

Consultation on National Litter and Flytipping Strategy

Equality Impact Assessment

December 2021

Description of Policy

Title of policy/ strategy/ legislation	National Litter and Flytipping strategy						
Minister	Minister for Green Skills, Circular Economy and Biodiversity						
Lead Official	Aidan Grisewood, Deputy Director, Environmental Quality and Circular Economy Division						
SG Officials involved in EQIA	<table border="1"><thead><tr><th>Name</th><th>Team</th></tr></thead><tbody><tr><td>Andrew Forsyth,</td><td>Zero Waste Team Leader</td></tr><tr><td>Sarah Letsinger,</td><td>Zero Waste Policy Officer</td></tr></tbody></table>	Name	Team	Andrew Forsyth,	Zero Waste Team Leader	Sarah Letsinger,	Zero Waste Policy Officer
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Andrew Forsyth,	Zero Waste Team Leader						
Sarah Letsinger,	Zero Waste Policy Officer						
Directorate	Environment and Forestry						
New policy and/or legislation	Scottish Government intends to publish a new National Litter and Flytipping Strategy in 2022.						

Screening

Background and policy aims

Litter and flytipping are well-documented indicators of local environmental quality and have significant social, environmental and economic impacts, and health implications.

Litter and flytipping are defined as follows;

Litter is waste in the wrong place: the wider environment. It can be all kinds of man-made materials. The Environmental Protection Act (1990) defines littering as 'throwing down or dropping an item in any public open space'.¹

Flytipping is illegal dumping of waste - from a bin bag of household waste to large quantities of domestic, commercial or construction waste.²

Research indicates that at least 15,000 tonnes of litter is disposed of into our urban and rural environment and is subsequently cleared by local authorities every year. This is composed of around 250 million easily visible items.³

¹ <https://www.legislation.gov.uk/ukpga/1990/43/section/87>

² <https://www.legislation.gov.uk/ukpga/1990/43/section/33>

³ <https://www.zerowastescotland.org.uk/sites/default/files/Scotland%27s%20Litter%20Problem%20-%20Full%20Final%20Report.pdf>

A further 26,000 tonnes of waste are flytipped each year and dealt with by local authorities, with an estimated 61,000 incidents occurring per year. This estimate excludes the vast majority of cases on private land.³

For both litter and flytipping these figures are likely to represent an underestimate due to data limitations.

Litter and flytipping have both direct and indirect costs for society. Scotland spends at least £53 million of public money on litter and flytipping each year in direct costs (for clearance, education and enforcement activities). Indirect costs are the negative impacts or consequences of litter that impact on society more widely, for example, crime, mental health and wellbeing. Research suggests that indirect costs are likely to exceed £25 million. This cost does not include a comprehensive estimate for marine litter.³

Litter and flytipping are indicators of the unsustainable use of our resources, and a leak from a circular economy. 80% of the litter stream consists of potentially recyclable material and 50% material could have been easily recycled, had it been properly disposed of.³ This unsustainable resource loss has a clear link to fundamental environmental challenges surrounding climatic change.⁴

Items littered in the terrestrial environment are part of a broader system, with many transported to the marine environment via fluvial pathways and other routes. Items littered on land in Scotland are now thought to constitute 90% of plastic in Scottish seas.⁵

The strategy will identify a suite of measures to prevent litter and flytipping and therefore reduce impact on local environmental quality. It will build upon the previous five year strategy 'Towards A Litter-Free Scotland: A Strategic Approach to Higher Quality Local Environments'⁶ and aim to provide an agile strategic framework to accommodate the changing landscape. A review of the National Litter Strategy was completed in 2019 and provides a snapshot of the activities that took place within the first five years of the strategy.⁷ Whilst progress has been made, litter still poses a significant challenge. In March 2021, Keep Scotland Beautiful in partnership with Zero Waste

⁴ <https://www.keepsotlandbeautiful.org/media/1566897/leq-2020-report-final-041220.pdf>

⁵ <https://www.sciencedirect.com/science/article/pii/S0025326X19308811>

⁶ <https://www.gov.scot/publications/towards-litter-free-scotland-strategic-approach-higher-quality-local-environments/>

⁷ <https://www.gov.scot/publications/five-years-review-scotlands-national-litter-strategy/pages/1/>

Scotland and Scottish Government hosted a litter summit;⁸ this provided an opportunity to reflect on work that had been carried out under the first strategy and start to define future priorities for tackling litter.

As this is a developing strategy area, the specific actions and related policy detail have not been fully defined and it is therefore not possible to identify outcomes. The actions will be co-developed with a range of stakeholders through working groups and the consultation process. The following thematic areas have been identified:

- **Behaviour change:** This theme recognises the need for improved communications and engagement, but also the need to take a holistic approach to behaviour change; understanding key audiences, issues and developing a framework to identify solutions that enable behaviours to be changed. It should also be noted that the key behaviours related to litter will differ from those for flytipping. Successful measures under this theme would improve the accessibility, consistency and nature of messaging that motivates people to change their behaviour.
- **Services and Infrastructure:** In order for prevention of litter and flytipping to be effective there needs to be services and infrastructure in place to support people to behave responsibly. This includes services offered by local authorities, but also more widely looking to businesses and community groups. Successful measures under this theme would ensure Scotland's services and infrastructure are fit for purpose and prioritise action and innovation that proactively prevents litter and flytipping and supports a circular economy.
- **Enforcement:** Enforcement and deterrents have been identified as an important link in the chain for achieving the prevention of litter and flytipping. This has been identified from numerous stakeholder calls to review the enforcement process and procedures, and to understand if alternative solutions are available (such as education or volunteering for those who cannot afford to pay fines), with collaborative measures seen as crucial. Success in relation to this theme would ensure there is a strong and consistent enforcement model across Scotland that acts as a proportional deterrent.
- **Data and research:** Underpinning any next steps, improved data is crucial to

⁸ <https://www.keepsotlandbeautiful.org/news/mar-2021/scottish-litter-summit/#:~:text=On%20Wednesday%2017%20March%202021,of%20dog%20fouling%20and%20graffiti>

successfully understanding the root causes of the issue, evaluating the success of any interventions, collaborating successful and monitoring progress. This includes reporting of issues by the public and communities, national reporting and monitoring, citizen science and measurable outcomes. Success for this theme would include an improved understanding of the behaviours, attitudes and drivers behind both littering and flytipping behaviours and develop an evidence base that can facilitate the implementation and monitoring of effective policy interventions.

Who will it affect?

The National Litter and Flytipping strategy will be applied across Scotland and does not specifically target particular sections of society. The policy is not anticipated to have a significant disproportionate impact on people with one or more of the protected characteristics.

What might prevent the desired outcomes being achieved?

The design of an impactful strategy for Scotland, which aims to reduce litter and flytipping will be informed by evidence gathered, including during the statutory consultation period. No significant barriers have been identified at this stage.

About the Equalities Impact Assessment (EQIA)

In developing this policy change, the Scottish Government is mindful of the three elements of the Public Sector Equality Duty (PSED):

- To eliminate unlawful discrimination, harassment and victimisation.
- To advance equality of opportunity between people who share a protected characteristic and those who do not.
- To foster good relations between people who share a protected characteristic and those who do not.

A policy measure may positively impact on one or more of the protected characteristics, while having a disproportionately negative impact on others. Where any negative impacts are identified, we seek to mitigate or eliminate these. We are also mindful that the PSED is not just about addressing negative impacts, as we also have a positive duty to promote equality.

Equality legislation covers the protected characteristics of age, disability, gender reassignment, gender including pregnancy and maternity, race, religion and belief, and sexual orientation. Marriage and civil partnership are not considered here as the Scottish Government does not require assessment against this protected characteristic unless the policy relates to work.

Stage 1: Framing

Results of framing exercise

A preliminary framing workshop was conducted by Zero Waste Scotland. However at this stage the strategy does not include specific measures and therefore the capacity to identify relevant impacts is limited. It was possible to identify some high-level considerations which will evolve and develop alongside the strategy.

Summary of activities:

- **Framing workshop:** Zero Waste Scotland
- **Evidence-gathering:** quantitative and qualitative data and evidence were sourced, including evidence from existing large surveys.

Summary of findings

This document provides an overview of relevant considerations for protected characteristics groups. The assessment of impacts is appropriate to the current stage in the development of the strategy.

In this EQIA we look at published evidence available and gathered so far in relation to the protected characteristics listed within the Equality Act 2010: Age, Disability, Sex, Pregnancy and Maternity, Gender Reassignment, Sexual Orientation, Race, and Religion or Belief.⁹

It is important to note that the protected characteristics listed, along with other socio-economic considerations, are not independent of each other and some people may have to deal with complex and interconnected issues related to disadvantage at any one time.

We have not identified any negative impacts associated with the overarching outcome of the strategy at this stage. However, impacts of the specific actions identified in the strategy will need to be assessed when they are available.

There may be positive impacts related to:

⁹ <https://www.legislation.gov.uk/ukpga/2010/15/contents>

Age

Younger people may litter more, but they are also impacted more by poor local environmental quality.¹⁰ Therefore a reduction in littering may have a disproportionately positive impact.

Disability

There is a correlation between disability and poverty¹¹ and therefore it is more likely that disabled people may live in more deprived areas, where litter is reported to be more abundant.³ A reduction in litter associated with the strategy would therefore potentially have a disproportionately positive impact.

Interaction with Other Policies (Draft or Existing)

Marine Litter Strategy for Scotland

The Scottish Government launched A Marine Litter Strategy for Scotland in 2014¹² which identified five strategic directions and 40 measures to address the impact of litter in Scotland's seas. The Marine Litter Strategy was developed to build upon the original National Litter Strategy with a number of the strategy's directions and measures being a co-ordinated consideration and actions being delivered in parallel. The Marine Litter Strategy is also currently under revision to reflect the need for increased focus on litter removal with the latest scientific reports and evidence-based policies being taken into consideration. The revision of the National Litter and Flytipping Strategy will complement the revision of the Marine Litter Strategy, while the two strategies have distinct themes and outcomes, both are principled on litter prevention. The recent Scottish Litter Summit focussed on developing a collaborative approach to tackling litter and reversing the decline in Scotland's local environments. A key theme to emerge from the Summit was the need for the National Litter and Flytipping Strategy to be closely aligned to the refreshed Marine Litter Strategy to ensure the systemic nature of littering is addressed holistically.¹³

Code of Practice on Litter and Refuse (CoPLAR)

This Code of Practice on Litter and Refuse (CoPLAR) provides practical guidance on fulfilling the

¹⁰ <https://scotland.shinyapps.io/sg-scottish-household-survey-data-explorer/>

¹¹ <https://data.gov.scot/poverty/#Disability>

¹² <https://www.gov.scot/publications/marine-litter-strategy-scotland/>

¹³ <https://www.keepsotlandbeautiful.org/news/mar-2021/scottish-litter-summit/#:~:text=On%20Wednesday%2017%20March%202021,of%20dog%20fouling%20and%20graffiti>

duties under the Environmental Protection Act 1990 Section 89.¹⁴ A review of CoPLAR was completed and replaced with the Code of Practice on Litter and Refuse (Scotland) 2018¹⁵ as part of the commitments set out in the 2014 National Litter Strategy. CoPLAR 2018 provides guidance to relevant bodies on how to meet their statutory responsibilities. It promotes a preventative approach towards litter and flytipping, freeing up money for other public services. The revised National Litter and Flytipping Strategy is being developed around four key themes: behaviour change, services and infrastructure, enforcement and data and research with litter and flytipping prevention being the central aim of each theme. CoPLAR 2018 has a clear focus on prevention and endorses preventative actions under themes paralleled with the revision to the National Litter and Flytipping Strategy, including: communications and engagement, behaviour change, infrastructure and service optimisation and enforcement.¹⁶

EU Single-Use Plastics Directive

In the 2021-22 Programme for Government¹⁷, the Scottish Government confirmed plans to introduce a ban on the single-use plastic items most commonly found littered on European beaches. Regulations will be introduced before the end of 2021 to end the supply and manufacture in Scotland of certain single use items, with limited exceptions where absolutely necessary, for example to ensure the new rules do not disadvantage disabled people. In Scotland, plastic represents 20% of all terrestrial litter¹⁸, it is the most commonly found littered item on Scottish beaches (nine out of the top ten items contain plastic)¹⁹ and items littered on land in Scotland are now thought to constitute 90% of plastic in Scottish seas.²⁰ The Scottish Government is fully supportive of the EU vision of phasing-out single-use plastics wherever possible and the proposed introduction of market restrictions on certain single-use plastic items forms part of a package of wider measures being taken forward by Scottish Ministers to address marine litter and support a shift away from Scotland's throwaway culture. By introducing a market restriction on certain single-use plastics, this will contribute to the achievement of Scotland's existing waste policies and targets and will also help to reduce single-use plastic litter in Scotland's terrestrial and marine environments, complementing the revised National Litter and Flytipping and Marine Litter

¹⁴ <https://www.legislation.gov.uk/ukpga/1990/43/contents>

¹⁵ <https://www.gov.scot/publications/code-practice-litter-refuse-scotland-2018/>

¹⁶ <https://www.zerowastescotland.org.uk/sites/default/files/1.3%20Preventative%20Actions%20final.pdf>

¹⁷ <https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/>

¹⁸ <https://www.zerowastescotland.org.uk/sites/default/files/Scotland%27s%20Litter%20Problem%20-%20Full%20Final%20Report.pdf>

¹⁹ <https://www.mcsuk.org/what-you-can-do/join-a-beach-clean/the-great-british-beach-clean/>

²⁰ Estimating a regional budget of marine plastic litter in order to advise on marine management measures (2019)

strategies.

The Scottish Deposit Return Scheme (DRS)

The Deposit and Return Scheme Scotland Regulations, passed by the Scottish Parliament in May 2020, aim to help improve the quality and quantity of recycling, reduce litter, and achieve Scottish Government climate change targets.²¹ In May 2020, the Scottish Parliament passed regulations to establish a Deposit Return Scheme, with a target of capturing at least 90% of in-scope containers from the third full year of operation onwards. The National Litter and Flytipping and Marine Litter Strategies both focus on prevention as the main solution for littering in Scotland, the implementation of the Scottish Deposit Return Scheme will be a key mechanism in tackling prevalent, highly visible, and expensive litter streams.

UK packaging producer responsibility system reform

The UK Government and the Devolved Administrations have committed to reforming the UK packaging producer responsibility system.

This policy is intended to ensure that the producers of packaging are responsible for 100% of the costs of treating it at the end of its useful life after deducting the income from the sale of materials (this is known as ‘full net cost recovery’). Dealing with litter is part of the cost that producers will be obligated to pay, and the impact of that will depend heavily on the final details of the payment mechanism and incentive design. In addition, if producers choose to use less packaging to reduce their costs under the scheme, this could impact on litter quantities.

Scottish climate change policy

Litter and flytipping contributes to climate change in two main ways. Litter and flytipping are wasted resources that have been lost from the circular economy. As well as the embodied energy of the resource itself being wasted, further energy is required to collect and process the litter or flytipping, most of which can then only be sent to energy from waste or landfill, due to the poor quality of the material.²² The update to the National Litter and Flytipping strategy will contribute to the objectives of the Climate Change (Scotland) Act 2009²³ and the Climate change plan: Third report on

²¹ <https://www.gov.scot/policies/managing-waste/deposit-return-scheme/>

²² <https://www.gov.scot/publications/five-years-review-scotlands-national-litter-strategy/pages/1/>

²³ <https://www.legislation.gov.uk/asp/2009/12/contents>

proposals and policies (RPP 3) 2018-2032.²⁴ The recent five-year review of the national litter strategy "Towards a litter free Scotland: a strategic approach to higher quality local environments" also highlighted the future need to "link littering to the climate change conversation" and set out a recommendation to prioritise mapping the interaction of litter and flytipping with climate change policy.²⁵

Scottish biodiversity policy

The Scottish Biodiversity Strategy was published in 2004²⁶ and was supplemented by The Scottish Government's 2020 Challenge for Scotland's Biodiversity (2013)²⁷ both forming the Scottish Biodiversity Strategy. The objectives of the 2020 challenge were to sustain and enhance the ecosystems on both land and at sea to maximise benefits to Scotland through natural diversity and economic growth. In addition, the Scottish Government recently commissioned research into the development of a new single high-level biodiversity indicator covering marine and terrestrial habitats to measure trends and replace the existing biodiversity indicator in the National Performance Framework Scotland.²⁸ A main consideration in developing biodiversity indicators is measuring the impact of human activities upon the natural environment in Scotland including littering. Litter poses a serious risk to biodiversity and marine ecosystems in Scotland. Reducing the amount of litter in terrestrial and marine environments will ensure the continued prosperity of our biodiversity in Scotland. The revised National Litter Strategy will contribute to the ambitions set out in the Scottish biodiversity policy through targeted litter prevention measures. The recent five-year review of the national litter strategy "Towards a litter free Scotland: a strategic approach to higher quality local environments" also recommended prioritising the mapping of litter and flytipping policy with biodiversity policy.²⁹

UN Sustainable Development Goals

In 2015, the Scottish Government signed up to support the United Nations Sustainable Development Goals.³⁰ The ambition behind the goals is to end poverty, protect the planet and

²⁴ <https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018/>

²⁵ <https://www.gov.scot/publications/five-years-review-scotlands-national-litter-strategy/pages/1/>

²⁶ <https://www.gov.scot/policies/biodiversity/scottish-biodiversity-strategy/>

²⁷ <https://www.gov.scot/publications/2020-challenge-scotlands-biodiversity-strategy-conservation-enhancement-biodiversity-scotland/>

²⁸ <https://www.gov.scot/publications/development-combined-marine-terrestrial-biodiversity-indicator-scotland/pages/2/>

²⁹ <https://www.gov.scot/publications/five-years-review-scotlands-national-litter-strategy/pages/1/>

³⁰ <https://sdgs.un.org/goals>

ensure prosperity for all as part of a new sustainable development agenda. An updated National Litter and Flytipping Strategy could have a positive impact on a number of these goals, most significantly Goal 12: Responsible Consumption and Production and Goal 14: Life Below Water.

Extent/Level of EQIA required

We recommend that EQIA be viewed as a live document to be developed alongside the strategy. This will involve additional engagement over the consultation period.

The evidence captured in the next section entitled '**Data and evidence gathering**' has been drawn from a range of sources and includes both quantitative and qualitative information.

Stage 2: Data and evidence gathering, involvement and consultation

This section includes the results of the evidence identified to date, based on the high level objectives of the strategy.

Evidence suggests that no single demographic group are inherent litterers.³¹ There is wide variation in the frequency and extent to which individuals' litter, which depends on the circumstances they find themselves in. This point is relevant to all the protected characteristic groups listed here.

The evidence is limited in relation to who fly tips.³¹ There is an element of premeditation which suggests the behaviours involved are quite different to littering and may relate more to specific groups.

Age:

Although there is no single demographic that litters significantly more than others, some evidence³² suggests that that younger people:

- May litter slightly more than older people.
- Are more willing to admit to littering.

³¹<https://www.zerowastescotland.org.uk/sites/default/files/Evidence%20Review%20of%20Flytipping%20Behaviour.pdf>

³²<https://www.zerowastescotland.org.uk/sites/default/files/Rapid%20Evidence%20Review%20of%20Littering%20Behaviour%20and%20Anti-Litter%20Policies.pdf>

However, it is also likely that younger people are more concerned about litter and flytipping and therefore could experience a greater benefit from a reduction in litter and flytipping. The Scottish Household Survey, 2019 reported that the proportion of individuals who felt that rubbish or litter lying around in the community was very/fairly common was slightly higher for the 16 – 39 age group (at 36%, compared with 31% for 40 – 59 and 26% for over 60s).¹⁰

Any communications interventions associated with the strategy would ensure an inclusive approach and consider those who are less likely to have internet access or be regular users. A growing proportion of older people are internet users it is still significantly lower than for the wider population at 66% for over 60s, compared to 88% for the wider adult population.³³

Disability:

There is limited evidence specifically relating to people with disabilities and litter and flytipping within Scotland. Whilst we have not identified published evidence, it is possible that the cumulative effect associated with socio-economics and the link between poverty and disability, could mean people with disabilities are more likely to live in deprived areas where litter is more prevalent and the local environmental quality lower. Some disabilities incur additional living costs, which are not generally taken into account by measures of poverty. Using an adjusted poverty rate that partly accounts for additional living costs, data from 2017-2020 showed that the poverty rate was higher for individuals in households with a disabled person. After housing costs, the poverty rate was 29% (640,000 people each year) for people living with a disabled household member, and 16% (500,000 people) for those without.³⁴

Any interventions developed as part of the strategy should take an inclusive approach and consider usability for those with disabilities. Consultation responses for the 2014 marine litter strategy highlighted that people with certain disabilities, such as visual impairments and learning difficulties may be at a disadvantage when it comes to information provision and awareness raising, unless messages are accessible.³⁵ Digital inclusivity is also relevant as the proportion of the population with disabilities has lower rates of internet usage. Twenty nine percent of adults who have some form of limiting long-term physical or mental health condition or illness do not use

³³ <https://www.gov.scot/publications/a-changing-nation-how-scotland-will-thrive-in-a-digital-world/pages/no-one-left-behind/%236%20ftn>

³⁴ <https://data.gov.scot/poverty/#Disability>

³⁵ <https://www.gov.scot/publications/draft-scottish-marine-litter-strategy-analysis-consultation-responses/pages/8/>

the internet, a significantly higher share than for those who have some form of non-limiting condition or illness (10%) and those who have none (6%).³⁶

Race:

We did not find any research specifically on race/ethnicity and littering or flytipping and there is no evidence to suggest that there will be any negative impacts on people on the grounds of their race.

Language may also be a barrier to understanding communications for some people, including those whose first language is not English. Any Communications, products and services designed should be inclusive and accessible.

Sex:

Evidence suggests that women have stronger anti-littering attitudes than men, and that men drop slightly more litter than women do.³² The strategy is not considered likely to have a disproportionate impact for this protected characteristic and it is therefore not further considered in this assessment.

For the following protected characteristics, no evidence was identified in relation to the impacts of litter and flytipping: Pregnancy and Maternity, Gender reassignment, Sexual orientation, Religion or belief.

Stage 3: Assessing the quality of the impacts and identifying opportunities to promote equality

At this stage of the partial equality impact assessment, the qualitative scoring of the potential impacts (negative, positive and neutral) has been considered for each of the protected characteristics. This qualitative scoring has been undertaken using the data and evidence available and gathered to date. This is a preliminary and indicative assessment of the potential impacts and may be revised after the consultation has taken place and as the strategy develops.

³⁶ <https://www.legislation.gov.uk/ukpga/1990/43/contents>

Do you think that the policy impacts on people because of their age?

AGE	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified
Advancing equality of opportunity	x			Potential positive impact for younger people due to disproportionate impact of litter in the local environment
Promoting good relations			x	No evidence identified

Do you think that the policy impacts people with disabilities?

DISABILITY	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified
Advancing equality of opportunity	x			The link between disability, socioeconomics and local environmental quality means disabled people affected by these cumulative impacts may experience a disproportionate impact from any litter reduction associated with the strategy.
Promoting good relations			x	No evidence identified

Do you think that the policy impacts on men and women in different ways?

SEX/GENDER	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified
Advancing equality of opportunity			x	No evidence identified
Promoting good relations			x	No evidence identified

Do you think that the policy impacts on women because of pregnancy and maternity?

PREGNANCY AND MATERNITY	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified
Advancing equality of opportunity			x	No evidence identified.
Promoting good relations			x	No evidence identified.

Do you think that the policy impacts on transgender people?

GENDER REASSIGNMENT	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified.
Advancing equality of opportunity			x	No evidence identified.
Promoting good relations			x	No evidence identified.

Do you think that the policy impacts on people because of their sexual orientation?

SEXUAL ORIENTATION	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified.
Advancing equality of opportunity			x	No evidence identified.
Promoting good relations			x	No evidence identified.

Do you think that the policy impacts on people on the grounds of their race?

RACE	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified.
Advancing equality of opportunity			x	No evidence identified.
Promoting good relations			x	No evidence identified.

Do you think that the policy impacts on people because of their religion or belief?

RELIGION OR BELIEF	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			x	No evidence identified.
Advancing equality of opportunity			x	No evidence identified.
Promoting good relations			x	No evidence identified.

Stage 4: Decision making and monitoring (Identifying and establishing any required mitigation action)

Have positive or negative impacts been identified for any of the equality groups?	This scoring has been undertaken using the data and evidence available and gathered to date and within the timescale allowed. However, this is a preliminary and indicative assessment of the potential impacts and will be subject to further review and revision after the consultation has taken place and as part of the scheme design. Possible positive impacts have been identified for Age and Disability, but these would require further investigation and engagement.
Is the policy directly or indirectly discriminatory under the Equality Act 2010?	There is no evidence within this EQIA that the policy is directly or indirectly discriminatory under the Equality Act 2010.
If the policy is indirectly discriminatory, how is it justified under the relevant legislation?	N/A
If not justified, what mitigating action will be undertaken?	N/A

Monitoring and Review

Any impacts flagged as part of the consultation, and associated engagement, would be monitored and investigated.

Stage 5: Authorisation of EQIA

Declaration;

I am satisfied with the partial EQIA that has been undertaken for the reform of the UK packaging producer responsibility system and give my authorisation for the results of this interim assessment to be shared as appropriate.



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Position: Deputy Director, Environmental Quality and Circular Economy



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