

Environmental Plans, Principles and Governance for Northern Ireland

Public Discussion Document

Stakeholder Response Template



10 December 2020

Sustainability at the heart of a living, working, active landscape valued by everyone



Department of
**Agriculture, Environment
and Rural Affairs**

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How to Respond

This template replicates the questions posed in the online survey on the Environmental Plans, Principles and Governance for Northern Ireland Public Discussion Document found at:

<https://www.daera-ni.gov.uk/consultations/environmental-principles-and-governance>.

The full text of the consultation can be found on the Department's website by following the link above or by contacting us to request a hard copy. It is recommended that you should read the full consultation document before completing your response, whether you choose to use this template or the Citizen Space Hub.

If you wish to use this template for your response, please reply by e-mail or hard copy respectively to:

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or

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Early responses are encouraged but all responses should arrive no later than **5pm on Friday 26 February 2021**. Before you submit your responses please read

the “Freedom of Information Act 2000 - Confidentiality of Consultation Responses” section below, which gives guidance on the legal position.

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The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can refuse to disclose information only in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

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For further information about confidentiality of responses, please contact the Information Commissioner's Office:

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ABOUT YOU

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Please note that the text boxes used throughout this template will expand to accommodate your response – there is no character limit.

The Institute of Public Health would like to acknowledge the support of Ben Cave, Ryngan Pyper and Eliza Powell ([BCA Insight Ltd](#)) in the development of this consultation response.

ENVIRONMENTAL PRINCIPLES

Q1: Should Northern Ireland continue to be guided by these environmental principles in the long term?

Yes

No

If so, would you agree with the mechanism for a policy statement of Environmental Principles as outlined above?

Yes

No

Additional comments

This response is from the Institute of Public Health in Ireland (IPH). In our response we make some suggestions for DAERA. For ease of reference, we place the recommendations at the start of each section. Each recommendation is then explained in the text.

IPH recommends that the relationship between the environment and human health be made explicit within environmental principles and governance. This includes definitions that promote enhancing, as well as protecting, the environment, including for human health.

IPH recommends that the explanation of the environmental principles acknowledges both the direct effects of environmental conditions on health and the indirect effects of environmental change on social and economic determinants of population health.

IPH recommends that the environmental principles refer to the UN Sustainable Development Goals (SDG).

PH recommends that the guiding objective of *a high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities* applies to the policies and activities of the OEP as it does to the European Commission.

1.1 Introduction to the Institute of Public Health – www.publichealth.ie

The Institute of Public Health is an all-island organisation which operates on a transboundary basis, focussed on Ireland and Northern Ireland but also in a cross-UK and European context. Our purpose is to inform public policy to support healthier populations in Ireland and Northern Ireland. We do this through research and evidence review; policy

analysis and evaluation; partnership working; specialist training and public communications. We focus on promoting health and wellbeing, improving health equity, and reducing health inequalities throughout the life course. The Institute has researchers and policy specialists from a range of disciplines based in offices in Dublin and Belfast and is jointly funded by the Departments of Health in Ireland and Northern Ireland. The IPH is responding to this consultation as it recognises the importance of the OEP for environmental policy in Northern Ireland.

1.2 'Health in all policies' approaches and linkages between environmental and public health laws, strategies and structures

The close dependence between environment and health has never been clearer: government, businesses and civil society are grappling with myriad health, social and economic effects of COVID-19. This global pandemic is understood to have originated in an infection which crossed from wild animals to humans. Physical and mental health are affected and stark differences, or inequalities, in health have been laid bare. The Environment Bill 2020 recognises the role the OEP plays in ensuring a high degree of protection for health.

IPH considers that a 'health in all policies' approach provides the best possible opportunity to create the conditions for health and health equity. This perspective is aligned with the Making Life Better public health framework in Northern Ireland which recognises the role of environmental and social determinants of health. Many public health outcomes are influenced by environmental factors – for example the built environment can influence physical activity and active travel and influence the occurrence of non-communicable diseases. Access to green and blue spaces can support both physical and mental health, providing opportunities for play, recreation, activity and social connection. Similarly by environmental strategy on farming and food systems can influence healthy eating.

The Environment Bill 2020 (22(1)) states that the principal objective of the OEP is to contribute to (a) environmental protection and (b) the improvement of the natural environment. The Bill also refers to human health as it states that the OEP strategy must contain an enforcement policy that sets out how it will determine whether damage to the natural environment or to human health is serious (22(6)b). IPH notes that the OEP will have Environmental Impact Assessment in its functions. The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 defines environment as including population and human health and other physical and social factors.

Similarly, the founding Treaty of the European Union (EU) ¹ required that “A high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities.” The OEP will be aware that its counterpart the European Commission will be working to this guiding objective.

IPH recommends that the guiding objective of a high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities applies to the policies and activities of the OEP as it does to the European Commission.

1.3 The environmental principles

The environmental principles are welcome and will be influential in guiding Northern Ireland policy. The environmental principles are not being placed on a statutory footing, and there is ambiguity in how they would be applied. A monitoring process could be

considered to support the ongoing alignment between principles and actions within any new structures and to ensure that deviation from the principles is addressed. The Discussion Document cites the *precautionary principle*, the *prevention principle*, the *integration principle* and the principle of *proportionality* and these are fundamental to the interaction between environmental policy and environmental governance and health. A *proportionate* approach to *preventing* adverse population health effects arising from environmental changes requires the application of the *precautionary principle* and the *integrated* working of different departments. The environmental principles are sound, but as worded, they are solely focused on mitigating negative bio-physical effects, which may represent too narrow a focus. In order to better support the DAERA vision of “*Sustainability at the heart of a living, working, active landscape, valued by everyone*”, a broader understanding of health encompassing social determinants and health behaviour dimensions should be considered.

An explicit acknowledgement that these environmental principles have an intrinsic health dimension would align with the DAERA vision. For example, the *prevention principle* can be applied positively in relation to environmental conditions to decrease levels of ill-health, increase wellbeing and reduce demand on, and therefore cost of, health services². Mitigation focusses on returning to a previously established baseline. We consider that the focus should be more ambitious and include enhancement in the DAERA vision.

IPH recommends that the relationship between the environment and human health be made explicit within environmental principles and governance. This includes definitions that promote enhancing, as well as protecting, the environment, including for human health.

IPH recommends that the explanation of the environmental principles acknowledges both the direct effects of environmental conditions on health and the indirect effects of environmental change on social and economic determinants of population health.

1.4 The One Health approach

In approaching environmental and health issues together, Northern Ireland can benefit from the One Health approach, which recognises the interdependence of human and ecosystem health³. This will facilitate win-win opportunities, including funding, for environmental and health objectives on a broad range of topics, such as climate resilient community infrastructure, high quality green and blue space for healthy lifestyles and equitable access to sustainable travel. IPH notes the following examples that may be of interest to DAERA:

- in the United States, a One Health Office has been established by the national health protection agency⁴ (the Centers for Disease Control and Prevention (CDC)) to support domestic and international One Health approaches;
- in Northern Ireland, the Department of Health, the DAERA and the Food Standards Agency have already launched a ‘One Health’ approach to tackle antimicrobial resistance⁵; and
- the World Health Organization (WHO) states that several technical areas assessed through the International Health Regulations Monitoring and Evaluation Framework⁶ (IHRMEF) are relevant to One Health. Furthermore, the WHO cite⁷ areas of work in which a One Health approach is particularly relevant include, not only antimicrobial resistance, but also food safety, control of zoonotic diseases, laboratory services, neglected tropical diseases and environmental health.

1.5 Sustainable Development Goals

IPH recommends that the environmental principles refer to the UN Sustainable Development Goals (SDG)⁸.

The SDGs are central to uniting all aspects of policy across the natural, social and economic environment.

SDG 3 is dedicated to health and well-being and success in this goal is highly contingent upon success in the other SDGs, for example ‘sustainable cities and communities’, ‘climate action’, ‘clean water and sanitation’, ‘life on land’, ‘life below water’ and ‘reducing inequalities’.

Furthermore, IPH assumes that the strategic and operational actions of the OEP will align with the principles outlined in the Aarhus Convention — that is, ensuring that environmental information is disseminated to the public, and that the public are included in environmental decision-making. This is part of upholding the individual’s right to *“live in an environment adequate to his or her health and well-being, and the duty ... to protect and improve the environment for the benefit of present and future generations”⁹.*

ENVIRONMENTAL IMPROVEMENT PLANS

Q2: How do you feel alignment of the Environment and Green Growth Strategies can be best achieved?

IPH recommends that DAERA consider undertaking a strategic assessment, that includes greater consideration of public health, to maximise the alignment of the Environment Strategy and Green Growth strategy.

IPH recommends inclusion of a supportive statement on the benefits from inclusion of Health Impact Assessment (HIA) processes in the final wording of the Environment and Green Growth Strategies.

2.1 Uses and benefits of Health Impact Assessment (HIA)

IPH acknowledges the significant challenges in aligning the Environment and Green Growth strategies. A potentially useful process to support and enrich alignment of the Environment Strategy and Green Growth strategies is the use of Health Impact Assessment (HIA) methods during the policy development process.^{1,2}

HIA is a structured process that looks at a proposal while it is being planned. Proposals include new legislation, policy, plans, programmes or projects. HIA approaches examine the effects on human health and can develop proposals to improve the strategies, including addressing tensions between environmental, social and economic objectives that influence the health and well-being of Northern Ireland's citizens. Impact assessment is therefore a structured approach to developing coherent interventions as proposed in the Discussion Document, the maximise the benefits for environment and health agendas.

IPH is currently developing updated HIA guidance for the island of Ireland, expected Spring 2021. This includes good practice in undertaking strategic assessments of the population health impacts of policy changes. Human health can be considered as part of a Strategic Environmental Assessment (SEA)¹⁰. Close alignment between environmental and health objectives and a (voluntary) application of SEA at the policy level are features of the *Protocol on SEA to the Convention on Environmental Impact Assessment in a Transboundary Context* (the SEA Protocol), which the EU approved on the UK's behalf¹¹.

IPH recommends that DAERA consider undertaking a strategic assessment, that includes greater consideration of public health, to maximise the alignment of the Environment Strategy and Green Growth strategy.

HIA considers the broad range of factors that influence population health. This includes an early consideration of how health is affected directly by environmental factors, and indirectly by the social and economic consequences of environmental changes. Such a public health viewpoint is central to identifying the win-win approaches needed for Northern Ireland communities and their environment as set out on a Green Recovery from COVID-19 and tackle Climate Change.

Environmental and health issues ranging from ecological conditions to human disease form an interdependent web and therefore require careful consideration¹². Including a policy or statement of support on the application of HIA in both the Environment Strategy and the Green Growth strategy would help align the strategies as they are implemented, and could support continuing sensitivity to changing circumstances.

IPH recommends inclusion of a supportive statement on the benefits from inclusion of Health Impact Assessment (HIA) processes in the final wording of the Environment and Green Growth Strategies.

This would also align with the forthcoming IPH guidance on HIA for the Island of Ireland, which promotes HIA policies as good practice.

2.2 Public Health England Guidance for local authorities on HIA in spatial planning

IPH notes that, in October 2020, Public Health England published a guide for local authorities in England on HIA in spatial planning¹³. The guide advises that policies for HIAs in strategic and local planning should be formally adopted. The adoption of similar guidance between the OEP and Public Health Agency could be considered.

2.3 Sustainable Development Goals

Public participation in environmental governance is favourable in terms of achieving the UN Sustainable Development Goals (SDG)¹⁴.

IPH is concerned that these SDGs are not present in the current Discussion Document, as they should be central in uniting environment, green growth, and health aims in Northern Ireland.

SDG 3, dedicated to health and well-being, could be a major priority in Northern Ireland. Success in this goal is highly contingent upon success in related environmental goals, for example climate action [SDG 13].

ENVIRONMENTAL GOVERNANCE IN NORTHERN IRELAND

Q3: Should the OEP be implemented in Northern Ireland?

Yes

No

If no, how would you envisage we maintain existing systems of environmental governance?

Additional comments

IPH recommends that the tools available to OEP be enhanced beyond judicial review. These could include the power to reopen consent and permitting decisions.

3.1 OEP in Northern Ireland – fit for purpose and context

IPH supports the investment in an OEP for Northern Ireland, in line with other devolved UK nations. This will help ensure that decision making in Northern Ireland is aligned with the rest of the UK but also sensitive to local contexts including a land border with the Republic of Ireland.

3.2 Enhancing the toolkit available to OEP in Northern Ireland

IPH recommends that the tools available to OEP be enhanced beyond judicial review. These could include the power to reopen consent and permitting decisions.

Judicial review is in effect a type of ‘process’ evaluation. It is not an evaluation of ‘impacts’ or ‘outcomes’. IPH is concerned that the focus on judicial review, upon which the OEP would depend, is predicated on the assumption that non-compliance, or undesired environmental outcomes, only arise if the correct process has not been followed. This may lead to practices that are more concerned with process than impacts and outcomes. If there is no remit to challenge impacts or outcomes then there is potential for unintended inequalities and inequities in relation to environmental and health outcomes.

The OEP will require the latest baseline data, policy and scientific evidence to reach evidence based reasoned conclusions, including for further mitigation or tighter conditions. Broadening the options available to OEP would allow it to order evaluation not only of ‘process’, but also of ‘impacts’ and ‘outcomes’, including where significant health inequalities or inequities inadvertently arise. This would be consistent with the Northern Ireland public health framework Making Life Better¹⁵, which states “Tackling the major inequalities in health and wellbeing and their causes will help promote equality of opportunity and good relations”. Equality of opportunity is a public body duty under Section 75 of the Northern Ireland Act¹⁶.

Please note- If you have indicated that you do believe there should be an alternative governance body for Northern Ireland then your answers to the remaining questions will be read on that basis.

INTERACTIONS WITH OTHER OVERSIGHT BODIES

Q4: Are there other public bodies with whom the OEP should establish particular arrangements and why?

Yes

No

If yes, please elaborate

IPH recommends that the OEP operates in partnership with public bodies responsible for population health, including the Department of Health and the Public Health Agency in Northern Ireland.

4.1 Public health structures in Northern Ireland

There would be missed opportunities if OEP adopted a narrow view of the environment, as has been the case in some environmental assessment practices¹⁷. OEP's relationships should be expanded to include public bodies responsible for environmental and population health as well as environmental bodies.

As the OEP could be a new oversight organisation for Environmental Impact Assessment (EIA) and for Strategic Environmental Assessment (SEA), there is now a unique opportunity for OEP to develop and deliver best practice, through co-operation with public health, in the context of the statutory requirement to consider human health within these assessments. Such good practice is set out in the forthcoming 2021 IPH updated guidance on Health Impact Assessment. Good practice includes proportionate consideration of the social and economic effects of environmental change on population health.

The Public Health Directorate of the Public Health Agency in Northern Ireland has the role of leading on protecting public health and improving health and social wellbeing. IPH would be willing to provide ongoing support for the integration of HIA into the operational development of OEP, if appropriate.

IPH recommends that the OEP operates in partnership with public bodies responsible for population health, including the Department of Health and the Public Health Agency in Northern Ireland.

The IPH assumes that the OEP will work with local authorities. The Planning Act (Northern Ireland) 2011¹⁸ gives local authorities responsibility for most planning functions. Through community planning local authorities in Northern Ireland, assisted by the Department of Communities, develop a vision and a plan for their areas that take account of community, as well as business aspirations. Success in environmental advancement and public health improvement are contingent upon one another.³

4.2 Shared data and evidence on the relationship between environment and health

NISRA and the public health intelligence function within the Department of Health have developed a rich source of data linked to the Making Life Better Framework. These indicators have both direct and indirect overlap with environmental indicators and the remit of the OEP. The most directly obvious areas of common concern include air quality, water quality, road safety and housing quality indicators. However, there are also common issues for health and environmental planning relevant to indicators on physical activity, social capital, social isolation, mental health and obesity.

ESTABLISHING THE OEP IN NORTHERN IRELAND

Q5: Do you have any comments on interim arrangements for Northern Ireland?

No comment

If suggesting an alternative to the OEP how would you address the longer development and implementation period that would result in a lengthier governance gap?

APPOINTMENTS, REMUNERATION AND FUNDING

Q6: Are you satisfied with the arrangement for Northern Ireland representation on the Board of the OEP?

Yes

No

If you have indicated that you believe there should be an alternative governance body, how do you think it should be structured?

Additional comments

IPH recommends that consideration be given to include representation from senior public health leadership on the OEP Board.

This would support a public health lens on the development of OEP and support a flourishing relationship between lead agencies enhancing both the environment and human health. It would enable coordination across health and environment governmental sectors which would ideally cascade from national to local levels.

At this stage the details of governance of the OEP in Northern Ireland are not clear. However, we invite early consideration of structures to enhance co-ordination of public health and environmental strategies and processes. For example, this might manifest as a health and environment or Health Impact Assessment subgroup or advisory committee reporting in to the OEP Board.

APPOINTMENTS, REMUNERATION AND FUNDING

Q7: How do you think the OEP or an alternative should be funded in Northern Ireland?

No comment

If an alternative, how would you justify the additional costs that would be involved in establishing a bespoke Northern Ireland approach?

Additional comments

PRACTICAL ARRANGEMENTS AND EXTENT

Q8: Should there be a permanent office in Northern Ireland?

Yes

No

IPH considers that a permanent office in Northern Ireland is necessary. This would provide a strong statement of intent. The risk in not staffing an office is that OEP becomes remote to, and distant from, policy developments in Northern Ireland. A permanent office in Northern Ireland would provide support to authorities in Northern Ireland and enable the OEP to build the vital cross-sectoral and cross-community relationships needed to deliver on its vision.

How should it be staffed?

PRACTICAL ARRANGEMENTS AND EXTENT

Q9: What other practical arrangements should be addressed in advance of setting up the OEP or an alternative in Northern Ireland?

No comment

FUNCTIONS OF THE OEP

Q10: Are you satisfied that the OEP or an alternative should carry out the described functions in Northern Ireland?

Yes

No

Additional comments

IPH recommends that the guiding objective of a high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities applies to the policies and activities of the OEP as it does to the European Commission.

IPH recommends that, in relation to OEP scrutiny of environmental legislation, that reference to the direct and indirect links to population health within Northern Ireland environmental policy and legislation should be retained and strengthened.

IPH agrees with the Discussion Document that the OEP advice and enforcement remit includes environmental legislation concerned with protecting human health.

IPH notes that the founding EU Treaty¹⁹ required that “A high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities.”

IPH recommends that the guiding objective of a high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities applies to the policies and activities of the OEP as it does to the European Commission.

IPH notes the European Commission’s 2001 guidance²⁰ on this matter defined health as including the effects of environmental change on lifestyles, socio-economic conditions and healthcare services.

The influence of the EU Treaty public health objective can be seen in Northern Ireland environmental laws^{21, 22} based in EU legislation, including the Directive on Environmental Impact Assessment (EIA), which states its objective is to “ensure a high level of protection of the environment and of human health”²³; and the Directive on Strategic Environmental Assessment (SEA), which states that “policy on the environment is to contribute to, inter alia, the preservation, protection and improvement of the quality of the environment, [and] the protection of human health ...”²⁴.

IPH recommends that, in relation to OEP scrutiny of environmental legislation, that reference to the direct and indirect links to population health within Northern Ireland environmental policy and legislation should be retained and strengthened.

IPH notes that good practice is to adopt a broad definition of health that includes the proportionate consideration of how health is affected directly by environmental factors, and indirectly by the social and economic consequences of environmental changes.

Scientific evidence is clear that environment and health are inextricably linked and part of a single system. The European Public Health Association, representing public health organisations across the EU and in the UK, is clear that the scope of health in environmental assessments is broad and goes beyond bio-physical factors such as air quality and noise²⁵.

TRANSBOUNDARY ISSUES

Q11: What bodies should the OEP or an alternative be working with on transboundary issues?

IPH welcomes the commitment to 'transboundary' issues, as understood in the context of terminology used in environmental legislation.

In light of the shared land border, environmental planning and governance could be considered as a specified area of cooperation between the OEP and relevant Republic of Ireland bodies. Within this context, the border region itself may require focussed attention, given that the area is characterised, on both sides, by less well developed infrastructure and a higher level of social and economic deprivation.

Impact assessments, including Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) can be useful in assessing transboundary health effects. Standalone health impact assessment (HIA) reports can also provide analysis to inform decisions or evaluations.

If an alternative, what arrangements should that body have for working with the OEP?

N/A

Other comments

N/A

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- ¹ Consolidated version of the Treaty on the Functioning of the European Union—Part Three: Union Policies and Internal Actions—Title XIV: Public Health—Article 168 (ex Article 152 TEC). Off. J. 2008, 115, 122–124.
- ² World Health Organization Regional Office for Europe. The 10 Essential Public Health Operations. no date.
- ³ Humboldt-Dachroeden, S.; Rubin, O.; Sylvester Frid-Nielsen, S. The state of One Health research across disciplines and sectors—A bibliometric analysis. *One Health* 2020, 10, 100146.
- ⁴ United States Department of Health and Human Services. Centres for Disease Control and Prevention (CDC). One Health. Available online: <https://www.cdc.gov/onehealth/index.html> [Accessed 26/02/2021].
- ⁵ Department of Health. Changing the Culture 2019-2024: One Health. Tackling Antimicrobial Resistance in Northern Ireland. A Five-Year Action Plan. May 2019.
- ⁶ World Health Organization. Health policy, One Health. International Health Regulations Monitoring and Evaluation Framework.
- ⁷ World Health Organization. Health policy, One Health. Available online: <https://www.euro.who.int/en/health-topics/health-policy/one-health> [Accessed 26/02/2021].
- ⁸ United Nations. Sustainable Development Goals. 2015.
- ⁹ United Nations Economic Commission for Europe. Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. Aarhus, Denmark. 1998.
- ¹⁰ United Nations Economic Commission for Europe. Draft guidance on assessing health impacts in strategic environmental assessment (SEA). Geneva, UNECE. 2019.
- ¹¹ United Nations. Convention on Environmental Impact Assessment in a Transboundary Context. Adopted in Espoo (Finland), on 25 February 1991 as amended on 27 February 2001. 2015.
- ¹² Frazzoli C., Mantovani A. The Environment-Animal-Human Web: A “One Health” View of Toxicological Risk Analysis. *Front. Public Health*. 2018.
- ¹³ Public Health England. Health impact assessment in spatial planning, A guide for local authority public health and planning teams. October 2020
- ¹⁴ United Nations. Sustainable Development Goals. 2015.
- ¹⁵ Department of Health. Making Life Better. A whole system strategic framework for public health. 2013-2023. Northern Ireland Executive. 2014.
- ¹⁶ HM Government of Great Britain & Northern Ireland. Northern Ireland Act. 1998.
- ¹⁷ Cave, B.; Pyper, R.; Fischer-Bonde, B.; Humboldt-Dachroeden, S.; Martín-Olmedo, P. "Lessons from an International Initiative to Set and Share Good Practice on Human Health in Environmental Impact Assessment". 2021. *Int. J. Environ. Res. Public Health* 18, no. 4: 1392.
- ¹⁸ HM Government of Great Britain & Northern Ireland. Planning Act (Northern Ireland). 2011
- ¹⁹ Consolidated version of the Treaty on the Functioning of the European Union—Part Three: Union Policies and Internal Actions—Title XIV: Public Health—Article 168 (ex Article 152 TEC). Off. J. 2008, 115, 122–124.
- ²⁰ European Commission. Ensuring a High Level of Health Protection, A Practical Guide; Health & Consumer Protection Directorate-General: Luxembourg, 2001. Available online: (accessed on 5 October 2020)
- ²¹ HM Government of Great Britain & Northern Ireland. The Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004.
- ²² HM Government of Great Britain & Northern Ireland. The Planning (Environmental Impact Assessment) Regulations (Northern Ireland). 2017.
- ²³ European Parliament, Council of the European Union. Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment Text with EEA relevance. ‘L 124/1’. 2014.
- ²⁴ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, *Official Journal of the European Communities*, L 197 (2001), pp. 30–37.
- ²⁵ Cave, B., Claßen, T., Fischer-Bonde, B., Humboldt-Dachroeden, S., Martín-Olmedo, P., Mekel, O., Pyper, R., Silva, F., Viliani, F., Xiao, Y. 2020. *Human health: Ensuring a high level of protection. A reference paper on*

addressing Human Health in Environmental Impact Assessment. As per EU Directive 2011/92/EU amended by 2014/52/EU. International Association for Impact Assessment and European Public Health Association.