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**To Ministry for the Environment**

Please find attached our submission on the Second Emissions Reduction Plan

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# Introducing Disabled Persons Assembly NZ

**We work on systemic change for the equity of disabled people**

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People’s Organisation run by and for disabled people.

**We recognise:**

* Māori as Tangata Whenua and [Te Tiriti o Waitangi](https://www.archives.govt.nz/discover-our-stories/the-treaty-of-waitangi) as the founding document of Aotearoa New Zealand;
* disabled people as experts on their own lives;
* the [Social Model of Disability](https://www.odi.govt.nz/guidance-and-resources/guidance-for-policy-makes/) as the guiding principle for interpreting disability and impairment;
* the [United Nations Convention on the Rights of Persons with Disabilities](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html) as the basis for disabled people’s relationship with the State;
* the [New Zealand Disability Strategy](https://www.odi.govt.nz/nz-disability-strategy/) as Government agencies’ guide on disability issues; and
* the [Enabling Good Lives Principles](https://www.enablinggoodlives.co.nz/about-egl/egl-approach/principles/), [Whāia Te Ao Mārama: Māori Disability Action Plan](https://www.health.govt.nz/publication/whaia-te-ao-marama-2018-2022-maori-disability-action-plan), and [Faiva Ora: National Pasifika Disability Disability Plan](https://www.moh.govt.nz/notebook/nbbooks.nsf/0/5E544A3A23BEAECDCC2580FE007F7518/%24file/faiva-ora-2016-2021-national-pasifika-disability-plan-feb17.pdf) as avenues to disabled people gaining greater choice and control over their lives and supports.

**We drive systemic change through:**

**Rangatiratanga / Leadership**: reflecting the collective voice of disabled people, locally, nationally and internationally.

**Pārongo me te tohutohu / Information and advice**: informing and advising on policies impacting on the lives of disabled people.

**Kōkiri / Advocacy**: supporting disabled people to have a voice, including a collective voice, in society.

**Aroturuki / Monitoring**: monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

## United Nations Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD),[[1]](#footnote-2) a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention.

The following UNCRPD articles are particularly relevant to this submission:

* **Article 4 – General Obligations**
* **Article 9 – Accessibility**
* **Article 11 – Situations of Risk and Humanitarian Emergency**

# The Submission

DPA welcomes the opportunity to engage in the discussion on Aotearoa’s Second Emissions Reduction Plan.

DPA supports Aotearoa NZ meeting its 2050 net zero emissions targets. Disabled people are already disproportionately bearing the brunt of climate change impacts both here and around the world.

DPA endorses the recent He Pou a Rangi Climate Change Commission’s recent *Progress Plan: National Adaptation Plan* report recommendation that this country needs to go even further in terms of reducing its emissions by 2050.[[2]](#footnote-3)

This submission traverses the impact of climate change on disabled people, the need to ensure an equitable and just climate transition for our disabled community and the need for deeper emissions cuts from high emissions industries.

**Disabled people at increased risk from climate change**

A recent Environment Health Intelligence New Zealand (2024) report identified disabled people as a ‘high priority population group and noted that “people with chronic health conditions, mental illness and/or disability are more susceptible to the negative impacts of climate related hazards.”[[3]](#footnote-4)

An article published by the journal *Nature Climate Change* [[4]](#footnote-5) also highlighted that governments are failing to take disability inclusive climate action and disabled people are disproportionately more at risk of higher mortality rates in climate emergencies.

This is underpinned by the fact that disabled people have historically been treated as a lower priority in climate emergencies or other disasters and systemically excluded from receiving emergency healthcare and humanitarian support as a result.

The article also highlighted that slow onset climate change, including sea level rise, more damaging weather events, as well as rising water and food scarcity all exacerbate the existing inequities experienced by disabled people.

Michael Stein, in a Harvard University Center for the Environment (2023) [[5]](#footnote-6) interview elaborated about the impacts of slow onset climate change on disabled people:

*“Climate change amplifies the marginalization experienced by persons with disabilities negatively affecting health, reducing access to healthcare services, food, water, and accessible infrastructure. People with psychosocial disabilities have triple the rate of mortality in heatwaves.”*

It is clear from this that we need disability-inclusive climate adaptation where governments and scientists collaborate with disabled people to develop disability-friendly adaptation and mitigation policies informed by research.

**Managed Retreat a major issue for disabled people**

One of the most crucial issues facing disabled people in the New Zealand context is that of managed retreat. This is a live one in an increasing number of communities around the country, including, for example, in South Dunedin which has a substantial population of disabled people.

The South Dunedin Future Project, a collaboration between the Dunedin City and Otago Regional Councils, is facilitating the development of a community-driven plan which will address the future of the suburb, that is expected to be one of the most climate change impacted areas in the country.

DPA has been involved in the South Dunedin Future Project as a key stakeholder and has been advocating for a disability lens to be applied to all decision making around this project. We are supportive of the community-driven approach to this project and hope that this will be a consultation model replicated in other areas of the country facing similar challenges due to climate change.

However, there are significant research gaps which still exist around disabled people and climate change and a pressing need for more research into its effects on the disabled community.

**Disabled People and DPO's must be involved**

Stein and other researchers including Schulte (2020) have made a strong case for disabled people to be one of the central groups in the response to climate change. [[6]](#footnote-7)

DPA, and disabled people, have also been involved in numerous climate change related discussions both under this and previous governments. We have made written submissions and engaged in dialogue with government agencies involved in climate change planning, including with the Climate Change Commission.

In these submissions, DPA has asked that Government recognise disabled people as a key population group that is at high risk from the effects of climate change and has a responsibility for ensuring that our rights are protected during this transition.

**DPA has consistently recommended that a disability lens is embedded within all central and local government climate change planning. This should be led and driven by disabled people and our Disabled People’s Organisations [DPOs] in partnership with central and local government.**

DPA recommends that climate resilience planning around disabled people is undertaken with full regard to relevant articles of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)5 : Article 4.3 (General Principles),6 Article 9 (Accessibility)7 and Article 11 (Situations of risk and humanitarian emergencies).8

**Recommendation 1:** that government recognise disabled people as a key population group for whom climate change impacts must be recognised and planned for.

**Recommendation 2:** that a disability perspective be embedded within all central and local government climate change planning including when it comes to emissions reduction. This disability-based climate change planning should be led and driven by disabled people and our DPOs.

Associated with this is the need for more data to be collected on disabled people and our exposure to climate change risks and impacts.

In fact, the discussion document for this consultation contains in-depth statistics about the impacts of climate change on Māori and non-Māori households.

We recommend that the same impact analysis be conducted for other equity groups including disabled people and their families/whānau.

**Recommendation 3:** that data be collated by government on the impacts of climate change on disabled people and their families/whānau.

**Needing for equity to achieve climate justice**

DPA is deeply disappointed that the new Government has abandoned the Equitable Transitions Strategy which informed climate change policy and planning processes under the previous government.

DPA participated in these discussions which were run by the Ministries of Social Development and Business Innovation and Employment.

These discussions sought to ensure that the voices of all New Zealanders would be heard in climate change planning, including when it came to determining emissions budgets and targets.

DPA continues to stress the need for climate justice for disabled people and other at-risk communities.

One way of the best ways to achieve climate justice is through the equitable sharing of the cost burdens that will come with transitioning to a low carbon economy. This means that the extra costs of doing so are placed more on industries which have high carbon emissions and less on individuals and communities, including disabled people, who generate the least emissions.

Disabled people are disproportionately low-income earners and, as with non-disabled people in the lower socioeconomic demographic, face significant barriers to paying for increasing everyday costs like food, electricity, transport and housing.

DPA recognises that, in the short term, there will need to be some additional costs carried by consumers as we transition to a more climate friendly economy.

Chief amongst these will be the possibility of higher electricity and transport prices as fossil fuel generated power and transport sources are replaced by cleaner ones.

**Recommendation 4:** that additional financial assistance is provided by government to meet any increased costs stemming from the transition to a carbon neutral economy to all lower-and middle-income consumers, especially households containing disabled people.

This assistance should include, for example, subsidised discounts/rebates on power bills coupled with assistance to create energy efficient homes.

Moving to cheaper, cleaner electricity generation will also reduce power prices in the medium to longer-term meaning that everyone, including disabled people, will win.

Transport, which is another significant cost for disabled people, will likely be impacted by increased costs, especially on fossil fuels like petrol, gas and diesel as these are phased out.

Many disabled people rely on a wide range of modes to mobilise within their communities. These include private vehicles (i.e., cars, vans), public transport including buses and privately run mobility services including taxis, rideshare and small passenger services funded through Total Mobility (TM).

DPA favours the transition to a clean, affordable, reliable and accessible public transport system as this will benefit everyone and the environment in the long run.

However, there will be additional transitional costs involved in the move to cleaner transport on disabled individuals who own/drive motor vehicles and those who utilise mobility transport services.

This is why we would like government to step up to help meet these additional transport costs until the time they begin to fall through the widespread uptake of new vehicular technologies.

**Recommendation 5:** that government reinstate the Clean Car Discount Scheme with a focus on supporting all motorists, including disabled and low-income motorists, to purchase clean energy accessible vehicles including accessible electric vehicles (EVs).

**Recommendation 6:** that Total Mobility passenger service operators are given financial assistance through the scheme to convert their accessible vehicle fleets to run on clean energy.

In terms of initiatives around increasing EV use, DPA is pleased to see that the new Government has plans to increase the number of EV charging stations on our roads.

The one key ask we have is that all charging stations are made accessible to everyone, including disabled motorists.

Government and EV charging providers must act to involve disabled people as one of the key co-design partners for these charging stations.

**Recommendation 7:** that all EV charging stations and facilities are made accessible to disabled people.

Local government needs to continue with its own moves to drive emissions reductions too in the absence of greater central government action.

For example, disabled people are benefitting from the introduction by local councils of more carbon neutral waste and recycling services, many which of which include assisted collection services aimed at disabled people.

Assisted collection services are where recycling and waste contractors come onto a disabled person’s property and take their waste/recycling to and from their properties.

**Recommendation 8:** that disabled people are actively involved in accessible climate change initiatives and projects, including emissions reductions projects, as active partners and that we are supported to do this by the Ministry for the Environment and other relevant agencies.

**Conclusion:**

We urge government to uphold its responsibilities around climate change and recognise the price that our disabled community and many others will pay if it doesn’t.

As the International Panel on Climate Change outlined in its 2023 annual report, the world has only a short window open to act it if it is to avoid going over the 1.5-degree Celsius warming limit agreed to in the Paris Climate Accords of 2015. [[7]](#footnote-8) The report outlined how 2023 was the hottest year on record, continuing the steady upwards trend.

At present the government’s policy decisions fall far short of what is needed to turn this around, and ring alarm bells for the disability community, as well as for other communities who will have to bear the greatest burden of the climate catastrophes that we are both already witnessing as well as those yet to come.

The move to fast-track consenting of major projects including mining, overturning the ban on all new gas and oil exploration, cutting public transport subsidies and not bringing agriculture into the ETS in 2025 are all putting this country’s ability to meet its agreed Paris targets at serious risk.

DPA urges government to increase investment in switching to climate friendly policies by investing in and bringing cleaner energy sources onstream, incentivising public transport and supporting deep cuts in emissions from agriculture and other high emissions industries.

**DPA reiterates the call we made earlier in this submission for cross-party agreement to be reached on climate change with an emphasis on making reductions through, for example, bringing agriculture into the ETS and dramatically reducing farming related emissions.**

**DPA recommends that disabled people are officially recognised by government as of the key stakeholder groups who need to be involved in all aspects of setting environmental and climate change policy as well.**

1. <https://social.desa.un.org/issues/disability/crpd/convention-on-the-rights-of-persons-with-disabilities-articles> [↑](#footnote-ref-2)
2. <https://www.climatecommission.govt.nz/our-work/monitoring/> [↑](#footnote-ref-3)
3. EHINZ. (2024). Social vulnerability to the impacts of climate-related hazards in Aotearoa New Zealand. Wellington: Environmental Health Intelligence New Zealand, Massey University. <https://www.ehinz.ac.nz/publications/news/latest-news/national-report-published-on-social-vulnerability-to-climate-related-hazards/> [↑](#footnote-ref-4)
4. Stein, J.S., Stein, M., Groce, N. & Kett, M. (2023). The role of the scientific community in strengthening disability-inclusive climate resilience. *Nature Climate Change 13*, 108-109.  [https://www.nature.com/articles/s41558-022-01564-6.epdf?](https://www.nature.com/articles/s41558-022-01564-6.epdf?sharing_token=WG7FDIwxm9EdrpxLpip75tRgN0jAjWel9jnR3ZoTv0OlD0JgJ93tTQjFULmdry3BVlmuGxD5onmsJt996nkMEGAr2tCBsveYWZXhgtd709bHCKwbcstWptPivtOz4U34R-phYAWEgIDvEDGs0fzjPHcHM0ng8l0DWIje7vQzL10%3D) [↑](#footnote-ref-5)
5. Harvard University Center for the Environment. (2023, January 19). *Disability in a Time of Climate Disaster*. Retrieved from <https://environment.harvard.edu/news/disability-time-climate-disaster#:~:text=Climate%20change%20amplifies%20the%20marginalization,rate%20of%20mortality%20in%20heatwaves>. [↑](#footnote-ref-6)
6. Schulte, C. (2020, March 28). *People With Disabilities Needed in Fight Against Climate Change*. Retrieved from <https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report>. [↑](#footnote-ref-7)
7. <https://www.wri.org/insights/2023-ipcc-ar6-synthesis-report-climate-change-findings> [↑](#footnote-ref-8)