

Submission for the New National Disability Strategy 2020

Andrea Weber, October 2020

As the National Disability Strategy 2020 is designed to assist planning over the next 10 years, it is essential that the Strategy aims to remove barriers to inclusion for *all* members of the community, especially for those currently inadequately represented in policy making including those with environmental sensitivities. Having an environmental sensitivity impacts every aspect of a person's life including health and wellbeing, economic security, sense of belonging, contribution, participation and every-day functioning.

There are currently many people in Australia suffering from environmental sensitivities without adequate recognition or support and without access to an inclusive education, an inclusive workplace or access to essential services and public facilities. People with multiple chemical sensitivity (MCS) and electromagnetic sensitivity (commonly known as electromagnetic hypersensitivity, EHS) can suffer from debilitating pain, exhaustion, fatigue and a wide range of symptoms that would certainly be considered disabling within the definition of disability of the Disability Discrimination Act 1992.

I would like to support Dr Sharyn Martin's submission regarding MCS and fragrance sensitivity and focus this submission on electromagnetic sensitivity (EHS). There is growing international recognition of EHS and Sweden formally recognises electromagnetic sensitivity as a functional impairment due to the limitations experienced by those affected (1). Environmental sensitivities are recognised as a medical condition and a disability by the Canadian Human Rights Commission that makes mention of chemicals, products and environmental triggers (2). EME (electromagnetic energy) is an environmental trigger for those with electromagnetic sensitivity and this is being increasingly recognised by doctors here in Australia as well as internationally. There are several European countries with increasing recognition of EHS (3).

While the exact number of people with EHS in Australia is unknown, there is certainly plenty of available information to indicate that the number of people affected is steadily increasing. People who suffer from EHS often face continuing isolation, limitation and considerable barriers to inclusion in education, employment, essential services and public facilities that *all* people

have a right to access. Restrictions to everyday functioning can lead to overwhelm and additional stress which can in turn create further health complications as well as degradation in other health conditions that often accompany environmental sensitivities such as chronic fatigue syndrome and fibromyalgia.

Due to these barriers to inclusive access, people are no longer able to participate fully and productively in everyday life. Many people have had to reduce work hours or resign from work altogether due to a lack of support and accessible options, creating financial, relationship, mental and emotional hardship. Already having to manage the debilitating physical symptoms of the condition, people also face social stigma and judgement due to a lack of awareness, knowledge and acceptance of the condition.

Families are often left with the only option of home schooling children who cannot access classrooms with wireless routers and wireless communications that now feature prominently in schools across Australia. Home schooling would not be a suitable or desired option for many families, placing people under further financial hardship and additional stress. Providing wired connectivity to access online learning would create the opportunity for more children to access an inclusive education and for more staff to access an inclusive workplace.

Due to the continuing limitations and barriers to everyday life that it brings and the improvements to the quality of living that could be gained from inclusion within the new Strategy, EHS and environmental sensitivities need to be considered within the realms of the National Disability Strategy.

In addition to the above information, I make reference to the specific Questions for the development of a new Strategy.

Question 1

The six outcome areas are all applicable to those managing environmental sensitivities such as MCS and EHS.

Question 2

I agree with the guiding principles, provided that barriers are also adequately recognised and addressed for people with environmental sensitivities such as EHS and MCS.

Question 3

The new Strategy most definitely needs to have a stronger emphasis on improving community attitudes across all outcome areas. A lack of knowledge or skewing of current knowledge does not justify ongoing inaction. Examples of organisations making adjustments to uphold their inclusive access policies should be openly communicated to promote awareness and knowledge of what can be achieved.

Question 4

All the points proposed to strengthen accountability are important and as the discussion paper says, “All levels of government play a key role in driving change.” There also needs to be an emphasis on the roles played by sectors outside of government in improving outcomes and removing barriers.

Question 5

The outcome areas, community focus, accountability, action plans and evaluation of policy and programs have relevance to all sectors of the community, including business, community organisations, research and investment. All people should have equal access to thrive and contribute within a community and people with environmental sensitivities are consumers with needs that have to be met like everyone else. Non-government sectors play an equally important role in driving change. Businesses, in particular, have the chance to step up and become industry leaders in recognising the opportunities in offering solutions.

Question 6

The general public would want to know that the services and supports are actually achieving improvements through the measurement of applicable outcomes. Staggered reporting would possibly uphold accountability and efficiency more so than reporting for longer periods of time such as every two

years. An annual public statement outlining government policy commitments is important but would not reflect the reality of what is actually being achieved.

Question 7

If targeted action plans are to drive change within shorter timeframes to be “adaptable to the changing needs of people with disability”, targeted action plans over a one year period with staggered reporting as outlined in answer to Question 6, would achieve this goal with flexibility for longer timeframes where required to achieve the best outcomes. Where a longer period is required, staggered reporting would be necessary to maintain accountability and efficiency.

Question 8

Including the regular input, discussion, review and evaluation from people with a disability as well as support and advocacy groups within the community will promote engagement and efficiency of the new Strategy. Past government initiatives for inclusion have often been criticised for falling short in active engagement from the very people its policies are meant to protect so an effective engagement plan is certainly needed. As outlined above, the new National Disability Strategy needs to include those currently not provided with adequate recognition or representation such as those with environmental sensitivities.

References

(1)

[https://pubmed.ncbi.nlm.nih.gov/17178584/#:~:text=In%20Sweden%2C%20electrohypersensitivity%20\(EHS\),electromagnetic%20field%20\(EMF\)%20sources.](https://pubmed.ncbi.nlm.nih.gov/17178584/#:~:text=In%20Sweden%2C%20electrohypersensitivity%20(EHS),electromagnetic%20field%20(EMF)%20sources.)

(2)

<https://www.chrc-ccdp.gc.ca/eng/content/policy-environmental-sensitivities>

- (3) In May 2011, the Parliamentary Assembly of the Council of Europe recommended to “pay particular attention to ‘electrosensitive’ people who suffer from a syndrome of intolerance to emfs and introduce special measures to protect them, including the creation of wave-free areas not covered by the wireless network.”

In 2015, a Scientific Committee of physicians, scientists, medical doctors and researchers presented the 2015, Brussels International Scientific Declaration on Electromagnetic Hypersensitivity and Multiple Chemical Sensitivity – stressing to all national and international bodies and institutions, including the WHO to recognise EHS and MCS as true medical conditions.

<https://ecfsapi.fcc.gov/file/10910251701394/EUROPAEM%20EMF%20Guideline%202016%20for%20the%20prevention%20and%20treatment%20of%20EMF-related%20health%20problems.pdf>