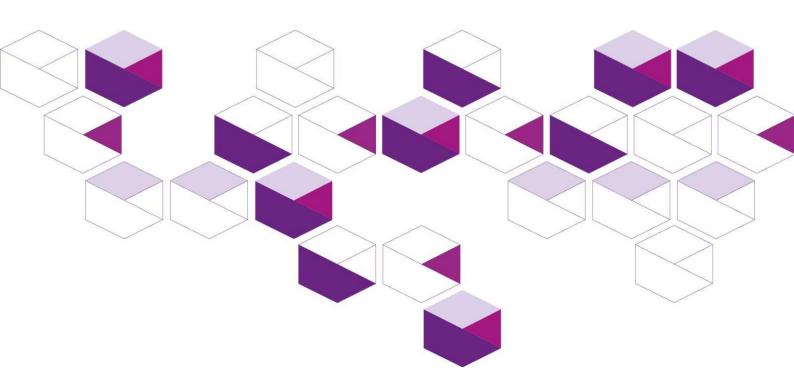
Submission to the Climate Health WA Inquiry

29 August 2019



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Executive summary

The South Metropolitan Health Service (SMHS) acknowledges the importance of the Climate Health WA Inquiry into the State's preparedness to address the health impacts of climate change for Western Australians. SMHS is committed to driving opportunities to reduce the environmental footprint of the hospital network and continues to work towards environmental and financial sustainability.

This submission broadly encompasses the following considerations as highlighted by the Inquiry:

- An overview of SMHS' actions to date and notable achievements in terms of sustainability;
- SMHS' perspective on challenges, strengths, opportunities or initiatives relevant to WA;
- Key issues, proposed resolutions and how Health Service Providers (HSPs) may contribute to addressing issues; and
- SMHS' ongoing commitment to a sustainable future for WA Health.

SMHS delivers hospital and community based public health care services to a population of more than 659,000 within a catchment area stretching 3,300 square kilometres across the southern half of Perth. It has a hospital network consisting of:

- Fiona Stanley Hospital (including the State Rehabilitation Centre)
- Fremantle Hospital
- Rockingham General Hospital
- Murray District Hospital
- Peel Health Campus (which is a privately operated public hospital)

The SMHS catchment represents 25 percent of the State's population. This population is projected to increase by 17 percent to 2026, or by an additional 110,000 people. The SMHS population is also ageing, with the older adult age group (65 plus) increasing by 37 percent in the next ten years, compared to a 16 percent increase in the under-65 population.

Given the particular geographic and socio-economic statistics of the WA population, early implementation of climate change mitigation and public health adaption strategies is imperative for the future wellbeing of all Western Australians.

The enduring strategies and recommendations resulting from Sustainable Health Review (SHR) will ensure the State continues to provide high quality healthcare while striving towards a more sustainable future. SMHS envisages the findings and/or recommendations resulting from the Inquiry will be considerably linked to the SHR, with particular reference to Recommendation 5.

As stated within SMHS' submission to the SHR, whilst preventative health is considered a shared responsibility across all levels of government, industry and business, there appears to be little coordinated national, state or health service effort. The same can be said in terms of climate health and environmental sustainability. Initiatives to improve the environmental footprint across the health sector to ultimately support the health of Western Australians requires a multi-agency, government, non-government and community approach. This requires a coordinated, multi-faceted assessment of existing practices, a system-wide mitigation and adaption plan reinforced by an overarching policy, and adequate investment to support climate health initiatives over the longer term.

SMHS' sustainability achievements

SMHS has actively engaged in the Climate Health WA Inquiry consultative process undertaken to date, including:

- Release of the initial cross-agency Health and Climate Change Community of Practice Consultation survey to key SMHS Executives and associated networks;
- Inviting the working group involved in the development of the SMHS Sustainability Framework to provide feedback into the above survey, as well as this submission;
- Communication of a SMHS-wide expression of interest to become involved in future sustainability initiatives across all SMHS hospital sites; and
- Promoting the Inquiry's public forums by way of responses to ministerial correspondence from members of the public interested in SMHS sustainability efforts.

Since late 2018, SMHS has progressed the development of the SMHS Sustainability Framework (Attachment 1) to provide a systematic approach for SMHS to work within to drive opportunities in reducing its carbon footprint and work towards financial and environmental sustainability. The Framework encompasses the 10 interconnected goals as per the Global Green and Healthy Hospitals (GGHH) Agenda.

As at 6 May 2019, SMHS became members of the GGHH Network. Membership is global recognition of SMHS' commitment to reduce the environmental impacts contributed by the healthcare sector, aligns SMHS with best practice approaches in environmental sustainability and provides access to resources and communication platforms going forward.

SMHS has adopted four Sustainability Goals to initially focus on; including Leadership as the key driver, plus three environmental goals being Chemicals, Waste, and Purchasing. This approach will assist in ensuring measurable and achievable implementation initiatives are progressed.

There are a number of dedicated teams across SMHS working on innovative sustainability initiatives. Some notable achievements include:

- The Fiona Stanley Hospital (FSH) Green Theatres Group, the first of its kind in WA, has implemented various sustainability initiatives in the operating theatres since it's opening in 2015. The Group continues to educate and engage with clinicians and facilities management representatives to improve outcomes across the hospital.
- The State Rehabilitation Service at FSH have their own 'War on Waste' group who have
 introduced a number of 'refuse, reduce, reuse' initiatives, including a share a cup system for
 reusable coffee cups; removing excess general waste bins and increasing visibility of
 recycling bins; and educating staff and patients on recyclable materials, resulting in a
 significant reduction in general waste and increase in co-mingled recyclables.
- SMHS Contract Management coordinated the substitution of 20ml plastic medication cups to 30ml recyclable paper medication cups, achieving cost savings and contributing to reducing disposable plastic policy requirements and sustainable procurement practices. This SMHS led initiative is being investigated by other WA hospitals and, if implemented, will contribute to increased savings and sustainability outcomes across WA Health.

In addition, there are ongoing SMHS-wide communications released in relation to sustainability activities and celebrating those initiatives already in place within the SMHS network. A dedicated intranet hub page is available which captures the SMHS Sustainability Framework, as well as activities being undertaken at sites, ensuring the SMHS community is informed of opportunities and responsibilities in terms of sustainability. A public release of the SMHS Sustainability Framework (Attachment 2) is available via the SMHS internet page via the Department of Health website, acknowledging our commitment to addressing climate health issues.

Summary of considerations

Challenges, strengths, opportunities or initiatives relevant to WA

It is well known that population health is dependent on the health of the planet and its ecosystems. Despite the improvements seen within the health sector over the years, climate change has the potential to undermine the social and ecological determinants of health. It is widely considered to be the biggest health threat of the 21st century.

Many of the effects of climate change are already being felt, and the frequency and intensity of their impacts will increase with time. The intensity of these impacts varies based on the particular vulnerabilities and adaptive capacity of individuals and populations. It is considered that the most vulnerable groups include Aboriginal and Torres Strait Islander peoples, people from culturally and linguistically diverse communities, people from lower socio-economic classes (i.e. those suffering from poverty, homelessness, unemployment/low income etc.), the elderly, women, and isolated or marginalised communities.

WA is no different to the rest of the world in regard to these factors; however, WA may be considered particularly vulnerable to:

- Further declines in rainfall patterns (reductions have been indicated over the last 40 years) causing significant stress on the south west regions of WA in particular;
- Rising sea levels posing significant risk to coastal infrastructure and population;
- Further loss of critically threatened bushland and native flora and fauna, which in turn
 decreases genetic diversity and causes subsequent risk to public health (i.e. reducing the
 adaptability of the population to their changing environment); and
- Loss of agribusiness and the associated risk to the mental and physical health of farming and related populations.

Given the particular geographic and socio-economic statistics of the WA population and with many people located in rural and remote areas, these factors could present as more of a challenge within WA.

2. Key issues, considerations and proposed resolution

Embarking on this issue is greater than WA Health alone; however, a system-wide approach will provide an essential foundation for enabling Health Service Providers (HSPs) to embed appropriate governance and drive change within operational environments. WA Health has a responsibility to current and future populations to be honest, clear and direct in terms of climate health action for both mitigation and adaptation strategies.

Policy, advocacy and centralised management

Evidence and data based advocacy will not alone result in organisational change. Development of an overarching, system-wide climate health/sustainability policy, or similar, to bring HSPs into alignment and embed into operational activities would provide a pillar for systemic change across WA Health. Through SMHS' sustainability endeavours to date, it is evident that active leadership and 'top down' support is critical to effecting operational changes and achieving positive, sustainable outcomes.

To drive engagement and support organisational change at a WA Health level, it would be beneficial if advocacy for sustainability could:

- 1. Plan, implement and monitor sustainability programs with the support of simple yet pragmatic policies.
- 2. Pivot upon a "Think Global, Act Local" vision and encourage staff, patients and the community to get on board and involved in the inevitable changes required.
- 3. Showcase evidence-based research and positive outcomes of pilot programs, trials and on the ground experience in similar environments to provide a platform for organisational change.
- 4. Link the science that already exists with both the emotional imperative and the greater self-interests of the audience i.e. tailor education pieces to both clinical and non-clinical perspectives and adjust to suit differing circumstances/audiences within HSPs.
- 5. Gather and link like-minded people to work horizontally across organisations, departments and communities.
- 6. Engage and support people with passion, people skills, technical skills/subject matter experts, tenacity and vision to work through the recommendations of the SHR, the findings of this Inquiry, and resulting sustainability initiatives at a local level.
- 7. Include an Aboriginal engagement strategy for liaison with local Aboriginal and Torres Strait Islander communities from the outset, as both traditional custodians of the land and a recognised vulnerable community.
- 8. Collect the data that conveys good news stories which can be broadcasted to a wider audience.

There are already many people from both clinical and non-clinical backgrounds within SMHS who have expressed interest in becoming involved in future sustainability initiatives. There is a clear opportunity to harness the genuine enthusiasm of the WA Health workforce to improve both their work environment as well as the health sector's footprint on the natural environment. Encouraging these people to champion sustainability activities and motivate colleagues, patients and hospital users to become involved will be a fundamental strength in moving forward.

System-wide considerations

To reasonably address climate health and support the above advocacy efforts, it is suggested that WA Health considers:

- Securing adequate resources, time and funding to perform/collate/present detailed research into current activities, key issues and proposed recommendations from a whole of Health perspective.
- 2. Development and implementation of a clear, directive policy to set baseline requirements across WA Health, which aligns to state/national/international policy, regulations and legislation.
- 3. Consider the establishment of a Sustainable Development Unit or similar at both a WA Health and HSP level (noting the recent establishment of the SHR Implementation Support Unit within the Department of Health) to progress local level research, reviews, implementation and support ongoing monitoring and compliance.
- 4. Consider a whole of Health review of sustainable procurement policies and supply chain practices, including sourcing of local goods and services, to support procurement of products and services that are compliant with environmental and social standards throughout their lifecycle.

- 5. Research the potential of clear and enforceable (where appropriate) regulation in health sector sustainability, which may include whole of government directives, incentives or support in reducing greenhouse gas emissions, improving water efficiency, moving towards transition to renewable energy within HSPs, and significantly decreasing waste within the health sector.
- 6. Consider alignment with international standards and recommendations from reputable research bodies (i.e. The Lancet, World Health Organisation) in terms of a healthy diet from a sustainable food system (refer to the *EAT-Lancet Commission on Food, Planet, Health*).
- 7. In terms of findings and/or recommendations arising from the Inquiry, a clear scope, role delineation and reporting methodology between WA Health, as System Manager, and HSPs will be essential for ongoing success and management.

As described in SMHS' submission to the SHR, for sustainable quality health care for our growing and aging population, a significant shift to prevention and early intervention is required from our current hospital based, crisis management model. HSPs must transition from a hospital centric model to a model that focuses on building of our populations' health and wellbeing. Environmental factors will have an obvious impact in consideration of a potential shift to a community based model of care.

Further, a significant limitation in terms of future sustainability actions is financial constraints and access to capital funding. SMHS has progressed the initial phases of its sustainability efforts within current budgetary allocations; however, it is evident that there is already potential for dedicated resource/s to centrally manage at a HSP level and drive implementation going forward. SMHS has communicated that any initiatives arising from site specific sustainability activities are subject to individual Business Cases, including consideration of financial and contractual impacts and endorsement of associated funding. As there are significant financial and resourcing pressures within SMHS, and across WA Health, full evaluation of benefits, risks, aggregation opportunities at both a HSP and system-wide level, and return on investment of any proposed sustainability initiatives is crucial.

Priority areas for improvement

SMHS recognises there is significant opportunity for progress in the areas of materials, utilities and human impacts on the environment. Key implementation considerations against each of these themes are indicated below.

These considerations are largely extracted from the SMHS Sustainability Framework which incorporates subsets of each of these themes under its 10 Sustainability Goals. Implementation criterion are identified within the Framework for sites to consider and effect at a local level. The Framework is supported by the relevant relationships to SMHS/WA Health policy, Operational Directives, Standards, Legislation and Regulations. It is endorsed by the SMHS Area Executive Group and has been provided to the SMHS Board as well as the Minister for Health in response to correspondence encouraging membership to the GGHH Network, of which SMHS are members.

Materials

Effective waste management has been an ongoing pressure point, particularly with media attention surrounding 'War on Waste' initiatives in recent years. There is great potential for harnessing the enthusiasm of the WA Health workforce to progress site based 'refuse, reuse, recycle' initiatives. Materials, however, is not limited to waste management and consideration should be given to:

- Reducing the volume and toxicity of waste produced by hospital sites, whilst implementing environmentally sound waste management (including storage, segregation, composting, transportation, treatment) and disposal options.
- Establish site-based Waste Management Committees (where not already in place) to lead sustainable waste management and disposal initiatives.

- Education of site users and provision of accessible information on waste management and segregation across hospital sites.
- Replace commonly purchased single use plastic products with recyclable, compostable or reusable alternatives throughout hospital sites in both clinical and non-clinical environments. Examples include, but are not limited to; plastic/foam cups, medication cups (recently implemented across SMHS), plastic straws, plastic utensils, bottles, coffee cups etc.
- Address the use of biologically and environmentally hazardous chemicals (as defined in SMHS/WA Health policies); including, but not limited to: glutaraldehyde, halogenated fire retardants, PVC, DEHP and BPA; and seek safer alternatives and substitutes.
- Source, purchase and serve sustainably grown, locally sourced, healthy food.
- Support access to healthy food options and nutrition, thereby helping to foster disease prevention and contributing to longer-term reduction in the population's health requirements.
- Work collaboratively with clinicians to appropriately prescribe, safely manage and properly dispose of pharmaceuticals.
- Adopt sustainable procurement policies, strategies and practices to support procurement of products and services that are compliant with environmental and social standards throughout their lifecycle.
- HSPs to work with the System Manager to source sustainably produced supply chain materials from socially and environmentally responsible vendors.

Utilities

A coordinated, system-wide approach to the reduction in the environmental footprint of health services (including but not limited to energy/carbon emissions, water etc.) would be of value, particularly given there are whole of government Common Use Arrangements in place for procurement of utility services. Potential options for consideration include:

- WA Health aspires to achieve carbon neutral targets through efficient building design, refurbishment and operation.
- For existing buildings, implement an energy efficiency program in consultation with facilities management and operational teams that will minimise energy consumption, in addition to providing cost savings.
- Once efficiency measures are implemented, investigate the purchase of clean, renewable energy and include its generation (or at a minimum, provision for future generation) in new buildings or the refurbishment of existing facilities.
- Implement site specific procedures to maximise water conservation strategies.
- Consider rainwater harvesting and/or recycling water to maximise water consumption efficiencies.
- Adopt guidelines/rating systems of the Green Building Council Australia and/or other local, national or international green building organisations to guide the design and construction of new buildings and support efficiencies in existing building operations.
- Prioritise the integration of hospital sites with the natural environment to support environmental sustainability whilst positively influencing patient health, as well as employee performance and satisfaction.
- Engage with facilities management contractors to explore avenues for improvement in terms of supporting environmental sustainability (within the bounds of existing contractual agreements).

Human impacts on the environment

WA Health and HSPs should consider promotion of improved transportation choices for employees and hospital users, in conjunction with service providers/contractors, by developing strategies to reduce the climate footprint of sites. These may include, but are not limited to:

Consideration of transition from a hospital centric model to a community based model that
focuses on building the population's health and wellbeing and in turn resulting in improvement
of the human impact on the environment, particularly in terms of transportation and emissions
reduction.

- Increased promotion and advocacy of non-hospital based healthcare services by way of innovations in technology for improving access and efficiency of health care services i.e. Telehealth.
- Development of site specific transportation and service delivery procedures that reduce hospitals' climate footprint and their contribution to local pollution.
- Encourage hospital site users to use bicycles, public transport and carpooling options to assist
 in reducing air pollution emissions related to healthcare facilities, whilst promoting public health
 strategies.
- Sites to promote Staff Wellness Programs; including encouraging the use of public transport services and subsidies in accordance with the WA Health Metropolitan Access and Parking Department Travel Plan.
- Audit existing hospital fleets (including patient transport vehicles, employee fleet pool vehicles, delivery vehicles etc.) and develop Business Case/s to determine whether shifting to hybrid technologies or natural gas are viable options.

3. Commitment to a sustainable future for WA Health

SMHS has been proactive in driving sustainability initiatives in recent years and will continue to support initiatives going forward, from both a local hospital site level to those arising as a result of the Inquiry.

SMHS will continue to prioritise environmental health matters, within existing budgetary and resource allocations, by:

- Providing leadership support of sustainability and environmental health initiatives.
- Communicate, promote and celebrate sustainability initiatives and achievements across our hospital sites, ensuring that the SMHS community is informed of opportunities and responsibilities in terms of sustainability.
- Increase education and awareness of the issue, to health professionals, non-clinical staff, patients and members of the public.
- Continue implementation of the SMHS Sustainability Framework across SMHS, embed within existing governance structures, and encourage sites to explore and implement the initiatives against each of the 10 Sustainability Goals at a local level.
- Progress the establishment of a Sustainability Working Group/s at a site level, within existing
 resources, to engage motivated staff with a genuine interest in environmental and public
 health to drive sustainability activities going forward.
- Working collaboratively with facilities management and infrastructure and operational teams across SMHS (including Serco as the contracted Facility Manager for Fiona Stanley Hospital) to incorporate sustainability practices where practical.
- Harness those enthusiastic staff and champion their successes via communication pieces, both internal and external (i.e. SMHS website).
- Allow our teams to be proactive, imaginative and innovative in potential solutions to sustainability issues.
- Support emission reduction targets and public health strategies by promotion of public transport options, use of bicycles and carpooling options.
- Evaluate the SMHS Sustainability Framework, record lessons learned and adjust if required.

Our Health Service is dedicated to supporting climate health initiatives for the future of the Western Australian community and will endeavour to support the findings and/or recommendations arising from the Inquiry.

Attachment 1: SMHS Sustainability Framework – Internal

Attachment 2: SMHS Sustainability Framework - Public

This document can be made available in alternative formats on request.

South Metropolitan Health Service

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Compiled: South Metropolitan Health Service, 2019

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SMHS Sustainability Framework: thinking globally, acting locally Implementation Framework

Leadership: Prioritise environmental health

SMHS has clear and strong leadership to ensure that environmental health and sustainability are key organisational priorities, and drives implementation of SMHS-wide sustainability initiatives.



Transportation: Improve transportation strategies for patients and staff

SMHS promotes improved transportation choices with key service providers/contractors and encourages alternate transport options for employees by developing strategies that reduce the climate footprint of sites.

Chemicals:

Substitute harmful chemicals with safer alternatives

SMHS commits to addressing chemical exposure in hospital settings to ensure the health of patients, employees and site users. whilst demonstrating the safe management of chemicals, including item substitution where possible and introducing policies for the disclosure of chemical ingredients.











Purchase and serve sustainably grown,

SMHS works in conjunction with cook fresh sites. pre-prepared food suppliers and hospital food service tenants to support the provision of healthy food options from sustainable sources across sites, and ensures compliance with the Healthy Options WA: Food and Nutrition Policy, aligned with the Australian Dietary Guidelines.

Waste:

Reduce, treat and safely dispose of healthcare waste

SMHS has strategies in place to support the protection of public health by reducing the volume and toxicity of waste produced in healthcare settings, and implements sustainable waste management and disposal options.

Pharmaceuticals:

pharmaceuticals

Safely manage and dispose of

for clinical and non-clinical staff.

SMHS provides appropriate care in line with

international best practice and national standards

and supports the safe management, appropriate

prescribing and suitable disposal of pharmaceuticals

by ensuring adequate waste disposal strategies are in place and the availability of education and training



Energy:

Implement energy efficiency and clean, renewable energy generation

SMHS has policies and support systems that promote energy efficiency, reduction of emissions, and transition to renewable energy sources where possible.



Water:

Reduce hospital water consumption and supply of potable water

SMHS strives to achieve water consumption efficiencies by implementing water conservation strategies and works collaboratively with contractors to minimise water usage.



















Buildings:

Support green and healthy hospital design and construction

SMHS aspires to carbon-neutral operation at a site level, working collaboratively with facilities management contractors across sites to adopt Green Star practices of the Green Building Council of Australia to support design, construction and operations for sustainable buildings, fitouts and healthcare communities where possible.

Purchasing: Buy safer and more sustainable products and materials

SMHS works with the System Manager to support the development and implementation of green and ethical purchasing policies and ensures appropriate education and training is available for clinical and non-clinical staff.

healthy food

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Sustainability goal*		Implementation criteria		
01	Leadership : Prioritise environmental health	1.1	SMHS has a clear Sustainability Framework based on WA Health system-wide Policy, which drives the systematic implementation of sustainability goals.	
		1.2	SMHS identifies clear accountability for all levels and aspects of implementing this Framework.	
		1.3	SMHS seeks representation to implement the Sustainability Goals and associated initiatives based on a baseline audit undertaken by hospital sites and monitoring and evaluation of results.	
		1.4	SMHS fosters education and cultural change around environmental sustainability.	
		1.5	SMHS allocates the human and financial resources necessary for all aspects of Framework implementation.	
02	Chemicals: Substitute harmful chemicals with safer alternatives	2.1	SMHS has a clear site-wide chemical and hazardous materials policy and protocols to protect patients, employees, community health and the environment.	
		2.2	Address the use of biologically and environmentally hazardous chemicals (as defined in SMHS Hazardous Chemicals Policy 148); including, but not limited to: glutaraldehyde, halogenated fire retardants, PVC, DEHP and BPA; and seek safer alternatives and substitutes.	
		2.3	Participate in the World Health Organisation (WHO) Health Care Without Harm (HCWH) global Mercury-Free Health Care Initiative by substituting mercury thermometers and blood pressure devices with safe, accurate, affordable alternatives where possible.	
03	Waste: Reduce, treat and safely dispose of healthcare waste	3.1	Reduce the volume and toxicity of waste produced by hospital sites, whilst implementing environmentally sound waste management (including storage, segregation, composting, transportation, treatment) and disposal options.	
		3.2	Establish site-based Waste Management Committees to lead sustainable waste management and disposal initiatives.	
		3.3	Educate site users and provide accessible information on waste management and appropriate waste segregation across SMHS sites.	
	E			
04	Energy : Implement energy efficiency and clean,	4.1 4.2	For existing buildings, implement an efficiency program that will minimise energy consumption. Once efficiency measures are implemented, investigate the purchase of clean, renewable energy and include its generation (or	
	renewable energy generation	4.2	provisions for future generation) in new buildings where appropriate.	
0.5	Water: Reduce hospital	5.1	SMHS has site specific procedures in place to maximise water conservation strategies across health sites.	
05	water consumption and supply of potable water	5.2	Consider rainwater harvesting and/or recycling water to maximise water consumption efficiencies.	
00	Transportation: Improve	6.1	SMHS drives improvements in transportation strategies for patients and staff.	
06	transportation strategies for patients and staff	6.2	Develop site specific transportation and service delivery procedures that reduce hospitals' climate footprint and their contribution to local pollution.	
		6.3	SMHS encourages hospital site users to use bicycles, public transport and carpooling options to assist in reducing air pollution emissions related to healthcare facilities, whilst promoting public health strategies.	
07	Food : Purchase and serve sustainably	7.1	SMHS purchases and serves sustainably grown, healthy food.	
	grown, healthy food	7.2	SMHS supports access to healthy food options and nutrition, thereby helping to foster disease prevention and contributing to longer-term reduction in the population's healthcare requirements.	
		7.3	Reduce hospitals' environmental footprint while fostering healthy eating habits in patients and employees.	
	Diamagastisala	0.4		
08	Pharmaceuticals: Safely manage	8.1 8.2	SMHS works collaboratively with clinicians to appropriately prescribe, safely manage and properly dispose of pharmaceuticals. SMHS aims to minimise inappropriate pharmaceutical waste disposal and promotes manufacturer take-back where possible.	
	and diapage of	8.3	SMHS works with community partners and other organisations to promote and contribute to local, national and international pharmaceutical pollution reduction activities.	
09	Buildings: Support green and healthy hospital	9.1	SMHS aspires to achieve carbon neutral targets through building design and operation.	
	design and construction	9.2	Adoption of guidelines/rating systems of the Green Building Council Australia and/or other local, national or international green building organisations to guide the design and construction of new buildings and support ongoing building operations.	
		9.3	Prioritise the integration of hospital sites with the natural environment to support environmental sustainability whilst positively influencing patient health, as well as employee performance and satisfaction.	
40	Purchasing: Buy safer and more sustainable products and materials	10.1	Adoption of sustainable procurement policies, strategies and practices to support procurement of products and services that are	
10		10.2	compliant with environmental and social standards throughout their lifecycle. SMHS works with the System Manager to source sustainably produced supply chain materials from socially and environmentally	
			responsible vendors.	
		10.3	SMHS creates and provides documents and resources to educate and support SMHS sites in integrating sustainable procurement into their operations.	