August 2024

**To Otago Regional Council**

Please find attached our submission on: Refreshing our approach to air quality in Otago

For any further inquiries, please contact:

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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.

## 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 25 - Health**

**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.

# The Submission

DPA welcomes the opportunity to engage in the discussion on updating the Otago Regional Council’s (ORC’s) Regional Plan: Air.

DPA is supportive of the work that the ORC undertakes around managing and controlling the discharge of contaminants into the air as well as maintaining and improving our air quality.

Improving our air quality needs to happen in the areas which the ORC has responsibility for, by strengthening monitoring and enforcing clean air standards in all Otago communities, banning coal burning from both domestic and industrial sources and financially incentivising the switch by all households and businesses in the region to cleaner, renewable heating and energy sources.

However, we also recognise the some of the challenges that lie ahead in terms of addressing these issues.

As the ORC’s consultation website on this issue outlines, there are specific challenges with regards to phasing out wood burners and replacing them with heat pumps and other electrically powered heat sources in air pollution hot spots like Alexandra and Queenstown.

DPA would like to see any new updated clean Regional Plan: Air is fully implemented within the next five years, if not sooner.

We also note that the consultation feedback is being sought in the form of an online survey.

DPA will provide long form answers to each of the survey questions within this written submission.

## 1.) What do we think of air quality in Otago?

DPA strongly agrees that it is important for us all to breathe clean air given the positive impacts this has on people’s health, quality of life and our environment/wildlife.

The right to clean air is pertinent for disabled people who are more likely to live with impairments and health conditions.

Disabled people's health and wellbeing are impacted by air pollution in a number of ways. For example, people who live with respiratory conditions may find themselves not being able to go outdoors and socialise or perform essential household tasks like hanging out washing or opening windows at times when air pollution levels are high.

It also creates further physical and mental health problems for disabled people due to the need to stay indoors for prolonged periods or, if they need to go outside, they find that the air quality may be so poor that it exacerbates any health issues they already have.

For these and other reasons, it is very important that the ORC continues to tackle air pollution that is the product of carbon emissions.

Dramatically cutting the rate of carbon emissions is vital for everyone, including disabled people, as climate related weather events are having a calamitous impact on our disabled communities, both locally and globally.

The severe North Island weather events of 2023 had significant impacts on many disabled people who faced barriers in terms of their being evacuated and accessing humanitarian support.

As to what we believe the main sources of air pollution are in Otago, all the examples outlined in the survey including outdoor burning, discharges from chimneys and other industrial processes, burning of fuel for home heating, the spraying of agricultural chemicals and vehicle exhaust fumes all contribute to air pollution.

According to the ORC’s information, there are significant pockets of air pollution, especially in Central Otago where, for example, a combination of colder winter temperatures and geographical factors combine to produce high levels of smoke pollution due to the extensive use of wood burners.

The challenge of eliminating air pollution in Central Otago in colder months is exacerbated by the fact that clean energy alternatives like heat pumps don’t work well in areas which experience very cold temperatures as Central does.

**Recommendation 1:** that more research and consultation is carried out, especially in pollution hot spots like Central Otago, about how best to manage the transition to cleaner heating methods that are more suited to the extremes of temperatures in the region.

## 2.) Rethinking air quality management

**a.) Reducing pollution from home heating**

DPA supports the proposals outlined for tackling pollution from home heating sources contained in the questionnaire.

In particular we support the following:

* gradually replacing existing solid fuel burners if they have high emissions
* stopping the burning of coal
* financial support for households and businesses to replace solid fuel burners
* introducing education about wood burner best practice
* bringing in a firewood certification scheme
* and supporting improvements in housing standards and housing insulation programmes.

While these proposals may take slightly longer to be realised in the challenging environment of Central Otago, there is still a need to do all the above.

What matters now is the sequencing and timing of these moves which should be done in partnership with local authorities and residents to ensure that there is good public buy in to the need for even more significant reductions in air pollution levels.

**Recommendation 2:** that the proposed methods for reducing pollution from home heating sources be added to the Regional Plan: Air.

**b.) Reducing pollution from outdoor burning**

Outdoor burning can create air quality issues and present a nuisance for residents in communities where this is carried out.

DPA is very concerned about the use of outdoor burning as a means of waste management in rural and provincial areas which do not have easy access to waste and recycling services.

The potential for inhaling fumes generated, for example, by the burning of plastic waste is very harmful to human health.

DPA fully supports all the proposals outlined for tackling pollution from outdoor burning contained in the questionnaire.

These include:

* banning outdoor burning during winter months (barring emergency situations)
* requiring smoke management plans for large-scale/long-last burning
* preventing outdoor burning on properties smaller than 2 hectares (barring emergency situations)
* requiring alternatives to burning where practicable
* running education programmes on outdoor burning and smoke management
* liaising with city/district councils to ensure the availability of waste collection services
* and establishing a particulate matter limit for outdoor burning at property boundaries.

**Recommendation 3:** that the burning of household and other waste is banned throughout the ORC area under the new Regional Plan: Air.

**Recommendation 4:** that all the proposed methods for reducing pollution from outdoor burning be added to the Regional Plan: Air.

**c.) Reducing pollution from vehicle emissions**

DPA recognises that, as the questionnaire states, that vehicle emissions release particulate matter and nitrogen dioxide, which harm both people’s health and contribute to climate change.

As we have noted above, both climate change and air pollution from any source present both immediate and long-term risks to disabled people and people living with health conditions.

DPA fully supports all the proposals outlined for tackling pollution from vehicle emissions contained in the questionnaire.

These include:

* recognising the effects of nitrogen dioxide and reducing them,
* improving public transport to reduce private vehicle use,
* decarbonising the ORC’s vehicle fleets and buses,
* running joint education campaigns with local councils on not idling vehicles and road sharing;
* and working collaboratively with other organisations to reduce vehicle emissions.

**Recommendation 5:** that all the proposed methods for reducing pollution from vehicle emissions be added to the Regional Plan: Air.

**d.) Reducing emissions from industrial emissions, odour, dust and agricultural spraying**

DPA recognises the impacts that industrial emissions and those from agricultural spraying can have on people and the environment.

DPA fully supports all the proposals outlined for tacking pollution from industrial emissions and agricultural spraying contained in the questionnaire.

## 3.) Home heating

The need for more disabled people to have affordable warm, dry homes has never been greater.

According to Statistics New Zealand, disabled people are more likely to live in damp, cold, mouldy rental housing than non-disabled people. [[2]](#footnote-3)

This means that the greater the number of people living in poorly insulated, energy-inefficient homes, the more risk there is of increased air pollution from home heating sources.

The dual factors of poor insulation and high pollution are doubly calamitous for disabled people and people with healthy conditions.

DPA acknowledges the collaboration that exists between the ORC, Dunedin City Council, Health New Zealand Te Whatu Ora and other local agencies on funding and supporting initiatives to create more energy efficient, warm, dry homes throughout the province.

DPA recommends that the ORC continues to support initiatives including Aukaha’s Healthy Homes Initiative to ensure that all people, especially groups which experience high levels of energy poverty including disabled people, can live in warm, well insulated, energy efficient homes in the future.

**Recommendation 6:** that ORC continues to collaborate with local housing and community agency stakeholders to support projects around creating more energy efficient, warm, dry homes.

## 4.) Additional resources

Currently, there is only a limited amount of research on the effects of air pollution on disabled people. In terms of the research which does exist, Chakraborty (2022) found that in the United States there were a greater number of disabled people and people with health conditions living in areas which experienced high levels of air pollution.[[3]](#footnote-4)

There has also been some research, including that by Stein and Stein (2022) linking worsening environmental conditions, including air pollution, with the right of disabled people to enjoy good health which is provided for in Article 25 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).[[4]](#footnote-5)

1. <https://social.desa.un.org/issues/disability/crpd/convention-on-the-rights-of-persons-with-disabilities-articles> [↑](#footnote-ref-2)
2. <https://figure.nz/chart/Kawm7Pyr93s4MrTJ> [↑](#footnote-ref-3)
3. Chakraborty J. (2022). Disparities in exposure to fine particulate air pollution for people with disabilities. *The Science of the total environment 842*; 10 October 2022. <https://pubmed.ncbi.nlm.nih.gov/35750189/> [↑](#footnote-ref-4)
4. Stein, M. & Stein, P. (2022). Climate change and the right to health of people with disabilities. *The Lancet Global Health 10* (1), E24 –25. [https://doi.org/10.1016/S2214-109X(21)00542-8](https://doi.org/10.1016/S2214-109X%2821%2900542-8) [↑](#footnote-ref-5)