

25 March 2021

He Pou a Rangi
Climate Change Commission
PO Box 24448
Wellington 6142

Tēnā koe

Re: Climate action for Aotearoa

Thank you for the opportunity to provide a written submission on this consultation document.

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Capital & Coast, Hutt Valley and Wairarapa and as a service is part of the Hutt Valley District Health Board.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

We are happy to provide further advice or clarification on any of the points raised in our written submission. We would welcome the opportunity to speak to our submission. The contact point for this submission is:

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Ngā mihi

Dr Stephen Palmer
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Introduction

Regional Public Health (RPH) is the public health unit for the greater Wellington Region (Wairarapa, Hutt Valley and Capital & Coast District Health Boards). Our business works to improve the health and wellbeing of our population and to reduce health disparities through public health action. We aim to work with others to promote and protect good health, prevent disease, and improve quality of life across the population. We are funded by the Ministry of Health and also have contracts with District Health Boards and other agencies to deliver specific services.

Regional Public Health is a member of the Wellington Regional Healthy Housing Group (WRHHG), a multi-sector group working collectively toward the vision of '*Everyone in the Wellington Region lives in warm, dry and safe housing by 2025*'. RPH endorses and supports the submission of the WRHHG.

General feedback

RPH would like to **commend** the work of He Pou a Rangi in identifying achievable, affordable and socially acceptable pathways for Aotearoa to respond to the climate change emergency. Climate change presents a serious and imminent threat to population health. New Zealanders are at risk of both the direct health effects of climate change (e.g. extreme weather events, injuries, heat waves and damage to infrastructure) and indirect health effects (e.g. changes in ecosystems and subsequent disease patterns, microbiological contamination of water, conflict over resource scarcity, poor mental health, food insecurity, destruction of infrastructure, homes and livelihoods).

RPH **commends** He Pou a Rangi for the use of He Ara Wairoa Framework as this has provided a consistent inclusion Mātauranga Māori to understand wellbeing. The acknowledgment of He Ara Wairoa values of manaakitanga, tikanga, whanaungatanga and kotahitanga clearly guides the transformational transition suggested in this report.

COVID-19 has highlighted the importance of community and neighbourhood resilience and how supportive neighbourhood features such as healthy housing, good urban design, public transport options, connected communities, and local food sources can contribute to individual and collective resiliency. COVID-19 has also demonstrated the impact of unequal distribution of these features on our communities. He Pou a Rangi has an opportunity to use learnings from COVID-19 to strengthen its advice to Government on making a fair and equitable transition.

Prioritising equity

Climate change is likely to exacerbate inequities in Aotearoa, particularly for Māori, Pacific and low-income communities who are at greater risk of poorer health and social outcomes^{1,2}. Strategies that address climate change can often provide health co-benefits and decrease existing inequities when implemented appropriately³.

¹ New Zealand College of Public Health Medicine. Policy Statement on Climate Change. Wellington: New Zealand College of Public Health Medicine. (2013).

² Howden-Chapman P, Chapman R, Hales S, Britton E, Wilson N. Climate Change and Human Health: Impact and Adaptation Issues for New Zealand. In: Nottage RAC, Wratt DS, Bornman JF, Jones K (eds). Climate Change Adaptation in New Zealand: Future Scenarios and Some Sectoral Perspectives. Wellington: New Zealand Climate Change Centre. (2010).

³ Climate Change: The Public Health Response. Frumkin. (2008).

To ensure a fair and equitable transition we need to consider and address the potential impacts of the proposed climate actions on populations with less access to the personal, neighbourhood and system resources needed to live healthy lives, particularly Māori.

Active consideration must be given to the impacts of climate change policy decisions on Māori, in line with Te Tiriti o Waitangi obligations. Engaging meaningfully with Māori and other population groups will help to ensure a just transition to a low carbon economy for all New Zealanders. It also provides a significant opportunity to foster an environmentally and socially sustainable economy, driving job creation, job upgrading, social justice and poverty eradication.

Overarching RPH recommendations

RPH supports the overarching work and advice to Government, and agrees that there is a need for quick and effective action to tackle climate change in Aotearoa. We support the key principles that have been used to guide the advice and transition. RPH reinforces the recommendation to the Government in necessary action 1, and commends He Pou a Rangi for their consistent messaging regarding access to a decarbonised economy through an equitable and fair transition.

RPH supports time critical action 1 and necessary action 1 of “an equitable, inclusive and well-planned climate transition.” This action is necessary to ensure all remaining actions are successful and sustainable. Central government’s role throughout implementation will be pivotal in resourcing and supporting communities to give effect to transition plans.

RPH supports the importance of localised transition planning (with central government working alongside iwi, Māori, business, local government and community stakeholders) to ensure that any negative unintended consequences of the policies are mitigated, and solutions are tailored for local populations. Clear guidance will be required to ensure that locally developed transition plans are customised and co-developed with local government and local communities.

RPH supports He Pou a Rangi advice on the need for Government funded targeted assistance across all recommended policies and actions to prevent and mitigate the creation of inequities, especially for Māori, Pasifika and low income whānau. The policies must improve both climate change effects and health equity, and this can be achieved through targeted assistance and support during implementation.

RPH encourages He Pou a Rangi to promote the need for evidence based equity tools and other frameworks to assist those involved in transition planning and in the targeting of assistance. For example, the Health Equity Assessment Tool⁴ could help to identify and address potential health and wellbeing impacts across the wide range of policy advice, and guide the local and central co-development of options to mitigate any potential negative impacts. He Pou a Rangi has an opportunity to advise Government on the tools necessary to make this transformational shift.

⁴ <https://www.health.govt.nz/system/files/documents/publications/health-equity-assessment-tool-guide.pdf>

Food environment and food security

RPH recommends that He Pou a Rangi strengthens its recommendations on protecting the use of land suitable for growing fresh produce and protecting soil.

He Pou a Rangi recommendations suggest several changes to agricultural practices however these largely neglect consideration for agricultural practices relating to fruit, vegetable and grain crops. While forestry and alternative farming systems and practices are vital solutions to solving the climate change problem, maintaining land, in particular good soil, as a valuable resource will benefit Aotearoa. Good soil has the potential to support outcomes across environmental, social, economic and cultural domains. Competing pressures on local authorities, with urban development regularly taking precedence over other land uses near urban centres means that local food systems often cannot provide adequate and affordable food for local populations. The protection of highly productive land close to urban centres needs to be prioritised and is crucial for protecting food security and wellbeing of the urban populations. This is essential in allowing urban centres to provide locally-grown food that is affordable, fresh and nutritious for all people in Aotearoa.

Climate change is already affecting food production through changing weather patterns⁵. This has wider implications such as increased food insecurity, particularly for more vulnerable populations which will worsen as climate change impacts continue⁵. New Zealand has the capacity to grow sufficient food to feed the entire population well, but there is currently a bias towards exporting much of our fresh produce. Protecting highly productive, non-renewable soil and land for future generations requires a fundamental shift towards prioritising food sovereignty and resilience, climate, human health and wellbeing, over economic concerns.

RPH suggests He Pou a Rangi consider the diversification of the food system as a means to reduce climate risks. He Pou a Rangi has an opportunity to advise the Government of the implications that may arise if the diversification of the food system is not considered as a means to reduce climate risks. The implications may include but are not limited to, the food production system, the adoption of healthy and sustainable diets, food loss and waste. This advice also highlights the importance of prioritising land for food production⁵.

Changing diets to focus on health and sustainability presents as an opportunity to reduce GHG emissions from the food system while benefitting people's health⁵.

Benefits include:

- Decreased carbon emissions compared with imported foods and meat production
- Protection of topsoil from erosion, maximisation of the caloric and nutrient content of food for the greatest number of people for a given area of land use
- Greater flexibility and potential for sustainable land use into the future in comparison to urban development
- Mitigation of the effects of climate-derived food shocks⁶.

⁵ The Intergovernmental Panel on Climate Change. Food Security (Ch 5). The Intergovernmental Panel on Climate Change. (2019).

⁶ EAT Lancet Commission, EAT-Lancet Commission on Healthy Diets From Sustainable Food Systems. EAT Lancet Commission. (2019)

Warm, dry, healthy decent homes, state owned properties and schools

RPH supports He Pou a Rangi advice to Government to improve the energy efficiency of buildings, alongside decarbonising the energy used for heating, hot water and cooking.

Warm, dry, energy efficient healthy homes are more beneficial to health and wellbeing for the people who live in them. There is strong evidence nationally and internationally of improved health outcomes resulting from warmer and drier homes. For example, in the short term a child living in a healthy home will be less likely to have asthma, and therefore more likely to be able to attend education frequently. With more days in education, the long term affect for this same child would be more opportunity to access higher education, and a well-paid job, one of the social determinants of health.

RPH supports the need to expand assistance to low-income and other vulnerable households/consumers to ensure that they can access the health and other benefits of energy efficient homes, and are provided with sustainable and affordable options for heating hot water and cooking.

It is important that all people are able to make the transition to decarbonised energy and that they reap the benefits of increased energy efficiency. To ensure equity, targeted support will need to be provided. Communities that require targeted assistance will include low-income households (across tenure types), Māori and Pacific people, people with disabilities, people living in remote areas, older persons, kaumatua and other identified priority populations.

Identifying and mitigating negative unintended consequences of housing related climate change policies needs to occur early in transition planning, through targeted assistance and supporting communities. The following are some examples of scenarios that should be worked through:

- Many families continue to utilise portable gas heating, as a way of managing their heating budgets. How do we ensure that people have options to manage their energy consumption within their financial means without compromising their right to live in a decent, warm, dry and healthy home?
- For people who are renting - how can they have access to decarbonised energy and increased energy efficiency without the costs of the transition being passed on to them? How will renters who are locked into natural gas be protected from paying the expected increasing costs?
- Many lower or fixed income homeowners cannot afford to make vital repairs, undertake maintenance or make improvements which would make a big difference to the energy efficiency of their homes and the health of the occupants. There is a clear need for targeted assistance in this area.
- How do we build resilience to electricity supply outages when we become more reliant on electricity to heat homes and to cook, especially for more vulnerable families? What is the place of other renewable energy options?

- What are the opportunities to increase the pace and scale of existing energy efficiency initiatives such as for insulation, energy efficient heating, maintenance etc – especially for low income home owners?

These scenarios and others should be addressed both centrally and locally through effective transition planning (critical and necessary action 1).

RPH commends He Pou a Rangi emphasis on ensuring an equitable and fair transition and agree with the need for careful consideration of the impacts of emissions budgets on New Zealanders. The risk of well-intentioned policies creating further inequities is considerable unless there is a strong intergenerational equity focus clearly led and resourced by Government now and into future implementation.

Housing and urban form

RPH supports necessary action 10 to reduce emissions from urban form. In their guideline on the right to a decent home the Human Rights Commission describe *‘Kāinga is more than a home, it also means a village, relationships and responsibilities to place, people and the natural environment’*.

RPH supports the importance of integrated planning for urban environments. We note the importance of the principles from the National Policy Statement in Urban Development and the critical role of local and regional authorities in leading and supporting healthy urban development with their communities.

Connected Communities - Transport

Internationally, there is a growing acceptance that transport is a key health determinant in relation to equitable health outcomes. Delivering quality public transport that is affordable, reliable and convenient is important for providing personal mobility and freedom for people to get to the places where they live, learn, work and play. Public transport plays an important role in the health and wellbeing of whānau as it is key to accessing almost all services, such as education, employment, and social activities. Transport planning decisions have the ability to potentially address equity or exacerbate inequity.

RPH supports He Pou a Rangi necessary action 2. The opportunity for whānau and all communities to participate in physical activity in a safe environment is paramount. Active transport helps to alleviate traffic congestion, saves energy, reduces air and noise pollution, conserves land, and produces various other environmental benefits. Furthermore, active modes of transport can contribute to a reduction in long-term health conditions such as Type 2 Diabetes, and improving safety can reduce injury events⁷.

RPH recommends that He Pou a Rangi promote relevant guidance which could support transition planning. For example, promoting resources and tools such as the Healthy Streets Guidelines⁸. These should be utilised in the design of active transport routes to ensure an effective, accessible and safe space for community use. The Healthy Street Guidelines provide a clear set of recommendations to

⁷ Ministry of Health. Health Loss in New Zealand: A report from the New Zealand Burden of Diseases, Injuries and Risk Factors Study 2006-2016, Wellington: Ministry of Health (2016).

⁸ Transport for London. Guide to the Healthy Street Indicators (2017). <https://healthystreets.com/>

make streets usable to all. As an example, it provides a clear separation between cyclists and pedestrian pathways with clear signage and adequate lighting to increase ease of use for both users, therefore support an equitable transition.

RPH supports necessary action 3 and 4, and reiterate the importance of targeted assistance to ensure successful uptake of electric vehicles. Barriers such as initial set-up costs, running costs, and vehicle use (e.g. driving long-distances) are more likely to be experienced by less-advantaged population groups. To reduce these barriers, **RPH recommends** that education is provided on the access to public charging stations. For example, in Wellington city, one in four dwellings lack reliable off-street parking in order to charge their EVs overnight⁹. Additionally, apartment dwellers and those living in rental units may not be able to arrange a charging point with their landlord⁹. Consideration should be taken as to the likely uptake of EVs by renters vs. homeowners, as well as incentives that can be provided to landlords for installing charging outlets on their properties¹⁰. Access to charging stations in workplaces should also be readily available. In order for the implementation of EVs to be successful, there needs to be a corresponding implementation plan to increase the infrastructure and awareness of EV charging stations.

While RPH acknowledges that moving to electric vehicles reduces carbon emissions, Aotearoa has a transport system focused on moving cars, not people. RPH suggests He Pou a Rangi provides greater emphasis on improving public, active and alternative transport modes (e.g. ride sharing) as these are likely to be more equitable in the long-term¹¹. Shifting the mode approach and the form of cities will have many benefits for climate, reduction in congestion, and increase active travel or public transport¹². All people, no matter where they live or what their situation, should be able to move around their city in ways that create positive health outcomes and take care of the planet.

Thank you for the opportunity to support He Pou a Rangi with the advice for consultation report. Regional Public Health is encouraged by the equitable advice and intended direction provided in response to the climate change emergency. Regional Public Health would welcome the opportunity to speak to our submission.

⁹ EV Support Strategy for the Wellington Region (2019). <http://www.gw.govt.nz/assets/EV-Support-Strategydraft-v1.5.7.pdf>

¹⁰ The Conversation (2018). Apartments rarely come with access to charging stations. But electric vehicles need them. <http://theconversation.com/apartments-rarely-come-with-access-to-charging-stations-but-electricvehicles-need-them-100296>

¹¹ Chapman R, Howden-Chapman, P. Transforming transport and cities in NZ: a note for the Climate Change Commission's engagements on transport and urban form (2020).

¹² Adams M, Chapman R. Do denser urban areas save on infrastructure? Evidence from New Zealand territorial authorities. Policy Quarterly, pp. 63-70. (2016).