December 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 *‘Waste Strategy and Legislation Consultation’*

## 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 strongly supportive of the waste strategy goal of Aotearoa moving to a circular economy in terms of waste. DPA acknowledges that waste generally, and single-use plastics specifically, are a major and growing concern.

Like the wider population, many disabled people are keen to play their part in reducing the impact of waste and plastics on the environment. However, we would like to highlight that there are a number of significant accessibility barriers for disabled people wishing to avoid single-use plastics and recycle and reduce their waste responsibly. These include:

* a lack of educational information in accessible formats about recycling and alternatives;
* physical and sensory barriers to being able to identify and sort items for recycling;
* difficulty finding suitable affordable and accessible alternatives for many every-day single-use items (for example, many re-useable coffee cups are difficult to get the lids on and off compared to single-use coffee cups);
* many products that are subsidised for disabled people (for example, continence pads) are not re-useable.

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

There are a number of articles and principles contained in the UNCRPD that are relevant to the MfE Waste Strategy . 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**

# Engagement with disabled people

DPA would like to see the Waste Strategy highlight the importance of ongoing proactive engagement with disabled people to ensure that we can play our full part in waste minimisation and relevant government agencies can be alerted to emerging issues for disabled people as they arise. We are deeply concerned that without this proactive engagement we will be negatively impacted by the policy responses that aim to minimise waste, which will result in disabled people being further marginalised as a group.

DPA recommends:

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

**Recommendation 2** **-** that the MfE Waste Strategy highlights the need for a just transition to a circular economy for disabled people. This discussion should recognise disabled people as experts in our own lives and our leadership in the response to waste minimisation.

# Waste

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

* How do blind people know what can and cannot be recycled if they are unable to read the information on products or in the mail 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 impairment-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 3 -** that the MfE Waste Strategy proposes the setting up and funding of programmes that support disabled people to manage their household waste more sustainably.

# Recycling and reusing disability aids and mobility devices

Many disabled people are keen to recycle and reuse disability aids and mobility devices, but this isn’t currently an easy option in New Zealand.

* While some hearing aids now come with rechargeable options, many people still have hearing aids that require batteries. In the UK all hearing aid batteries must be taken back by the manufacturers. DPA believes that this should also be the case in New Zealand.[[1]](#endnote-1)
* Many disabled people are keen to recycle and repurpose disability aids and mobility devices. There are a number of overseas schemes that either recycle or fix up and reuse disability aids and mobility devices. However, there is no such scheme in New Zealand. DPA believes that there would be significant support within the disability community in New Zealand for such a scheme.

DPA recommends:

**Recommendation 4** **–** that the MfE Waste Strategy and waste legislation mandate a battery takeback scheme similar to that in the UK.

**Recommendation 5** **-** that the MfE Waste Strategy highlights the need for recycling and reusing disability aids and mobility devices and proposes that the disability community is supported and resourced to set up such a scheme.

# Research to understand the impact of the plastic straw phase-out and what needs to be included in the proposed regulations

DPA understands that in July 2021, despite the advice offered in our submission to the MfE Plastics Consultation, that Government have decided to phase out single-use plastic straws by July 2023.

DPA is pleased to have been invited to participate in the research to examine how this might be done with the minimum impact on disabled people. However, we reiterate the same advice we gave in the Plastics Consultation in 2020.

There are currently no alternatives that provide the access features that single-use plastic straws provide. Paper straws in particular are a very poor substitute and are unsuitable for the large majority of disabled people who use straws.[[2]](#endnote-2) Re-useable steel and silicone straws are also not suitable for some disabled people.

At present DPA is opposed to any phase-out or ban on plastic straws. However, if MfE does proceed with a ban on single-use plastic straws then, as an absolute minimum, an exemption scheme for disabled people must be in place first. The exemption scheme must be designed in partnership with disabled people and meet the following criteria:

1. It must be simple and easy to access for disabled people.
2. It must ensure that plastic straws remain widely and reliably available despite a greatly reduced supply.
3. There should be no requirement for disabled people to ‘prove’ ( such as a medical certificate) that they need plastic straws.
4. It must not impose extra costs on disabled people who are already less likely to report having adequate income for every-day needs.[[3]](#endnote-3)
5. It must be non-stigmatising for disabled people so that they are not criticised or abused in public for using plastic straws.
6. Any exemption scheme must also be supported by an awareness campaign to educate the wider public that some people need access to plastic straws.

# Summary of DPA’s recommendations

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

**Recommendation 2**  **–** that the MfE Waste Strategy highlights the need for a just transition to a circular economy for disabled people. This discussion should recognise disabled people as experts in our own lives and our leadership in the response to waste minimisation.

**Recommendation 3 -** that the MfE Waste Strategy proposes the setting up and funding of programmes that support disabled people to manage their household waste more sustainably.

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1. <https://www.gov.uk/battery-waste-supplier-reponsibilities#:~:text=You%20must%20offer%20free%20collection,from%20where%20you%20supply%20batteries>. [↑](#endnote-ref-1)
2. <http://disabilityorganizing.net/uploads/donet-straw-report-012319-ACCESSIBLE.pdf> [↑](#endnote-ref-2)
3. <https://ccsdisabilityaction.org.nz/assets/resource-files/The-State-of-wellbeing-and-equality-FINAL-ONLINE.pdf> [↑](#endnote-ref-3)