

1. About the RCPCH

The Royal College of Paediatrics and Child Health (RCPCH) is responsible for training and examining paediatricians. The College has over 20,000 members in the UK and internationally and sets standards for professional and postgraduate education. We work to transform child health through knowledge, research and expertise, to improve the health and wellbeing of infants, children and young people across the world.

The voices of children and young people are at the heart of everything we do. Guided by the UNCRC, the RCPCH &Us Network facilitates children and young people to have their voices heard in decisions that affect them (Article 12) and work with them to help shape services so they have the best healthcare possible (Article 24).

2. Introduction

The World Health Organization has described climate change as “the defining health challenge of our time” and the RCPCH recognise the importance of using our collective voice as a Royal Medical College to support Government to take action.¹ The RCPCH are focusing our efforts on placing the impact on child health at the heart of climate change activity. The RCPCH are members of the UK Health Alliance for Climate Change (UKHACC) which brings together doctors, nurses and other health professionals from several organisations to advocate for responses to climate change that protect and promote public health.² We have also recruited a group of RCPCH members to support the delivery of the College’s climate change strategy which includes, among other things, advocacy and policy work, research, work with stakeholders, our curriculum and education and a child and young people led youth action project.³

The RCPCH strongly support national policies, practices and legislation that aim to improve outdoor air quality⁴ because, collectively we have a responsibility to act for the health and wellbeing of future generations.⁵ The RCPCH therefore welcome the opportunity to respond to the Committee for Agriculture, Environment and Rural Affairs Call for evidence and views on the Climate Change Bill and agree with the four stated policy objectives: enable the mitigation of the impact of climate change in Northern Ireland; establish a legally binding net-zero carbon target for Northern Ireland; provide for the establishment and powers of a Northern Ireland Climate Commissioner and Northern Ireland Climate Office and; guarantee existing environmental and climate protections.

3. Declaration of climate emergency

The RCPCH fully welcome that Section 1(1) of the Bill⁶ will subsequently legally declare a Climate Emergency in Northern Ireland. In October 2020 the RCPCH joined many other organisations in declaring a climate emergency.⁷ The RCPCH asserts that the crisis poses an existential threat to population health in the UK and across the world, and its effects are especially harmful to the health and wellbeing of children and young people.⁸

¹ RCPCH, ‘Tackling Climate Change’ available at: <https://www.rcpch.ac.uk/resources/tackling-climate-change>

² UK Health Alliance on Climate Change available at: <http://www.ukhealthalliance.org/about/>

³ RCPCH (2020) ‘Introducing the RCPCH Climate Change Working Group’, available at: <https://www.rcpch.ac.uk/key-topics/climate-change/working-group>

⁴ RCPCH (2020) ‘Outdoor air quality in the UK - position statement’, available at: <https://www.rcpch.ac.uk/resources/outdoor-air-quality-uk-position-statement>

⁵ Academy of Medical Royal Colleges (2020) ‘Climate Change Statement’, available at: https://www.aomrc.org.uk/wp-content/uploads/2020/07/200707_climate_change_statement.pdf

⁶ NI Assembly (2021) Climate Change Bill available at: https://consultations.nidirect.gov.uk/northern-ireland-assembly/climate-change-bill/user_uploads/climate-change---as-introduced.pdf

⁷ RCPCH, ‘Tackling Climate Change’ available at: <https://www.rcpch.ac.uk/resources/tackling-climate-change>

⁸ RCPCH Insight (26 June 2020) *How does air pollution affect children and young people?* available at: <https://medium.com/rcpch-insight/how-does-air-pollution-affect-children-and-young-people-f2a7d1e01b3>

Air pollution is the single greatest environmental threat to public health and many of the causes of air pollution are major contributors to climate change.⁹ However, by acting now and transforming as quickly as possible to a net zero economy, we can help in the global effort to limit climate change and bring immediate co-benefits such as reduced air pollution. Adaptation will also have a central role in reducing climate impacts and hence health effects.¹⁰

Children and young people are disproportionately affected by air pollution because their bodies are still developing. Impacts such as stunted lung growth and function include irreversible damage that can lead to problems later in life. Younger people also spend more time outdoors and, due to their shorter height, they are more likely to be in closer proximity to sources of pollution such as vehicle exhaust systems. With 93% of children breathing polluted air every day, the issue of clean air is a major public health challenge.¹¹ It follows that every effort must be made by the NI Executive to ensure children, young people and future generations are protected from the negative health impacts of climate change.

“Although using cars on our trips to work and school every day seem like the convenient option, it is slowly killing our earth in the long run. Air has never been this polluted and climate change is going negatively impact the future generations massively, increasing incidents of asthma, lung disease and heart disease”

“It is estimated that 1/4 of climate change is caused by transport. Just think of how much suffering and difficulty you would prevent the future generations from facing just from using your car less often”

(RCPCH &Us (2021 Voice Bank)

The link between the negative impacts of climate change and health inequality should also be noted. Environmental inequality implies disadvantages in subpopulations and certain communities because increased levels of both pollution exposure and socioeconomic deprivation may lead to impaired health. Social gradients in health are well established, and it has been estimated that between 1.3 and 2.5 million years of life are lost because of health inequalities.¹²

4. Net zero target

The RCPCH welcome the overriding climate objective of the Bill at Section 2(2) viz. ‘the establishment in Northern Ireland of a net-zero carbon, climate resilient and environmentally sustainable economy by the year 2045’. However, the UKHACC has called for all countries to achieve net zero emissions by 2040 with countries with high emissions of carbon making much bigger cuts than those with low emissions. In the same vein, the UKHACC assert that all health services should become net zero as soon as possible and before 2040.¹³ The Northern Ireland population density and sizable rural economy has the potential means to reach net zero sooner than other parts of the world. We therefore consider that Northern Ireland could be more ambitious in setting an earlier net zero target.

Young people told us:

⁹ RCPCH (2020) ‘Outdoor air quality in the UK - position statement’, available at:

<https://www.rcpch.ac.uk/resources/outdoor-air-quality-uk-position-statement#key-facts>

¹⁰ The Climate Coalition (2021) *The impacts of climate change on public health*, available at:

<http://www.ukhealthalliance.org/wp-content/uploads/2021/02/This-report-comes-with-a-health-warning-the-impacts-of-climate-change-on-public-health-compressed.pdf>

¹¹ RCPCH Insight (26 June 2020) *How does air pollution affect children and young people?* available at:

<https://medium.com/rcpch-insight/how-does-air-pollution-affect-children-and-young-people-f2a7d1e01b3>

¹² NHS National Institute for Health Research (2018) *Public health air pollution impacts of pathway options to meet the 2050 UK Climate Change Act target: a modelling study*, available at: <https://www.ncbi.nlm.nih.gov/books/NBK507623/>

¹³ UKHACC (2020) ‘Health professionals call for action to avert a climate catastrophe’ available at:

<http://www.ukhealthalliance.org/wp-content/uploads/2021/02/UKHACC-COP26-Calls-for-Action.pdf>

“Having clean air is essential in helping to reduce asthma attacks when playing all outdoor sports children love to do”

(RCPCH &Us (2021 Voice Bank))

5. Climate action plans; targets and measures

The RCPCH signed up to a Medact letter¹⁴ welcoming Prime Minister Johnson’s statement of intent to urge world leaders to commit to ‘transformational targets’ ahead of the announcement of enhanced Nationally Determined Contributions (NDCs) to emission reductions. However, the letter dictates that the UK Government needs to do much more to secure its own path to zero-carbon and take responsibility for historical emissions and urges the UK to decarbonise in a rapid and just way, in line with an equality-based attribution approach to emission reductions.

The RCPCH *State of Child Health 2020 reports’* adolescent mortality and road safety indicators made recommendations that there should be adequate monitoring and measurement of the population’s exposure to air pollution, particularly in urban areas and near schools.¹⁵

The UKHACC recently urged the UK Government to introduce new legally binding air quality targets without delay stating that the current Government plans are insufficient to protect the public from immediate harm.¹⁶ This was prompted by the Government response to the coroner’s report produced to prevent future deaths from air pollution after it was recorded as a cause of the death nine-year-old Ella Kissi-Debrah. The response failed to heed the Assistant Coroner’s primary recommendation, and in line with the guidance of the World Health Organization, the standard that fine particulate (PM 2.5) pollution should not exceed 10 µg/m should be seen as a “minimum requirement”.¹⁷ The NI Executive should pay cognisance to the utility of air quality targets and transformational targets as linked to NDCs and Northern Ireland’s role in supporting the delivery of such targets.

Young people told us:

“Children who are exposed to high levels of unclean and polluted air are more likely to develop respiratory diseases later on in life, so keeping myself and others safe is very important to me”

(RCPCH &Us (2021) Voice Bank)

5. Office of a Climate Commissioner

The RCPCH notes the proposed establishment of an Office of an independent Climate Commissioner at Sections 9 and 10 of the Bill. We particularly welcome the proposal that the Climate Commissioner will be responsible for annual reports which must contain the views of the Commissioner on the adequacy and effectiveness of the subsequent Climate Change Act and may contain such recommendations considered necessary and desirable in order to achieve the overriding climate objective of the establishment of a net-zero carbon, climate resilient and environmentally sustainable economy. We also welcome that the Bill mandates that the Executive Office must produce a response to Commissioner reports and lay before the Assembly.

¹⁴ Medact (2020) Letter to UK Government and COP26 Leadership, available at: https://www.medact.org/2020/actions/sign-ons/health-justice-means-climate-justice-at-cop26-%E2%94%80-letter-to-the-uk-government-cop26-leadership/?utm_medium=email&utm_source=CiviMail&utm_campaign=Climate_Health&utm_content=Has%20your%20Royal%20College%20spoken%20out%20about%20COP26%20yet

¹⁵ RCPCH (2020) *State of Child Health; Northern Ireland*, available at: <https://stateofchildhealth.rcpch.ac.uk/evidence/nations/northern-ireland/>

¹⁶ UKHACC (2021) ‘UK health leaders say government air pollution plans are insufficient to protect the public’, available at: <http://www.ukhealthalliance.org/environment-bill-letter/>

¹⁷ Ibid

The RCPCH notes the merit in having independent oversight for climate change targets. Many of the benefits are set out in; *The role of independent bodies in climate governance: the UK's Committee on Climate Change*, for example; an independent expert body can strengthen climate governance by introducing a long-term perspective, enhancing the credibility of climate targets and ensuring more evidence-based policymaking.¹⁸ The Centre for Climate Change Economics and Policy also states that to be effective, independent advisory bodies must have an appropriate status i.e. a clear statutory mandate and sufficient powers to hold Government to account,¹⁹ provisions which are proposed at Section 10 of the Bill. It is important that detail within the statutory mandate is maintained during any legislative process.

6. Sectoral plans

The RCPCH notes the prioritisation of sectoral plans, policies and proposals to ensure that the overriding climate objective is achieved in the range of sectors detailed at Section 3(7) of the Bill including; energy production and supply, infrastructure, transport, business processes and waste management.

The RCPCH also welcome the proposals at Section 3(8) that without limiting the generality of the overriding climate objective, sectoral plans should also: support jobs and growth of jobs that are climate resilient and environmentally and socially sustainable; support net-zero carbon investment and infrastructure; create work which is high-value, fair and sustainable; reduce inequality as far as possible and; reduce, with a view to eliminating, poverty and social deprivation. These additional benefits of the proposed sectoral plans are congruent with observations in; the Medact letter issued to the UK Government and COP26 Leadership,²⁰ the UKHACC *Principles for a healthy and green recovery*²¹ and the Climate Coalition report *the Impact of climate change on public health*.²²

Furthermore, the NI Executive and Assembly should note the *Delivering a 'Net Zero' National Health Service* which sets out how sustainable models of care, medicines and supply chains and hospital infrastructure should be configured to support both practical action and deepening ambition in tackling climate change.²³ Moreover, the UKHACC stated that because the health sector is responsible for 5% of all greenhouse gas emissions in the UK it should play a leading role in decarbonisation. The UKHACC are playing a part in NHS England's Greener NHS programme, which is hoped will be a lever and leader in ensuring that other sectors responsible for significant emissions publish their own plans for rapid decarbonisation before the current legislative mandated date.²⁴ As previously stated, the UKHACC have stated that all health services should become net zero as soon as possible and before 2040.²⁵

7. The voice of children and young people

¹⁸ The Centre for Climate Change Economics and Policy (2018) *The role of independent bodies in climate governance: the UK's Committee on Climate Change*, available at: <https://www.lse.ac.uk/granthaminstitute/publication/role-independent-bodies-in-climate-governance-uk-committee-on-climate-change/>

¹⁹ Ibid

²⁰ Medact (2020) Letter issued to the UK Government and COP26 Leadership, available at: [https://www.medact.org/2020/actions/sign-ons/health-justice-means-climate-justice-at-cop26-%E2%94%80-letter-to-the-uk-government-cop26-leadership/?utm_medium=email&utm_source=CiviMail&utm_campaign=Climate Health&utm_content=Has%20your%20Royal%20College%20spoken%20out%20about%20COP26%20yet](https://www.medact.org/2020/actions/sign-ons/health-justice-means-climate-justice-at-cop26-%E2%94%80-letter-to-the-uk-government-cop26-leadership/?utm_medium=email&utm_source=CiviMail&utm_campaign=Climate%20Health&utm_content=Has%20your%20Royal%20College%20spoken%20out%20about%20COP26%20yet)

²¹ 2020) 'Principles for a healthy and green recovery', available at: <http://www.ukhealthalliance.org/wp-content/uploads/2020/06/UKHACC-Principles-Priorities-for-a-HealthyRecovery.pdf>

²² The Climate Coalition (2021) *The impacts of climate change on public health*, available at: <http://www.ukhealthalliance.org/wp-content/uploads/2021/02/This-report-comes-with-a-health-warning-the-impacts-of-climate-change-on-public-health-compressed.pdf>

²³ NHS England (2020) *Delivering a 'Net Zero' National Health Service*, available at: <https://www.england.nhs.uk/greenernhs/wp-content/uploads/sites/51/2020/10/delivering-a-net-zero-national-health-service.pdf>

²⁴ UKHACC (2020) 'Principles for a healthy and green recovery', available at: <http://www.ukhealthalliance.org/wp-content/uploads/2020/06/UKHACC-Principles-Priorities-for-a-HealthyRecovery.pdf>

²⁵ UKHACC (2020) 'Health professionals call for action to avert a climate catastrophe', available at: <http://www.ukhealthalliance.org/wp-content/uploads/2021/02/UKHACC-COP26-Calls-for-Action.pdf>

In taking forward new policy on tackling climate change the NI Executive and Assembly must meaningfully engage with children and young people in line with the UNCRC. As inheritors of the planet, children and young people are key stakeholders and should be acknowledged as such.

RCPCH keeps children and young people at the centre by having a rights based approach, where we take seriously our role in supporting children and young people’s dignity, participation, development, non-discrimination and best interests within engagement in health and paediatric service design, their right to interdependence and indivisibility and our role in being transparent and accountable across their engagement. Engagement refers to the process of participation and involvement, where children and young people are given the chance to be educated about their rights and opportunities to engage, collaborate with others to share their views, become engaged in shaping policy, practice and identifying / leading solutions and create change through their voices, wishes and needs and those of other children and young people. Strategic voice relates to children and young people’s involvement in informing and influencing our work.

Young people told us:

“that in the future they want the chance to share their opinions and to make sure everyone has the same sense of power”

(RCPCH Northern Ireland Paediatrics 2040 Voice Bank 2020)

“Give us a chance to have an impact on climate change”

(RCPCH &Us Voice Bank 2019)

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