



Blind Citizens Australia

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Response to the Alternative Commonwealth Capabilities for Crisis Response Discussion Paper

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1. Introduction

1.1 About Blind Citizens Australia (BCA)

Blind Citizens Australia (BCA) is the peak national representative organisation of and for the over 500,000 people in Australia who are blind or vision impaired. For nearly 50 years, BCA has built a strong reputation for empowering Australians who are blind or vision impaired to lead full and active lives and to make meaningful contributions to our communities. BCA provides peer support and individual advocacy to people who are blind or vision impaired across Australia.

Through our campaign work, we address systemic barriers by promoting the full and equal participation in society of people who are blind or vision impaired. Through our policy work, we provide advice to community and governments on issues of importance to people who are blind or vision impaired. As a disability-led

organisation, our work is directly informed by lived experience. All directors are full members of BCA and the majority of our volunteers and staff are blind or vision impaired. They are of diverse backgrounds and identities.

1.2 About people who are blind or vision impaired

There are currently more than 500,000 people who are blind or vision impaired in Australia with estimates that this will rise to 564,000 by 2030. According to Vision Initiative, around 80 per cent of vision loss in Australia is caused by conditions that become more common as people age.¹

Australians who are blind or vision impaired can live rich and active lives and make meaningful contributions to their communities: working, volunteering, raising families and engaging in sports and other recreational activities. The extent to which people can actively and independently participate in community life does, however, rely on facilities, services and systems that are available to the public being designed in a way that makes them inclusive of the needs of all citizens – including those who are blind or vision impaired.

2. Submission Context

BCA welcomes the opportunity to make a submission in response to the Department of Home Affairs' discussion paper on Alternative Commonwealth Capabilities for Crisis Response. BCA's submission recommends policy changes to build community resilience amidst more frequent, severe and overlapping natural disasters.

BCA's submission is based on the following policy frameworks, noting gaps in the fulfilment of requirements laid out in existing arrangements:

- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). Particularly "Article 9 – Accessibility" and "Article 11 – Situations of Risk and Humanitarian Emergencies."
- Australia's Disability Strategy 2021–2031.
- Sendai Framework for Disaster Risk Reduction 2015–2030.
- United Nations Office for Disaster Risk Reduction (UNDRR) Strategic Framework 2022–2025.

- Commonwealth, state, territory and local government emergency preparedness, response and recovery plans.

According to the Australian Prudential Regulation Authority (APRA), it is up to 11 times more costly to recover and rebuild after a natural disaster than it is to build resilience beforehand.² Despite this, the Commonwealth dedicated 98 per cent of the \$24.5 billion it spent on natural disasters between 2005 and 2022 to relief and recovery efforts.³

Only modest progress has been made in curbing global emissions, with greenhouse gas emissions now higher than at any other point in human history.⁴ As a result, Australia will experience more frequent and devastating natural disasters in the years ahead.

The Commonwealth must shift the funding dial from recovery to resilience. APRA estimates that to limit the damage caused by increasingly frequent natural disasters, Australia must henceforth spend \$3.5 billion annually on disaster resilience projects.⁵

Communities and individuals also have a part to play in building resilience. As a disability representative organisation, BCA has developed a detailed Emergency Preparedness Policy Report to educate and prepare people who are blind or vision impaired by outlining how natural disasters affect them specifically.⁶

In developing this Policy Report, BCA's extensive consultations with people who are blind or vision impaired affirmed the findings of international scholars.⁷ Namely, that when it comes to emergency preparedness and response, there are three recurring barriers for people who are blind or vision impaired:

1. A lack of data, information and knowledge of people with disability.
2. Inaccessible communication of emergency warnings and advice.
3. Inaccessible transport and evacuation facilities.

This submission offers practical solutions to the Commonwealth for each of these barriers. This submission also considers the future of eye health in a climate-affected world.

3. Blind Citizens Australia’s Submission

3.1 An overview of Australia’s emergency management systems

International obligations

In recent years, governments across Australia have taken steps to improve the lives and experiences of the 18 per cent of Australians (about 4.4 million people) who have some form of disability.⁸ As a signatory to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), governments in Australia have an obligation to protect and promote the human rights of people with disability.

Regarding natural disasters, the UNCRPD’s “Article 9 – Accessibility” requires State Parties to “take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, ... including electronic services and emergency services.”⁹

Furthermore, “Article 11 – Situations of Risk and Humanitarian Emergencies” requires State Parties to take “all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk, including situations of armed conflict, humanitarian emergencies and the occurrence of natural disasters.”¹⁰

Australia is also a signatory to the Sendai Framework for Disaster Risk Reduction 2015–2030, the global blueprint for natural disaster risk reduction and resilience. To accelerate and amplify the benefits of the Sendai Framework, the United Nations Office for Disaster Risk Reduction (UNDRR) developed the Strategic Framework 2022–2025. The UNDRR Strategic Framework 2022–2025 prioritises disability-inclusive disaster risk reduction activities.¹¹

Domestic responsibilities

Australia’s Disability Strategy 2021–2031 is a joint agreement between Commonwealth, state, territory and local governments. The Strategy identifies “Inclusive Homes and Communities” as one of its intended outcomes: “Accessible housing, transport, communication and the built environment are key factors supporting the participation of people with disability.”¹²

Under Australia’s constitutional arrangements, state and territory governments manage frontline emergency responses, including police, fire, health and emergency services. Each state and territory government has a health disaster plan that helps coordinate their health facilities during emergency situations.¹³

The roles and responsibilities of Australia’s 540 local governments – cities, shires, towns and municipalities – differ between jurisdictions. Between 60 and 70 per cent of local governments are in regional or rural areas.¹⁴ Local governments often lead the delivery of community services such as evacuation centres, and work to restore community infrastructure after a natural disaster.

The Commonwealth plays a central role in coordinating responses to and recovery from disasters and emergencies. The Department of Home Affairs maintains a suite of response plans that can be accessed by state and territory governments and international partners during an emergency.¹⁵

The Commonwealth also provides emergency assistance through the deployment of Australian Defence Force (ADF) personnel and assets. Since 2019, more than 35,100 personnel out of a workforce of 62,000 have been sent to help communities respond to bushfires, floods and the COVID-19 pandemic.¹⁶ As noted in the discussion paper, Australia’s strategic environment will curtail the deployment of ADF personnel in future domestic relief efforts.

3.2 A lack of data, information and knowledge of people with disability

Adapt or die

“The sudden explosion of record temperatures carries a warning for humans: adapt or die,” wrote Alice Hill of the Council on Foreign Relations in August 2023. “If governments and societies do not make adequate preparations, the damaging impacts of climate change will crush lives, livelihoods, and communities across the globe.”¹⁷

Even at the best of times, people with disability are more likely to experience poverty and a lack of social support. When communities are ravaged by natural disasters, people with disability are the ones who suffer most.

People with disability are excluded from all stages of natural disaster risk management. According to the UNDRR, 85 per cent of people with disability have not been invited to participate in risk reduction processes in their communities.¹⁸

This means that when natural disasters strike, emergency services personnel are ill-equipped to offer the person-centred assistance required by people with disability. Consequently, “people with physical disability are two to four times more likely than the general population to die or sustain injuries” during a natural disaster.¹⁹

The urgent need for a Disability Disaster Management Centre

As the principal source of natural disaster-related expenditure, the Commonwealth must set aside some funding to establish an advisory body that will improve the data, information and knowledge of people with disability.

The need to establish a disability-centric natural disaster advisory body was identified during the course of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Disability Royal Commission). In April 2020, the Disability Royal Commission published an Emergency Planning and Response Issues Paper, to which people with disability, their families, academic experts and disability representative organisations could respond.

Respondents to the Issues Paper described how repeated emergencies had “exposed Australia’s lack of emergency preparedness” and that the “lack of preparedness disproportionately affects people with disability, whose pre-existing disadvantages are exacerbated during crises.” Of particular concern was the Commonwealth’s failure “to establish any permanent and effective mechanisms to ensure the participation of persons with disabilities and their representative organisations in emergency planning and response.”²⁰

To rectify this problem, BCA endorses the proposal from the Disability Advocacy Network Australia (DANA) to establish a Disability Disaster Management Centre (DDMC) within the National Emergency Management Agency (NEMA).²¹ Whilst constituting only a tiny fraction of the billions set to be spent on natural disaster preparedness and recovery in the coming years, the DDMC would have a profound impact on people with disability.

The DDMC would consult with people with disability, disability representative organisations and disability service providers. The DDMC would also advise the Commonwealth on how best to recognise, support and protect people with disability during an emergency event.

The DDMC would devise Disability Disaster Plans for specific emergency events such as floods, bushfires, communicable disease outbreaks, etc. Crucially, these plans would outline the steps to be taken to ensure the timely release of emergency information in accessible formats, including large print, braille and audio.

DDMC representatives should also be given a seat on state and territory Disaster Management Committees, allowing people with disability to be represented as a distinct cohort when disaster responses are activated in each jurisdiction.

The DDMC, the NDIA and P-CEP

During a disaster, the DDMC would work with housing and health agencies on the ground to ensure that people with disability were appropriately prioritised and supported. The DDMC would also work closely with the National Disability Insurance Agency (NDIA).

According to the UNDRR, only 20 per cent of people with disability would be able to evacuate immediately in the event of a sudden natural disaster.²² One of the reasons for this is that disability support workers understandably often prioritise their own safety and that of their loved ones when a natural disaster strikes, leaving people with disability to fend for themselves.

In Australia, the NDIA currently has no plan for addressing disability support workforce deficiencies during natural disasters. This means that many people with disability go without support at the time they need it most. The DDMC and the NDIA would collaborate on a disability support workforce strategy as a matter of urgency.

Many people with disability currently do not have a person-centred emergency plan. Person-Centred Emergency Preparedness (P-CEP) requires time and support from a formal and/or informal support who understands the person's situation.

P-CEP currently has no specific line item in National Disability Insurance Scheme (NDIS) plans. NDIS participants may still be able to incorporate P-CEP as one of

their goals, but planners and local area coordinators (LACs) will need to be notified of this possibility.

To ensure people with disability can create their own P-CEP plans, the NDIA should provide an initial three hours of support coordination in all NDIS plans to develop a P-CEP plan and one hour per year after that to review and revise the plan. For NDIS participants without support coordination, that P-CEP funding should be provided to a key support worker chosen by the participant and used to develop a P-CEP plan.

For people with disability who are not NDIS participants, P-CEP toolkits should be made readily available through mainstream government services. Disability representative organisations should be funded by the Commonwealth to host sessions with people with disability to develop their own P-CEP plans.

Once the P-CEP plans are completed, they should be securely stored in a database housed at the DDMC. This would allow government at all levels to quickly identify people with disability and their support needs when a natural disaster occurs in a particular region.

The dire consequences of ignorance

Until such a time as the DDMC is established, emergency services personnel will continue to struggle to identify and assist people with disability, including people who are blind or vision impaired, during natural disasters.

At present, it is incumbent on people who are blind or vision impaired to introduce themselves to their local emergency services crew. Even then, there is no guarantee the local crew will have the resources to help during a natural disaster.

The dangers posed by emergency services personnel's lack of awareness of people who are blind or vision impaired were evidenced during the Victorian floods in October 2022. Corey Crawford, BCA's National Policy Officer, was visiting family in the Campaspe Shire town of Rochester at the time. According to the State Emergency Service (SES) controller for Rochester, "every single house" in the town of 3,100 people experienced some level of flooding.²³

SES resources in Rochester were stretched thin, a situation made worse by the agency not keeping a record of how many volunteers and crews it had active in the town during and after the flood peak.²⁴ Consequently, it was left to a local Country

Fire Authority (CFA) volunteer, who lived next door to where Corey was staying, to personally rescue five people who were blind or vision impaired from the rising floodwaters.

The CFA volunteer was a lifelong Rochester resident and so knew precisely where those five people resided in the town. Had it not been for this volunteer's local knowledge, initiative and heroism, five people who are blind or vision impaired may not have survived the flood.

Recommendations:

1. Establish a Disability Disaster Management Centre (DDMC) within the National Emergency Management Agency (NEMA).
2. Provide DDMC representatives with a seat on state and territory Disaster Management Committees.
3. Develop a disability support workforce strategy with the National Disability Insurance Agency (NDIA) as a matter of urgency.
4. Provide an initial three hours of support coordination or support worker funding in all National Disability Insurance Scheme (NDIS) plans to allow people with disability to develop a Person-Centred Emergency Preparedness (P-CEP) plan.
5. Provide an additional one hour of funding in NDIS plans each year to allow the P-CEP plan to be reviewed and revised.
6. Make P-CEP toolkits readily available through mainstream government services to assist people with disability who are not NDIS participants.
7. Fund disability representative organisations to host sessions with people with disability to develop their own P-CEP plan.
8. Store completed P-CEP plans in a database at the DDMC to allow government at all levels to quickly identify people with disability and their support needs when a natural disaster occurs in a particular region.

3.3 Inaccessible communication of emergency warnings and advice

As noted in the summary of responses to the Disability Royal Commission's Emergency Planning and Response Issues Paper, "information and advice provided

by governments during emergencies overlooks the specific needs of the disability community and is often inaccessible to many people with disability.”²⁵

To give them as much time as possible to take evasive action, people with disability require access to clear, consistent and current information in the lead-up to and during natural disasters. This is especially true for people who are blind or vision impaired. This section outlines the steps that must be taken by the Commonwealth to increase the accessibility of emergency information.

Radio broadcasts

International experts regard radio broadcasts as the most accessible source of information during a natural disaster.²⁶ In Australia, the ABC’s analogue radio broadcasts reach 99 per cent of the population.²⁷ Radio services are a vital source of information, especially when television, mobile phone networks and the internet are not available.

Recognising the lifeline offered by radio, the Commonwealth recently announced a \$20 million Broadcasting Resilience Program (BRP) to keep regional and rural communities informed during natural disasters.²⁸ The BRP will bolster ABC broadcast sites with infrastructure upgrades, battery and diesel backup power systems, and five rapid recovery assets that can be deployed anywhere in Australia during a natural disaster. Going forward, the Commonwealth must provide sufficient funding to ensure that all ABC radio broadcast sites around the country are resilient.

Radio is not a perfect medium, however, as people who are blind or vision impaired discovered during the February 2011 earthquake in Christchurch, New Zealand. Poor quality radio broadcasts spread misinformation and caused significant fear in the aftermath of the earthquake.²⁹ The aural nature of radio also poses accessibility issues for people with deafblindness and for people who are Deaf or hard of hearing. As such, the Commonwealth must ensure that other communication platforms are accessible for people with disability.

Visual media, PDFs, smartphones and social media

Even as Australian Sign Language (Auslan) has become more widely recognised in recent years, people who are blind or vision impaired continue to struggle to access emergency information that is presented visually, such as during televised press

conferences and on smartphone apps, government and news websites, and social media.

Televised media briefings by emergency services personnel and other government officials often feature on-screen text – including references to maps, graphs and charts as well as website addresses and phone numbers which viewers can go to for further information – which is not read out to viewers.

Non-verbalisation of this information deprives and potentially endangers the lives of people who are blind or vision impaired. In future, Commonwealth, state, territory and local government officials must verbalise any emergency information presented on screen during media briefings.

Similarly, the presentation of vital information on websites and smartphone apps in PDF and image-based formats poses major problems for people who use screen readers and voice navigation software. Smartphones are a vital piece of assistive technology, with more than 90 per cent of people who are blind or vision impaired and aged 18 to 64 owning one.³⁰ Websites and smartphones are rendered significantly less useful, however, when people who are blind or vision impaired cannot access the information displayed on their screen.

During the Black Summer bushfires, for example, a BCA member in New South Wales downloaded the Fires Near Me app onto their phone to monitor the situation near their home. However, when they clicked on a fire which was occurring in the watch zone they had set up, this member found that they were directed to a map which they could not see.³¹

Furthermore, the Fires Near Me app includes a “List” feature. This allows users to see which fires are currently burning but offers no information as to the direction or speed at which the fires are travelling. This precludes the app’s users from being able to make fully informed decisions as to whether they should stay or evacuate.³²

Another BCA member who experienced the Black Summer bushfires found that the only clear, consistent and current information pertaining to the area in which they lived was on their local mayor’s Facebook page.³³ Though successful in this case, social media content producers typically engage users with eye-catching graphics and images.³⁴

The highly visual nature of social media often overlooks the needs of text-centric social media users, including people who are blind or vision impaired. In an emergency context, it is essential that any visual-oriented social media content distributed by Commonwealth departments or agencies be coupled with written information accessible to screen readers.

The Commonwealth could improve digital content accessibility across the board by adopting the new Web Content Accessibility Guidelines (WCAG), which are currently being drafted. The WCAG are the voluntary international standards for the accessibility of digital information such as PDFs.

Australia currently follows the 2008 version (WCAG 2.0) and it is not yet clear if it will adopt the new version (WCAG 3.0).³⁵ The Commonwealth must signal its commitment to digital content accessibility by adopting the new guidelines when they are released.

The inaccessibility of Commonwealth communications during COVID-19

In 2020, researchers from Monash University analysed the accessibility of COVID-related information in online Australian news articles, televised news broadcasts, and statistical data from health organisations.³⁶

The researchers found that web pages using interactive data often could not be accessed by people using voice navigation or screen reader software. They also found that graphic information was often accompanied by textual explanations of insufficient granularity to convey what was shown in the images.

People who are blind or vision impaired also faced additional barriers during the COVID-19 pandemic, such as a lack of easy-to-read or plain format information. People without access to digital technology struggled to find information in braille or large print.³⁷

Governments at all levels must provide accessible versions of information and resources at the outset of any future communicable disease outbreak or pandemic. It is also crucial that disability-specific information, support and services be included in government planning and responses to outbreaks and pandemics.

As previously noted, the establishment of a Disability Disaster Management Centre (DDMC) within the National Emergency Management Agency (NEMA) would ensure

the needs and requests of people with disability are factored into government decision-making at all levels during future emergencies, including communicable disease outbreaks and pandemics.

The Commonwealth specifically has lessons to learn from the COVID-19 pandemic. According to researchers from Curtin University, smartphone usage amongst people who are blind or vision impaired increased significantly during the first year of the pandemic.³⁸

It was incredibly disappointing, therefore, that the Commonwealth's COVIDSafe app – which assisted users in swiftly identifying and responding if they had come into contact with someone who tested positive for COVID-19 – was not fully accessible for people who are blind or vision impaired.

Discontinued from 16 August 2022, the COVIDSafe app featured buttons that were not labelled. The app also affected some glucose monitoring equipment for people with diabetes. Diabetes Australia advised people using glucose monitoring equipment to temporarily delete the COVIDSafe app if they noticed a problem.³⁹

Research from Vision Australia found that people who downloaded the COVIDSafe app but could not install it due to its inaccessibility often simply deleted it.⁴⁰ In future pandemics, governments must ensure that public health warnings, information and associated technology are accessible from the outset. Failure to do so erodes trust and confidence in government.

Furthermore, according to the Australian Bureau of Statistics, 85 per cent of people with a sensory and speech disability – which encompasses people who are blind or vision impaired – intended to get a COVID-19 vaccination when it became available. This compared favourably to the 73 per cent of the population as a whole who intended to get a COVID-19 vaccination when it became available.⁴¹

It was extremely disappointing, therefore, that people who are blind or vision impaired were excluded from the COVID-19 vaccination process. This exclusion was a result of the Commonwealth's eligibility checker and clinic finder website failing to meet basic website accessibility standards.

Large sections of the website were incompatible with screen readers. The website also featured poor colour contrast and excessive alt text (which describes the appearance or function of an image on a webpage).⁴²

This ultimately meant that people who are blind or vision impaired were forced to seek assistance from others to determine when and where they should get their vaccination. In future, the Commonwealth must lead other Australian governments by example in ensuring the accessibility of pandemic-related information and booking platforms for people with disability.

Recommendations:

9. Provide sufficient funding to ensure that all ABC radio broadcast sites around the country are resilient.
10. Ensure that Commonwealth, state, territory and local government officials verbalise any emergency information presented on screen during media briefings.
11. Ensure that all visual-oriented social media content distributed by Commonwealth departments or agencies is coupled with written information accessible to screen readers.
12. Adopt the new Web Content Accessibility Guidelines (WCAG 3.0) when they are released.
13. Provide accessible versions of information, resources and technology at the outset of any future emergency event, including communicable disease outbreaks and pandemics.
14. Ensure that disability-specific information, support and services are included in government planning and responses to outbreaks and pandemics.
15. Provide a positive example for other Australian governments by ensuring the accessibility of pandemic-related information and booking platforms for people with disability.

3.4 Inaccessible transport and evacuation facilities

International research has found that people with physical disability are “less likely to evacuate from their home” during natural disasters and “wait longer to do so due to a lack of accessible transport and concerns that evacuation shelters will not accommodate their needs.”⁴³

Inaccessible transport

The tragic case of a 91-year-old American woman, who died in the aftermath of Hurricane Katrina in August 2005, serves as a poignant reminder of the potentially deadly consequences of inaccessible transport and evacuation facilities during a natural disaster.

This woman, who was legally blind, died in her wheelchair outside an overwhelmed New Orleans hurricane shelter. She had been waiting for a bus to carry her to safety. The buses eventually arrived four days later.⁴⁴

Roads and railways are often closed or otherwise inaccessible during floods and bushfires, severely limiting people's ability to take evasive action. This problem is exacerbated for people who are blind or vision impaired, who typically cannot drive themselves away from the approaching danger.

A Disability Disaster Management Centre (DDMC) database of completed P-CEP plans would assist state, territory and local government officials in identifying and offering transport assistance to people with disability in an disaster-affected regions.

Recommendations:

16. Use the DDMC database of completed P-CEP plans to assist state, territory and local government authorities in identifying and offering transport assistance to people with disability in disaster-affected regions.

Inaccessible evacuation centres

Even if transport to an evacuation centre is readily available, the probable loss of independence in a such a facility deters people who are blind or vision impaired from seeking shelter.⁴⁵

The temporary and ad hoc nature of evacuation facilities means that people who are blind or vision impaired often have great difficulties in navigating their way to food and drink stations and bathroom facilities, and in feeding, watering and toileting their dog guides.

People who are blind or vision impaired also often do not receive the assistance they require at evacuation centres when it comes to accessing up-to-date emergency information in an accessible format such as braille, large print or audio. Nor do they

receive the dedicated orientation and mobility (O&M) assistance required to navigate the unfamiliar surrounds of the evacuation centre.

The emergency services personnel and volunteers who work at these facilities should receive disability awareness training, particularly as it relates to the unique needs of people who are blind or vision impaired. The Commonwealth should fund disability representative organisations to provide this training. Until such training is commonplace, disability awareness at evacuation centres will be sorely lacking.

As explained by one BCA member who has worked at evacuation centres, there is usually “organised chaos” in the early stages of a natural disaster response.

Emergency services personnel and volunteers who work at the centres may not have actually experienced a natural disaster before and so are unable to display the sort of leadership and initiative that members of the public may anticipate.

This BCA member has spoken to a senior state-based emergency services officer and was told that there were no specific plans or facilities in evacuation centres for people with disability. As such, people who are blind or vision impaired sadly cannot expect to have a pleasant stay at an evacuation centre nor for the emergency services personnel or volunteers there to provide them with the unique assistance they require.

For these reasons, people with mobility issues and/or people who are blind or vision impaired may choose to shelter in place or simply be left behind during a natural disaster. The record-breaking February 2022 floods in Lismore, New South Wales proved how dangerous this can be.

An 82-year-old woman with significant mobility issues was trapped in her South Lismore home and died when the floodwaters rose far higher and quicker than anyone had expected. Despite this tragedy, the property has not been eligible for a state government buyback.⁴⁶

Recommendations:

17. Fund disability representative organisations to provide emergency services personnel and volunteers with disability awareness training, particularly as it relates to the unique needs of people who are blind or vision impaired.

The need for resilient and inclusive infrastructure

Existing infrastructure systems are increasingly being affected by natural disasters and extreme weather events. A 2016 report by New Climate Economy identified the need for US\$90 trillion (AU\$140 trillion) of infrastructure investment over the next 15 years, more than the entire current stock of global infrastructure.⁴⁷

Social engagement, one of the six UNDRR Principles for Resilient Infrastructure, must be paramount as Australia replaces ageing infrastructure and establishes new infrastructure systems. As the UNDRR explains, “critical infrastructure services are a unique class of goods that should be available and accessible to everyone, including those with disabilities and impairments.”⁴⁸

The UNDRR emphasises that trust is “essential to stakeholder engagement ... and this needs to be developed over time and reinforced by setting out and meeting the expectations of critical services’ users.”⁴⁹

As described in BCA’s previous submissions to the Commonwealth, including a recent submission to the Review of the Disability Standards in Accessible Public Transport (DSAPT), people who are blind or vision impaired face many accessibility challenges when seeking to use critical infrastructure services.⁵⁰

Trust in government is eroded whenever people with disability, including people who are blind or vision impaired, are excluded from or discriminated against when trying to use critical infrastructure services. When exclusionary or discriminatory events occur repeatedly, people with disability surmise that governments simply do not understand or care for their basic needs.

Many infrastructure accessibility problems could be averted in the design phase, if only governments consulted people with disability. Therefore, as the Commonwealth works with industry and state, territory and local governments to build resilient infrastructure systems, it is imperative that people with disability, including people who are blind or vision impaired, are given a seat at the table to ensure the finished product is completely accessible for all Australians.

The DDMC would allow people with disability to work constructively with government and industry stakeholders to develop truly inclusive and resilient infrastructure systems. Without this consultation mechanism, the Commonwealth risks spending

billions of dollars on the construction of new evacuation centres and other critical infrastructure services that continue to exclude people with disability.

Recommendations:

18. Use the DDMC to allow people with disability, including people who are blind or vision impaired, to work with government and industry stakeholders to develop truly inclusive and resilient infrastructure systems.

3.5 Climate change and the future of eye health

The human eye is an incredibly complex sensory organ – one that is uniquely susceptible to minor changes in environmental factors. As warned by the International Agency for the Prevention of Blindness, a changing climate will have a significant impact on global eye health.⁵¹

Higher temperatures and lower rainfall are expected to increase the incidence of trachoma infections. Vitamin A deficiency, which can lead to night blindness, will become more common with rising food insecurity.

Increased exposure to ultraviolet (UV) radiation may lead to an additional 200,000 cases of cataract globally by 2050. Traffic-related air pollution and severe allergic eye diseases are linked to glaucoma and age-related macular degeneration.

More directly, natural disasters are known to cause eye injuries and disrupt eye health delivery.⁵² More frequent and severe natural disasters in Australia will inevitably produce a growing number of eye injuries.

As climate change worsens eye health, the Commonwealth will have to increase Medicare funding for ocular treatments. As more Australians experience blindness and vision impairment, the Commonwealth must ensure that disability representative organisations like BCA are well funded.

To minimise long-term costs and maximise the quality of life for Australians, the Commonwealth should act now to increase funding for eye health research, technology and early intervention treatments, lest the worsening situation eventually spiral into a national crisis.

Recommendations:

19. Ensure that disability representative organisations like BCA receive additional funding as blindness and vision impairment become more prevalent in a climate-affected world.
20. Invest in eye health research, technology and early intervention treatments before a national crisis arises.

4. Recommendations

To build national resilience and enhance crisis responses, the Commonwealth must:

1. Establish a Disability Disaster Management Centre (DDMC) within the National Emergency Management Agency (NEMA).
2. Provide DDMC representatives with a seat on state and territory Disaster Management Committees.
3. Develop a disability support workforce strategy with the National Disability Insurance Agency (NDIA) as a matter of urgency.
4. Provide an initial three hours of support coordination or support worker funding in all National Disability Insurance Scheme (NDIS) plans to allow people with disability to develop a Person-Centred Emergency Preparedness (P-CEP) plan.
5. Provide an additional one hour of funding in NDIS plans each year to allow the P-CEP plan to be reviewed and revised.
6. Make P-CEP toolkits readily available through mainstream government services to assist people with disability who are not NDIS participants.
7. Fund disability representative organisations to host sessions with people with disability to develop their own P-CEP plan.
8. Store completed P-CEP plans in a database at the DDMC to allow government at all levels to quickly identify people with disability and their support needs when a natural disaster occurs in a particular region.
9. Provide sufficient funding to ensure that all ABC radio broadcast sites around the country are resilient.
10. Ensure that Commonwealth, state, territory and local government officials verbalise any emergency information presented on screen during media briefings.

11. Ensure that all visual-oriented social media content distributed by Commonwealth departments or agencies is coupled with written information accessible to screen readers.
12. Adopt the new Web Content Accessibility Guidelines (WCAG 3.0) when they are released.
13. Provide accessible versions of information, resources and technology at the outset of any future emergency event, including communicable disease outbreaks and pandemics.
14. Ensure that disability-specific information, support and services are included in government planning and responses to outbreaks and pandemics.
15. Provide a positive example for other Australian governments by ensuring the accessibility of pandemic-related information and booking platforms for people with disability.
16. Use the DDMC database of completed P-CEP plans to assist state, territory and local government authorities in identifying and offering transport assistance to people with disability in disaster-affected regions.
17. Fund disability representative organisations to provide emergency services personnel and volunteers with disability awareness training, particularly as it relates to the unique needs of people who are blind or vision impaired.
18. Use the DDMC to allow people with disability, including people who are blind or vision impaired, to work with government and industry stakeholders to develop truly inclusive and resilient infrastructure systems.
19. Ensure that disability representative organisations like BCA receive additional funding as blindness and vision impairment become more prevalent in a climate-affected world.
20. Invest in eye health research, technology and early intervention treatments before a national crisis arises.

¹ Vision 2020 Australia, "Eye Health in Australia," accessed 31 January 2023, <http://www.visioninitiative.org.au/common-eye-conditions/eye-health-in-australia>

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