Northern Ireland Executive Programme for Government

CIEH submission to public consultation on Northern Ireland Programme for Government

4th November 2024

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,500 members working in the public, private and third sectors, in 52 countries around the world. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Key points:

- **Environmental Health (EH) is vital for public health and economic sustainability**: The Programme should recognise the preventative impact of EH across housing, air quality, food safety, and workplace health, which reduces pressure on NHS services and lowers long-term public health costs.

- **Renewable energy expansion requires strategic environmental protections**: To achieve self-sufficiency and become a net exporter, renewable energy infrastructure must be developed with community engagement, environmental health safeguards, and strategic planning for sustainable growth.

- **Urgent need for updated housing standards**: Northern Ireland's minimum housing standards, based on the outdated Fitness Standard, limit EHOs' ability to enforce adequate living conditions. CIEH calls for modern standards that address energy efficiency, fire safety, and fall prevention.

- **Increased energy efficiency in the Private Rented Sector (PRS)**: The absence of minimum energy standards in the PRS impacts both fuel poverty and carbon emissions. CIEH recommends aligning PRS energy efficiency with UK standards to benefit tenants and support decarbonisation.

- **Investment in Environmental Health yields significant savings**: For instance, mitigating Category 1 Hazards in housing alone could save the NHS £39.5 million, with a societal saving of £401 million, underscoring the economic case for investing in EH services.

- **A Clean Air Strategy is essential for Northern Ireland**: Air quality improvements are directly linked to better public health outcomes and should be prioritised as part of the Programme's efforts to reduce healthcare demand and improve quality of life.

- **EH's role in safer and resilient communities**: Through proactive emergency planning and climate resilience measures, EH can support communities in preparing for and responding to environmental challenges, creating safer, healthier environments.

- **Independent environmental regulator needed**: To protect natural resources like Lough Neagh and manage pollution effectively, CIEH recommends establishing an independent environmental regulator to oversee environmental compliance and enforcement.

- **Greater integration of EH in public services transformation**: EH functions at local government level offer adaptable, preventative services that can bridge gaps in central government service delivery, especially in rural and underserved areas.

- **EH resourcing is crucial**: Adequate funding and staffing in EH functions are essential to ensure that public health, housing standards, and environmental protections are maintained, supporting the Programme's goals sustainably

Doing What Matters Most Today: Grow a Globally Competitive and Sustainable Economy

1. How much do you agree that the priority 'Grow a Globally Competitive and Sustainable Economy' should be included in the Programme for Government?

Response: Strongly Agree

2. The draft Programme for Government has set out actions that we plan to take under the priority 'Grow a Globally Competitive and Sustainable Economy'. How much do you agree that these are the right actions to take?

Response: Agree

3. Please provide any other comments you have in relation to the 'Grow a Globally Competitive and Sustainable Economy' priority:

CIEH supports Northern Ireland's ambition to build a globally competitive economy that is also sustainable. Achieving this requires addressing key Environmental Health (EH) factors, especially as Northern Ireland looks to grow its renewable energy capacity to reach self-sufficiency and become a net exporter. While expanding renewable infrastructure is essential, CIEH recommends an integrated strategy that includes EH monitoring, community engagement, and regulatory planning. These measures will help manage and mitigate the impacts of infrastructure projects on public health, including noise, air quality, and environmental degradation risks.

To ensure that renewable energy expansion supports, rather than disrupts, communities, EH professionals should be actively involved in the early planning stages of high-voltage transmission lines, wind farms, and other infrastructure projects. This involvement will enhance transparency and enable early intervention on potential health impacts, fostering greater public buy-in and reducing opposition to new developments.

Environmental Health also plays a critical role in enforcing food safety standards, which bolsters Northern Ireland's reputation for high standards in public health and consumer protection. By maintaining rigorous food safety enforcement, EH professionals support a robust food industry that meets national and international regulatory requirements, making Northern Ireland more attractive to businesses and trade partners. This commitment to food safety fosters consumer confidence, supports local economies, and contributes to the sustainable growth of Northern Ireland's food and hospitality sectors.

Additionally, CIEH advocates for a Clean Air Strategy for Northern Ireland, which would align with the economic growth objectives while protecting public health. Clean air is critical not only for the health of residents but also for attracting businesses and talent to Northern Ireland. As regions with higher air quality become increasingly desirable, especially among younger and skilled professionals, prioritising clean air strengthens Northern Ireland's appeal as a place to live and work. This alignment with quality-of-life values not only enhances public health but also supports economic growth by drawing in businesses that are committed to environmental and social responsibility. Clean air initiatives, therefore, contribute to a healthier, more vibrant, and economically competitive Northern Ireland.

By recognising the enabling role played by Environmental Health as part of broader economic strategy—from infrastructure and environmental planning to food safety enforcement—Northern Ireland can strengthen its reputation as a forward-thinking leader committed to sustainable growth, public health, and consumer confidence.

Doing What Matters Most Today: Cut Health Waiting Times

1. How much do you agree that the priority 'Cut Health Waiting Times' should be included in the Programme for Government?

Response: Strongly Agree

2. The draft Programme for Government has set out actions that we plan to take under the priority 'Cut Health Waiting Times'. How much do you agree that these are the right actions to take?

Response: Agree

3. Please provide any other comments you have in relation to the 'Cut Health Waiting Times' priority:

CIEH fully supports the Programme's commitment to reducing healthcare waiting times. However, we emphasise that a long-term solution requires a preventative approach, with Environmental Health (EH) at its core, to reduce healthcare demands at the root. EH professionals play a vital role in addressing critical determinants of public health, including air quality, housing conditions, workplace safety, and food safety standards. For instance, addressing Category 1 Hazards in housing could yield substantial NHS savings—estimated at £39.5 million annually, with a broader societal saving of £401 million. This illustrates EH's economic impact and highlights the direct link between safe housing and reduced hospital admissions.

To complement acute and primary care improvements, CIEH advocates for a Northern Ireland Clean Air Strategy. Poor air quality worsens respiratory conditions, increasing the demand on healthcare services, especially among vulnerable populations. Similarly, rigorous food safety enforcement by EH professionals helps prevent foodborne illnesses, reducing unnecessary healthcare visits and safeguarding public health. By implementing preventive EH measures—such as stricter air quality standards, pollution controls, and food safety interventions—Northern Ireland can build a healthier population overall, lightening the load on primary healthcare and easing waiting times.

In addition, increased funding for EH services is essential to achieving the Programme's health goals. Investment in preventive measures, including safe housing, environmental monitoring, workplace safety, and food safety standards, will not only yield long-term healthcare savings but also contribute to a healthier, more resilient population. CIEH strongly recommends that the Programme for Government formalise EH as a core component of public health and embed EH-led preventative strategies as an integral part of the approach to reduce waiting times effectively.

Doing What Matters Most Today: Provide More Social, Affordable, and Sustainable Housing

1. How much do you agree that the priority 'Provide More Social, Affordable, and Sustainable Housing' should be included in the Programme for Government?
Response: Strongly Agree

2. The draft Programme for Government has set out actions that we plan to take under the priority 'Provide More Social, Affordable, and Sustainable Housing'. How much do you agree that these are the right actions to take?
Response: Agree

3. Please provide any other comments you have in relation to the 'Provide More Social, Affordable, and Sustainable Housing' priority:

CIEH fully supports the Programme's prioritisation of affordable and sustainable housing, recognising that adequate housing is fundamental to public health, safety, and social stability. However, Northern Ireland's housing standards are outdated, still relying on the Fitness Standard from 1992, which limits EHOs' enforcement capability in addressing issues related to heating, energy efficiency, and general safety. CIEH recommends an urgent update to this minimum standard to include modern safety considerations, such as fall protection, fire safety, and energy efficiency, to ensure that housing standards meet the needs of 21st-century residents.

Energy efficiency is a particularly pressing issue in the Private Rented Sector (PRS), where outdated heating and insulation standards directly contribute to fuel poverty and carbon emissions. Northern Ireland currently lacks minimum energy efficiency standards for the PRS, placing vulnerable tenants at a disadvantage compared to the rest of the UK. Updating energy standards for the PRS would not only reduce emissions and help address fuel poverty but also improve overall health outcomes for residents by reducing cold-related illnesses and respiratory conditions.

Furthermore, CIEH advocates for an increase in funding and resources for Houses in Multiple Occupation (HMO) licensing, allowing for better oversight and enforcement of housing safety standards. We also recommend expanding Environmental Health's role in the planning and pre-application stages of new developments to ensure that housing quality and safety considerations are built in from the start. Comprehensive support for Environmental Health teams across all housing initiatives will help ensure that Northern Ireland's housing stock is safe, sustainable, and supports positive health outcomes.

Doing What Matters Most Today: Safer Communities

1. How much do you agree that the priority 'Safer Communities' should be included in the Programme for Government?

Response: Strongly Agree

2. The draft Programme for Government has set out actions that we plan to take under the priority 'Safer Communities'. How much do you agree that these are the right actions to take?

Response: Agree

3. Please provide any other comments you have in relation to the 'Safer Communities' priority:

CIEH endorses the Programme's objective of building safer communities, recognising that Environmental Health (EH) plays a foundational role in creating resilient, secure environments. Through proactive risk mitigation and preparedness, EH professionals are essential to reducing the impact of environmental hazards, including those from climate change, on communities. Flood prevention, air quality improvement, and health preparedness are just a few areas where EH contributes directly to community safety and resilience.

The increasing frequency of environmental hazards, such as flooding, requires a forward-thinking approach that places EH as having a central role in emergency planning. CIEH advocates for a formalised role for EH professionals in the emergency planning framework, allowing them to provide critical expertise on environmental risks. Integrating EH into flood risk management, for example, would help build robust responses to climate-related emergencies, ensuring that communities are protected from both immediate harm and long-term health risks. By prioritising EH within the Programme's safer communities framework, Northern Ireland can build stronger, more resilient communities that are better equipped to face future challenges.

Doing What Matters Most Today: Protecting Lough Neagh and the Environment

1. How much do you agree that the priority 'Protecting Lough Neagh and the Environment' should be included in the Programme for Government?

Response: Strongly Agree

2. The draft Programme for Government has set out actions that we plan to take under the priority 'Protecting Lough Neagh and the Environment'. How much do you agree that these are the right actions to take?

Response: Agree

3. Please provide any other comments you have in relation to the 'Protecting Lough Neagh and the Environment' priority:

CIEH strongly supports the focus on Lough Neagh and broader environmental protections, advocating for an integrated approach to address pollution at its source. Lough Neagh is facing significant environmental challenges due to nutrient runoff and pollution from agriculture, wastewater, and industrial processes. These pollutants have led to severe algal blooms, posing a threat to both ecosystem health and public safety. CIEH recommends introducing stricter nutrient management regulations and enforcement mechanisms to address these issues effectively.

An independent environmental regulator could provide oversight and accountability, ensuring that environmental protections are upheld and that pollution management efforts are transparent. CIEH also advocates for the establishment of a soil strategy in Northern Ireland to regulate nutrient use and control runoff, which is critical for both soil health and water quality. This strategy would align with best practices from other regions and help mitigate agricultural pollution's impact on Lough Neagh.

To ensure that environmental goals are met comprehensively, CIEH also recommends a broader carbon budgeting framework as part of the Programme. Establishing long-term carbon targets and regularly reviewing progress will help Northern Ireland achieve both its environmental and public health objectives. Protecting Lough Neagh and the wider environment requires a robust, multi-faceted approach, with Environmental Health playing a central role in pollution management, regulatory enforcement, and community engagement to ensure the long-term sustainability of these critical natural resources.