November 21

To the Ministry for the Environment (MfE) - [Manatū Mō Te Taiao](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjZ2szBo5z0AhXPwTgGHZmHDrgQFnoECAUQAQ&url=https%3A%2F%2Fenvironment.govt.nz%2F&usg=AOvVaw3G-aYB23jpEdPmZRfph8EY)

Please find below DPA’s submission on ‘*Transitioning to a low-emissions and climate-resilient future:* *Have your say and shape the emissions reduction plan’.*

## Disabled Persons Assembly NZ

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# Introducing Disabled Persons Assembly NZ

The Disabled Persons Assembly NZ (DPA) is a pan-impairment disabled person’s organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

* telling our stories and identifying systemic barriers
* developing and advocating for solutions
* celebrating innovation and good practice

# The submission

DPA is extremely disappointed that unlike the advice to Government from the Climate Change Commission (CCC), which recognised that disabled people are ***amongst the most adversely affected groups*** in relation to climate change, and the group that faces the largest barriers in responding to the effects of climate change, that this discussion document on transitioning to a low-emission society is largely silent on the specific issues of this transition for disabled people.

Every aspect of climate change affects disabled people. Given the wide-ranging extent of the topics covered in this discussion document, we have restricted our feedback to those areas that have the most serious impact for disabled people or where we believe that there is specific disability advice needed.

We will reiterate most of the recommendations we provided to the CCC draft advice, as they remain highly relevant to the transition to a low-emission and climate-resilient society.

# The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

Many of the articles and principles contained in the UNCRPD are relevant to the MfE discussion paper . We highlight those most relevant below:

## **Article 3 - General Principles**

1. Respect for inherent dignity, individual autonomy including the freedom to make one’s own choices, and independence of persons;
2. Non-discrimination;
3. Full and effective participation and inclusion in society;
4. Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity;
5. Equality of opportunity;
6. Accessibility;
7. Equality between men and women;
8. Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities.

## **Article 4.3 - Actively engage with organisations of disabled people**

## **Article 9 - Accessibility**

## **Article 11 - Situations of risk and humanitarian emergencies**

# Engagement with disabled people

DPA would like to see the discussion paper urge Government to proactively engage with disabled people to ensure an equitable transition to a low-carbon society. We are deeply concerned that without this proactive engagement that we will be negatively impacted both by the direct effects of climate change and by the policy responses that aim to reduce or mitigate climate change, which will result in disabled people being further marginalised as a group.

DPA recommends:

**Recommendation 1 -**  that the MfE discussion paper stresses to Government the ongoing importance of engagement with disabled people and our organisations.

**Recommendation 2**  **–** that the MfE discussion paper highlights the need for a just transition to a low-emission economy for disabled people. This discussion should recognise disabled people as experts in our own lives and our leadership in the response to climate change.

# Transport

The MfE discussion paper recognises the need to move to the adoption of more electric vehicles, to increase walking and cycling, and to improve public transport in order to transition to a low-emission society. DPA agrees that such moves are necessary in order to limit the effects of climate change and to keep society moving. However, such changes to transport can either increase or decrease barriers for disabled people depending on whether there is active engagement with disabled people that ensures our needs are fully considered and met. For example, not everyone can walk or cycle or walk or cycle far. Often when walking and cycling is prioritised it can lead to less carparks, which means that people who need to park close to where they are going because of mobility impairments, cannot. The lack of nearby carparks may stop some disabled people from taking a trip, even an essential one. Constructive engagement with disabled people can mitigate such issues.

## **Electric vehicles**

While electric vehicles are undoubtedly better for the planet than petrol or diesel vehicles, they do create significant issues for disabled people:

* They tend to be more expensive and are therefore out of reach for many disabled people who live in poverty.
* They tend to be smaller, making it difficult or impossible for some disabled people requiring larger wheelchairs and other equipment, to use them.
* They are much quieter than conventional vehicles, posing a safety risk to disabled people, older people and children.
* Charging points and related infrastructure need to be accessible in order for disabled people to independently use electric vehicles.

DPA recommends:

Recommendation 3 - that the MfE discussion paper urges Government to, in consultation with disabled people, implement standards on both the minimum noise level and the type of noise to be omitted by electric vehicles. Furthermore, it is important that this noise cannot be turned off by the driver. This would reduce the risk of accident to disabled people and would improve safety across the population.

Recommendation 4 **–** that the MfE discussion paper highlights the need for Government to set up a grant or subsidy to support disabled people to purchase suitable electric vehicles so that disabled people who need larger vehicles to transport wheelchairs are not disadvantaged by the phasing out of more affordable petrol and diesel versions.

## **Increased walking and cycling**

DPA supports the discussion that walking and cycling needs to increase. However, just stating this won’t make pavements and footpaths safer or easier to navigate for disabled people. Bikes, scooters and other micro-mobility devices pose significant issues for disabled people when used on footpaths and should be restricted to cycle lanes where they exist, and the road where they do not, for the safety and comfort of all pedestrians.

DPA recommends:

Recommendation 5 **-** that the MfE discussion paper clearly state that footpaths should be well maintained, and that bikes, scooters and other micro-mobility devices should not generally be allowed on footpaths.

## **Public transport**

DPA recognises that public transport isn’t always an option for some disabled people and that many disabled people are reliant on driving or being driven. However, there are other disabled people who are highly reliant on public transport because they cannot drive.

DPA would like the MfE discussion paper to highlight to Government and wider society that all public transport must be accessible to disabled people. The co-benefit of this is that older people, people travelling with small children and others with restricted mobility would also benefit.

We would also like to see the MfE discussion paper raise issues regarding targeted subsidised public transport fares for groups who are transport disadvantaged.

DPA recommends:

Recommendation 6 **–** that the MfE discussion paper highlights to Government the need for accessible public transport and targeted fair subsidies for disabled people.

# Housing

DPA supports the discussion points that new homes will need to be significantly more energy efficient than current ones. However, if houses aren’t accessible to disabled people, their energy efficiency doesn’t really matter. We strongly urge the MfE discussion paper to highlight that new houses should meet universal design standards for accessibility. This would not only mean that disabled people could benefit from warmer, dryer, more energy-efficient homes, but it would have the added benefit of allowing older people to age in place.

DPA recommends:

**Recommendation 7 –** that the MfE discussion paper highlight the need for all new houses to meet universal design standards so that they can easily be made accessible.

## **Domestic heating**

DPA recognises that disabled people will benefit from making energy efficiency improvements to their homes. We believe that support will need to be given up front to disabled people to help with the cost of energy efficiency improvements. Disabled people are less likely to own their own homes and are more likely to live in rented accommodation, so we welcome the introduction of standards for heating and insulation in rented accommodation. We believe that Government will need to monitor rental affordability as a result of the introduction of these standards.

In addition, the move to reliance almost exclusively on electricity for domestic purposes, while necessary for a transition to a low-emission economy, does present dangers for some disabled people who are reliant on electricity for apparatus such as ventilators. A power outage or power disruption could be life threatening for some disabled people, so we believe that the MfE discussion paper needs to raise issues of the duties of power companies to ensure electricity supply to disabled people who require a constant supply for medical reasons.

# Waste

Many disabled people are keen to do their part to reuse, recycle and repurpose waste. However, this is not always easy for us:

* How do blind people know what can and cannot be recycled if they are unable to read the letters promoting the ability to recycle? Accessing information on recycling, reusing and repurposing isn’t always accessible to us, and systems for waste disposal, reusing or recycling are not always physically accessible either.
* Disabled people are not always in control of the disability-related products we are supplied with by District Health Boards and other disability service providers such as continence products. We have to use what we are given and don’t have choices around buying a product that is more environmentally friendly.
* There is a need for initiatives that work with the disability community to find new, innovative ways for dealing with our waste in ways that are progressively more environmentally sustainable.

DPA recommends:

**Recommendation 8 –** that the MfE discussion paper discusses the merits of setting up and funding programmes that support disabled people to manage their household waste more sustainably.

# Jobs

DPA is disappointed that the discussion paper contains no specific discussion of employment for disabled people, reasonable accommodation or flexible working. Disabled people will continue to face discrimination and high rates of unemployment if an environmentally sustainable economy doesn’t explicitly include initiatives and support in employment and job-seeking for disabled people.

DPA recommends

**Recommendation 9 –** that the MfE discussion paper explicitly states the need for support, advice and education as regards disabled workers and jobseekers.

# Summary of DPA’s recommendations

DPA recommends the following:

1. That the MfE discussion paper stresses to Government the ongoing importance of engagement with disabled people and our organisations.
2. That the MfE discussion paper highlights the need for a just transition to a low-emission economy for disabled people. This discussion should recognise disabled people as experts in our own lives and our leadership in the response to climate change.
3. That the MfE discussion paper urges Government to, in consultation with disabled people, implement standards on both the minimum noise level and the type of noise to be omitted by electric vehicles. Furthermore, it is important that this noise cannot be turned off by the driver. This would reduce the risk of accident to disabled people and would improve safety across the population.
4. That the MfE discussion paper highlights the need for Government to set up a grant or subsidy to support disabled people to purchase suitable electric vehicles so that disabled people who need larger vehicles to transport wheelchairs are not disadvantaged by the phasing out of more affordable petrol and diesel versions.
5. That the MfE discussion paper clearly states that footpaths should be well maintained, and that bikes, scooters and other micro-mobility devices should not generally be allowed on footpaths.
6. That the MfE discussion paper highlights to Government the need for accessible public transport and targeted fair subsidies for disabled people.
7. That the MfE discussion paper highlight the need for all new houses to meet universal design standards so that they can easily be made accessible.
8. That the MfE discussion paper discusses the merits of setting up and funding programmes that support disabled people to manage their household waste more sustainably.
9. That the MfE discussion paper explicitly states the need for support, advice and education as regards disabled workers and jobseekers.