



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



Submission on Draft Better Regulation Policy

HSE Consultant in Public Health Medicine Environment and Health Group

Date: 8th April 2015

Members of the Consultant in Public Health Medicine Environment and Health Group are:

Dr. Anthony Breslin, Consultant in Public Health Medicine, HSE North West

Dr. Melissa Canny, Consultant in Public Health Medicine, HSE West

Dr. John Cuddihy, Director of Public Health, HSE South East

Dr. Una Fallon, Consultant in Public Health Medicine, HSE Midlands

Dr. Tessa Greally, Consultant in Public Health Medicine, HSE MidWest

Dr. Kevin Kelleher, Assistant National Director Health and Wellbeing – Health Protection

Dr. Ina Kelly, Consultant in Public Health Medicine, HSE Midlands (Chair)

**Dr. Ruth McDermott, Specialist Registrar in Public Health Medicine, HSE Midlands
(Secretary)**

Dr. Helena Murray, Consultant in Public Health Medicine, HSE East

Dr. Mary O'Mahony, Director of Public Health, HSE South

Dr. Emer O'Connell, Consultant in Public Health Medicine, HSE West

Dr. Patrick O'Sullivan, Director of Public Health, HSE North East

Dr. Anne Sheahan, Consultant in Public Health Medicine, HSE South

Submission Summary

We recommend that a quality assured public health risk assessment system is in place in order to fulfill the principle of proportionality safely.

We recommend that minimizing the burden of regulation should never be at the expense of protecting the environment and the health of the public from environmental influences.

Core Principles – Proportionality (p3)

“The EPA ensures that any action taken is fair and proportionate to the harm or risk of harm to the environment or public health”

While we agree with this core principle, in order to act on this principle, it is essential that the EPA has effective methods of assessing the harm or risk of harm to public health. It is not apparent what these methods are, or whether they are quality assured and safe.

We recommend that a quality assured public health risk assessment system is in place in order to fulfill this principle.

Burden of regulation

This document mentions the burden being imposed on those being regulated.

Obviously any avoidable burden should be avoided as it is a waste of resources.

However, it is important that primary purpose of the EPA – to protect the environment (and the health of the public from environmental effects) - remains the priority and is never compromised by trying to reduce the burden of regulation.

We recommend that minimizing the burden of regulation should never be at the expense of protecting the environment and the health of the public from environmental influences.