

Submission from Doctors for the Environment Australia to the Review of the NICNAS Existing Chemicals Assessment Program

I am making this submission on behalf of Doctors for the Environment Australia, a voluntary organisation of medical doctors from all States and Territories which promotes human health and wellbeing by educating the profession and the public, and by briefing political and industry leaders to sustain the natural environment. Our priorities at present are the health aspects of climate change and the impact of environmental pollution and degradation on childhood health.

Our opinions are scientifically based and we are fortunate to have the support of some of Australia's most eminent scientists. These include Professor Fiona Stanley, Australian of the year 2003, Professor Frank Fenner of smallpox vaccine fame, Professor Sir Gustav Nossal and Professor Tony McMichael of ANU who is a lead author on the health aspects of climate change with the Intergovernmental Panel on Climate Change. A full list of names of our Scientific Committee is available on our web page www.dea.org.au

I attended the Adelaide Engagement Forum on 22 May and found the NICAS staff and Community Engagement representatives helpful and enthusiastic. I had not previously addressed the role and detailed operation of NICNAS in my own mind and my comments can therefore be looked upon as an outsider to the system, unable to offer a detailed critique but possibly of value as an overview from one who has worked in structured medical systems.

There are some useful comparisons with the climate change issue. Here we have the production of greenhouse gases that will change the biological face of the earth and the destiny of humanity, yet we squabble internationally and nationally about Kyoto which offers a 5 % reduction in emissions whereas 60% reduction is needed in the next few years. Clearly the international situation with chemicals is similar. Substances are accumulating in the environment which will have a health and environmental impact for generations to come. It is a "sleeper" that needs a huge increase in commitment. Indeed in Australia the assessment of only a small fraction of chemicals in use reflects this disparity between need and action

The following broad issues should be addressed in the Review

The Budget

The budget of six million dollars, based significantly on industry fees is grossly inadequate for the size and importance of the problem. There needs to be core funding from government to provide independence from commercial involvement (though fees should be levied as well) There are analogies here to assessment of pharmaceuticals and many lessons can be learned from this process. Core funding will also provide an ability to carry out some research relevant to Australia and will allow us as a wealthy nation to contribute to the base of scientific knowledge rather than allow other countries to shoulder the burden. For example, body burden studies will be important in Australia for a different spectrum of accumulants may be found in comparison to other countries. Body burden studies are likely to provide leads to selection of substances of direct relevance to human health.

No doubt community pressure may have some role in indicating to government that an increase in funding is necessary. However it is likely that the wider medical profession and

not just its public health sector will have to provide this pressure through its organisational structures. This was not a topic for the Review but I mention it as a fundamental issue for progress.

Education

We see this as the fundamental issue in furthering the success of NICNAS.

The role of the medical profession is crucial. The profession is effective in getting change within the spheres it sees to be of importance and when the profession starts talking publicly about these issues then the public will listen. Some questions and thoughts are:-

Should the topic be taught in the medical curriculum?

I comment as someone involved in reforming the curriculum over 30 years There is little point in approaching Deans of Medical Schools, for the curriculum is over burdened and there are a large number of topics competing for inclusion. Even successful input would have a 15 year lead time for a doctor to emerge with skills in this area. If there is to be an approach it should be through the public health teaching departments in the medical schools. This raises the question as to whether this falls within the role of NICNAS—I think it does but it would need to be part of a revised charter

What is the role of NICNAS in educating the Profession?

I see this as difficult. The fact is that doctors are grossly overworked and are burdened by paperwork, forms and regulations. Government web sites are not popular and tend to be used only when absolutely necessary. I suspect that the NICNAS site will be used only as a reference point. Awareness is more likely to be through professional web sites and doctor's NGOs. To quote an example from the experience of Doctors for the Environment Australia, we are using doctor's surgeries to give wide exposure to the health aspects of climate change. Go to www.healthyplanet.info Evidence suggests that this is educating the public and the doctors. This initiative is received enthusiastically and I suspect more so because it comes from us and not from government. NICNAS needs to explore such possibilities for its own educational materials and to fund modestly the provision of the materials for surgeries and web sites. If the profession provides the time and expertise NICNAS will need to fund it.

How can awareness be generated through the spectrum of doctor's organisations?

This will be difficult but not impossible. The approach would be to identify individuals in the Colleges and general practitioner groups who will act as catalysts. There **are** such individuals for we have them as members of our organisations. At some point NICNAS must put up funding to bring together representatives from these organisations to activate the issue

Conferment of Powers

I will not comment on the many proposals that relate to administrative matters for I do not have the experience to do so. However it is clear to me that the effectiveness of NICNAS needs to be increased by the powers to restrict or ban chemicals. The analogy is with pharmaceutical drug regulation. It is necessary to have powers in the interest of individual and community health.

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