

Manifesto for environmental health 2023



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 and wellbeing, 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. Building on our rich heritage, CIEH campaigns to ensure that government policy addresses the needs of communities and businesses in achieving and maintaining improvements to our environment and our health.

This manifesto for environmental health brings together essential policy initiatives covering housing, food safety, environmental protection, health and safety at work and public health. We want to see political parties and candidates commit to supporting environmental health and the crucial work of environmental health professionals.

Retained EU Law (Revocation and Reform) Bill

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 time-frame for sunseting retained EU law included within the Bill. The Bill promises to review, repeal, or replace the over 4,000 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 UK Government's plans to sunset over 600 items of retained EU law by 31st December 2023, including the National Emissions Ceiling Directive.

The Bill also puts a whole raft of EU-derived health and safety regulations at risk of sunseting. 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.

In evidence given to the Public Bills Committee, CIEH urged caution with regards to the UK Government's approach, warning this could result in significant regulatory divergence between the United Kingdom and

the European Union¹. Owing to the Northern Ireland Protocol, and now the Windsor Framework, 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.

Smarter Regulation reforms

In May 2023, the UK Government published its 'Smarter Regulation to Grow the Economy' policy paper².

The Government claim that their new approach to regulation will 'deliver rules that are proportionate to the outcomes they are trying to achieve' claiming that some of the 'current regulatory standards inherited from the EU are based on an overly restrictive and often disproportionate interpretation of the precautionary principle'. The reforms will 'end the default expectation of government departments that regulation is a first choice', tasking government departments to come up with non-regulatory policy solutions before regulation is even considered. In the event regulation is considered, it must 'align with UK interests' and will be subject to assessments as to its impact on business, trade, competition, and innovation.

In other words, the Government aims to significantly reduce regulatory burden on business by weighing regulation against economic factors in a form of cost-benefit analysis.

Furthermore, government departments will be subject to additional scrutiny in that they will be tasked with providing clear justification as to why regulatory options are being pursued as well as sharing early-stage criteria for monitoring and evaluating how successful regulation has been in practice.

¹ [Retained EU Law \(Revocation and Reform\) Bill: CIEH Response to Public Bills Committee \(cieh.org\)](#)

² [Smarter Regulation to Grow the Economy \(publishing.service.gov.uk\)](#)

CIEH are concerned about the consequences of these proposals fearing that the outcome will result in a reduction of vital standards protecting public health, whether that be in food safety and hygiene, environmental protection or occupational health and safety. CIEH are also concerned that government departments may divest their regulatory responsibilities to local authorities, many of whom are already under resourced. While the Government has stated that it will not reduce or eliminate regulations that are essential to protect public health, it is not clear how the government will define "essential". It is possible that some regulations that are currently considered essential could be reduced or eliminated in the future.

CIEH urgently seek clarification from the government as to what impact assessments have been conducted on the possible consequences of the 'Smarter Regulation' on vital regulatory standards protecting public health, particularly in food safety, environmental protection and occupational health and safety.

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 emissions³. There were 30,000 excess winter deaths in 2019/20 in England and Wales excluding COVID-19⁴. 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.⁵ In Wales, 155,000 households are living in fuel poverty⁶ while Northern Ireland has the highest level of fuel poverty in the UK.⁷ The period 2017/18 saw the highest recorded number

³ Final UK greenhouse gas emissions national statistics: 1990 to 2019 - GOV.UK (www.gov.uk)

⁴ Excess winter mortality in England and Wales - Office for National Statistics (ons.gov.uk)

⁵ Annual Fuel Poverty Statistics LILEE Report 2022 (2020 data) (publishing.service.gov.uk)

⁶ Fuel poverty estimates for Wales: 2018 | GOV.WALES

⁷ NEA EAS Fuel Poverty Report (fuelpoverty.org)

of excess winter deaths in Northern Ireland since data began in 1974/75.⁸ 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 introduce 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.

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 to be lauded, these are temporary fixes which do not support households reduce their energy usage in the first place. A joint research paper conducted by Friends of the Earth and New Economics Foundation found that by 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.⁹ We believe that 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 the improvement of energy efficiency a priority across all the UK

⁸ Age Sector Platform Data (published 2019)

⁹ Why the energy crisis demands street-by-street energy saving measures | Policy and insight (friendsoftheearth.uk)

¹⁰ Housing supply: net additional dwellings, England: 2021 to 2022 - GOV.UK (www.gov.uk)

nations and provide adequate funding to speed up progress, both in the immediate and long-term. The Government must bring forward their ambition of phasing in 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.

Future of housing

If current averages are maintained, there will be 750,000 new homes built by 2025.¹⁰ 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 time-frame needs to be accelerated.

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 the 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 to implement.

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 tenures¹¹ – 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 the CIEH responded to.¹² 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.

Using selective licensing schemes to improve housing conditions

CIEH has written to Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities, urging the UK Government to make it easier for councils in England to use selective licensing schemes to improve housing conditions. The letter reflects recommendations in the report ‘A licence to rent’ that was produced by the Chartered Institute of Housing and CIEH¹³. We have drawn attention, in particular, to the need to ensure that local authorities operating such schemes can improve housing conditions through licence conditions. We have also emphasised the role that national landlord registration could play in supporting selective licensing and suggested that the Government should make it easier to set up selective licensing schemes.

The UK Government must make it easier for councils to use selective licensing schemes to improve

¹¹ [English Housing Survey: headline report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

¹² [Reforming the Private Rented Sector CIEH submission to the Department for Levelling Up, Housing and Communities Committee \(cieh.org\)](https://www.cieh.org)

¹³ [A licence to rent \(cieh.org\)](https://www.cieh.org)

housing conditions and, in particular, must ensure councils can improve housing conditions through licence conditions.

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.¹⁴

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.¹⁵ 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 Strategy¹⁶, released in June by the Department for the Environment, Food and Rural Affairs, should fully embrace the recommendations of The Food Strategy Independent Review led by Henry Dimbleby.¹⁷ In which 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.¹⁸ Food is wasted at all stages of the food chain, creating missed opportunities for the economy and food security. The Department'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.

¹⁴ Feeding Britain: Food Security after Brexit - Food Research Collaboration

¹⁵ 2020 UK final greenhouse gas emissions statistics: one page summary (publishing.service.gov.uk)

¹⁶ Government food strategy - GOV.UK (www.gov.uk)

¹⁷ The National Food Strategy - The Plan

¹⁸ Food surplus and waste in the UK: Key Facts (wrap.org.uk)

Enhancing food safety and standards

2.4 million people suffer from food-borne illnesses across the UK every year,¹⁹ with an approximate annual cost to the UK economy of £9bn.²⁰ 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.²¹ 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.

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

Embedding high standards of environmental protection

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.

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.

¹⁹ Foodborne Disease Estimates for the United Kingdom in 2018

²⁰ The Burden of Foodborne Disease in the UK 2018 (nationalarchives.gov.uk)

²¹ LAEMS Annual report 2019-2020 (food.gov.uk)

According to UK government analysis, the amount of raw sewage being discharged into our rivers is increasing.²² This is due to a variety of reasons, from misconnected plumbing systems,²³ to ageing sewage infrastructure which has not seen adequate investment.²⁴

With outbreaks of polio being detected in the UK,²⁵ 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.²⁶ 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. A recent consultation outlined 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.²⁷

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.

According to UK government evidence, domestic wood burners and open fires are the second biggest source of small particle air pollution in the UK.²⁸ Despite improvements in their design, academic research has found that even homes with "eco" wood burners are three times more polluted than those without.²⁹ In fact, wood burners and open fires produce more harmful PM_{2.5} than road transport in the UK. The Government's own data has suggested that emissions of PM_{2.5} from domestic heating has increased by 125% in 10-years, implying a significant increase in the use of domestic wood burners.³⁰

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

²² Water and sewerage companies in England: environmental performance report 2021 - GOV.UK (www.gov.uk)

²³ Drain misconnections: How they affect our environment - CIWEM

²⁴ England's water groups slashed investment in sewage network in recent decades | Financial Times (ft.com)

²⁵ Polio outbreak warning as experts raise alarm over return of disease | Science | News | Express.co.uk

²⁶ Unicef UK Research Briefing - The toxic school run - September 2018.docx (unicef.org.uk)

²⁷ WHO global air quality guidelines - September 2021

²⁸ Emissions of air pollutants in the UK - Summary - GOV.UK (www.gov.uk)

²⁹ Atmosphere | Free Full-Text | Indoor Air Pollution from Residential Stoves: Examining the Flooding of Particulate Matter into Homes during Real-World Use (mdpi.com)

³⁰ Emissions of air pollutants in the UK - Summary - GOV.UK (www.gov.uk)

Air quality guidelines is 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 line with the World Health Organisation’s Air Quality Guidelines, in order to protect public health.

Bringing in UK-wide measures to reduce 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. Air quality is a devolved matter, and it is welcome that the Welsh Government has recently tabled the Environment (Air Quality and Soundscapes) (Wales) Bill, provides a framework for setting national air quality targets as well as amending existing legislation to better enable Welsh Ministers to implement CAZs or LEZs. Where they are needed. It remains disappointing that the Northern Ireland has yet to introduce its own Clean Air Bill.

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 closely in supporting the Welsh Government with the implementation of the Environment (Air Quality and Soundscapes) (Wales) Bill. Furthermore, owing to the urgency of the situation, the UK Government should legislate for a Clean Air Bill for Northern Ireland should the Northern Ireland Assembly remain dissolved.

While priority is often afforded to more widely understood forms of air pollution, such as from transport and domestic heating, reducing nitrogen pollution, such as ammonia and nitrous oxide, will play a big part in improving air quality and public health.

According to data from the government, emissions from agriculture accounted for 87% of total ammonia emissions in 2021 and this was the main contributor to the increase in emissions between 2013 and 2017. Furthermore, it found that the spreading of organic and inorganic fertilisers is a significant source of ammonia emissions from agriculture and is showing an upward trend (emissions from this source increased from 109 thousand tonnes in 2011 to 117 thousand tonnes in 2021).³¹

Nitrogen pollution is not only damaging to biodiversity, but also to public health. Agricultural ammonia has the potential to mix with industrial and transport emissions, which further increases the levels of PM_{2.5} in the air.³²

Following legally mandated emission reporting owing to the National Emissions Ceilings Regulations, the UK is projected to miss its 2030 emission reduction commitments for Nitrous Oxide in 2030 and for ammonia in 2030 and 2040 without further action.³³

The UK Government must urgently introduce a Nitrogen Reduction Strategy for England. Furthermore, the UK Government must work with the devolved administrations in an integrated manner to ensure levels of nitrogen pollution are significantly reduced.

³¹ Emissions of air pollutants in the UK - Summary - GOV.UK (www.gov.uk)

³² Nitrogen pollution (soilassociation.org)

³³ UK IIR 2023 Submission (defra.gov.uk)

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 2050³⁴. 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.

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.

³⁴ UK IIR 2023 Submission (defra.gov.uk)

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 2021/22.³⁵

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.

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

³⁵ [Health and safety statistics \(hse.gov.uk\)](https://www.hse.gov.uk/statistics/)

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 to pay for the salaries of 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 Senior Policy and Public Affairs Executive, Ciaran Donaghy: c.donaghy@cieh.org