



a healthier world through
sonographer expertise

Monday, 23 January 2023

Australian Commission on Safety and Quality in Health Care
Level 5, 255 Elizabeth Street
Sydney NSW 2000

Submitted via email NSQHSSStandards@safetyandquality.gov.au

Dear Sir/Madam,

Consultation on the Sustainable Healthcare Module

Thank you for the opportunity to provide feedback to the ACSQHC Sustainable Healthcare Module.

The Australasian Sonographers Association (ASA) is the professional organisation for Australasian sonographers, who are the experts in ultrasound. With over 7,000 members, and representing more than 70% of Australasia's sonographers, the ASA's purpose is to foster a sonography profession that delivers high quality ultrasound with a vision to create a healthier world through sonographer expertise.

Sonographers are highly skilled health professionals who are strategically involved at the initial diagnostic stages of patient care and perform the majority of comprehensive medical diagnostic ultrasound examinations, which is the most utilised diagnostic imaging modality in Australia.¹

The ASA also recognises climate change as a key public health issue and is committed to mitigation and adaptation strategies as an organisation as well as promoting and advocating for these among sonography practices and the community. The ASA, through its Sonographer Policy and Advisory Committee, has considered the Consultation, and has provided feedback and recommendations below.

Thank you for the opportunity to provide input into this Consultation. The ASA would be pleased to be involved in further discussions about this important work.

If you have any questions or require additional information, please contact Slade Carter, General Manager, Policy and Advocacy, at policy@sonographers.org or (03) 9552 0000.

Yours sincerely,

Jodie Long

Chief Executive Officer

Australasian Sonographers Association

¹ Australian Government: Services Australia, Medicare Group Reports, Diagnostic Imaging Services, for financial year to June 2022.

http://medicarestatistics.humanservices.gov.au/statistics/mbs_group.jsp (Accessed December 2022).

ACSQHC Sustainable Healthcare Module Consultation Australasian Sonographers Association: Feedback and recommendations

Background to the sonography profession in Australia

Sonographers are highly skilled health professionals who are strategically involved at the initial diagnostic stages of patient care and perform the majority of comprehensive medical diagnostic ultrasound examinations. Ultrasound as a specialty in qualified hands provides essential information to medical colleagues in a timely, cost effective, and safe way.

There are currently 7,408 medical sonographers and 1,366 student sonographers in Australia.² In the financial year 2021-2022, there were 11.67 million Medicare-funded diagnostic ultrasound examinations undertaken; most performed by sonographers.³

The environmental impacts of ultrasound are significantly less harmful to the environment than the MRI and CT imaging modalities. This is significantly less in terms of production and use phases of energy, emitting fewer CO₂ equivalents and pollutants.⁴

Like all forms of healthcare, there are still environmental impacts from ultrasound – for instance, through the use of energy and consumables, and through the use of sanitisation procedures. Nevertheless, its use has a better environmental impact than most other modalities. One article suggests using low-impact imaging, such as ultrasound and X-ray, where clinically appropriate. Secondly, whenever possible, scanners should be turned off to reduce emissions from standby power. Thirdly, ensuring high utilisation rates for scanners both reduces the time they spend in standby, and apportion the impacts of the reduced standby power of a greater number of scans. This therefore reduces the impact on any individual scan, maximising resource efficiency.⁵

General comments on the consultation

The ASA commends the worthy aims of the module to make healthcare more sustainable and reduce greenhouse gas emissions. The consultation notes that Australia's healthcare system contributes 7% of Australia's greenhouse gases, more than double that of England, at 3%. Indeed, as a result of its ambitious work, the National Health Service (NHS) in the UK had cut its carbon emissions by 62% in 2020, compared to 1990 levels.⁶

The success of the NHS is driven in part by targets that are placed on relevant planning, commissioning and delivery organisations. The NHS has a net zero target, which is underpinned by legislation, strategic direction and significant investment of £550 million in energy efficiency and renewable energy as part of the UK Government's Public Sector Decarbonisation Scheme.⁷

² Australian Sonographer Accreditation Registry Quarterly Report provided to the ASA. Period covers quarter 4, 2022 (to 31 December 2022)

³ Medicare Statistics: http://medicarestatistics.humanservices.gov.au/statistics/mbs_group.jsp (Accessed December 2022).

⁴ Martin, M. et al. (2018) Environmental Impacts of Abdominal Imaging: A Pilot Investigation. J Am Coll Radiol. 2018 Oct;15(10):1385-1393. <https://pubmed.ncbi.nlm.nih.gov/30158086/>

⁵ McAlister, S. et al. (2022) The carbon footprint of hospital diagnostic imaging in Australia. The Lancet Regional Health - Western Pacific 2022; 24: 100459. Published online 3 May 2022 <https://doi.org/10.1016/j.lanwpc.2022.100459>

⁶ NHS England and NHS Improvement (2022) Delivering a net zero National Health Service (July 2022). Available at: <https://www.england.nhs.uk/greenemhs/publication/delivering-a-net-zero-national-health-service/> Accessed January 2023.

⁷ Ibid.

Without specific legislative tools, without targets, without directives, it is very difficult to envisage significant impact from a voluntary module.

The ASA recommends

- That the ACSQHC use this module as springboard to encourage the Government to introduce measures that direct the health service to reduce carbon emissions and operate more sustainably.
- For instance, organisations receiving funding and incentives from Commonwealth or State and Territory Governments, could be required to adopt measures set out in the module to improve sustainability, with progress measured accordingly.

Responses to specific consultation questions

Is there a need for the Module as it applies to health service organisations?

o If yes, is the Module an effective mechanism to address this issue?

o If no, what alternative strategy, if any, should be considered by the Commission?

The module provides a useful administrative framework to approach more sustainable healthcare. However, it may not be an effective mechanism in isolation for the following reasons:

- The module is voluntary
- The module is not part of a broader Government strategy
- There are no incentives/disincentives for participating
- There is little detail in the module. Greater detail would help guide different sectors of the healthcare industry to tackle sustainability using more specific measures.

Recommendation

An alternative strategy is for the Commission and other stakeholders to work with Government, the public and private healthcare sectors, to develop a compulsory module that tackles sustainability more meaningfully, with consideration for targets linked to incentivisation.

Do the actions in the Module address the key sustainability and climate-resilience concerns?

o If no, what additional areas should be covered?

The module features the main measures to address sustainability and climate-resilience concerns. However, it is not particularly ambitious or innovative.

For instance, the only mention of consumables is “Select consumables that are ecologically friendly for use in clinical care.” This measure could include more detailed suggestions such as consider whether consumables are always necessary, consider more sustainable alternative consumables, consider whether consumables are energy dependant (and if so, whether that energy source is renewable), consider whether consumables have been imported and what their carbon importation footprint is.

There is no mention of energy use, which can play a significant part in Co2 emissions and pollutants. Nor is there any mention of renewable energy, and the opportunities providers might have for its use.

Waste is mentioned in the introduction, but not in the module itself.



The Module mentions partnerships as follows: “Ensures partnerships with consumers and other key stakeholders to inform, develop, implement, monitor and evaluate the organisation’s sustainability performance.” The ASA suggests a fuller description of opportunities for working in partnership to improve sustainability. Suggestions include supply chain partners, partnering and learning from best practice sites, and working across multiple sites.

Should the Module be assessed by independent external accrediting agencies? • Please provide any further comments in relation to the Module.

The ASA believes that an independent assessment by external accrediting agencies would be helpful. This would help to legitimise the Module’s strategies designed to have a positive impact on long-term sustainability.