DEALING WITH ASSERTIONS OF RISK OR EFFECTS FROM ENVIRONMENTAL EXPOSURES:

A SYSTEMATIC APPROACH

ABSTRACT

Public concern about health effects which might be associated with exposure to environmental agents frequently generates enquiries to departments of public health, local authorities, environment agencies and others. These approaches may be direct or indirect and are often prompted by media interest. However, approaches often involve demands that investigations are exhaustive and that results are communicated in a transparent and accessible manner. While the agencies concerned should not have any difficulty in conducting and reporting their work openly, the demand for exhaustive investigation would soon deplete the limited resources available if every assertion of an environmental health problem was followed up in this comprehensive way. Agencies require a strategy of escalating the intensity of an investigation if the initial evidence supports the view that a problem does indeed exist. Clearly, in some instances it will prove difficult to justify to the complainant that a!

limited investigation is required rather than a detailed and thorough epidemiological investigation, particularly in instances where there is intense public pressure. In many cases, scientific evidence or other circumstances will demand positive action by the agencies involved. It is important that a systematic approach is adopted when responding to and investigating assertions of health effects.

This document sets out a structured approach to dealing with assertions of health effects associated with environmental exposures. It is intended that this should assist public service bodies in determining an appropriate response and in subsequently defending any decisions taken. A staged approach is recommended with the fulfilment of stated criteria being desirable before progressing to a subsequent stage. The agencies typically involved are local authorities (and in particular the environmental health departments), the public health departments of local health boards, the Scottish Environment Protection Agency (SEPA) and frequently, though perhaps indirectly, the Scottish Centre for Infection and Environmental Health (SCIEH) and the NHS Information and Statistics Division (ISD) both of which are divisions of the Common Services Agency of the National Health Service in Scotland. Depending on the nature of the problem the relevant water authority, the Meteorological Office, The Royal Environmental Health Institute of Scotland (REHIS) or the National Society for Clean Air (NSCA) may also be involved.

Local authorities or public health authorities and other agencies may become involved in a range of situations and we consider here three scenarios:

Scenario 1a A belief that ill health exists in the community and that this is linked to exposure to an environmental agent(s) and the potential source of exposure is identified (e.g. from a specific factory or installation)

Scenario 1b As in 1a except no specific environmental source is under suspicion

Scenario 2 No ill health is evident yet there may be a local source of environmental exposure which members of the community believe has the potential to cause ill health even though there is no

actual assertion that it is currently doing so

This document sets out possible strategies for addressing public concern. The emphasis is on principles to apply in formulating a response rather than health outcomes or risks from specific agents or types of exposure. The guidance is not intended to address concern over proposed developments as these are catered for under the planning process.

The definition of an environmental exposure used in this guidance is inclusive and could be fulfilled by proximity to a fixed industry, site, plant or installation; by intermittent exposures such as might relate to rail, road or air transport; by seasonal exposures such as might be associated with agricultural practices; by exposures to energy and waste related activities, whether conducted at a defined site such as an incinerator, landfill site or power station or by proximity to power conductors such as overhead cables.

With the emergence of "Health Impact Assessment" as a public health tool, it is perhaps appropriate to observe that assessment of the health effects of contaminants in the environment are as much health impact assessments as assessments of proposed policies and there is inevitably some overlap in methodology.

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