7 February 2017

Submission to the Ministry of Business, Innovation and Employment:
Draft replacement New Zealand Energy Efficiency and Conservation Strategy

The New Zealand College of Public Health Medicine would like to thank the Ministry of Business, Innovation and Employment for the opportunity to make a submission on the Draft replacement New Zealand Energy Efficiency and Conservation Strategy.

The New Zealand College of Public Health Medicine (NZCPHM) is the professional body representing the medical specialty of public health medicine in New Zealand. We have 228 members, all of whom are medical doctors, including 185 fully qualified Public Health Medicine Specialists with the majority of the remainder being registrars training in the specialty of public health medicine.

Public Health Medicine is the branch of medicine concerned with the assessment of population health and health care needs, the development of policy and strategy, health promotion, the control and prevention of disease, and the organisation of services. The NZCPHM strives to achieve health gain and equity for our population, reducing inequalities across socioeconomic and cultural groups, and promoting environments in which everyone can be healthy.

Position
The NZCPHM supports the decision to update the New Zealand Energy Efficiency and Conservation Strategy (the Strategy) and the goal to “support New Zealand to be an energy efficient, productive and low emissions economy”. We also acknowledge MBIE’s recognition of the relationship between public health and the environment in this Strategy.

Efficient and Low Emissions Transport
The NZCPHM recognises climate change as a serious emerging risk to global public health, development and equity¹. Therefore we support the second priority in the Strategy regarding efficient and low emissions transport as well-designed policies to reduce emissions, such as this, can bring about substantial health and health equity co-benefits². These co-benefits arise because some emission reduction measures impact on important determinants of health¹. For example, greater use of low-emission transport (walking, cycling, public transport) increases physical activity, and can reduce air pollution and road traffic injuries¹.

Further, walking and cycling are inexpensive modes of transport, and public transport is used proportionately more by people with lower incomes³. Hence investing in low-cost public transport, along with active transport infrastructure, could benefit health, climate and equity¹². Given these potential benefits, the NZCPHM supports this priority however recommends active transport is also included in low emission transport planning.
Innovative and efficient use of electricity
The NZCPHM supports the third priority in the Strategy, regarding innovative and efficient use of electricity. Increasing energy efficiency and/or moving away from fossil fuel energy would reduce health damaging air pollution (e.g. particulate matter) from fuel combustion, in both indoor and outdoor environments, with large health gains¹.

The NZCPHM also supports the proposed action to implement EECA’s Warm Up New Zealand Healthy Homes rental programme through to June 2018. However, the NZCPHM suggests that this programme is extended to at least 1 July 2019 when all residential tenancies must comply with the new minimum insulation standards under the Residential Tenancies Act (RTA). The reasoning for this is that the programme should have good uptake as the deadline for responsibility approaches. An economic evaluation of the Warm Up New Zealand programme demonstrated a benefit-cost ratio of 3.9, indicating that the benefits are 3.9 times higher than the costs³. Improving indoor environments (for example, by using energy efficiency measures) can reduce illnesses associated with cold, damp housing¹. Childhood asthma and chest infections which are leading causes of hospital admissions, particularly for Māori and Pacific children, are examples of this¹.

Further, the NZCPHM supports the proposed action in the Strategy to implement recent changes to the RTA, requiring landlords to insulate residential rental homes. World-leading research undertaken in New Zealand found that insulating existing houses leads to a warmer, drier indoor environment and improved health and outcomes including⁴:

- Fewer exacerbations of respiratory illness (less wheeze for those with asthma).
- Fewer general practitioner visits.
- Less time off work/school.
- Improved self-rated health.
- A trend towards reduced hospitalisations for respiratory and coronary conditions.

This research also concluded that insulation resulted in reduced energy use (insulated houses consumed 81% of that consumed by non-insulated houses)⁴.

The NZCPHM also supports the submission put forward by the Royal New Zealand College of General Practitioners, please find this submission enclosed.

Thank you for the opportunity for the NZCPHM to submit on the Draft replacement New Zealand Energy Efficiency and Conservation Strategy. We hope our feedback is helpful and please do not hesitate to contact the NZCPHM if we can be of further assistance.

Yours faithfully,

Dr Felicity Dumble, President Elect, NZCPHM
References:


