

Emailed to cehape@hpa.org.uk

10th June 2008

A Children's Environment and Health Strategy for the United Kingdom - A Response From Environmental Protection UK

We are writing in response to your consultation 'A Children's Environment and Health Strategy for the United Kingdom'. Environmental Protection UK has considered the consultation documents and welcomes the opportunity to comment on the proposals.

About Environmental Protection UK

Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

Environmental Protection UK's membership includes policy makers, regulators and practitioners from local authorities, consultants, developers, academics, industry and interested NGOs. As such we are able to draw on a wide range of expertise and views from representatives of the air quality and noise communities.

Answers to Consultation Questions

Regional Priority Goal 1: Water, Sanitation and Health

1. Do you agree that the areas highlighted need to be addressed with regards to water, sanitation and children's health in the UK?

Yes

2. Are there any additional areas concerning water, sanitation and children's health that you feel need to be addressed in the UK, but aren't highlighted in this strategy? If so, please explain.

Additional areas which could usefully be looked at are:

- The potential health impacts for children associated with the use of private water supplies, predominantly in rural areas. In the North of England Bradford MBC and Oldham MBC are known to have a considerable number of supplies (Oldham has 409 premises on private supply from around 290 sources). Whilst the conversion of premises to use mains potable water supplies may not always be viable, more encouragement to convert to mains supplies needs to be stimulated. General Practitioners and the Public Health Regime are becoming increasingly aware of visitors to households provided with a

private water supply subsequently presenting to General Practitioner “Presentations” with gastro-enteritic conditions. This can be due to visitors lacking an acquired resistance to bacterial contamination to the supply being used.

There is also a need to speed the implementation of the current Private Water Supply Regulations. Where private supplies continue to be used, a “Sanitary Survey” type approach should be used by all Local Authorities to review the condition of supplies. This should be implemented normally just after major heavy rainfall when contamination may be at its potential peak.

- The unsupervised and often illegal use in summertime of reservoirs for bathing by groups of young people. Wide vertical temperature gradients from the surface of the reservoir downwards may cause some of those tempted to enter the water by diving and jumping to be affected by thermal shock and cramp, which can quickly lead to drowning. Despite often-excellent safety advice being communicated by the water companies this problem persists and it remains unacceptable to expect over stretched Local Police and Community Support Officers to enforce this type of issue. An alternative would be to empower Countryside Rangers and require the Water Companies to increase their level of commitment to this potential problem by including safety considerations in formal ‘Asset Management Plan’ periods.

3. What issues concerning water, sanitation and children’s health, if any, do you feel are a priority for the UK over the next few years?

Complying with a revised Drinking Water Standard for lead.

4. Is there anything else you would like to add?

No

Regional Priority Goal II: Accidents, Injuries, Obesity and Physical Activity

5. Do you agree that the areas highlighted need to be addressed with regards to accidents and injuries, obesity and physical activity, and access to green spaces and children’s health, in the UK?

Yes

6. Are there any additional areas concerning accidents and unintentional injuries, obesity and physical activity, and access to green spaces and children’s health, that you feel need to be addressed in the UK, but aren’t highlighted in this strategy? If so, please explain.

Yes, the higher than acceptable severe injury and fatal accident rates amongst younger vehicle drivers warrants further attention, despite excellent pro-active work currently being undertaken by Local Authority Road Safety Officers, Police Forces and the voluntary sector.

7. What issues concerning to accidents and injuries, obesity and physical activity, and access to green spaces and children’s health, if any, do you feel are a priority for the UK over the next few years?

Those issues articulated in the consultation relating to diet, lifestyle and obesity and noise. A recent MORI¹ survey commissioned by Environmental Protection UK found that fewer people say they have access to quiet green places (countryside, woods,

¹ National Noise Survey 2008 – Environmental Protection UK/Ipsos MORI

parks, churchyards) in 2008 compared to 2007. The consultation acknowledges that noise can impact on children's learning at school – and by implication it can also affect their cognitive abilities and interfere with communication outside school. There is also increasing evidence of the impact of environmental noise (in particular road transport noise) on adult health. We feel therefore that addressing the noise environment of children should be a priority.

8. Is there anything else you would like to add?

Environmental noise is currently being addressed in work towards implementing the Environmental Noise Directive 2002/49/EC in the UK, which aims to prioritise reducing the impact of noise where it affects the most people. However, there is still very limited data on the impact of this noise on health for the UK (most data that shows impacts comes from other European States). We agree that further investigation is needed. A programme of research into the effects of the availability of quiet outdoor spaces and of environmental noise on children's health would enable the management of environmental noise to be targeted effectively.

Regional Priority Goal III: Respiratory Health, Indoor and Outdoor Air Pollution

We are pleased to see the inclusion of a section on air quality and respiratory health within this consultation. Great strides have been made since the coal smog era to improve outdoor air quality, and national government, local government and affected industries have worked to make significantly improvements in air quality, with consequent improvements in public health.

In the 1970s the focus moved towards air quality issues relating to traffic, and again large improvements have been made through regulating emissions from vehicles and industry, introducing a national Air Quality Strategy and by local measures introduced by local authorities working under the Local Air Quality Management Regime. Despite this outdoor air quality is still not 'fixed' with many towns and cities still experiencing breaches of Air Quality Strategy targets, and with modelling suggesting breaches will still take place well into the future.

Indoor air quality has, in contrast, received much less attention, mainly as it falls uncomfortably into the area between regulation of pollutants and personal responsibility. It is therefore pleasing to see recognition of the effect of indoor air quality on children's health in this consultation.

9. Do you agree that the areas highlighted need to be addressed with regards to outdoor air pollution and indoor air pollution and children's health in the UK?

Yes, again we would like to comment that we are very pleased to see indoor air quality featured as a major issue in this consultation.

10. Are there any additional areas concerning outdoor air pollution and indoor air pollution and children's health that you feel need to be addressed in the UK, but aren't highlighted in this strategy? If so, please explain.

For outdoor air quality the consultation document prioritises measures to reduce emissions from relevant sources, however we feel a greater focus is needed on more innovative measures to tackle pollution hot spots and exposure management measures to reduce exposure of vulnerable individuals.

Actions to improve air quality should include instruments to encourage wider adoption of measures such as Low Emission Zones, for example national frameworks for local authorities to act within, and national certification procedures for vehicles that install retrofit emissions abatement equipment. On the exposure

reduction side as well as 'hard' measures further actions are needed to help vulnerable individuals to manage their own exposure to polluted air. The current pilots of the AirText and airALERT systems can help inform these actions.

11. What issues concerning outdoor air pollution and indoor air pollution and children's health, if any, do you feel are a priority for the UK over the next few years?
As outlined in our previous answers, the UK will not comply with outdoor Air Quality Strategy targets with the current suite of measures (which focus on regulating tail pipe and chimney stack emissions). Many towns and cities will need further measures to comply, and we believe that the next few years should see a strong focus on local measures such as Low Emission Zones and control of emissions from niche areas such as construction sites. Nationally more needs to be done to support and encourage local authorities in taking these actions forward, within the umbrella of Local Air Quality Management.

In the area of indoor air quality, as the consultation document suggests, a co-ordinated cross-departmental strategy for improving indoor air quality is needed. This should include measures to improve product standards (combustion appliances and other household/office items), building ventilation standards, and educational measures designed to improve awareness of indoor air quality and individual action to improve it. Targets and appropriate monitoring should also be included, albeit developed within the limitations of the central action/individual responsibility constraints

Tobacco smoke continues to be a major issue for indoor air quality, and emphasis should continue to be made into the proven links between second hand tobacco smoke and its impacts in households and in vehicles where one or more individuals smoke.

Regional Priority Goal IV: Chemical, Physical and Biological Hazards

13. Do you agree that the areas highlighted need to be addressed with regards to chemicals, ionising and non-ionising radiation, noise, biological hazards and emergency preparedness and children's health in the UK?

Yes

14. Are there any additional areas concerning chemicals, ionising and non ionizing radiation, noise, biological hazards and emergency preparedness and children's health that you feel need to be addressed in the UK, but aren't highlighted in this strategy? If so, please explain.

As stated at 7. and 8. – we feel that more research is needed on the effects of noise on children's health and well-being.

15. What issues concerning chemicals, ionising and non-ionising radiation, noise, biological hazards and emergency preparedness and children's health, if any, do you feel are a priority for the UK over the next few years?

The priorities may need to include:

- Tighter and more comprehensive regulation of businesses providing sunbed use or hire. Lack of supervision still appears to be an issue.
- The potential health impacts from the use by children of mobile technology. We are learning more about the health impacts of prolonged exposure over many decades, particularly with mobile phone usage.

- The issue of hearing conservation needs a higher priority than it currently enjoys, where known health impacts are occurring influenced by lifestyle. Issues include noisy leisure activities (computer games, toys etc), the recreational use of loud amplified music, the use of MP3 players/ipods/phones.
- The wider noise environment needs more thorough consideration – effects of persistent exposure to noise from transport sources on children’s health needs to be addressed along with access to quiet green spaces.

16. *Is there anything else you would like to add?*

Overarching Issues and Priorities

17. *Are there any other overarching issues not highlighted that you feel should be taken into account in developing the Children’s Environment and Health Strategy and action plans?*

No comment

Organising to Deliver

18. *Do you agree with the proposed general approach for addressing the CEHAPE priorities in the UK?*

No comment

19. *Do you consider the use of environment and health indicators a useful means of measuring environmental determinants of children’s health and the overall impact of the Children’s Environment and Health Strategy?*

No comment

20. *Are there any other means of monitoring the impact of the Children’s Environment and Health Strategy that should be considered?*

No comment

21. *Over what timescales do you think the Children’s Environment and Health Strategy should operate?*

No comment

Consultation Process

22. *Are there any ways we could improve similar consultations in the future? Anything Else?*

It is important to target those under the age of 19 who are articulate, responsible and aware of personal and community health impacts. There is an argument that roadshows could/should be funded as part of the consultation co-ordinated by Primary Care Trusts through selected Secondary Schools, Colleges and Universities particularly where a “fit” might be achieved with the National Curriculum, the subject area of Personal Social Education, and those at University involved in Health related studies.

23. *Is there anything else you would like to add concerning the Children’s Environment and Health Strategy?*

Section 3 – Contact Us

If you require any further information on the views expressed in this response please contact:

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