential role in ensuring that all food produced, transported, stored, prepared and sold is safe and what it says it is. Effective and independent regulation provides assurance for consumers that businesses are meeting the required standards. Whilst the majority of food businesses operate within the law, a significant number are identified as requiring improvement each year. Of the food establishments registered by local authorities in England, Northern Ireland and Wales in 2019/20, 27% received written warnings and 4,784 were subject to formal enforcement action for food hygiene offences¹⁴. In Wales and Northern Ireland, mandatory Food Hygiene Rating schemes ensure consumers are able to make informed choices about where they eat and purchase food.

To enable consumers in England to make informed choices about where they eat and purchase food, the UK Government must introduce a public awareness campaign and make the display of Food Hygiene Ratings by food businesses mandatory.

Transforming the UK's agricultural and food system

Food security, standards and sustainability are interconnected. Agriculture contributes to 12% of the UK's greenhouse gas emissions¹⁵. However, only 18% of the emissions reductions needed from the sector are covered by confirmed policy¹⁶. To minimise negative environmental impacts and ensure the UK has continued access to sustainable sources of food, we must transform our food system. The UK Government's food strategy¹⁷, released in June 2022 by the Department for the Environment, Food and Rural Affairs, should fully embrace the recommendations of The National Food Strategy's recommendations missing from the review includes the reformulation of salt and sugar tax as well as a need to transform the nation's diet to consume less meat to protect public health and the environment¹⁸.

The impacts of Brexit, COVID-19, labour shortages and the war in Ukraine have all resulted in significant changes to the UK food system¹⁹, particularly including the increased prevalence of 'delivery only' kitchens, highlighting the need to future proof the UK's food safety and integrity framework, ensuring it remains robust and adaptable.

CIEH would like to see the strategic delivery of the

¹² Food Standards Agency, Foodborne Disease Estimates for the United Kingdom in 2018, 2020

¹³ Food Standards Agency, Foodborne Disease in the UK 2018, 2020

¹⁴ Food Standards Agency, Annual report on local authority food law enforcement for England, Wales and Northern Ireland 1 April 2019 to 31 March 2020, 2020

¹⁵ Department for Energy Security and Net Zero, 2023 UK greenhouse gas emissions, provisional figures, 2024

¹⁶ Green Alliance, Net zero policy tracker: March 2024 update, 2024

¹⁷ Department for Environment, Food and Rural Affairs, Government food strategy, 2022

¹⁸ The National Food Strategy, The Plan, 2021

¹⁹ Food Standards Agency, Food System Strategic Assessment: Trends and issues impacted by UK economic condition, 2023

National Food Strategy, with a mandate to ensure all policies related to food work together and deliver health and environmental benefits, and importantly tackle emerging issues within food safety.

Unnecessary waste should be minimised throughout the food production and supply systems. Every year, we waste an estimated 6.4 million tonnes of food, 74% of which was intended to be consumed by people²⁰. Food is wasted at all stages of the food chain, creating missed opportunities for the economy and food security. The Department's Food Strategy has missed an opportunity to follow the Independent Review's recommendation to consult on mandatory food waste reporting for businesses of a certain size.

The UK Government must meet its commitment of halving food loss and waste throughout the system by 2030 as per targets in the United Nations Sustainable Development Goals.

Robust and ambitious air and noise quality targets

Good air quality is a basic requirement and determinant of human health. As of 2018, approximately 4.5 million children in the UK (one in three) are growing up in a town or city with unsafe levels of particulate pollution²¹. This is made even more harrowing by the recent findings that every new school being built in England exceeds at least one WHO air quality guidelines²².

²⁰ WRAP, Food Surplus and Waste in the UK Key Facts, updated November 2023, 2023

Note for editors: Across all sectors in the UK, 10.7 million tonnes of food waste are generated each year. In total including all disposal routes, like home composting and sewer, we waste 6.4 million tonnes.

²¹ Unicef, The Toxic School Run: UK Children at Daily Risk from Air Pollution, 2018

²² BMJ, Investigating the air quality surrounding new schools in England: polluted playgrounds and school buildings are a source of avoidable harm, 2024

²³ World Health Organizations, Global Air Quality Guidelines, 2021

²⁴ House of Lords Science and Technology Committee, Impact of noise and light pollution on human health, 2024

²⁵ House of Lords Science and Technology Committee, The Neglected Pollutants: The effects of artificial light and noise on human health, 2023

The Environment Act has led to two new air quality targets enshrined within the Air Quality Strategy, to achieve a maximum concentration of PM_{2.5} of 10µg/m³ to be met across England by 2040 and a 35% reduction in population exposure by 2040 (compared to a base year of 2018). The targets fall short of the World Health Organization's guidelines²³.

Noise pollution remains a significant public health and economic burden, second in magnitude only to that from air pollution. The House of Lords Science and Technology Committee's inquiry found that in 130,000 healthy life years were lost in the UK because of noise pollution in 2018, and that 40% of the population remain exposed to harmful noise levels from traffic pollution²⁴. Furthermore, sleep disturbances caused by noise and light pollution are estimated to cost the UK economy £34 billion per year²⁵.

Despite this, insufficient attention has been given to noise pollution, and the inquiry's recommendations. In particular, the need to establish specific noise pollution targets by the next five-year Environmental Improvement Plan cycle, formulate an Expert Noise Committee and provide adequate resource for local authorities to regulate noise pollution, have yet to be actioned in any UK policies.

The UK Government must urgently introduce ambitious air quality targets by committing to reducing the concentration of PM_{2.5} to 10µg/m³ by 2030, and place greater attention on noise pollution in order to protect public health.

According to UK government evidence, domestic wood burners and open fires are now the biggest source of small particle air pollution in the UK, producing more harmful PM_{2.5} than road transport²⁶. Despite improvements in their design, academic research has found that even homes with “eco” wood burners are three times more polluted than those without²⁷. Domestic wood burning is currently caused by 8% of the population. However, the government’s own data has suggested that emissions of PM_{2.5} from domestic heating has increased by 125% in 10-years, implying a significant increase in the use of domestic wood burners²⁸.

The UK Government must regulate the sale and use of domestic solid fuel burners in urban areas where there are on-grid heating alternatives.

Air Quality guidelines is a devolved matter however, the Welsh Senedd and the Northern Ireland Assembly are yet to introduce their own Air Quality guidelines.

The Welsh Senedd and the Northern Ireland Assembly must introduce Air Quality targets and should also aim to reduce the concentration of PM_{2.5} to 10µg/m³ by 2030, in line with the World Health Organisation’s Air Quality Guidelines, in order to protect public health.

Crucially, the enforcement of air quality targets and implementation and monitoring of various interventions are carried out by local authorities. However, as CIEH stated in response to Defra’s April 2023 consultation on their draft Air Quality Strategy without updated guidance, resourcing and legislation, efforts by local authorities will remain piecemeal and disjointed.

Any scale in national ambition around air quality must be met with a holistic framework for resourcing local authorities.

Holistic, UK-wide measures to reduce emissions

Reducing road transport emissions is vital to reducing people’s exposure to air pollution. Road transport is the most common reason for the introduction of Air Quality Management Areas across the UK, from Northern Ireland to London. The effectiveness of air quality schemes, such as London’s Ultra Low Emissions Zone (ULEZ), which estimates claim has reduced levels of dangerous Nitrous Dioxide (NO₂) by 44% for central London²⁹, demonstrates that well designed Clean Air Zones (CAZ) at regional or local level can reduce levels of dangerous pollutants. Air Quality is a devolved matter, and it is welcome the Welsh Government has recently tabled the Environment (Air Quality and Soundscapes) (Wales) Act, provides a framework for setting national air quality targets as well as amending existing legislation to better enable Welsh Ministers to implement CAZs (Clean Air Zones) or LEZs (Low Emission Zone). Where they are needed. It remains disappointing that the Northern Ireland Assembly has yet to introduce its own Clean Air Bill.

The UK Government must work closely in supporting the Welsh Government with the implementation of the Environment (Air Quality and Soundscapes) (Wales) Act. Furthermore, owing to the urgency of the situation, the UK Government should legislate for a Clean Air Bill for Northern Ireland should the Northern Ireland Assembly remain dissolved.

While priority is often afforded to more widely understood forms of air pollution, such as from transport and domestic heating, reducing nitrogen pollution, such as ammonia and nitrous oxide, will play a big part in improving air quality and public health.

²⁶ Department for Environment, Food and Rural Affairs, Emissions of air pollutants in the UK – Particulate matter (PM10 and PM2.5), 2024

²⁷ MDPI, Indoor Air Pollution from Residential Stoves: Examining the Flooding of Particulate Matter into Homes during Real-World Use, 2020

²⁸ Department for Environment, Food and Rural Affairs, Emissions of air pollutants in the UK, 2024

²⁹ London City Hall, Inner London ULEZ Expansion 1 Year Report, 2023

According to data from the government, emissions from agriculture accounted for 87% of total ammonia emissions in 2021 and this was the main contributor to the increase in emissions between 2013 and 2017. Furthermore, it found that the spreading of organic and inorganic fertilisers is a significant source of ammonia emissions from agriculture and is showing an upward trend (emissions from this source increased from 109 thousand tonnes in 2011 to 117 thousand tonnes in 2021)³⁰.

Nitrogen pollution is not only damaging to biodiversity, but also to public health. Agricultural ammonia has the potential to mix with industrial and transport emissions, which further increases the levels of PM_{2.5} in the air³¹.

Following legally mandated emission reporting owing to the National Emissions Ceilings Regulations, the UK is projected to miss its 2030 emission reduction commitments for Nitrous Oxide in 2030 and for ammonia in 2030 and 2040 without further action³².

The UK Government must urgently introduce a Nitrogen Reduction Strategy for England. Furthermore, the UK Government must work with the devolved administrations in an integrated manner to ensure levels of nitrogen pollution are significantly reduced.

Decarbonising our economy and achieving Net-Zero

The move towards a zero-carbon economy should be reached as quickly as possible if we are to reduce the likelihood of catastrophic weather events now and in the future. The UK Government's Net Zero Strategy commits

to decarbonising all sectors of the UK economy to meet our net zero target by 2050³³.

CIEH feels that the strategy lacks ambition in some key areas such as improving energy efficiency measures. We welcome the fact that the Environment Act, introduced last year, has standalone targets for environmental protection, such as air quality and water quality targets. However, once more, we feel that the targets outlined within this Act lack the required ambition necessary to reach net zero as a matter of urgency.

The UK Government must bring forward its ambitions to introduce minimum performance standards to ensure all homes meet EPC Band C by 2030.

There should be new legislation establishing an overarching goal to consider climate change, sustainability, and carbon reduction as part of all central and local government decisions and policies.

Environmental Health Practitioners are on the front line with regards to inspecting housing within the private rented sector, ensuring the adequate development of brownfield sites, monitoring air and water quality, as well as ensuring adequate food standards are maintained. In other words, our members play a vital role in ensuring the UK is on track to meet its net zero commitments and are an invaluable resource of information in highlighting suitable courses of action to better reach this urgent target.

The UK government must commit to engage with environmental health professionals within the implementation of current net zero policies to protect against unintended consequences arising from adaptation and mitigation and understand the potential impact upon EHPs roles.

³⁰ Department for Environment Food & Rural Affairs, National Statistics Chapter 11: Environment, 2022

³¹ Soil Association, The impacts of nitrogen pollution

³² Department for Environment, Food and Rural Affairs, UK Informative Inventory Report (1990 to 2021), 2023

³³ Department for Energy, Security and Net Zero and Department for Business, Energy and Industrial Strategy, Net Zero Strategy: Build Back Greener, 2022

Embedding high standards of environmental protection

Fracking is a water intensive process, with figures from the US estimating that fracking used at least 239 billion gallons of water since 2005³⁴. Furthermore, peer-reviewed scientific studies show that fracking waste has been responsible for contaminating waterways, and even residential drinking water³⁵.

Fracking also releases high amounts of methane gas, a greenhouse gas that traps 25 times more heat than carbon dioxide and as such is incredibly detrimental in the fight against climate change³⁶.

This practice is detrimental to air and water quality, creates high levels of noise pollution, emits high volumes of greenhouse gases, and will not materially impact household energy bills.

While CIEH welcomes the decision by the UK Government to reverse the decision to lift the moratorium on fracking, we would urge the Government to make this permanent by introducing a ban on fracking. CIEH would encourage the Government to instead pursue investment in renewable forms of energy to guarantee energy security, as well as introduce a raft of energy efficiency measures to reduce household bills and tackle climate change.

According to UK government analysis, the amount of raw sewage being discharged into our rivers is increasing³⁷ totalling 3.6 million hours in 2023, more than double that of 2022³⁸. This is due to a variety of reasons, from misconnected plumbing systems³⁹, to ageing sewage infrastructure which has not seen adequate investment⁴⁰.

With the 60% rise of waterborne diseases since 2010⁴¹ there is growing concern that the UK government is not doing enough to target the illegal discharge of raw, untreated sewage into our rivers and waterways by water companies to protect our marine life and public health. Furthermore, current regulation allows water companies to discharge untreated sewage into waterways when storm overflow limits are reached.

The UK government must take tougher action in the form of fines, and criminal sanctions, against water companies illegally discharging untreated sewage into our waterways. The government must also improve the UK's sewage treatment and drainage infrastructure as a national priority to tackle water pollution.

Health and safety at work

An average of 677,000 workers each year experience a case of ill health which they believe to be caused by, or exacerbated by, their work⁴². The human cost of this is paramount, with people spending a notable proportion of their week working⁴³ as well as the UK's rising health

³⁴ Environment America, Fracking by the Numbers, 2016

³⁵ Meng, The impacts of fracking on the environment: A total environmental study paradigm, 2016

³⁶ International Energy Agency, Methane Tracker – Data Tools, 2023

³⁷ Environment Agency, Water and sewerage companies in England: environmental performance report 2021, 2022

³⁸ Department for Environment Food and Rural Affairs, Event Duration Monitoring - Storm Overflows - Annual Returns, 2023

³⁹ Chartered Institution of Water and Environmental Management, Drain misconnections: How they affect our environment

⁴⁰ Financial Times, England's water groups slashed investment in sewage network in recent decades, 2021

⁴¹ The Guardian, Hospital admissions for waterborne diseases in England up 60%, report shows, 2024

⁴² Health and Safety Executive, Statistics – Costs to Britain of workplace injuries and new cases of work-related ill health, 2022

⁴³ Office for National Statistics, Time Use in the UK: 23 September to 1 October 2023, 2023

inequalities⁴⁴. The economic burden of this through loss of production and healthcare costs is also significant with an average annual cost estimate of £20.7 billion to the UK economy⁴⁵.

The benefits of good health and safety include, but are not exclusive to, reduced risk and costs, an improved corporate social responsibility reputation and increased productivity as a result of happier, healthier and more motivated employees⁴⁶. Consequently, it is important that the Government work alongside CIEH to frame Health and Safety as a value-added, and essential, contribution to organisations.

To achieve this, CIEH are asking the Government to support, and work with, our members in their mission to promote and address health and safety in SMEs (small and medium enterprises), micro-organisations and under-regulated sectors including the gig economy, remote working organisations, the voluntary sector and the leisure industry. SMEs account for 61% of employment, around 16.7 million people who provide an estimated annual turnover of £2.4 trillion⁴⁷. The impact of the COVID-19 pandemic saw a rapid rise in remote working with many employees now working most of their hours from home⁴⁸. Additionally, the gig economy workforce was recently estimated at just under half a million people⁴⁹. It is clear that the way in which people are accessing work is ever-changing and health and safety must also be understood, promoted and welcomed outside of traditional working arenas.

Our members are unique in being able to recognise and promote the public health benefits of health and safety regulation and enforcement due to their holistic skillset.

They are distinctively positioned, often locally and within environmental health, to address the ever-evolving changes to the UK's workforce whilst simultaneously driving business innovation and safeguarding environmental and public health.

CIEH are asking the government to recognise Health and Safety in Environmental Health's contribution to the UK's public health by engaging with our members to promote the importance of Health and Safety regulation in SMEs, micro-organisations and under-regulated sectors.

Better regulation of cosmetic treatments

Many cosmetic treatments puncture the skin, which carries a risk of blood borne viruses and other serious infections to the client, yet the legislation that had regulated these treatments was out of date and had resulted in a patchwork of different approaches. CIEH are proud to have played a significant role in the UK Government's introduction of an amendment to the Health and Care Act enabling the introduction of an England-wide licensing scheme for non-surgical cosmetic procedures. In Wales a mandatory licensing scheme is being introduced requiring the training and licensing of practitioners carrying out tattooing, body piercing, acupuncture and electrolysis. No such mandatory licensing scheme currently exists in Northern Ireland.

The UK Government should work closely with CIEH and other industry experts in the design and delivery of the England-wide licensing scheme for

⁴⁴ The Health Foundation, Addressing the leading risk factors for ill health, 2022

⁴⁵ The Health and Safety Executive, Statistics – Costs to Britain of workplace injuries and new cases of work-related ill health, 2022

⁴⁶ Health and Safety Executive, Benefits and Costs – Benefits of good health and safety, 2024

⁴⁷ Department for Business and Trade, National Statistics – Business population estimates for the UK and regions 2023: statistic release, 2023

⁴⁸ Office for National Statistics, Public opinions and social trends, Great Britain: 24 April to 6 May 2024, 2024

⁴⁹ CIPD, The True Story of the UK Gig Economy, 2023

non-surgical cosmetic procedures, which needs to be underpinned by thorough standards and training requirements for all practitioners carrying out these procedures.

Public awareness raising campaigns should be funded by the Department of Health and Social Care and focus on the risks of treatments, how to choose a safe practitioner and how to report concerns and complications.

Smarter Regulation reforms

In May 2023, the UK Government published its 'Smarter Regulation to Grow the Economy' policy paper⁵⁰. The Government claim that their new approach to regulation will 'deliver rules that are proportionate to the outcomes they are trying to achieve' claiming that some of the 'current regulatory standards inherited from the EU are based on an overly restrictive and often disproportionate interpretation of the precautionary principle'. The reforms will 'end the default expectation of government departments that regulation is a first choice', tasking government departments to come up with non-regulatory policy solutions before regulation is even considered. In the event regulation is considered, it must 'align with UK interests' and will be subject to assessments as to its impact on business, trade, competition, and innovation.

The government aims to significantly reduce regulatory burden on business by weighing regulation against economic factors in a form of cost-benefit analysis. Government departments will be subject to additional scrutiny in that they will be tasked with providing clear justification as to why regulatory options are being

pursued as well as sharing early-stage criteria for monitoring and evaluating how successful regulation has been in practice.

CIEH are concerned about the consequences of these proposals fearing that the outcome will result in a reduction of vital standards protecting public health, whether that be in food safety and hygiene, environmental protection or occupational health and safety. CIEH are also concerned that government departments may divest their regulatory responsibilities to local authorities, many of whom are already under resourced. While the government has stated that it will not reduce or eliminate regulations that are essential to protect public health, it is not clear how the government will define "essential". It is possible that some regulations that are currently considered essential could be reduced or eliminated in the future.

CIEH urgently seek clarification from the government as to what impact assessments have been conducted on the possible consequences of the 'Smarter Regulation' on vital regulatory standards protecting public health, particularly in food safety, environmental protection and occupational health and safety.

Getting in touch

We would be delighted to hear from you and work with you going forwards, so please do get in touch with our **Policy and Campaigns Manager, Ciaran Donaghy**: c.donaghy@cieh.org

⁵⁰ Department for Business and Trade, Smarter Regulation to Grow the Economy, May 2023