

Submission No 23

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Submission regarding the  
Disability (Access to Premises – Buildings)  
Standards

By

Fragrance and Chemical Sensitivity  
Support Group

Prepared by

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We consider that the draft standards, as they have been presented to the Standards Committee, are discriminatory against a population that is disabled by Environmental Sensitivities (ES) / Multiple Chemical Sensitivity (MCS). Further they do not meet the needs of people with Asthma and allergies.

An email from an employee of the Disability Rights Unit stated the following: *"The draft Premises Standards at this stage is limited to addressing those access related issues covered by the current Building Code of Australia (BCA). As the BCA does not currently address issues such as chemical sensitivity the Premises Standards also does not cover them. This is also the case for other areas of access such as fitout and wayfinding for blind people. It may be that in the future these issues will be considered further."*

That same email also stated: *"To my knowledge submissions in relation to MCS have been made on numerous occasions by organisations representing people with multiple chemical sensitivity."*

Disabilities are not limited to mobility. The Australian Human Rights Commission in its own document Access to buildings and services: Guidelines and information advises "A growing number of people report being affected by sensitivity to chemicals used in the building, maintenance and operation of premises."

The Australian Human Rights Commission accepts that ES/MCS is a disability.

These standards have been under revision for 8 years. You have previously been advised of the problems people with ES/MCS had and you have chosen to ignore them.

When any organisation undertakes a review all aspects should, and need to, be considered. The very purpose of a review is to determine that they meet the needs of the community and consumers.

To ignore the issue of the human right to clean air, among other things, is an act of blatant discrimination and negligent.

People with ES/MCS find it difficult to access buildings as part of their everyday lives and in particular accessing health care. The disability affects how they work and many people are now not able to work. They are now part of a growing socio-economic loss to this country because our Government is not taking appropriate action.

Many other countries, including Canada and The United States, have moved to protect people with ES/MCS. The Australian Government has been left behind in this world wide issue.

As ES/MCS affects an ever increasing number of the population each year we need action now. By the time the standards are reviewed again, it will be too late.

***Term of Reference - the appropriateness and effectiveness of the proposed Premises Standards in achieving their objects.***

The proposed Premises Standards are not appropriate or effective for people with ES/MCS disability, asthmatics and allergies.

The health of the general population, particularly those disabled by ES/MCS, is being affected by poor Indoor Air Quality (IAQ). The current standard regarding ventilation and fresh air flow is not adequate to combat the effect of mould, dust and Volatile Organic Compounds (VOC's) which emanate from chemicals including pest control chemicals, cleaning products, personal products worn by staff, building materials, office furnishings.

While the construction of a building is covered by other standards these Access to Premises standards need to regulate the need of effective fresh air flow as it relates to those with health problems.

These standards need to address the maintenance of air conditioning systems, many of which are not adequately maintained and grow mould and become dirty, particularly in cities.

They also need to address the following issues which have an impact on those with ES/MCS:

- Rest room air fresheners should not be used
- Cleaning products – use non fragrant, low toxic, environmentally friendly cleaning products
- Use low VOC emitting furnishings, building materials
- Cease pumping fragrance in to the air of offices, department stores, shops and shopping centres

We have the right to live as others do in our community. Our ability to do so is severely hindered, and in many cases stopped, by these issues.

***Term of Reference - whether the Premises Standards will have an unjustifiable impact on any particular sector or group within a sector***

As they stand now these standards will do nothing to improve the building access for those with ES/MCS, asthma and allergies.

As they stand now these standards do not meet the United Nations Human Rights standards as they do not cater for all disability groups. Therefore they have an unjustifiable impact on a growing number of the population.