



National Public Health Institute of South Africa Bill (As amended by the Portfolio Committee on Health (National Assembly)) B 16B-2017 – groundWork Comment and further questions

Date: 15th November 2018

For Attention: Ms Marcelle Williams

Select Committee on Social Services,

Parliament of Republic of South Africa

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The Select Committee on Social Services has invited interested people and stakeholders to submit written comments on the National Public Health Institute of South Africa Bill.

General comments:

1. We address you as, groundWork, Friends if the Earth South Africa. groundWork is a non-profit environmental justice service and developmental organization working primarily in Southern Africa in the areas of Climate & Energy Justice, Coal, Environmental Health, Global Green and Healthy Hospitals, and Waste. groundWork is the South African member of Health Care Without Harm and Friends of the Earth International¹.
2. We welcome the Amendment Bill to provide for the establishment of the National Public Health Institute of South Africa in order to coordinate, and where appropriate to conduct, disease and injury surveillance; to provide for specialised public health services, public

¹ <http://www.groundwork.org.za/>

health interventions, training and research directed towards the major health challenges affecting the population of the Republic; and to provide for matters connected therewith and we ask that it does so with both prudence and urgency.

3. We submit that this process must be based on clear policies and plans in accordance with the Constitution, transparency and meaningful consultation, and administered through democratic governance.

Functions of NAPHISA (general comments):

4. We submit that one of the key functions of the NAPHISA must be to identify existing and emerging public health issues of national concern that public health authorities are not acting on and also detrimental to the sustainable development of South Africans, and in particular aligned to the attainment of the SDG' adopted by the South African government. One such example of an issue that is of national and international concern but not adequately acted on by public health authorities within the various spheres of government includes ambient and household air pollution.
5. For this reason we submit that the NAPHISA coordinate a multi-stakeholder key informants forum to identify and surface these emerging public health issues of national concern that public health authorities are not acting on and also detrimental to the sustainable development of South Africans.

Functions of NAPHISA (specific comments):

6. Section 3.1(f) provide leadership [suggest insert] *support* and direction to provinces....response. We submit that many SA local authorities and provinces lack the necessary capacity and expertise to undertake health surveillance and epidemiological research for a variety of pressing environmental health non communicable diseases such as those linked to air pollution and for this reason NAPISA can fill this important gap.
7. Similarly we submit that there is in fact a serious delink between the national department of health and local, and provincial authorities mandated to quantify the health impact of environmental pollution linked to NCD's and that NAPHISA is potentially best placed to address this serious delink.
8. Section 3.1(o) Speaks to coordinate research however we submit that a key function of NAPHISA should also be to "interpret research" and catalyse the process of "public health action" from research.
9. Section 3.1(u) Speaks of monitoring trends in occupational health. Additionally monitoring trends in environmental health indicators are just as important and necessary. We recommend that monitoring trends in key environmental health indicators and sensitive receptors as this is a fundamental gap in our public health knowledge in South Africa. We recommend monitoring in indicators and sensitive population such as those affected by (a) air pollution, (b) acid mine drainage, (c) coal and other mining, (d) lead in the environment, (e) mercury in the environment, (f) persistent organic pollutants, (g) highly hazardous pesticides etc.

10. In order to undertake these functions we recommend the establishment of an expert multi-stakeholder task team e.g. to advise on existing and emerging trends in major public health challenges affecting the Republic.

Governance and control of NAPHISA

11. We welcome the proposal that NAPHISA is governed and controlled by its board.
12. However we submit that the composition of the board should be expanded to include one additional member nominated by civil society organisations in good standing who are working on environment and public health issues.
13. Additionally we submit that the composition of the board should also be expanded to include one additional member from the Public Health Association of South Africa.
14. Finally we request that the NAPHISA consider that a major component of public health is child health and early development (as well as there being increasing evidence that health trajectories are often set in early-life), particularly for non-communicable conditions. For this reason we hope to see this reflected in the Act.

For more information please contact:

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The logo for GroundWork features the word "ground" in a black, lowercase, serif font, followed by "Work" in a green, uppercase, serif font. A thick, horizontal green brushstroke underline is positioned beneath the "Work" portion of the text.