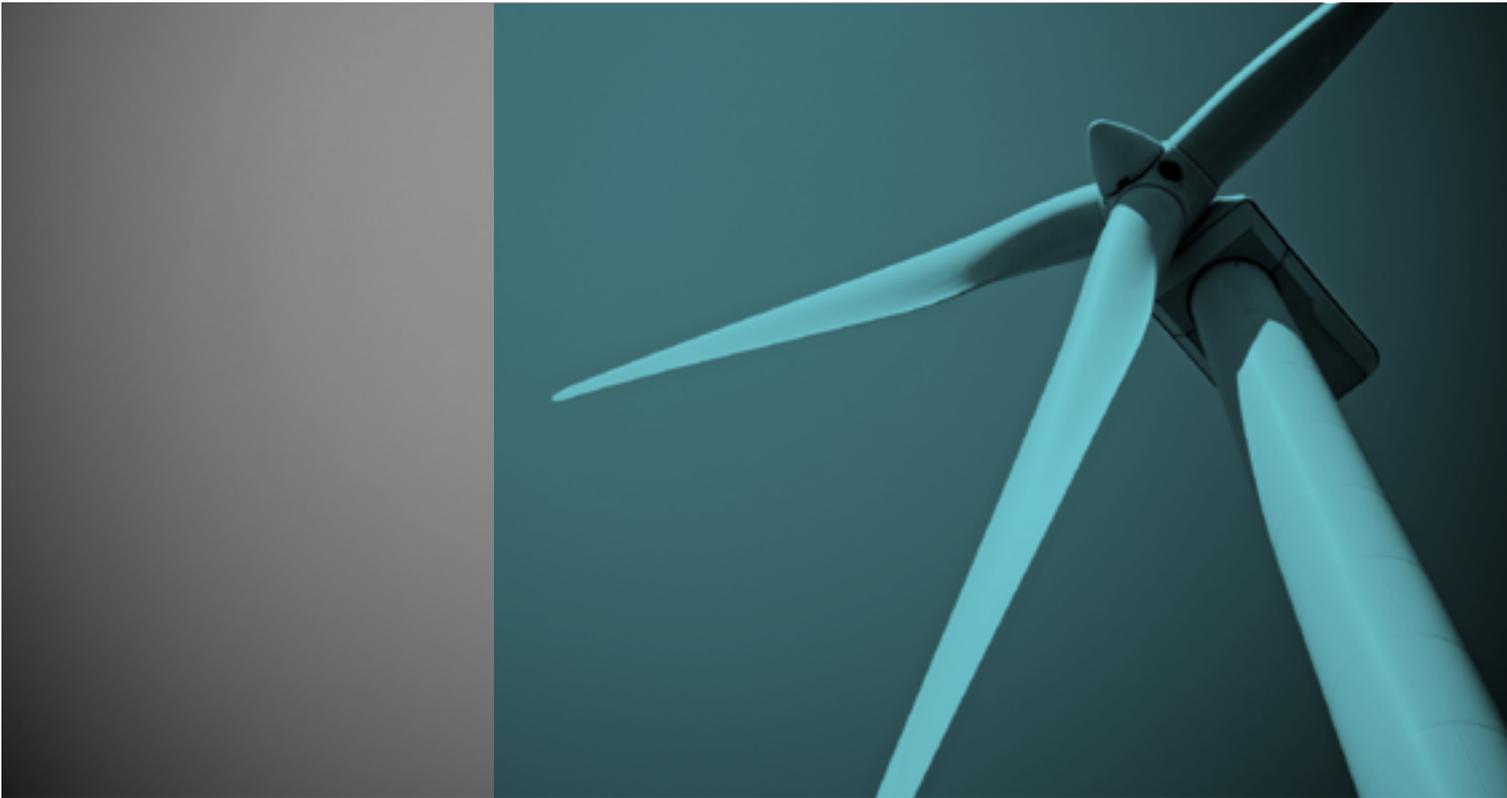


Manifesto for Environmental Health 2022/23



The Case for Environmental Health

The Chartered Institute of Environmental Health (CIEH) is the professional voice for environmental health representing over 7,000 members across the UK working in the public, private and third sectors. We are calling on political parties, the devolved administrations, and the UK government to recognise the vital role environmental health plays in all our lives.

Environmental health has an important and unique contribution to make to improving public health, reducing health inequalities, and protecting our environment. From tackling air quality, fighting for better housing conditions, and making sure the food we eat is safe, environmental health professionals are a vital element in our society.

This Manifesto for Environmental Health brings together essential policy initiatives covering housing, food safety, environmental protection, health and safety at work, and public health.

Poor housing conditions

The recent 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 and illustrates the importance of tackling poor housing conditions in all types of tenure. This highlights the need for better resourcing of local authorities and environmental health.

There is a huge volume of chronic ill-health affecting large sections of the population arising from exposure to damp and mouldy housing. Damp and mould are often caused by persistent condensation and the biggest factors are poorly heated and poorly insulated dwellings.

We believe local authorities have a crucial role to play in protecting vulnerable people in all types of tenure against poor housing conditions. But they need to be properly funded to deliver this protection.

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.

Alongside calling for proper funding for local authorities and environmental health teams, CIEH is also 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.

Making domestic energy efficiency a UK Government priority

There are over 30 million buildings in the UK. In total, these buildings are responsible for around 30% of our national emissions. The vast majority of these emissions result from heating: 79% of buildings emissions and about 23% of all UK emissions.¹ There were 30,000 excess winter deaths in 2019/20 in England and Wales excluding COVID-19.² More than 3.1 million people in England are currently living in fuel poverty and it is estimated that between 140,000 and 240,000 low income households remain in the two lowest energy efficiency bands - F and G.³ In Wales, 155,000 households are living in fuel poverty⁴ while Northern Ireland has the highest level of fuel poverty in the UK.⁵ The period 2017/18 saw the highest recorded number of excess winter deaths in Northern Ireland since data began in 1974/75.⁶ 2022 has seen energy bills soar, driven by rising inflation and the ongoing war in Ukraine threatening Russian oil and gas supplies. In response, Ofgem, the energy market regulator, increased the price-cap from £1,277 in October 2021, to £3,549 by October 2022, and planned to revert to quarterly price-caps before former Prime Minister Liz Truss announced the Energy Price Guarantee (EPG), which froze energy prices at around £2,500 for two years. Despite plans by the new Chancellor, Jeremy Hunt, to end the EPG in April 2023, this has now been extended for a further 12 months, although with prices frozen at around £3,000 from April 2023 to April 2024. Prior to this intervention, Boris Johnson's government introduced the Energy Bills Discount Scheme, which sought to support households with their energy bills over the winter months by paying each household £400 spread over 6 months.

¹ Final greenhouse gas emissions national statistics: 1990 to 2019 ([gov.uk](https://www.gov.uk))

² Excess winter mortality in England and Wales - Office for National Statistics (ons.gov.uk)

³ Annual Fuel Poverty Statistics LILEE Report 2022 (2020 data) (publishing.service.gov.uk)

⁴ Food poverty estimates for Wales: 2018 (gov.wales)

⁵ NEA-EAS-Fuel-Poverty-Report-and-Exec-Summary.pdf (fuelpovertyni.org)

⁶ Age Sector Platform Data (published 2019)

The UK Government must commit to engaging with key stakeholders, such as CIEH, as part of the newly created Energy Efficiency Taskforce.

While freezing the price-cap and supporting households with their energy bills is commendable, these are temporary fixes which do not support households to reduce their energy usage in the first place. The Chancellor, in his recent Autumn Statement, committed £6 billion of new funding to be allocated for 'energy efficiency measures' from 2025, as well as setting up a new Energy Efficiency Taskforce. However, while this is to be lauded, the Government remain light on detail regarding what exactly these measures will be, although the ECO+ (Energy Company Obligation) announcement has been a step in the right direction. A joint research paper conducted by Friends of the Earth and the New Economics Foundation found that targeting "energy crisis hotspots" in England and Wales would raise energy efficiency standards in the UK housing stock, support levelling up and go towards reducing the UK's carbon emissions.⁷ We believe that by introducing targeted energy efficiency measures in our homes right now, followed by a national universal insulation programme, the Government could help to reduce unnecessary NHS costs, fuel poverty, and make greater progress towards the 2050 carbon net zero target.

The UK Government should make improving energy efficiency a priority across all the UK nations and should bring forward the allocated £6 billion that has been promised in 2025 for energy efficiency measures to right now. The Government must bring forward their ambition of phasing in a higher minimum performance standard to ensure all homes meet EPC Band C by 2030. Furthermore, the Government must prioritise fuel poor homes, and bring forward its ambitions to upgrade these homes to EPC Band C by 2028.

This investment should be targeted at the homes of households living in fuel poverty and homes with the lowest energy efficiency ratings. Financial incentives for homeowners should also be provided by the Government to speed up investment in energy efficiency, with the funding for ECO+ being trebled from £1 billion to £3 billion. ECO+, announced in the 2022 Autumn Statement, is a welcome initiative which will see widespread insulation of the lowest energy-efficient housing, and those in the lowest council tax bands. However, the Government must show more ambition and invest further in this promising programme. The Government's Energy Bills Support Scheme does not go far enough and provides no additional energy efficiency measures. Northern Ireland remains outside the Warm Homes Discount Scheme and funding provided for the Affordable Warmth Scheme that operates in Northern Ireland is unsustainable. Furthermore, political gridlock in Northern Ireland is preventing households from accessing the Energy Bills Discount Scheme and thereby withholding vital support from fuel poor households in the region of the UK most in need. These policies should be reviewed.

⁷ [Why the energy crisis demands street by street energy saving measures | Policy and insight \(friendsoftheearth.uk\)](https://www.friendsoftheearth.org/why-the-energy-crisis-demands-street-by-street-energy-saving-measures/)

Future of housing

If current averages are maintained, there will be 750,000 new homes built by 2025.⁸ The homes we build today will be around for a long time, so they should conform to the highest standards, both in their design and execution. We welcome the introduction of the Future Homes and Buildings Standard which requires all new homes built from 2025 to be net zero and energy efficient, so as not to require future retrofitting, but feel that this timeframe needs to be accelerated.

The UK Government should bring forward the timeframe for implementing the Future Homes and Buildings Standard from 2025 to 2023.

According to the UK Government's own Fairer Private Rented Sector White Paper, in England "some 1.6 million people are living in dangerously low-quality homes", so it is laudable that the UK Government has committed to halve the number of non-decent rented homes by 2030 and require privately rented homes to meet a Decent Homes Standard for the first time. We are concerned, however, that the Decent Homes Standard set out in the 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.

National registration scheme for the private rented sector

Almost a quarter of private rented homes in England are non-decent – the highest proportion of all the tenures⁹ – 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 rogue landlords exploit this to the detriment of their tenants. Registration and licensing schemes covering all rented properties already operate in Wales, Scotland, and Northern Ireland. The UK Government proposed a raft of reforms in the private rented sector in England in its Fairer Private Rented Sector White Paper, which CIEH responded to.¹⁰ One of the proposals was the introduction of a new property portal. This, coupled with a National Ombudsman to which tenants can seek redress for any issues, represents a step in the right direction. However, we are seeking clarity on how these proposals will be implemented in practice and hope that such measures are not seen as a replacement for selective licensing schemes.

CIEH wishes to work with the UK Government on the introduction of the Property Portal. The UK Government should commit to having this portal operate as a mandatory national registration scheme for all landlords and agents in England to enable better regulation and oversight of the private rented sector by regulating authorities.

⁸ [Housing supply: net additional dwellings - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

⁹ [English Housing Survey: headline report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

¹⁰ [Reforming the Private Rented Sector - CIEH submission to the Department for Levelling Up, Housing and Communities Committee](#)

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 Bill 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 a number of 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 additives.¹¹

We would like the UK Government to commit to maintaining and improving our high food standards in any future trade deals.

Food production and sustainability

Agriculture contributes to 11% of the UK's greenhouse gas emissions.¹² In order 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 Strategy¹³, released in June by the Department for Environment, Food and Rural Affairs (DEFRA), should fully embrace the recommendations of the National Food Strategy Independent Review led by Henry Dimbleby.¹⁴ The Independent Review recommends a 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 environment.

We would like to see the appointment of a new Minister for Food to oversee the consultation and delivery of the National Food Strategy, with a mandate to ensure all policies related to food work together and deliver health and environmental benefits.

Unnecessary waste should be minimised throughout the food production and supply systems. Every year, an estimated 10 million tonnes of food is thrown away, 70% of which was intended to be consumed by people.¹⁵ Food is wasted at all stages of the food chain, creating missed opportunities for the economy and food security. DEFRA'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.

¹¹ [Feeding Britain: Food Security after Brexit - Food Research Collaboration \(foodresearch.org\)](https://www.foodresearch.org/)

¹² [2020 UK final greenhouse gas emissions statistics: one page summary \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/)

¹³ [Government food strategy - GOV.UK \(gov.uk\)](https://www.gov.uk/government/food-strategy)

¹⁴ [The National Food Strategy - The Plan \(nationalfoodstrategy.org\)](https://www.nationalfoodstrategy.org/)

¹⁵ [food_surplus_and_waste_in_the_uk_key_facts_oct_21.pdf \(wrap.org.uk\)](https://www.wrap.org.uk/assets/food_surplus_and_waste_in_the_uk_key_facts_oct_21.pdf)

Enhancing food safety and standards

2.4 million people suffer from food-borne illnesses across the UK every year,¹⁶ with an approximate annual cost to the UK economy of £9 billion.¹⁷ 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 offences.¹⁸ 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 make the display of food hygiene ratings by food businesses mandatory in England.

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

Embedding environmental protection into policymaking

The UK Government's post-Brexit green watchdog, the Office for Environmental Protection, has criticised the Government's Environment Bill's targets and Principles as "unambitious" and lacking a "comprehensive" implementation guide.¹⁹ Therefore, there is a need for the Government to address these concerns by strengthening the Principles outlined in the Bill. The cross-party Environmental Audit Committee have also expressed concerns that Whitehall will not fully implement the Principles outlined in the Environment Bill.²⁰

The UK Government should strengthen, embrace, and fully implement the Principles laid out in the Environment Bill to ensure that Environmental Protection is fully embedded in policymaking throughout government.

Fracking is a water intensive process, with figures from the US estimating that fracking used between 70 billion and 140 billion gallons of water extract oil and shale gas from 35,000 wells. Furthermore, peer-reviewed scientific studies show that fracking waste has been responsible for contaminating waterways, and even residential drinking water.

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 change.

¹⁶ Foodborne Disease Estimates for the United Kingdom in 2018

¹⁷ The Burden of Foodborne Disease in the UK 2018 (nationalarchives.gov.uk)

¹⁸ LAEMS Annual report 2019-2020 (food.gov.uk)

¹⁹ Office for Environmental Protection calls on Government to strengthen 'unambitious' nature targets - edie

²⁰ Recommendations on the Government's Environmental Principles Policy Statement (parliament.uk)

The former Chancellor, Kwasi Kwarteng, has been quoted as saying that fracking “won’t materially affect the wholesale market price...UK producers won’t sell shale gas to UK consumers below the market price. They’re not charities”. 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 increasing.²¹ This is due to a variety of reasons, from misconnected plumbing systems,²² to ageing sewage infrastructure which has not seen adequate investment.²³

With outbreaks of polio being detected in the UK,²⁴ 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.

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 perhaps even 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.

Robust and ambitious air 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 pollution.²⁵ The UK Government’s Environment Bill establishes a legally binding duty on government to bring forward at least two new air quality targets in secondary legislation by 31st October 2022. However, as of yet, the UK Government has failed to introduce such targets. A recent consultation outlined that the proposed air quality targets are 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 Organisation’s Air Quality Guidelines.²⁶

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

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

²¹ [Water and sewerage companies in England: environmental performance report 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614121/water-and-sewerage-companies-in-england-environmental-performance-report-2021.pdf)

²² [Drain misconnections: How they affect our environment - CIWEM](https://www.ciwem.org.uk/news/drain-misconnections-how-they-affect-our-environment)

²³ [England’s water groups slashed investment in sewage network in recent decades | Financial Times \(ft.com\)](https://www.ft.com/content/2019/07/11/england-water-groups-slashed-investment-in-sewage-network-in-recent-decades)

²⁴ [Polio outbreak warning as experts raise alarm over return of disease | Science | News | Express.co.uk](https://www.express.co.uk/news/health/1111111/polio-outbreak-warning-as-experts-raise-alarm-over-return-of-disease)

²⁵ [Unicef UK Research Briefing - The toxic school run - September 2018.docx \(unicef.org.uk\)](https://www.unicef.org/uk/research-briefing-the-toxic-school-run)

²⁶ [WHO global air quality guidelines - September 2021](https://www.who.int/air-quality-guidelines)

Air quality guidelines are 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} of 10µg/m³ by 2030, in order to protect public health.

Bringing in UK-wide measures to reduce transport 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 London, demonstrates that well designed Clean Air Zones (CAZ) at regional or local level can reduce levels of dangerous pollutants. However, with air quality being a devolved issue, it is disappointing that neither the Senedd nor the Northern Irish Assembly currently have dedicated clean air legislation.

While we welcome the UK Government's Decarbonising Transport Plan, which commits to banning the sale of new diesel and petrol cars by 2030 and for all new cars to be fully zero emission at the tailpipe from 2035, the UK Government must work more closely with local authorities and devolved administrations in developing Clean Air Bills and implementing Clean Air Zones in their areas to reduce air pollution from road transport.

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 2050²⁷. CIEH feels that the strategy lacks ambition in some key areas such as improving energy efficiency measures. We welcome the fact that the Environment Bill, 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 Bill 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, 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 working with key environmental and public health stakeholders in the race to reach net zero.

²⁷ Net Zero Strategy: Build Back Greener - GOV.UK (www.gov.uk)

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 has been introduced requiring the training and licensing of practitioners carrying out tattooing (including semi-permanent make-up), 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 cosmetic treatments, which needs to be underpinned by thorough standards and training requirements for all practitioners carrying out these treatments.

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.

Health and safety at work

1.8 million working people were suffering from a work-related illness and 565,000 working people sustained a workplace injury in Great Britain in 2021/22.²⁸

The UK Government should protect the health and safety of workers across the UK, as well as working to ensure that adequate resources are available at local authority level to protect employees working for small businesses.

UK Government's deregulatory approach

There has been significant concern among our members regarding the UK Government's recently tabled Retained EU Law (Revocation and Reform) Bill, primarily due to the timeframe for sunseting retained EU law included within the Bill. The Bill promises to review, repeal, or replace the over 2,400 pieces of existing EU legislation currently remaining on the UK statute book.

Much of this retained EU law still regulates vital areas of environmental health, including food safety and standards. CIEH recognises that there is now an opportunity for the UK to review our current regulatory frameworks to see if they are fit for purpose and that we now have the opportunity to devise our own regulatory regimes tailored to our needs. However, whilst CIEH appreciates that retained EU law was never intended to remain permanently on the UK statute book, there remains significant concern with the sunset date included in the Retained EU Law Bill, which aims to remove all retained EU law by 31st December 2023.

²⁸ [Health and safety statistics \(hse.gov.uk\)](https://www.hse.gov.uk/statistics/) Accessed December 2022

The Bill also puts a whole raft of EU-derived health and safety regulations at risk of sunset. The removal of these regulations would risk increasing accidents, work related injuries and ill health.

CIEH urges the UK Government to retain existing regulatory standards as ensured by retained EU law. Where this is not practicable, we urge the UK Government to ensure that any new UK legislation in areas of environmental health, such as food, environmental protection and health and safety, either maintains or enhances existing regulatory standards.

CIEH also wishes to caution the UK Government against significant regulatory divergence between the United Kingdom and the European Union. Owing to the Northern Ireland Protocol, Northern Ireland must adhere to European Union regulatory standards. Therefore, any significant divergence between the UK and the EU would serve to threaten the smooth movement of goods between Northern Ireland and Great Britain, increasing pressure on port authorities, inland environmental health professionals as well as increasing the risk of food crime.

Workforce

One of the major issues facing local authorities today is the issue of workforce capacity and resources. In 2021, CIEH carried out a Workforce Survey of local authorities in England which produced the following findings:

- The vast majority - 4 out of 5 local authorities - reported that they use agency staff to deliver environmental health services.

- 9 out of 10 (87%) local authorities told us that agency staff were used because of shortages in resources or delays in recruitment. By contrast, only 30% used agency staff because of an unprecedented demand for services and 23% due to specialist knowledge not being available in-house.
- 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 environmental health professionals who are fully qualified and experienced.

The UK Government should provide funding for local authorities to support regulatory and public health work, including a ring-fenced fund for environmental health apprentices. The Government must also deliver the recommendations of the Cross-Government working groups in full. Finally, we are asking the UK Government to 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, which will seek to prevent future pandemics.

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 Head of Policy and Campaigns, Ross Matthewman: r.matthewman@cieh.org

CIEH
Chadwick Court, 15 Hatfields,
London SE1 8DJ

+44 (0)20 7827 5800
info@cieh.org



[cieh.org](https://www.cieh.org)