



NACCHO
National Aboriginal Community
Controlled Health Organisation
Aboriginal health in Aboriginal hands
www.naccho.org.au

National Health and Climate Strategy

Department of Health
and Aged Care

July 2023

ABOUT NACCHO

NACCHO is the national peak body representing 145 Aboriginal Community Controlled Health Organisations (ACCHOs). We also assist a number of other community-controlled organisations.

The first Aboriginal medical service was established at Redfern in 1971 as a response to the urgent need to provide decent, accessible health services for the largely medically uninsured Aboriginal population of Redfern. The mainstream was not working. So it was, that over fifty years ago, Aboriginal people took control and designed and delivered their own model of health care. Similar Aboriginal medical services quickly sprung up around the country. In 1974, a national representative body was formed to represent these Aboriginal medical services at the national level. This has grown into what NACCHO is today. All this predated Medibank in 1975.

NACCHO liaises with its membership, and the eight state/territory affiliates, governments, and other organisations on Aboriginal and Torres Strait Islander health and wellbeing policy and planning issues and advocacy relating to health service delivery, health information, research, public health, health financing and health programs.

ACCHOs range from large multi-functional services employing several medical practitioners and providing a wide range of services, to small services which rely on Aboriginal health practitioners and/or nurses to provide the bulk of primary health care services. Our 145 members provide services from about 550 clinics. Our sector provides over 3.1 million episodes of care per year for over 410,000 people across Australia, which includes about one million episodes of care in very remote regions.

ACCHOs contribute to improving Aboriginal and Torres Strait Islander health and wellbeing through the provision of comprehensive primary health care, and by integrating and coordinating care and services. Many provide home and site visits; medical, public health and health promotion services; allied health; nursing services; assistance with making appointments and transport; help accessing childcare or dealing with the justice system; drug and alcohol services; and help with income support. Our services build ongoing relationships to give continuity of care so that chronic conditions are managed, and preventative health care is targeted. Through local engagement and a proven service delivery model, our clients 'stick'. Clearly, the cultural safety in which we provide our services is a key factor of our success.

ACCHOs are also closing the employment gap. Collectively, we employ about 7,000 staff – 54 per cent of whom are Aboriginal or Torres Strait Islanders – which makes us the third largest employer of Aboriginal or Torres Strait people in the country.

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Recommendations

NACCHO recommends:

1. the Strategy utilise the traditional perspectives and expertise of Aboriginal and Torres Strait Islander peoples and Rangers in land and water management.
2. consideration of more effective and reliable power options for remote Aboriginal and Torres Strait Islander communities as part of the Strategy including the use of rooftop solar schemes.
3. major investment in adequate water systems by Commonwealth and jurisdictional governments as a critical primordial prevention measure to address endemic health issues in communities.
4. the inclusion of regulatory and funding levers to influence health product manufacturing and packaging to reduce waste.
5. dedicated, long-term funding for ACCHOs to deliver prevention and early intervention activities across their communities.
6. long-term investment in community-led, local food production and harvesting initiatives.
7. investment in roads, bridges and sea landings for remote communities to ensure reliable and efficient food supply as well as food security during periods of extreme weather.
8. major investment in housing from Commonwealth and jurisdictional governments as a critical primordial prevention measure to address endemic health issues in Aboriginal and Torres Strait Islander communities.
9. Government apply flexible, sustainable-design principles to housing for Aboriginal and Torres Strait Islander people that respond to local cultural needs, environments and climate change.
10. Government partner with community-controlled organisations, particularly ACCHOs, to undertake natural-disaster planning, response and recovery; and that ACCHOs are funded to support disaster management preparedness, response and recovery.

Acknowledgements

NACCHO welcomes the opportunity to provide a submission to National Health and Climate Strategy – Consultation. NACCHO would like to acknowledge the valuable input received from Dr Alana Gall, Postdoctoral Research Fellow at Southern Cross University, the Aboriginal Health Council of Western Australia (AHCWA) and the HEAL Network in this submission. We also acknowledge the support of the Public Health Association of Australia.

NACCHO supports the submissions made by our Members and Affiliates to the consultation.

National Agreement on Closing the Gap

At the meeting of National Cabinet in early February 2023, First Ministers agreed to renew their commitment to Closing the Gap by re-signing the National Agreement, first signed in July 2020. The reforms and targets outlined in the National Agreement seek to overcome the inequality experienced by Aboriginal and Torres Strait Islander people and achieve life outcomes equal to all Australians.

This Government's first Closing the Gap Implementation Plan commits to achieving Closing the Gap targets *through implementation of the Priority Reforms*. This represents a shift away from focussing on the Targets, towards the structural changes that the Priority Reforms require, and which are more likely to achieve meaningful outcomes for our people in the long term:

Priority Reform Area 1 – Formal partnerships and shared decision-making

This Priority Reform commits to building and strengthening structures that empower Aboriginal and Torres Strait Islander people to share decision-making authority with governments to accelerate policy and place-based progress against Closing the Gap.

Priority Reform Area 2 – Building the community-controlled sector

This Priority Reform commits to building Aboriginal and Torres Strait Islander community-controlled sectors to deliver services to support Closing the Gap. In recognition that Aboriginal and Torres Strait Islander community-controlled services are better for Aboriginal and Torres Strait Islander people, achieve better results, employ more Aboriginal and Torres Strait Islander people and are often preferred over mainstream services.

Priority Reform Area 3 – Transformation of mainstream institutions

This Priority Reform commits to systemic and structural transformation of mainstream government organisations to improve to identify and eliminate racism, embed and practice cultural safety, deliver services in partnership with Aboriginal and Torres Strait Islander people, support truth telling about agencies' history with Aboriginal and Torres Strait Islander people, and engage fully and transparently with Aboriginal and Torres Strait Islander people when programs are being changed.

Priority Reform 4 – Sharing data and information to support decision making

This Priority Reform commits to shared access to location-specific data and information (data sovereignty) to inform local-decision making and support Aboriginal and Torres Strait Islander communities and organisations to support the achievement of the first three Priority Reforms.

Introduction

Aboriginal and Torres Strait Islander people are the oldest continuous living culture in the world and have a deep understanding of and connection to Country. Through this connection, Aboriginal and Torres Strait Islander peoples have cared for and sustained their environment for thousands of years. Country holds a great significance for Aboriginal and Torres Strait Islander peoples and is deeply linked to culture, spirituality, identity, language and family. When Country is disrespected or damaged, not only does it cause disconnection from culture and spirituality, it also impacts the health and wellbeing of Aboriginal and Torres Strait Islander peoples. The ongoing legacy of colonisation, including the persistence of racism, discrepancies in life outcomes and the lack of input into public policy and programs, compound the impacts of climate change on Aboriginal and Torres Strait Islander people.

Impact on cultural practices

NACCHO welcomes the Strategy's acknowledgement of the negative impacts of climate change and global warming on Aboriginal and Torres Strait Islander cultural practices, and on health and wellbeing. One example is a Pakana/Palawa cultural practice called kanalritja¹, that has been impacted by rising acidity in the ocean. Higher acidity is affecting not only the numbers of mollusks used in kanalritja through decreased kelp growth, but also the quality of the shells, making them very thin and fragile. Adaptation and mitigation efforts are underway by Pakana/Palawa people in Tasmania to maintain this important cultural practice.²

It is critical to slow the rate of climate change and mitigate its impacts to ensure Aboriginal and Torres Strait Islander people can maintain connection to culture and Country through practices such as kanalritja. To do so, the Strategy must use the expertise of Aboriginal and Torres Strait Islander people and their long history of knowledge to manage the land and water.

Aboriginal and Torres Strait Islander Rangers continue to use traditional land management practices such as fire. They work to protect threatened native animals and plants, reduce and mitigate bushfires and maintain cultural sites. They do this by combining traditional knowledge and conservation training³. In northern and central Australia, Aboriginal and Torres Strait Islander Rangers have had an impact in guarding biodiversity and reducing bushfires. Research has shown that the world's best fire management systems in emission reduction practices are in northern and central Australia and being led by Aboriginal and Torres Strait Islander Rangers and Land Managers⁴.

NACCHO is encouraged to note the Government's recent commitment to double the number of Aboriginal and Torres Strait Islander Rangers by 2030.

NACCHO recommends the Strategy utilise the traditional perspectives and expertise of Aboriginal and Torres Strait Islander peoples and Rangers in land and water management and embed this practice in Commonwealth and jurisdictional Safety Guidelines such as fire.

¹ NITV, 1 March 2023, <https://www.sbs.com.au/nitv/article/how-3d-printing-can-preserve-culture-in-the-face-of-climate-change/h481mj97e>

² Australian Government Geoscience Australia. Retrieved from: <https://www.ga.gov.au/education/classroom-resources/hazards/natural-hazards/bushfire>.

³ B Williamson. Caring for Country means tackling the climate crisis with Indigenous leadership: 3 things the new government must do, 2022. Retrieved from: <https://theconversation.com/caring-for-country-means-tackling-the-climate-crisis-with-indigenous-leadership-3-things-the-new-government-must-do-183987>

⁴ R Fisher, J Altman. The world's best fire management system is in northern Australia, and it's led by Indigenous land managers, 2020. Retrieved from: <https://theconversation.com/the-worlds-best-fire-management-system-is-in-northern-australia-and-its-led-by-indigenous-land-managers-133071>

Impact on health and wellbeing

The impacts of climate change amplify health and wellbeing issues facing Aboriginal and Torres Strait Islander people and communities. The impact of climate change compounds the social determinants of health including, housing, employment conditions, education, social relationships, income, poverty and the distribution of power and resources. Changes in climate patterns cause greater frequency, severity and duration of extreme weather events, affecting the natural and built environment. Aboriginal and Torres Strait Islander people, particularly those living in regional and remote areas are at significant risk of poorer health outcomes as a result of climate change both directly through extreme events such as heatwaves, floods, bushfires, dust storms and indirectly via worsening air quality, threats to food and water supplies, and effects on mental health.

Climate change can also have direct health impacts which may include heat-related illness and respiratory illness from poor air quality. Climate change can also lead to food and water-borne illnesses and other infectious disease. Climate change may reduce the ability to access and engage in social gatherings and cultural practices, ceremonies and other activities—due to interruption of natural weather cycles, harsh weather conditions and/or inaccessibility of routes and/or destinations. Reduced cultural and community access and engagement has implications for social and cultural connectivity and wellbeing.⁵

Principles

NACCHO is very pleased to see a focus on First Nations leadership and health equity in the principles of the Strategy. We are also pleased to note the emphasis on Aboriginal and Torres Strait Islander health and climate change as well as the incorporation of the National Aboriginal and Torres Strait Islander Health Plan, the National Aboriginal and Torres Strait Islander Health Workforce Strategic Framework and Implementation Plan, and of course, the National Agreement on Closing the Gap.

If we hope to see real and sustained improvements for Aboriginal and Torres Strait Islander communities, deliver better health outcomes and improved social and emotional wellbeing, Aboriginal and Torres Strait Islander leadership and control must be at the core of systemic shifts in the way governments seek to address climate change. It is imperative that Government prioritise Aboriginal and Torres Strait Islander voices and expertise in developing the Strategy throughout the entirety of the work. Engagement with forums such as the Coalition of Peaks, Ranger groups and establishing an Aboriginal and Torres Strait Islander Advisory Group in the development of the Strategy is essential. The Strategy would also benefit from a review of Aboriginal and Torres Strait Islander projects that focus on climate change issues, mitigation and adaptation.

Objective 1: Measuring Emissions

A broader focus than emissions measurement is required. Acknowledging the difficulty of measuring other outputs such as waste, a focus on emissions only is unlikely to adequately capture the impact of health systems on climate change.

Objective 2: Mitigation

International climate science reports indicate that Australia is especially vulnerable to climate changes and its impacts, including heightening risks associated with heat, drought and bushfires. It is anticipated there will be an increasing impact on long sections of coastline, river deltas, wetland

⁵ Ford, 2012. Indigenous Health and Climate Change. *American Journal of Public Health*, 102(7), <https://ajph.aphapublications.org>

areas and islands due to erosion and saltwater inundation, and that inland areas will also be more prone to bushfires, dust storms, extremes in temperatures, flooding and droughts.⁶

Built environment and facilities

In Australia, as the risk and impact of climate change increases, energy consumed for heating and cooling also increase. To address this issue, infrastructure needs to be better adapted, providing higher heating and cooling performance, while also reducing energy consumption. The simplest principles used to reduce consumption for heating and cooling can include glazing systems, better-designed windows, higher insulation levels, natural ventilation and rooftop solar panels. These techniques are effective, however, have not been placed at the core of building design practice, especially in remote communities and Aboriginal and Torres Strait Islander housing. Such initiatives could significantly reduce household and organisational reliance on fossil fuels.

Many remote communities are already on off-grid power and are using generators and pre-paid systems which increases the risk of poor health outcomes. “Most Australians take safe housing and uninterrupted electricity for granted. Yet in remote Aboriginal and Torres Strait Islander communities, low quality poorly insulated housing and energy instability are common”.⁷ Currently many Aboriginal and Torres Strait Islander communities do not have access to permanent, reliable power, this shortage is expected to increase during periods of temperature variability; which in turn has effect on health outcomes for Aboriginal and Torres Strait Islander people.⁸

A 2021 study of 3,300 Aboriginal and Torres Strait islander households in remote communities showed the extent of this issue. The study used daily smart meter data and regression analysis to assess the relationship between temperature, electricity usage and disconnection in 28 remote communities. The study found that nearly 91% of households experienced a disconnection from electricity during the 2018-2019 financial year. Moreover, 74% households experienced disconnection more than ten times.⁹

It is evident that prepaid meters often leave Aboriginal and Torres Islander households disconnected from electricity. Prepaid meters work by allowing households to purchase power cards and swipe on the meter for usage. If households do not have money on their power card, electricity is simply disconnected. This means that regulator protections against energy disconnection for consumers is non-existent. However, people living in urban areas largely use post-paid billing systems and have protection from disconnection. The use of rooftop solar power could be a solution for many Aboriginal and Torres Strait Islander households. Rooftop solar can reduce energy insecurity, as more than 3.4 million households are currently enjoying the benefits of renewable technology to help the environment and lower power bills.¹⁰

In a pilot study done by researchers at the Australian National University (ANU), rooftop solar demonstrated significant benefits for Aboriginal and Torres Strait Islander prepay customers. The pilot study trial tested the effectiveness of solar energy for prepay customers in Tennant Creek. A

⁶ CSIRO, 2012, *Marine and Atmospheric Impacts on Remote Indigenous Communities in Northern Australia*

⁷ Lea T, Grealy L, Moskos M, et al. Sustainable Indigenous housing in regional and remote Australia — final report No. 368. Melbourne: Australian Housing and Urban Research Institute, 2021. <https://www.ahuri.edu.au/research/final-reports/368>

⁸ Quilty S, Frank Jupurrurla N, Bailie RS, Gruen RL. Climate, housing, energy and Indigenous health: a call to action. Med J Aust. 2022 Jul 4;217(1):9-12. doi: 10.5694/mja2.51610. Epub 2022 Jun 16. PMID: 35708259; PMCID: PMC9545280.

⁹ T Londen, S Quilty, et all. Energy insecurity during temperature extremes in remote Australia, 2021. Retrieved from: <https://www.nature.com/articles/s41560-021-00942-2>

¹⁰ J Blakkarly. Remote Aboriginal communities left behind in Australia's rooftop solar boom, 2023. Retrieved from: <https://www.choice.com.au/shopping/shopping-for-services/utilities/articles/remote-aboriginal-communities-left-behind-in-solar-boom>

Warumungu elder and his family were disconnected 12 times a year before the installation of solar panels. However, after installation, benefits included a reduction in energy cost and elimination of disconnection. The family reported that having solar panels has made their household more stress free and enjoyable. Rooftop solar schemes should be made more readily available for Aboriginal and Torres Strait Islander communities, as they are amongst those who can gain the most from this scheme.¹¹

NACCHO recommends consideration of more effective and reliable power options for remote Aboriginal and Torres Strait Islander communities as part of the Strategy including the use of rooftop solar schemes.

Water Quality

Climate change and its impact on fragile environmental conditions adversely affects water quality and the health and wellbeing of Aboriginal and Torres Strait Islander people and communities. The impact on water quality and supply leaves many Aboriginal and Torres Strait Islander people in remote communities without access to safe drinking water. A recent study showed 25,000 Aboriginal and Torres Strait Islander people are not able to access safe drinking water across 99 remote communities.¹² Broome and surrounding regions face particular water quality and supply issues due to susceptibility to industrial contamination. Climate and associated weather changes worsen the situation. Water supplies in many communities are increasingly contaminated by microbes or chemicals - in the Kimberley this includes contaminates such as arsenic. High salinity and the use of shallow aquifers are problematic in many communities.

NACCHO recommends major investment in adequate water systems by Commonwealth and jurisdictional governments as a critical primordial prevention measure to address endemic health issues in communities.

Supply chain

A focus on health system mitigation is narrow at best, and small sale given the estimated contribution of 6% of national emissions. Government has higher level levers at its disposal that will be more impactful than small scale reductions in energy use. A focus on manufacture of health equipment and medications for example, is critical.

It has been highlighted that manufacturing is one of the top three sources of greenhouse gas emissions causing global warming and climate change, as well as the highest waste generation industry. Manufacturing companies produce various types of products from food packaging, electronic devices to large items like aircrafts. With the rapid population growth and development of countries, manufacturing sector is only set to increase which can have a detrimental impact on the environment unless more sustainable manufacturing protocols are adopted.¹³

¹¹ Australian National University. Rooftop solar a game-changer for First Nations prepay customers in the Top End, 2023. Retrieved from: <https://reporter.anu.edu.au/all-stories/rooftop-solar-a-game-changer-for-first-nations-prepay-customers-in-the-top-end>

¹² The Conversation, <https://theconversation.com/countless-reports-show-water-is-undrinkable-in-many-indigenous-communities-why-has-nothing-changed-194447>

¹³ Australian Government, Department of Industry, Science and Resources, 2022, Make it Happen: The Australian Government's Modern Manufacturing Strategy. Retrieved from: <https://webarchive.nla.gov.au/awa/20220816062844/https://www.industry.gov.au/data-and-publications/make-it-happen-the-australian-governments-modern-manufacturing-strategy>

There is an increasing reliance on single use plastics in the health system, including sheets and some surgical equipment which can be successfully reused, and indeed has for decades. The emphasis on single use items generates an extraordinary volume of non-recyclable waste. Waste reduction in medicines manufacture such as blister packs and cardboard packaging (largely used to simplify transport and counter display) could be significantly reduced with manufacturer engagement or legislative levers.

NACCHO recommends the inclusion of regulatory and funding levers to influence health product manufacturing and packaging to reduce waste.

Another industry that requires closer regulation and employment of funding levers is the mining industry. Emissions from construction, mining and developments in Aboriginal and Torres Strait Islander communities is causing issues with air quality leading to respiratory illness. Some ACCHOs are developing a data set for environmental dust contaminants to demonstrate the potential health impacts of local mining, a model which could be used in this Strategy.

Prevention and optimising models of care

To strengthen the preparedness and resilience of Aboriginal and Torres Strait Islander people and communities, a greater investment must be made in prevention and early intervention services—including public awareness raising and campaigning. This includes raising awareness of the need to keep families and households healthy and well, as identified by UPK, a model for improving environmental health in developing communities.¹⁴ Many ACCHOs across Australia already deliver healthy lifestyle awareness programs, including healthy cooking workshops.¹⁵ Such awareness raising can help embed local perspectives and expertise about traditional foods.

While a shift from primary care to prevention models is welcome, ensuring support for the provision of such work across the sector is required.

NACCHO recommends dedicated, long-term funding for ACCHOs to deliver prevention and early intervention activities across their communities.

However, a focus on behavioural change models can only do so much in the face of circumstances which hinder full participation and the ability for individuals to effectively undertake behavioural change. An increased focus on primordial prevention is critical. In particular, improvement to housing, water quality, energy reliability and food security will improve health and wellbeing outcomes for Aboriginal and Torres Strait Islander communities.

ACCHOs in urban, rural, regional and remote regions mitigate their contribution to climate change in a number of ways. These initiatives are often highly innovative within restricted funding. ACCHOs are pro-active in utilising renewable resources such as solar panels, and at working to reduce their environmental footprint.

The focus on behavioural change approaches also risk pushing responsibility for emissions back down to the individual and community level, rather than requiring government to play a more active, systemic role in mitigation efforts.

¹⁴ Bailie, 2001, *An Ecological Approach to Health Promotion in Remote Aboriginal Communities*, p43, para 4

¹⁵ Winnunga Nimmityjah, 2019, *Healthy cooking workshops*, <http://www.winnunga.org.au/>

Communicable disease

Warmer climates also extend the disease transmission seasons. Climate change is improving the climatic and environmental conditions for the transmission of many diseases. This may also lead to an increase in the duration of disease transmission seasons and incidence of vector-borne diseases, such as Ross River virus and encephalitis.

Food safety and sovereignty

Members of Aboriginal and Torres Strait Islander communities have defined food security as '*the land and the sea is our food security. It is our right. Food security has two parts: food security is when the food of our ancestors is protected and always there for us and our children. It is when we can easily access and afford the right non-traditional food for a collective health and active life. When we are food secure, we can provide, share and fulfil our responsibilities, we can choose good food knowing how to make choices and how to prepare and use it.*' This definition highlights the importance of culture and traditional food sources in achieving food security for Aboriginal and Torres Strait Islander people.

The impact of climate change on the environment includes adverse effects on flora and fauna—including food sources. Combined with damage to and resultant inaccessibility of land and water, access to a traditional, healthy diet and hunting and gathering practices can be impeded preventing connection to land and water and affecting social and emotional wellbeing. Limited availability and use of traditional foods as a result of colonisation has resulted in changed dietary patterns of Aboriginal and Torres Strait people from nutrient-dense traditional diets, to energy-dense western diets.¹⁶ It is estimated that 41% of total energy intake among Aboriginal and Torres Strait Islander people is derived from discretionary food and drink items, which are high in saturated fat, salt, and sugar.^{17,18} Higher consumption of carbohydrate-based foods, sugar-sweetened beverages and processed meats, coupled with less fruit and vegetables results in sub-optimal dietary intake.¹⁹

Producing food in and around Aboriginal communities can help increase availability of healthy food. Harvesting and growing more food locally shortens the supply chain of fresh produce, lowering the cost and improving the quality and shelf life of fresh food.

The relationship between our food system and climate change is bi-directional. Food security cannot be addressed or achieved without acknowledging this relationship. Central to promoting food security for all, is building a resilient food system which can withstand climatic changes. Without this, food production, distribution and utilisation will be compromised. Australia currently and will continue to face the impacts of climate change associated with increase in extreme fire events, heavier rainfall, flooding, and longer periods of drought.²⁰ Many communities have already experienced the impact of extreme weather on food availability and cost. This was seen in

¹⁶ Shannon, Cindy (2002) *Acculturation: Aboriginal and Torres Strait Islander nutrition*. Asia Pacific Journal of Clinical Nutrition.

¹⁷ Australian Bureau of Statistics (2015) *Australian Aboriginal and Torres Strait Islander Health Survey: Nutrition Results - Food and Nutrients, 2012–13*. Canberra: Australian Bureau of Statistics

¹⁸ Sherriff, S., Kalucy, D., Tong, A. et al. (2022). *Murradambirra Dhangaang (make food secure): Aboriginal community and stakeholder perspectives on food insecurity in urban and regional Australia*. BMC Public Health 22

¹⁹ Lindberg, R.; McNaughton, S.A.; Abbott, G.; Pollard, C.M.; Yaroch, A.L.; Livingstone, K.M. (2022) *The Diet Quality of Food-Insecure Australian Adults—A Nationally Representative Cross-Sectional Analysis*. Nutrients 14

²⁰ Commonwealth Government (2022) *State of Climate 2022*. Australian Government: Canberra

early 2022, when road closures due to flooding, in the Northern Territory, inhibited food transport trucks from reaching supermarkets.²¹

NACCHO recommends long-term investment in community-led, local food production and harvesting initiatives.

NACCHO recommends investment in roads, bridges and sea landings for remote communities to ensure reliable and efficient food supply as well as food security during periods of extreme weather.

NACCHO welcomes the development of the National Remote Food Security Strategy.

Objective 3: Adaptation

Critical to adaptation responses are efforts in the primordial prevention space: housing and food security, as well as emergency response.

Housing and infrastructure

Aboriginal and Torres Strait Islander people are significantly more likely to live in overcrowded, poorly maintained housing than other Australians. Inadequate housing is a key indicator and driver of poverty and a critical social determinant of health.²² The evidence demonstrating the powerful links between housing and outcomes for health is abundant.²³ Safe, environmentally fit for purpose and adequate housing must be treated as a key primordial prevention measure for Aboriginal and Torres Strait Islander communities.²⁴ Improved hygiene facilities, water infrastructure and living conditions support prevention of communicable diseases including scabies, trachoma and otitis media. Housing shortages and overcrowding in rural and remote communities only exacerbate health issues.

Living in overcrowded housing increases the likelihood of health problems, from ear and eye infections, RHD and mental health issues.²⁵ The impact of deteriorating housing on occupants, and also the lack of air-conditioning and heating is made more severe where there is overcrowding and an inability to maintain hygiene. During the COVID-19 pandemic, overcrowding made it extremely difficult to isolate or quarantine.

There are also considerable problems with the quality of existing houses. Aboriginal housing and public housing used by Aboriginal and Torres Strait Islander people is often not constructed from high quality materials, and older houses (over 10 years old) often did not adhere to building codes. Extreme weather events increase the speed and extent of deterioration of this low quality housing, including the formation of mould, rusting of pipes and damage to doors and windows, which adversely effects occupants' wellbeing and safety. Occupants' physical health, economic productivity, psychological wellbeing and protection from health hazards and physical security is compromised.

²¹ Dick, S (2022) Northern Territory food shortages continue as parts of the Stuart Highway remain submerged in floodwater Viewed online at: <https://www.abc.net.au/news/2022-01-31/nt-food-supply-shortages-flooding-road-transport/100792204>

²² Australian National Audit Office. Indigenous Housing Initiatives: the Fixing Houses for Better Health program. Canberra: Department of Families, Housing, Community Services and Indigenous Affairs ; 2010.

²³ Baker E, Mason K, Bentley R. Exploring the bi-directional relationship between health and housing in Australia. Urban policy and research. 2014;71–84.

²⁴ NACCHO, Core Services and Outcomes Framework <https://csof.naccho.org.au/>

²⁵ NACCHO and The Royal Australian College of General Practitioners, 2018, *National guide*

Sustained investment in aged and deteriorating housing and community infrastructure more generally is critical. Not only do existing structures need to be upgraded, but future developments need to be designed and engineered to withstand significant weather events and changes in temperature. This should include passive or environmentally sound cooling, heating and ventilation systems. In addition, maintenance and repairs must be carried out efficiently and effectively and take into account changing environmental conditions. Adherence to building codes and guidelines are therefore essential to ensure that housing is climate appropriate and safe.

Addressing these issues provides an opportunity for growth and upskilling of the Aboriginal and Torres Strait Islander workforce with real jobs and provides local people genuine options to stay on Country.

NACCHO recommends major investment in housing from Commonwealth and jurisdictional governments as a critical primordial prevention measure to address endemic health issues in Aboriginal and Torres Strait Islander communities.

NACCHO recommends Government apply flexible, sustainable-design principles to housing for Aboriginal and Torres Strait Islander people that respond to local cultural needs, environments and climate change.

[Emergency response](#)

During the 2019-20 bushfire crisis it became clear that national disaster-coordination arrangements do not appropriately consider or cater for Aboriginal and Torres Strait Islander people and communities. Thousands of Aboriginal and Torres Strait Islander people in Victoria, New South Wales and the ACT were directly and indirectly affected by the 2019-20 bushfire crisis, with housing, clinics, Aboriginal Community Controlled Health Organisation (ACCHO) facilities and other community buildings being destroyed or damaged by fire.

During the crisis, NACCHO heard anecdotal evidence of a lack of support provided to Aboriginal and Torres Strait Islander peoples during and after the emergency. This included experiences of racism and discrimination when evacuating and seeking to access emergency support and supplies (including at evacuation centres). These experiences were reflected in NACCHO's submission to the ACT Royal Commission into National Disaster Arrangements²⁶ as well as a report from the ANU Centre for Aboriginal Economic Policy Research (CAEPR), which found that Aboriginal Australians experienced racism and unfair treatment during the bushfire catastrophe.²⁷

Emergency support to Aboriginal and Torres Strait Islander communities affected by the bushfires was largely provided by the Aboriginal Community Controlled Health sector rather than funded agencies. ACCHOs provided this support without the benefit of being involved in emergency response planning, and without the additional funding, resources, staffing or surge capacity provided to mainstream agencies. The report by CAEPR also noted that, the lack of planning involving First Nations peoples meant that the response during the Black Summer bushfires was inadequate,

²⁶ NACCHO (2020) *Submission to the Royal Commission into National Natural Disaster Arrangements*, ACT, Canberra.

²⁷ Williamson, B (2022) *Aboriginal Community Governance on the Frontlines and Faultlines in the Black Summer Bushfires*, Centre for Aboriginal Economic Policy Research, 300, p28. <https://caepr.cass.anu.edu.au/research/publications/aboriginal-community-governance-frontlines-and-faultlines-black-summer>

ineffective and inappropriate. In the aftermath of the disaster, a lack of much-needed mental health support impacted Aboriginal and Torres Strait Islander people.²⁸

Disaster preparedness, response and recovery must recognise and fund the crucial role ACCHOs play in supporting their communities in crisis situations. The provision of consistent funding will help ensure the Aboriginal Community Controlled Health sector is able to provide immediate support to communities affected by natural disasters, has the ability to leverage a surge capacity and workforce in support of a response, and can work closely with emergency response services to coordinate a local response.

NACCHO recommends Government partner with community-controlled organisations, particularly ACCHOs, to undertake natural-disaster planning, response and recovery; and that ACCHOs are funded to support disaster management preparedness, response and recovery.

Objective 4: Health in All Policies

NACCHO is very pleased to see Health in All Policies (HiAP) focus in the Strategy. HiAP is an approach that incorporates considerations of health impacts into policymaking across sectors to improve health outcomes for all people and communities. HiAP focuses on the multitude of factors that go beyond healthcare and recognises that health outcomes are influenced by a wide range of social, commercial, political, environmental and cultural determinants.

The HiAP approach is important for Aboriginal and Torres Strait Islander peoples and communities because it considers the health impacts on Aboriginal and Torres Strait Islander people in all policy decisions. This aligns with the ACCHO model of health, as outlined in the NACCHO Core Services and Outcomes Framework²⁹ – a holistic approach that considers and addresses factors that contribute to health and wellbeing. The HiAP approach may also be effective in identifying gaps in evidence and achieving health equity.

A HiAP approach supports action to address the social determinants of health that leave some Aboriginal and Torres Strait Islander communities more vulnerable to the impacts of climate change. Particular areas to be addressed include improvement of housing, water supply, food security, and prioritising preventative health. As mentioned above, inadequate housing is a key indicator and driver of poverty and a critical social determinant of health.

A HiAP approach also aligns with National Agreement targets to close the gap in health outcomes and life expectancy for Aboriginal and Torres Strait Islander people.

Enablers

The enablers could be improved to better inform the objectives of the Strategy by emphasising the need for a genuine partnership with Aboriginal and Torres Strait Islander people in line with the stated principle of Aboriginal and Torres Strait Islander leadership. It is not sufficient to simply consult, engage or collaborate with Aboriginal and Torres Strait Islander people, rather the Strategy must have an active partnership and co-design process. This aligns with Priority Reform 1 of the National Agreement on Closing the Gap – shared decision-making.

²⁸ National Mental Health Commission (2021) *Our Stories Beyond the Disaster*
<https://www.mentalhealthcommission.gov.au/getmedia/5221a681-0530-475b-8396-c8fc51c1ac3d/Our-Stories-Beyond-the-Disaster-Research-Report>

²⁹ <https://csor.naccho.org.au>