



## **Submission on the 3DHB Sustainability Strategy**

**16 August 2021**

### **About the PSA Eco Network**

The Eco Network is a voluntary network of 1,992 members of the Public Service Association Te Pūkenga Here Tikanga Mahi who aim to, “Build union organisation able to improve workplace sustainability and contribute to local, national and global campaigns for environmental justice and action on climate change.”

The Eco Network is led by a team of elected convenors – two National Co-convenors and Regional Convenors across the country, with support from the Eco Network Organiser. We also have a team of Eco Reps who are interested in leading activities in their workplaces. The Eco Reps within the 3DHB organisations have been consulted in the preparation of this submission.

### **Summary**

The PSA Eco Network strongly supports the 3DHB Sustainability Strategy. In our view, it represents a natural evolution from earlier positions taken within the sub-region – by CCDHB in particular – under the previous regulatory regime for Crown entities based around voluntary commitments<sup>1</sup>. The Strategy cements the 3DHB as a national leader in the DHB Sector, during its transition to a single national health service. And it positions the three organisations to thrive in the new legislative and regulatory environment supporting a sustainable Public Sector.

We recommend the following additions to strengthen the 3DHB Sustainability Strategy:

1. A specific acknowledgement (in italics) of the “social inequities that are regarded as precursors to poverty and poor health outcomes, *including for Māori and Pasefika communities.*”
2. An explicit assurance of mandated representation of Māori and Pasefika communities on the 3DHB Sustainability Governance Group.

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<sup>1</sup> See, eg. 'Moves to reduce shrinking carbon footprint even further', <https://www.ccdhb.org.nz/news-publications/news-and-media-releases/2019-07-04-moves-to-reduce-shrinking-carbon-footprint-even-further/>

3. An EOI process should be undertaken to select one suitably qualified staff member from each DHB to join the 3DHB Sustainability Governance Group.
4. Further clarification of Sustainability Principle of “Staff promotion/ involvement/ education”, through the addition of the following italicised wording: “DHBs should resource sustainability functions to produce and maintain these resources as well as provide support to staff champions as appropriate, *including through paid release time to undertake their roles.*”
5. A commitment to decommission the CCDHB Total Energy Centre and replace it with renewable energy alternatives.
6. An explicit requirement that new builds should be designed to achieve a 5-star rating (or higher) through the New Zealand Green Building Council's certification programme.
7. A commitment to more comprehensive accounting for carbon emissions in Scope 2 and Scope 3 of the GHG Protocol Corporate Standard.
8. The addition of the following italicised wording: “procurement activities will take into account the need to ensure that goods and services purchased are manufactured, delivered, used and disposed of in an environmentally and socially responsible manner, *using approaches such as Life Cycle Analysis.*”

## Discussion

We wish to begin by highlighting key components of the Strategy which, in our view, must be retained and approved by the 2DHB and WrDHB Boards without amendment.

Guided by organisational values, as outlined in the document, the Strategy focuses on the intersections between “reducing carbon emissions and social inequities that are regarded as precursors to poverty and poor health outcomes.”

This focus is woven through the Strategy. It is seen, for example, in the statement that, “Sustainability evolves from minimising negative impact to maximizing positive outcomes across all environments (natural, social, cultural and economic).” It is reflected in the linkage to other actions already being taken by 3DHB which are “contributing to the UN agenda, for example, gender equality, equity of access.” And it underpins the procurement objective of, “Promoting fair working conditions through ethical procurement practices.”

This focus is consistent with the Climate Change Commission's advice to Government, that the transition to net zero carbon emissions must also involve a fair, equitable transition for people.

We feel it is imperative that this focus is retained at the forefront of the Strategy, to guide its implementation, and strengthened through the addition of a **specific acknowledgement (in italics) of the “social inequities that are regarded as precursors to poverty and poor health outcomes, *including for Māori and Pasefika communities.*”**

In order to drive implementation of the Strategy, it is proposed to create Staff Sustainability Groups at each DHB, overseen by a unitary 3DHB Sustainability

Governance Group. The role of the Staff Sustainability Groups is to provide advice and feedback on the sustainability work programme with a focus on implementation, while the Governance Group ensures that the work programmes are aligned with the stated objectives, and the broader legislative, regulatory and international context. This structure is appropriate for the delivery of the Strategy's Sustainability Objectives, although there should be **an explicit assurance of mandated representation of Māori and Pasefika communities on the 3DHB Sustainability Governance Group.**

The Strategy also acknowledges that, “Climate change mitigation is the responsibility of all staff and we strive to inspire and motivate others” and that the Governance Group should include representation from both clinical and non-clinical leaders. It therefore appears counter-intuitive to limit participation in the 3DHB Sustainability Governance Group to “senior representatives” only.

**We recommend that an EOI process should be undertaken to select one suitably qualified staff member from each DHB to join the 3DHB Sustainability Governance Group.**

The Strategy proposes a number of “Sustainability Principals” [sic.]. The first of these is around, “Staff promotion/ involvement/ education” There it states: “Staff should be supported to improve environmental outcomes through procurement/ purchasing decisions, clinical practice and broader behaviour change campaigns.”

We believe that slippage around this principle represents a significant risk to the implementation of the Strategy as a whole. We recommend further clarification of this Sustainability Principle, through the **addition of the following italicised wording: “DHBs should resource sustainability functions to produce and maintain these resources as well as provide support to staff champions as appropriate, including through paid release time to undertake their roles.”**

The second Sustainability Principle is around “Infrastructure Energy Efficiency and Decarbonisation.” There it states, “Fossil fuels should be phased out for primary use and low emissions alternatives, including self-generation of renewable energy.”

Entering operation in 1981, the Total Energy Centre on the Wellington Regional Hospital Campus provides back-up electricity generation capacity using fossil fuels (natural gas, supplemented with diesel fuel oil). According to reports, “The generators in this facility are now past the date of reliable operation.”<sup>2</sup> The increased investment in the State Sector Decarbonisation Fund in Budget 2021 appears to provide the ideal opportunity to prepare a business case to replace these generators. The project scale and lead-time for replacing this generation capacity is sufficiently large that it should be signaled in the Strategy document and not merely left to subsequent implementation plans. We recommend that the Strategy includes **a commitment to decommission the CCDHB Total Energy Centre and replace it with renewable energy alternatives.**

The Sustainability Principle of “Infrastructure Energy Efficiency and Decarbonisation” also addresses energy efficient buildings. “New builds should strive for industry best practice energy performance”, it states.

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<sup>2</sup> Hunt, T. 2019, Sept 03. 'Fixes keep Wellington Hospital back-up generators running but new ones needed'. <https://www.stuff.co.nz/dominion-post/news/115456451/fixes-keep-wellington-hospital-backup-generators-running-but-new-ones-needed>

The lack of a definition for the relatively vague term, “industry best practice”, has the potential to compromise a work programme around “Green and Healthy Hospital Design and Construction”. We recommend **an explicit requirement that new builds should be designed to achieve a 5-star rating (or higher) through the New Zealand Green Building Council's certification programme**. We note this is also recommended by the Ministry of Health<sup>3</sup>. Such a commitment could then support future stretch goals such as roof gardens, vertical farming and greatly expanded permaculture on DHB land.

The third Sustainability Principle addresses, “Travel Efficiency and Decarbonisation.” The concluding paragraph describing this principle refers to, “Air Travel for patients and staff entitled to continuing medical education.”

As noted in footnote 1 (above), CCDHB enrolled in the Certified Emissions Measurement and Reduction Scheme (CEMARS) programme in 2013. CCDHB opted for “Scope 1”, measuring and reporting only the direct emissions from sources that are owned or controlled by the DHB. Emissions from air travel lie outside of Scope 1. We recommend that the implicit scope creep in the Strategy should be made explicit, through **a commitment to more comprehensive accounting for carbon emissions in Scope 2 and Scope 3 of the GHG Protocol Corporate Standard**.

The fourth Sustainability Principle relates to “Water Management”. We applaud the visionary approach to the Three Waters in the Strategy, including a commitment that, “Storm water should also be used to supplement fresh water supplies for non-potable uses such as toilet cisterns.” Looking forward to implementation plans which will flow from this Strategy, we see great opportunities for reducing storm water flows through on-campus features such as swales and rain gardens.

The final Sustainability Principle is about “Sustainable Procurement”. The inclusion of this principle in the Strategy is again something that we strongly support – in particular due to the express reference to all three Environmental Social and Governance (ESG) considerations in the proposed sustainable procurement objectives. Our small suggestion to strengthen this principle is **the addition of the following italicised wording: “procurement activities will take into account the need to ensure that goods and services purchased are manufactured, delivered, used and disposed of in an environmentally and socially responsible manner, using approaches such as Life Cycle Analysis.”**

In conclusion, we greatly appreciate the opportunity to feed back on the 3DHB Sustainability Strategy. We find the consultation draft inspiring. We eagerly look forward to supporting its implementation.

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<sup>3</sup> Ministry of Health. 2019. *Sustainability and the Health Sector: A guide to getting started*. Wellington: Ministry of Health. [https://www.health.govt.nz/system/files/documents/publications/sustainability-and-the-health-sector-30jul2019\\_1.pdf](https://www.health.govt.nz/system/files/documents/publications/sustainability-and-the-health-sector-30jul2019_1.pdf)