

## EQUALITY IMPACT ASSESSMENT - RESULTS

<p><b>Title of Policy</b></p>	<p>Scotland's deposit return scheme (DRS) for single-use drinks containers.</p>
<p><b>Summary of aims and desired outcomes of Policy</b></p>	<p>Scottish Ministers intend to introduce a deposit return scheme for single-use drinks containers.</p> <p>This new policy forms part of Scottish Government's wider ambition to develop a more circular economy which keeps products and materials circulating in a high-value state of use for as long as possible – maximising resources to benefit the economy and the environment.</p> <p>The work to establish the scheme is underpinned by four key strategic objectives:</p> <ol style="list-style-type: none"> <li>1. Increase the quantity of target materials collected for recycling.</li> <li>2. Improve the quality of material collected, to allow for higher value recycling.</li> <li>3. Encourage wider behaviour change around materials.</li> <li>4. Deliver maximum economic and societal benefits for Scotland.</li> </ol>

<b>Directorate: Division: team</b>	Environment and Forestry Directorate: Environmental Quality and Circular Economy Division
------------------------------------	--

## Executive summary

The proposal to introduce a deposit return scheme (DRS) forms part of the Scottish Government's wider ambitions to develop a more circular economy which keeps products and materials circulating in a high-value state of use for as long as possible - maximising resources to benefit the economy and the environment.

The public consultation for the design of DRS ran from June to September 2018 and sought views on a partial equality impact assessment (EQIA) on our proposals. Specifically, the partial EQIA examined, in broad terms, the likely impacts of DRS on different groups in society. The full EQIA serves to focus in on some of the key issues identified in the partial EQIA and considers what mitigations could be put in place to reduce the risk of disadvantage that may unintentionally be caused by the introduction of such a scheme in Scotland.

Ministers announced the key features of Scotland's DRS on 8 May 2019. The preferred scheme design is detailed through the Deposit Return Scheme Full Business Case Stage 1 and has been informed by extensive public consultation, international best practice and engagement with a broad range of stakeholders.

The scheme design enables consumers to take single-use containers back and redeem a 20p deposit from any retailer selling drinks covered by the scheme. This will include plastic bottles made from PET (the most common type of bottle for products such as fizzy drinks and bottled water), aluminium and steel cans and glass bottles. Bigger retailers with more space

may install machines to both collect the bottles and cans and enable people to redeem deposits. Smaller retailers with less space have the option to return deposits over the counter, collecting the containers manually.

Online retailers will be included in the scheme. This means that those customers who are dependent on online delivery, because for a variety of reasons they are unable to travel to shops, are able to easily get back the deposits paid on containers. Non-retail spaces will also be able to act as return locations including, for example, recycling centres, schools or other community hubs.

The above features are designed to maximise consumer convenience and participation in the scheme. In addition, the proposal will maximise the capture rate of material and, in doing so, support an increase in the quality and quantity of recycling.

Accessible communication and inclusive engagement will be central to ensuring high participation and equality of access to the scheme. As work progresses in preparation for the scheme's implementation, it will be crucial to ensure that DRS communication and engagement activity has a strong equality focus. This will allow us to ensure that people with a range of needs and characteristics will be able to clearly understand what the DRS is, how it works, where they can find their nearest return point, what they can return and how they can redeem their deposit. Comprehensive, multi-channelled and inclusively designed communication and engagement programmes and materials will be key to achieving this.

A final EQIA will be produced and published following passage of the secondary legislation to establish the scheme.

## Background

The Scottish Government is committed to creating a more circular economy where things are made to last, preventing litter and addressing climate change for the betterment of our environment, economy and society. As part of this, we are committed to ambitious targets to increase the recycling rate and recognise that fresh interventions are needed to bring about the systemic and behaviour change necessary to fulfil these aspirations.

It is against this backdrop that in the 2017 Programme for Government, the First Minister committed to introducing a DRS for drinks containers for Scotland.

Many other countries in the world – ranging from Palau in the South Pacific to many of our European neighbours – already operate deposit return schemes. Some of these are well established and have helped countries like Sweden, Norway and Germany achieve high recycling rates and clean environments. Other countries, like Estonia and Lithuania, have recently introduced schemes.

Ministers announced the design of Scotland's DRS on 8 May 2019. The scheme will be available throughout Scotland and will involve consumers paying a deposit of 20p when they buy a drink in a single-use container.

The following materials are covered by the scheme:

- PET plastic bottles (like most fizzy drinks and water bottles)
- Steel and aluminium cans
- Glass bottles

All types of drinks in these containers and all containers above 50 ml (items such as whisky miniatures are 50ml) and up to 3 litres (such as a beer keg) in size are included.

Across Scotland, wherever people can buy a drink in a container made from one of these materials, from the islands to our major cities, they will also be able to return it to reclaim the deposit. Online retailers will also be included in the scheme, ensuring it's accessible to people that are dependent on online delivery. It will be just as easy to return a drinks container, as it is to buy one.

There will be two ways consumers can return their empty containers - over the counter, or by using a reverse vending machine (RVM). An RVM is a machine that scans containers when they are returned and then refunds your deposit. There will be a range of ways you can get your deposit back, for example cash at a till, a token or discount voucher or digitally. The returned containers are stored in the machine and are then collected for recycling.

Businesses that sell drinks to be opened and consumed on-site, such as pubs and restaurants, will have a choice as to whether to charge the deposit to the public and will only be required to return the containers they sell on their own premises.

The scheme aims to capture 90% of containers which attract a deposit for recycling. It's intended that DRS will be run by an independent, privately-run, not-for-profit company. The scheme will be paid for through three sources of funding: unredeemed deposits, revenue from the sale of materials and a producer fee.

## **The Scope of the EQIA**

It is clear that DRS will affect the vast majority of people in Scotland. The Full EQIA has been informed by detailed analysis of existing evidence and data (both qualitative and quantitative) in order to draw out the potential impacts of the policy for the nine protected characteristics: Age; Disability; Gender

Reassignment; Marriage and Civil partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; Sexual Orientation.

In the Partial EQIA a broad range of research, data and evidence gathering was highlighted against each of the protected characteristics. In the Full EQIA many of the considerations covered do not relate to any one single protected characteristic, reflecting the fact that individuals often have to deal with complex and interconnected equality issues at any given time. This also reflects the fact that key issues such as mobility/ accessibility and inclusive communication span more than one protected characteristic.

## Key Findings

Evidence gathered for the purposes of the full EQIA highlights age and disability as key areas for consideration as work is progressed to implement DRS. The full EQIA goes on to identify the following features of DRS as being of particular relevance when considering the potential equality impacts associated with the scheme:

### 1. Public communication

Accessible communication and inclusive engagement will be central to ensuring high participation and equality of access to the scheme. Working in partnership with equality groups to harness their expertise, resources, guides, communication channels and networks is fundamental to maximising participation.

### 2. Accessibility of return points

The evidence gathered to date suggests that the location of return points, their accessibility and convenience of use is essential to maximise participation in the DRS. The preferred scheme proposes that a return to any place of purchase model

will be adopted which means that members of the public will be able to return containers to any retailer who sells single-use drinks containers covered by the scheme. Non-retail spaces will also be able to act as return locations. These could include recycling centres, schools or other community hubs.

### 3. Operation of reverse vending machines

Evidence gathered suggests it is important that all RVMs are accessible in terms of both their location and operation. The provision of modified RVMs, alongside RVMs of standard design, will also be key in enhancing access to the scheme as will the provision of support in those retail settings operating RVMs. These are factors which will be considered as part of the work the Scottish Government's DRS Implementation Advisory group.

### 4. Participation of those who use online grocery retailers

The scheme design proposal that online retailers be required to operate a take-back service for their customers means that those customers who are dependent on online delivery will be able to easily get back the deposits paid on containers.

### 5. Participation of those who use local authority assisted kerbside collection services

Further work is required to understand what additional support can be offered to those individuals who currently receive assisted kerbside collection services in order to aid their participation in DRS. This will be considered as part of ongoing discussions with local government about the implementation of deposit return.

## Recommendations and Conclusion

The preferred scheme design outlined in the Deposit Return Scheme Full Business Case Stage 1 takes steps to mitigate any potential negative impacts on equality groups and prioritises the promotion of equality of opportunity to participate in the scheme.

As the implementation phase of the scheme progresses, the following steps may be helpful to further mitigate the potential for any negative impacts to be realised:

1. Principles and practice of inclusive design, using the BS8300 Standard, should inform implementation activity going forward.
2. The accessing of further expert advice in inclusive design could assist in the implementation of a scheme that maximises participation by all.
3. A range of functional modifications to RVMs should be considered to aid participation amongst all members of society.
4. Continuing involvement of equality groups in the implementation of DRS will enable clear and inclusively designed communication strategies and materials to be developed to enable high levels of participation in the scheme.