



Environment / Sustainability in Health: drivers for change by the pharmaceutical industry

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11 June 2024

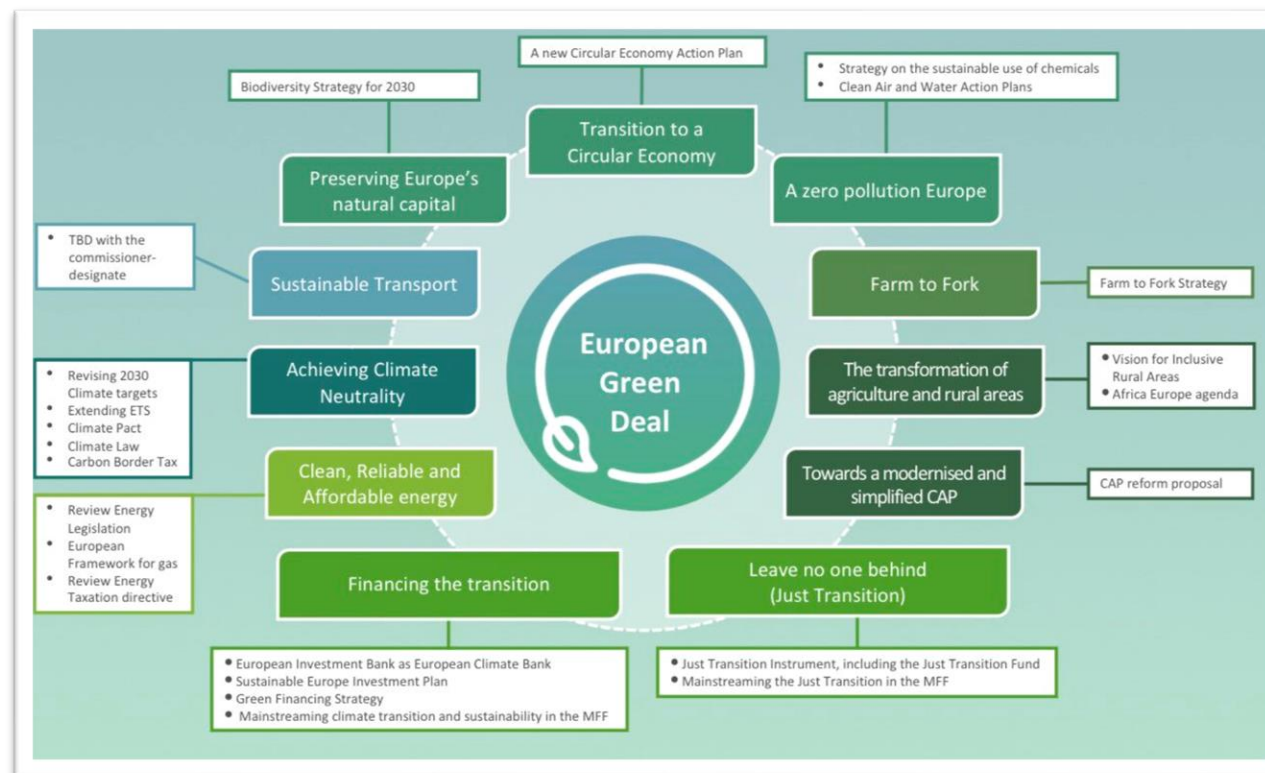




European Green Deal



- The **European Green Deal** was launched by the Commission in December 2019.
- The European Green Deal is a package of policy initiatives, which aims to set the EU on the path to a **green transition**, with the ultimate goal of reaching climate neutrality by 2050.





Climate, Patients, Supply, Innovation and Regulatory Flexibility



Climate

Focused on achieving environment, sustainability and climate targets.

Global and EU legislation (E.g., Climate for action, Green Deal, REACH, the Montreal Protocol and Kigali amendment etc) **will increasingly impact supply of medicinal products.**



Patients

Changes to regulations and products can negatively impact supply.

It is vital to ensure **that critical medicines remain available to patients globally.**



Innovation and Regulatory Flexibility

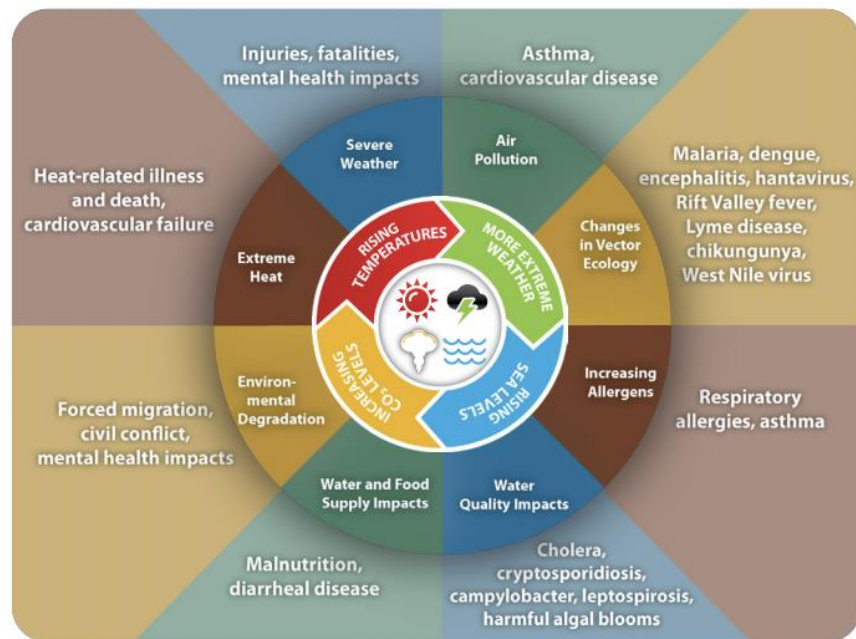
General principles applied to all changes to enable sustainable medicines' supply.

- Reducing the climate and environment impact of medicines through introduction of alternative manufacturing processes and materials is a key area of innovation.

EU medicines regulators can play a vital role in enabling innovation to support climate and environment goals.



Combatting Climate Change



- An EFPIA survey observed a **10% cut in scope 1 and scope 2 CO₂ emissions between 2020 and 2022**. This is equivalent to 1.5 million tons of CO₂ and was achieved despite a significant net sales increase.
- **95% of EFPIA companies engage with downstream suppliers on climate action targets.**
- **70%** have long-term targets for reducing scope 3 emissions generated by suppliers, and **45%** have short-term targets.
- **80%** of survey respondents reported using the greenhouse gas protocol (GHP)
- Benchmarked against high-impact industry sectors (such as chemicals), the pharmaceutical sector's global CO₂ emissions are reported to be **about 10 times lower in absolute emissions**





Pharmaceuticals in the Environment



MANUFACTURING EFFLUENTS MANAGEMENT
Technical guidance

eERA
Proposal for an extended ERA

EPR

campaign to **raise awareness** on how to dispose of **unused or expired medicines** appropriately in Europe

Establish a shared set of principles to identify and mitigate the potential impacts of active pharmaceutical ingredients (API) in wastewater from manufacturing operations.

Designed to strengthen the current ERA process and industry's commitment to conduct robust and risk-based ERAs without compromising environmental protection or patient access to medicines across the life cycle of the API.

Balancing challenges on Urban Wastewater Treatment with access to Medicines in Europe.



Responsible supply chain management and better business conditions across the industry.

Common antibiotic manufacturing framework and science-based assessments effectively control antibiotic releases





Sustainable Chemicals

EDQM driven activities

Concrete actions

- Avoid and reduce use of hazardous reagents (replacing hexane by heptane, reduce use of chloroform, dioxane, etc.)
- Reduce the amounts of solvents
- Avoid use of Mercury and mercury compounds

Restrictions stemming from EU legislation

- Replacement of substances of very high concern
- New amendment to annex XIV of REACH: DEHP as PVC plasticizer
- EU regulations on fluorinated gases
- Impact on anesthetics and propellants and heating systems

Future considerations – planning ahead

- Restrictions planned for Polyfluoroalkyl substances (PFAS) (Awaiting decisions on the scope of the restriction)
- PVC and additives – waiting on Commission restriction proposal

EU Strategy for Sustainable Chemicals

- Published in October 2020
- **Actions**
 - **ban** the most harmful chemicals in consumer products
 - **phasing out** the use of per- and polyfluoroalkyl substances (PFAS) in the EU, unless their use is essential
 - **boosting the investment and innovative capacity** for production and use of chemicals that are safe and sustainable by design
 - promoting the EU's **resilience of supply and sustainability** of critical chemicals
 - establishing “**one substance one assessment**” process
 - **Lead globally** by championing and promoting high standards and not exporting chemicals banned in the EU

Industry is active

- Supports substitution however must avoid regrettable substitution
- Public private partnership opportunities
- Close consideration of supply chain risk and possible shortages of medicines



A universal PFAS ban: availability of medicines, manufacturing, jobs and economic growth will be put at risk

The pharmaceutical industry shares concerns about the environmental impact of PFAS. However, PFAS is a broad non-specific term which does not inform whether a compound is harmful, and not all PFAS present the same risk to the environment or health. The potential impact of a Europe-wide ban on PFAS in pharmaceutical products, packaging and operations is significant:

- The pharmaceutical industry relies on PFAS for safe manufacturing, distribution and use of medicinal products.
- The proposed derogation for PFAS Active Pharmaceutical Ingredients (API) does not derogate medicinal products, and only applies to less than 10% of medicinal products in the EU market impacted by the ban. We need strategic planning and alternative approaches to avoid disruptions in patient care.

Impact on patient access to medicines

- 98% of the Market Authorisations of innovative medicines would need to be amended
- 93% of the EU's active substance manufacturing relies on fluoropolymers*
- >70% of critical medicines in European Member States could be in short supply

Examples of the widespread impact:

R&D Laboratory Equipment, Instruments, Piping; Chemicals API, Starting materials, Intermediates, Process materials

Manufacturing Production equipment Pipes, Gaskets, Caps, Valves, Injector, Degasser Filters, Refrigerants, Lubricants; Packaging Stoppers, Blisters

Distribution & Use Storage & transport equipment Plastics, Coatings, Refrigerants; Application Medical device, Drug delivery devices

Our recommendations

- Derogations until suitable alternative solutions are commonly agreed and qualified
- Develop partnerships throughout supply chains to better manage emissions
- Global health authorities expedite approvals of sustainable fluorine-free alternatives





Animal Welfare

History of 3Rs at EDQM

(Human and Veterinary)

2012 - 2020

- ✓ Reduction of unnecessary use of animals in pertussis vaccines
- ✓ Adoption of 80 vet vaccine monographs reducing the number of animals used in testing
- ✓ ELISA alternative introduced in *Assay of hepatitis A vaccine*
- ✓ Revision of testing strategy for extraneous agents
- ✓ Revision of general monograph *Vaccines for veterinary use (0062)*: reduction of animal testing for veterinary vaccines
- ✓ Provision for additional systems for monitoring of production consistency and *in vitro* alternatives
- ✓ New chapter in Ph. Eur: *Substitution of in vivo method(s) by in vitro method(s) for the quality control of vaccines*
- ✓ Revised *Monocyte-activation test*, an alternative to pyrogen
- ✓ Suppression of the Test for Abnormal Toxicity from 49 monographs of the European Pharmacopoeia
- ✓ Replacement of the Histamine sensitisation test (HIST) for residual pertussis toxin testing
- ✓ Review of toxicity testing requirements for tetanus vaccines - three animal tests have been suppressed
- ✓ Review of veterinary vaccine monographs to promote the 3Rs

Next – 2026:

- Endotoxin** → the possibility to replace the “LAL” reagent (horseshoe crab) by the recombinant factor C
- Pyrogen** → development of a new strategy to phase out the Rabbit Pyrogen test

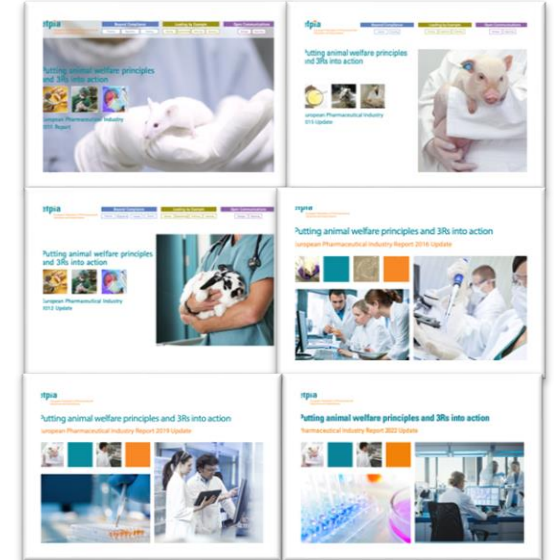


Phasing-In New Approach Methodologies

EFPIA members are committed to the **science-based phase-in of methods to replace the use of animals for scientific purposes** and the deletion of animal tests which are obsolete or redundant.

Commission Roadmap to phase-out use of animals for (chemical) safety assessments

- To be published in 2026
- Active engagement across all key players
- Close consideration of Supply chain risk an





Innovation and regulatory flexibility to meet climate environmental and sustainability goals

Many ambitious initiatives:*

Sustainable materials

- Recycling/circularity, bio-derived, PVC-free packaging, ePIL....

Chemistry

- Low-carbon or recycled solvents, use of surfactants, green chemistry routes....

Raw Materials

- F-Gas, PFAS replacement, non-animal derived materials (LAL)...

Manufacturing

- Process intensification, water, energy use, sterilisation, transport and storage....



Critical enablers

- Consistent frameworks to assess climate & environmental impact
- Medicines regulators' input to enable innovation to meet climate and environmental goals



*Source: EFPIA MQEG and EHSEG joint brainstorm, February 2024





Net Zero: the inevitable future of healthcare

Classification: Official **NHS**

Delivering a 'Net Zero' National Health Service

HEALTHIER PLANET
HEALTHIER PEOPLE

Discover how the NHS is becoming greener. [Search Greener NHS](#)



ATACH Alliance for Transformative Action on Climate and Health WHO hosted network

World Health Organization

UK International Development Partnership | Progress | Prosperity

Sustainability Leadership for Greener Health and Care Programme

NHS

How to produce a Green Plan: A three-year strategy towards net zero

www.england.nhs.uk/greenernhs

NHS **ASTHMA+LUNG UK**

Did you know...
Improving your lung health can help you and the environment?

Talk to your healthcare professional at your next appointment.

Asthma + Lung UK and NHS England are working in partnership to support you to live better with your lung condition and help the environment.

Scan the QR code to find out more

Global Road Map for Health Care Decarbonization

A navigational tool for achieving zero emissions with climate resilience and health equity

Health Care Without Harm: Climate-Smart Health Care Series

Green Paper Member: Yes

NET ZERO CLINICAL CARE

Book your seat →

14 July 2023 | BMA House, London

Delivering greener care for a healthier future

EDQM **60** 1964 - 2024

COUNCIL OF EUROPE **75** 1949 - 2024 CONSEIL DE L'EUROPE



Lower Carbon Models are Key to Becoming Net Zero



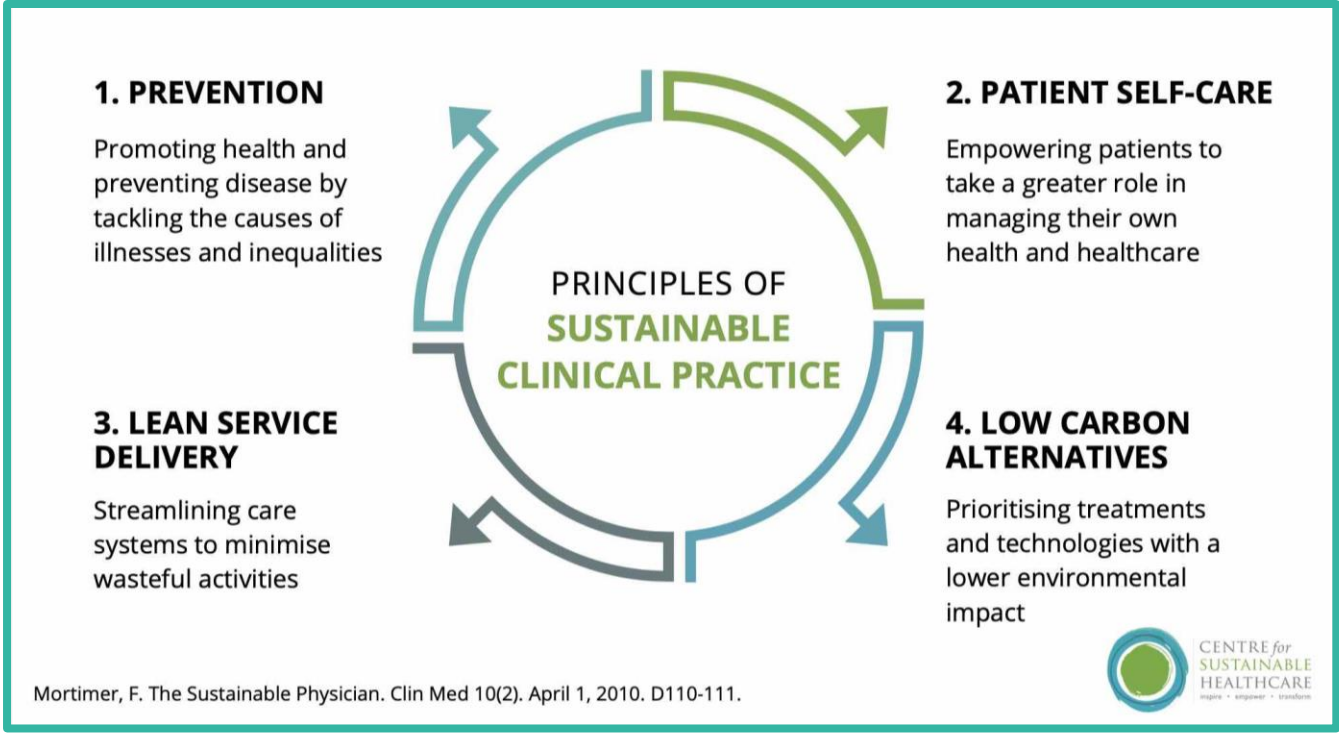
Low carbon care settings



Provide the right care, at the right time in the right place



Keep people healthy over their life course



NHS England. Areas of focus. 2022. Available here: <https://www.england.nhs.uk/greenernhs/a-net-zero-nhs/areas-of-focus/> (Accessed November 2023)

Centre for Sustainable Healthcare. What we do. 2023. Available here: <https://sustainablehealthcare.org.uk/what-we-do> (Accessed October 2023)





About the Sustainable Healthcare Coalition



- We are a partnership of healthcare companies and other health agencies drawn together to address some of the most pressing sustainability issues in global healthcare.
- Our purpose is to facilitate the journey towards good health and wellbeing on a finite planet, through open-minded collaboration across public and private healthcare.

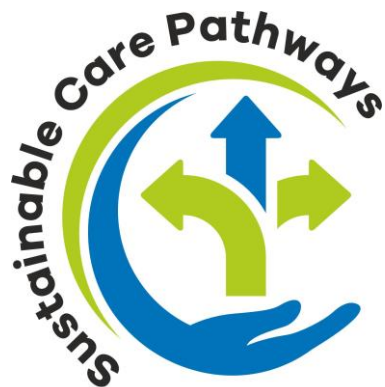
Our core group draws in participation from other health system players including trade bodies, state healthcare providers, public health institutions and international agencies.





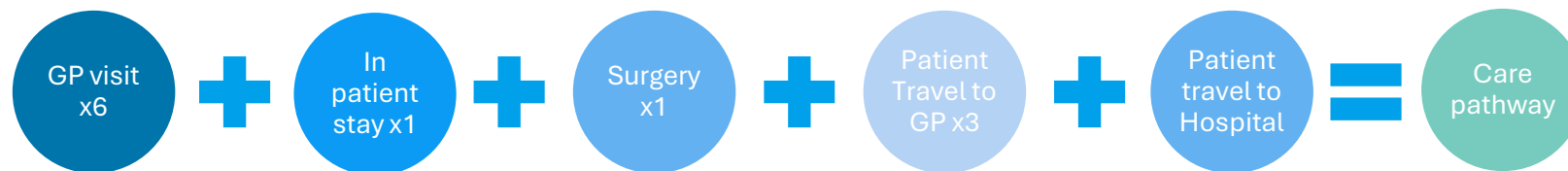
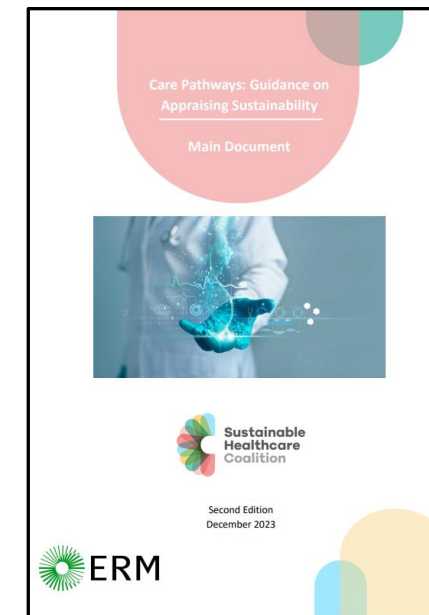
Measuring the Impact of Care Pathways

- World's first guidance on how to measure the **carbon footprint of pharmaceuticals and medical devices** and the environmental impact of **whole care pathways** through freely available guidance;
- Understand the current footprint of services and how **innovation can transform healthcare systems** through **case studies**;
- Freely available guidance and an **online calculator**: <https://shcoalition.org/patient-care-pathways>



CARE PATHWAYS MODULES

- GP consultation
- Patient travel
- Emergency Department visit
- Inpatient bed day
- Surgical procedure
- Self-management
- Diabetes Management



Patient Care Pathway Carbon Calculator

[Start Calculation](#)





Clinicians Driving Innovation

Trusted partnerships join up the system and accelerate change by learning together:

- **Carbon footprint of renal haemodialysis services** at Newcastle UTH informing local and national carbon reduction plans with an **international carbon calculator**;
- **Shifting towards prevention and early intervention** such as testing for pre-eclampsia, vaccination for influenza, and modifying disease progression;
- **Digital innovation to reduce impact**;
- **General practice carbon calculator** to identify and manage non-clinical emission hotspots;
- **Measuring the impact of clinical trials** with a standardised framework.

The collage features several key elements:

- Environmental Impact of the Care Pathway for Chronic Kidney Disease in the UK** (Care Pathway Case Study) by AstraZeneca and Sustainable Healthcare Coalition.
- Environmental Impact and Benefits of Care4Today® Total Knee Replacement Care Pathway** (Care Pathway Case Study) by care4today.
- Environmental Impact of the Care Pathway for Seasonal Influenza** (Care Pathway Case Study) by AstraZeneca.
- PIGF-based testing for pre-eclampsia** (An Environmental Assessment) by Oxford Academic Health Science Network and Sustainable Healthcare Coalition.
- ICHD Carbon Calculator** (In-centre haemodialysis carbon calculator) by Sustainable Healthcare Coalition, in association with NHS The Newcastle upon Tyne Hospitals NHS Foundation Trust.
- General practice carbon calculator** (A practical calculator for general practices) by Sustainable Healthcare Coalition, in association with Boehringer Ingelheim.
- Renal Services** grid including: Primary care, Haemodialysis, Peritoneal Dialysis, Renal Transplantation, In-patient nephrology, Out-patient nephrology, Diagnosis & monitoring, In-centre HD, Home PD, Live donor programme, Renal clinical investigation unit, Co-morbidity management, Satellite centre HD, Assisted PD, Deceased donor programme, Nephrology clinics (Advanced kidney disease, General nephrology, Hypertension, GN/vasculitis, New patient, Renal transplant, Remote advice & guidance, Q&C clinic, Genetics, PD, Joint obstetrics), Arresting disease progression, Home HD.
- Sustainable Clinical Trials** logo.
- EDQM 60** (1964 - 2024) logo.
- COUNCIL OF EUROPE 75** (1949 - 2024) logo.

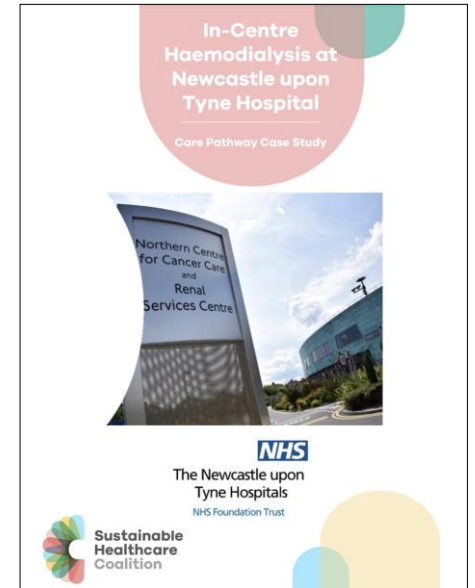
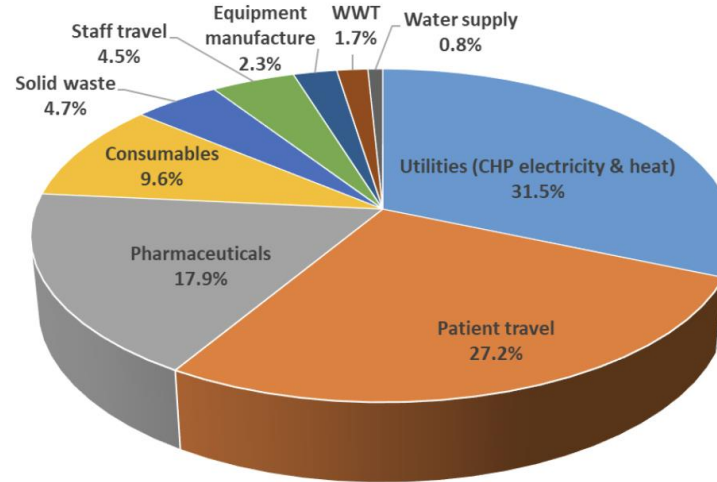
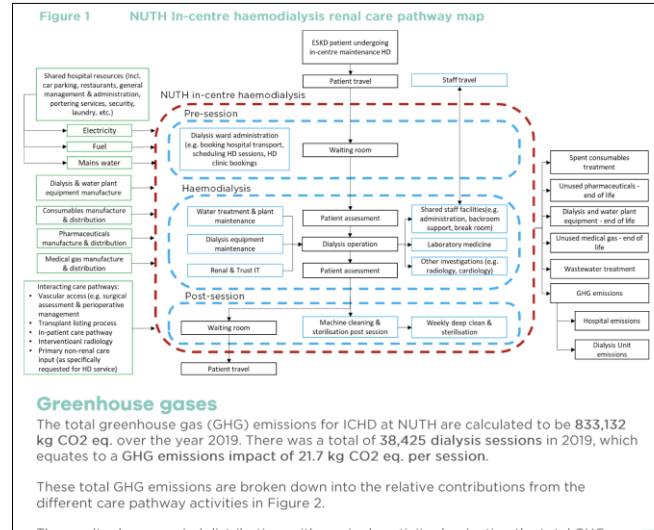


Care Pathways Approach for Renal Replacement Therapy

- Pathway mapping of in-centre haemodialysis;
 - 21.7 kg CO₂e per patient session at NUTH or 3.4 tonnes CO₂e per patient per year¹
- Note: the average global citizen footprint is 4.3 tonnes CO₂e per year²*

➤ Hotspots – Utilities, Travel, Pharmaceuticals

- Recommendations identified:
 - Work with supply chain on manufacture, packaging + distribution
 - Reduce energy use and increase efficiency
 - Reduce transport emissions
 - Bulk delivery system



1. The Newcastle upon Tyne Hospitals NHS Foundation Trust. A Care Pathway Environmental Assessment of In-Centre Haemodialysis at Newcastle upon Tyne Hospitals NHS Foundation Trust. 2022. Available here: <https://shcoalition.org/in-centre-haemodialysis-at-newcastle-upon-tyne-hospital/> (Accessed October 2023) 2. The World Bank. CO₂ emissions (metric tons per capita). 2020. Available here: <https://data.worldbank.org/indicator/EN.ATM.CO2E.PC> (Accessed November 2023) 3. Liyanage T, Ninomiya T, Jha V, Neal B, Patrice HM, Okpechi I, et al. Worldwide access to treatment for end-stage kidney disease: a systematic review. Lancet (2015) 385:1975–82. 10.1016/S0140-6736(14)61601-9





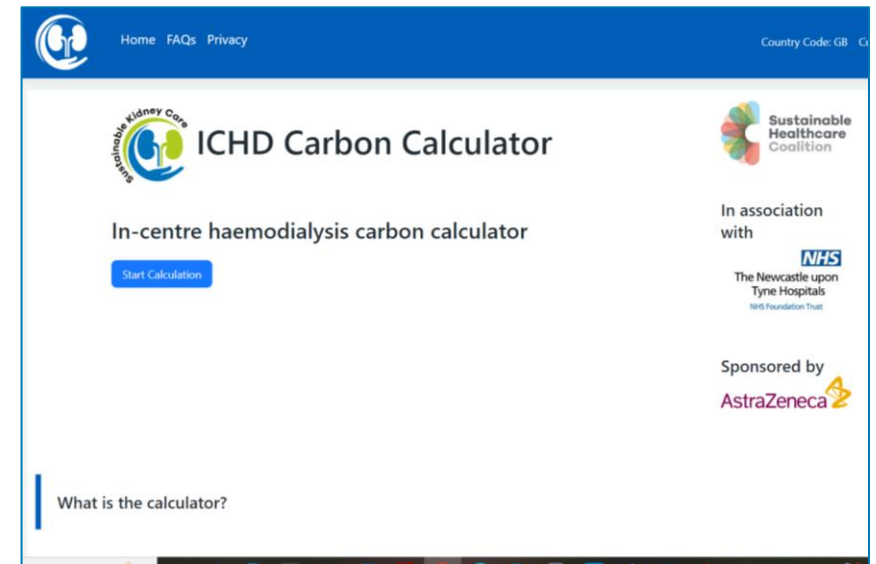
Practical Guides for Healthcare Action

12 steps to GREEN A KIDNEY UNIT



- 1** **Communication:** nominate a staff Sustainability Champion to be the link to best practice with other units and encourage all staff to join the wider Kidney Care Sustainability Network
- 2** Reduce and decarbonise patient travel
- 3** Reduce energy consumption of kidney care estates
- 4** Decarbonise energy sources
- 5** Focus on acid concentrates
- 6** Save water
- 7** Reduce and decarbonise staff travel
- 8** Encourage patients to bring own blankets to dialysis
- 9** Move charitable and research accounts to greener banks
- 10** Consider carbon implications in procurement
- 11** Tackle prevention and tailor dialysis
- 12** Develop resilience/contingency plans

This is a summary of UKKA Sustainable Kidney Care Committee's '12 Steps to Green a Kidney Unit'. For the full version go to: [Networks.sustainablehealthcare.org.uk/resource/s/12-steps-green-kidney-unit](https://networks.sustainablehealthcare.org.uk/resource/s/12-steps-green-kidney-unit)



<https://ichdcarbon.org>

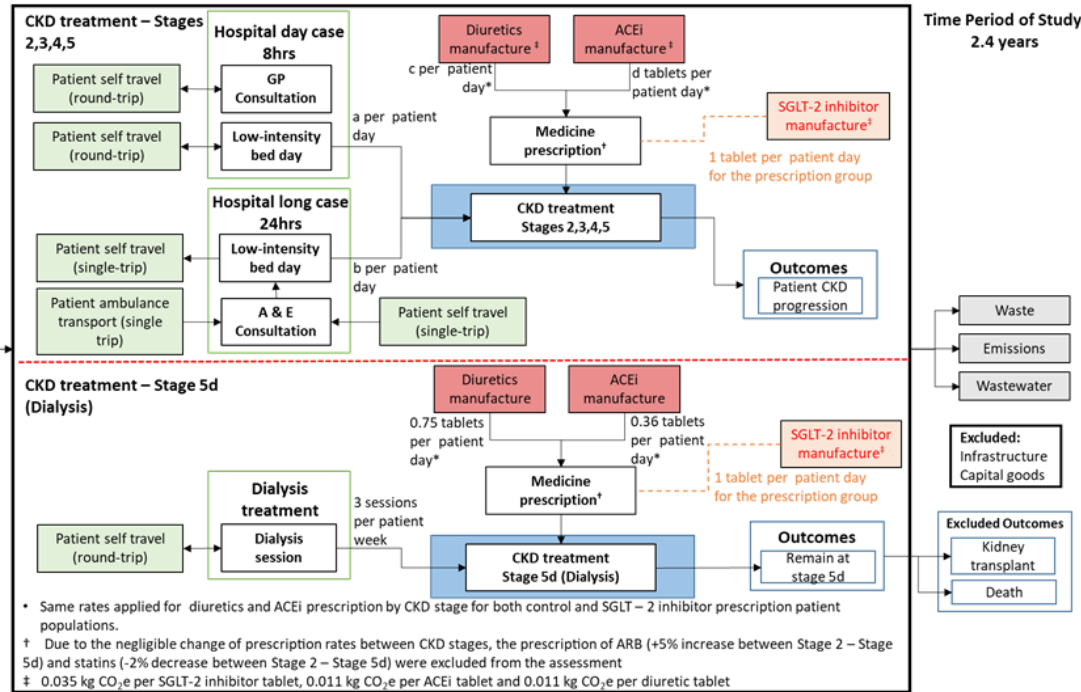




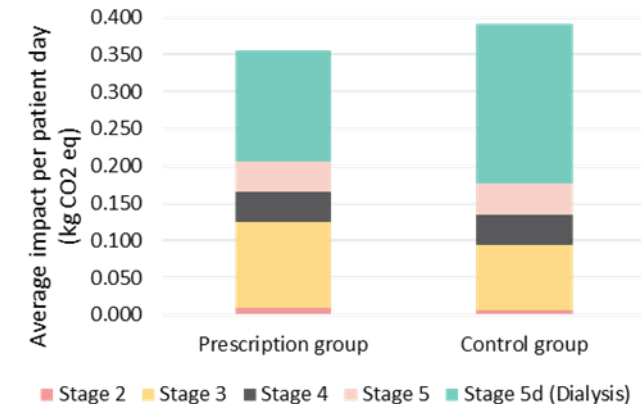
Impact of Reducing Chronic Kidney Disease Progression: Opportunities for Innovation



- Fuels & energy
- Electricity
- Water
- Raw materials



CKD Stage	GHG Impact per Control Patient Day in Stage (kg CO ₂ eq)	UK CKD Population	UK CKD Patient GHG Impact (tonnes CO ₂ eq/year)
Stage 2 (eGFR 90-60)	0.064	210,000	5,000
Stage 3 (eGFR 60-30)	0.140	2,430,000	124,000
Stage 4 (eGFR 30-15)	0.325	120,000	14,000
Stage 5 (eGFR <15)	0.325	38,000	5,000
Stage 5d (Dialysis)	9.39	30,000	103,000



Environmental Impact of the Care Pathway for Chronic Kidney Disease in the UK
Care Pathway Case Study

AstraZeneca

Sustainable Healthcare Coalition

<https://shcoalition.org/environmental-impact-of-the-care-pathway-for-chronic-kidney-disease-in-the-uk/>





Opportunities for Collaboration Across The Value Chain



The SMI Health Systems Task Force Commitment

Meaningful change will require all stakeholders to work together. As a collaborative alliance of public and private sector leaders, the SMI Health Systems Task Force is uniquely positioned to accelerate decarbonisation efforts across the entire health ecosystem. With relevance to patient care pathways, it is committed to:



Engage and collaborate with health policy makers, regulators, payers and providers, and hospitals from across the globe to raise awareness of the need and the opportunity to decarbonise care pathways

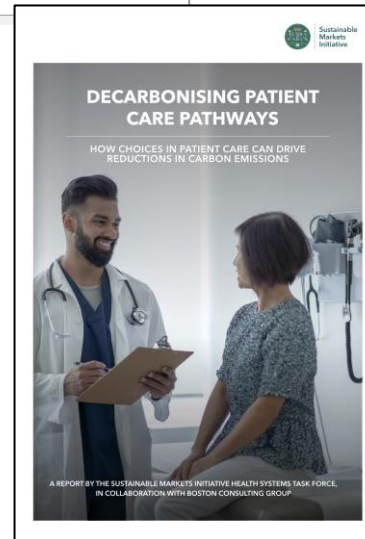
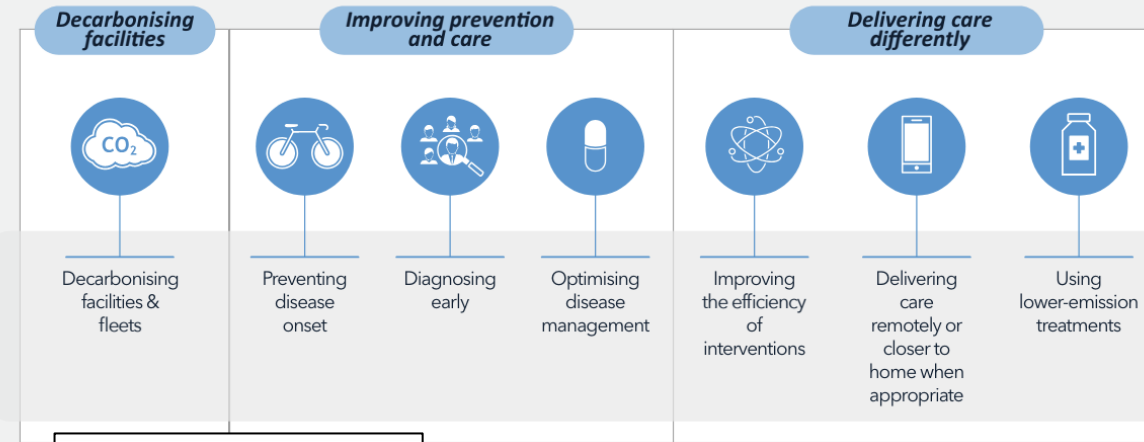


Build an end-to-end care pathway emissions calculation standard and tool for specific diseases that allows stakeholders to **measure and track emissions** across the care pathway and assess decarbonisation strategies



Align on a common framework to perform lifecycle assessments (LCA) - with private sector members also committed to publishing product-level LCA data across their product portfolio to increase transparency on treatment emissions

Seven levers to reduce emissions in care pathways



Sustainable Markets Initiative





Recommendations towards sustainable healthcare



1. Collaboration and Partnerships

Foster collaboration among stakeholders including governments, healthcare providers, industry, and non-profit organisations. Seek new perspectives and possibilities from clinicians and patients.

2. Research and Innovation

Invest in research and development of new technologies, therapies, and healthcare delivery models that prioritise sustainability without compromising on patient access to medicines or health outcomes. Focus on service delivery problems to release energy for innovation.

3. Efficient Resource Management

Optimise the use of healthcare resources by reducing waste, improving supply chain management, and adopting sustainable practices.

4. Promote Sustainable Practices

Encourage industry and healthcare providers to adopt environmentally friendly practices such as energy efficiency, waste reduction, and the use of renewable resources in their operations...

5. Measure Environmental Impact of care routinely so that it is an integral part of all health system decisions. In effect we need to reimagine healthcare system rules so that healthcare quality is based on environmental impact as well as clinical outcomes and cost

6. Education and Awareness

Promote awareness among industry, healthcare professionals, patients, and the general public about the environmental impact of healthcare and the importance of sustainability





Thank You!

