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APPENDIX 5-1

HUMAN HEALTH ASSESSMENT GUIDELINES

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WHO

The WHO defines health as: "*A state of complete physical, mental and social well-being and not merely the absence of disease or infirmity*".

National Guidance

In Section 3.3.6 of the EPA 2022 EIAR Guidelines, it states that "*in an EIAR, the assessment of impacts on population and human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in this EIAR e.g., under the environmental factors of air, water, soil etc.*" Environmental Impacts from the Proposed Development which may also have an impact on population and human health are discussed in this chapter but addressed in more detail in the following chapters: Chapter 7 Land Soil and Geology, Chapter 8 Hydrology and Hydrogeology, Chapter 9 Air Quality, Chapter 10 Climate, Chapter 11 Noise and Vibration, Chapter 13 Landscape and Visual, Chapter 15 Material Assets (including Traffic and Transport).

As referenced in the European Commission's Environmental Impact Assessment of Projects: *Guidance on the Preparation of the Environmental Impact Assessment Report*, human health is, "*a very broad factor that would be highly project dependent.*" The report continues:

> *'*The notion of human health should be considered in the context of the other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study. In addition, these would concern the commissioning, operation, and decommissioning of a Project in relation to workers on the Project and surrounding population.'*

The EPA 2022 EIAR Guidelines state that,

> *"while no specific guidance on the meaning of the term Human Health has been issued in the context of Directive 2014/52/EU, the same term was used in 3.3.6 the SEA Directive (2001/42/EC). The Commission's SEA Implementation Guidance states 'The notion of human health should be considered in the context of the other issues mentioned in paragraph (f)'" of the Directive, where paragraph f lists environmental factors such as soils, water, landscape, air etc. The Guidelines state that this approach is 'consistent with the approach set out in the 2002 EPA EIS Guidelines where health was considered through assessment of the environmental pathways through which it could be affected, such as air, water or soil'. The Guidelines note that the above approach follows the 2002 EPA guidelines already in place which details the following:*
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> *'The evaluation of effects on these pathways is carried out by reference to accepted standards (usually international) of safety in dose, exposure or risk. These standards are in turn based upon medical and scientific investigation of the direct effects on health of the individual substance, effect or risk. This practice of reliance upon limits, doses and thresholds for environmental pathways, such as air, water or soil, provides robust and reliable health protectors [protection criteria] for analysis relating to the environment'.*

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IEMA Guidance 2017

The Institute for Environmental Management and Assessment (IEMA) published *'Health In Environmental Impact Assessment: A Primer for a Proportionate Assessment'* examining what a proportionate assessment of the impacts on health should be in Environmental Impact Assessments. The document states that Health Impact Assessment (HIA) and EIA are separate processes.

> 'HIA is defined as a combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended, effects of a policy, plan, programme or project on both the health of a population and the distribution of those effects within the population. HIA identifies appropriate actions to manage those effects... [...] ... HIA can inform EIA practice in relation to population and human health but conducting a HIA will not necessarily meet the EIA population and human health requirement. By the same token, conducting an EIA will not automatically meet the requirements of a HIA.'

The IEMA report acknowledges that 'disproportionate burdens maybe placed on developers if HIA is applied as a proxy for the consideration of population and human health in every future UK EIA'. The focus of EIA should be on predicting health and wellbeing outcomes, rather than focusing on changes in determinants of health e.g., expected changes in noise levels. *Determining the significance of impacts on* population and human health should include a professional judgement, scientific literature; consultation responses; comparison with baseline conditions; local health priorities; and national/international regulatory standards and guidelines. The IEMA report refers to the WHO 2014 report which provides and overview of health in different types of assessment:

"*The health sector, by crafting and promoting HIA, can be regarded as contributing to fragmentation among impact assessments. Health issues can, and need to, be included [in impact assessment] irrespective of levels of integration. At the same time, from a civic society perspective, it would be unacceptable for HIA to weaken other impact assessments. A prudent attitude suggests optimizing the coverage of health along all three avenues:*

- *Better consideration of health in existing impact assessments other than HIA;*
- *Dedicated HIA; and*
- *Integrated forms of impact assessment."*

As such, the WHO does not support a stand-alone HIA unless it could be demonstrated to be of advantage over an EIA Therefore, given that this human health assessment is part of the EIAR; there is no stand-alone HIA.

EIA Significance Matrix for Human Health, IEMA Guidance 2022

The IEMA Working Group 2022 published *Determining Significance for Human Health In Environmental Impact Assessment* in response to gaps and inconsistencies across existing guidance documents as to how health is assessed in EIA, particularly with regard to significance. The aim of this report is to assist and streamline discussions for consultants producing the assessments and for the decision makers who are reviewing the assessments. The report states that an EIA must identify, describe and assess the direct and indirect significant effects in an appropriate manner of a proposed development on human health. It must include the information that may reasonably be required for reaching a reasoned conclusion on the significant effects, taking into account current knowledge and methods of assessment.