Comments on the National Environmental Health Policy Notice 517 of 2011 as published in the Government Gazette, 3 August 2011.

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In support of the objective of the policy document to serve "as a broad guideline for the effective implementation and rendering of environmental health services in South Africa", I offer you the WHO's healthy cities concept. It provides an appropriate, tested, affordable, and effective framework for a policy on environmental health.

I copy below from the WHO web-site:<sup>1</sup>

The WHO Healthy Cities project is a global movement. It engages local governments in health development through a process of political commitment, institutional change, capacity-building, partnership-based planning, and innovative projects. About 90 cities are members of the WHO European Healthy Cities Network and 30 national Healthy Cities networks across the WHO European Region have more than 1400 cities and towns as members.

The primary goal of the WHO European Healthy Cities Network is to put health high on the social, economic, and political agenda of city governments. Health is the business of all sectors and local governments are in a unique leadership position with power to protect and promote their citizens' health and well-being.

The Healthy Cities movement promotes comprehensive and systematic policy and planning for health and emphasizes:

- the need to address inequality in health and urban poverty
- the needs of vulnerable groups
- participatory governance
- the social, economic and environmental determinants of health.

This is not about the health sector only. It includes health considerations in economic, regeneration, and urban development efforts.

In lieu of comments I attach/ed a proposal with supporting documents for a pilot healthy cities programme prepared in 1990. It is part of a larger document on healthy cities, villages, and neighbourhoods.<sup>2</sup> The issues raised are still relevant today.

www.euro.who.int/en/health-topics/environment-and-health/urban-health/activities/healthy-cities www.effieschultz.com/files/pdf/1990 HCVN Concept.pdf (for pilot site only see pages 40-43)