



CCS
disability action
Including all people

TE HUNGA HAUĀ MAURI MŌ NGĀ TĀNGATA KATOA

**Submission on
Question 16
of the
Reducing the impact of plastic on our environment
moving away from hard-to-recycle
and single-use items
Consultation document**

30 November 2020

About us

CCS Disability Action is a community organisation that has been advocating for disabled people to be included in the community since 1935. We provide direct support to approximately 5,000 children, young people and adults through our 18 branches, which operate from Northland to Invercargill. Our support focuses on breaking down barriers to participation. We receive a mixture of government and private funding.

CCS Disability Action has a national network of access coordinators, who work with local government and transport operators to create a more inclusive society. We also run New Zealand's nation-wide Mobility Parking Permit scheme. This scheme currently supports more than 150,000 people to more easily access their communities and facilities. Our fully owned subsidiary, Lifetime Design Ltd, advocates for and provides universal design guidelines to improve the accessibility of New Zealand housing.

Question 16. What do you think about the proposed mandatory phase-out of some single-use plastic items?

At this stage, we oppose any phase out of plastic single-use straws. We oppose this for three reasons:

1. There is no real detail around the proposed exemptions;
2. The proposed exemptions are not guaranteed. In the consultation document, the Ministry only commits to consider exemptions and describes the exemptions as potential (Ministry for the Environment, 2020, pp. 48, 65). The Ministry also appears to state that any exemptions will be dependent on submissions (Ministry for the Environment, 2020, p. 65); and
3. There is no proposed mechanism to address, or any acknowledgement of, the extra costs disabled people will face from banning plastic single-use straws.

The details of any exemption matter

The consultation document says any exemption could be similar to those in England and European Union. Apart from that there is no detail about how the exemptions would work. Given the possible effects of a ban on plastic single-use straws on some disabled people's lives, this lack of detail is very problematic. An effective and non-stigmatising exemption will be extremely difficult to achieve. In general, there are reports of the exemptions in other jurisdictions being ineffective, imposing costs on disabled people, and/or being stigmatising (Jenks & Obringer, 2020; Danovich & Godoy, 2018; Schultz, 2019).

Exemptions need to be effective and, crucially, non-stigmatising. This means there needs to be widespread knowledge about, and a commitment to, any exemption in the hospitality industry as well as knowledge and acceptance of the exemption from the general public. For any exemption to be effective, single-use plastic straws have to be widely and reliably available, which will be difficult given the supply of straws will shrink dramatically with the ban.

The costs of exemptions for disabled people

An exemption could also increase the already high costs disabled people face, both financial-costs and time-costs. Disabled people and their whānau are already far more likely to report income inadequacy than non-disabled people (Murray, 2019, pp. 10-11, 24-27). Disabled people also report that one of the biggest barriers they face is a lack of time (Wilkinson-Meyersa, et al., 2014, p. 1547). With an exemption both financial and time costs could increase. For example, if disabled people have to buy straws from pharmacies that imposes a cost where currently disabled people can get straws for free in many hospitality establishments. Those pharmacies may also charge higher rates than supermarkets for straws.

If only some hospitality establishments stock plastic straws, or are aware of the exemption, this will increase the time-cost for disabled people and their whānau of accessing meals and drinks. They may have to try multiple venues. An exemption process may also be stigmatising and will require people to disclose that they have a disability (Jenks & Obringer, 2020; Schultz, 2019; Danovich & Godoy, 2018).

Research into alternatives

There is not a single alternative to plastic single-use straws that works for every disabled person. There is tremendous diversity within the disability community. United States research has found that paper straws do not work for an overwhelming number of disabled people. Between 70% to 78% of the disabled people in this research would not recommend them (The Disability Organizing Network , 2018, p. 4).

The most recommended alternative to current single-use plastic straws is compostable single-use bent plastic straw (77% of disabled people in this research would recommend them). This alternative would also be banned under the current proposals. The highest scoring remaining alternative was a BPA-free reusable bent straw (67% of disabled people in this research would recommend). The steel and silicon options had between 38% and 52% of disabled people recommending them (The Disability Organizing Network , 2018, p. 4).

In addition, as the consultation document acknowledges, alternatives often cost more (Ministry for the Environment, 2020, p. 43).

The way forward

The Ministry for the Environment needs to proactively involve disabled people in any decision-making around banning plastic straws and the design of any exemptions.

This current consultation process is not adequate. The online process the Ministry prefers for submissions provides no easy way to provide feedback on the straw proposal specifically or to comment on possible exemptions. Instead it has high-level overarching questions.

The details of any exemptions need to be worked out with disabled people before any ban of single-use plastic straws takes place. This is crucial. If a ban is passed, with poorly designed exemptions or the exemptions are not in place, there will be a significant and unacceptable impact on some disabled people.

Designing for everyone

There is currently not a strong enough focus on making sure reusable products are universally designed and work for all disabled people. We are not at all confident a solely market solution will ensure disabled people's needs are met by new reusable technology and products. Instead the government needs an adequately resourced strategy for ensuring the needs of disabled people are met by designers and companies working on reusable products. This will likely require a mix of incentives and awards. It will also require linking disabled people to designers and encouraging more diversity amongst designers so that disabled people are represented amongst the workforce designing the technology of the future.

Addressing costs

Even if more inclusive reusable products are available, cost will be a significant barrier. A straightforward solution is to expand the existing Disability Allowance to cover the purchase of reusable alternatives to single-use products that are linked to a disability-related need. The Disability Allowance is currently underutilised with most people receiving far below the possible maximum (Murray S. , 2020).

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