

A Deposit Return Scheme for Scotland

Equality Impact Assessment



Scottish Government
Riaghaltas na h-Alba
gov.scot

Interim Equality Impact Assessment

Consultation on the Design of a Deposit Return Scheme (DRS) for Drinks Containers in Scotland

Description of Policy

Title of policy/ strategy/ legislation	Consultation on the Design of a Deposit Return Scheme for Drinks Containers in Scotland identified by Scottish Government as part of Programme for Government 2017-18.	
Minister	Roseanna Cunningham, MSP, Cabinet Secretary for Environment, Climate Change and Land Reform	
Lead Official	Donald McGillivray, Deputy Director, Environmental Quality and Circular Economy	
SG Officials involved in EQIA	Name	Team
	Timothy Chant:	Zero Waste Team
	Graeme Beale	Rural & Environment Science & Analytical Services Research Team
	Gita Anand	
Directorate	Environment and Forestry Directorate	
New policy and/or legislation	After consultation, Scottish Government may lay regulations before the Scottish Parliament to establish a deposit and return scheme.	

Screening

Policy Aim

The aim of the policy is to introduce a deposit and return scheme (DRS) for drinks containers in Scotland which we will refer to as the 'DRS' or 'scheme' throughout this document.

In September 2017, The Scottish Government announced its commitment to design and introduce a deposit return scheme for drinks containers in Scotland as part of its Programme for Government 2017-18. The scheme will contribute to the delivery of Scottish Government's National Outcomes 12 and 14:

- We value and enjoy our built and natural environment and protect it and enhance it for future generations;
- We reduce the local and global environmental impact of our consumption and production

This new policy forms part of Scottish Government's wider ambitions to develop a more circular economy which aims to keep products and materials circulating in a high-value state of use for as long as possible, and maximise resources to benefit

the economy and the environment. A deposit return scheme is one such way of keeping as many valuable materials in circulation for as long as possible in our economy. It works by placing a deposit on drinks containers at the point of sale, in order to incentivise people to return them. When they are empty and returned to an authorised return point for recycling, the deposit is refunded in full to the consumer. The deposit scheme will manage the collection, distribution and recycling of the drinks containers.

A Programme Board, chaired by the Scottish Government, has been established to oversee the process in the context of a wider extended producer responsibility programme. The overall policy objectives of a deposit return, as agreed by the Programme Board, are:

- Increasing recycling quantity
- Increasing recycling quality
- Encouraging wider behaviour change around materials
- Delivering maximum socio-economic benefit for Scotland during the transition to a low carbon world

There is a range of previous research work undertaken by Zero Waste Scotland (ZWS) that is relevant to this policy:

- In Spring 2015, ZWS published a review of a feasibility study¹, that was carried out on behalf of ZWS. The feasibility study² looked at the benefits and challenges of introducing a DRS in Scotland;
- In 2017, ZWS published a further summary report³ in response to issues raised from the evidence submitted. The design of a scheme for Scotland is considering a range of factors including, for example:
 - the level of the deposit;
 - the types of products and containers included in the scheme;
 - the options for where containers can be returned;
 - how the scheme is managed and promoted;
 - labelling and logistical requirements;
 - impact on other recycling and waste schemes;
 - the potential financial and economic impact of the scheme.

¹ Review of Feasibility Study for a Deposit Return System for Drinks Containers 2015
<https://www.zerowastescotland.org.uk/sites/default/files/Review%20of%20feasibility%20study%20for%20a%20Deposit%20Return%20System%20for%20Drinks%20Containers.pdf>

² A Scottish Deposit Refund System 2015
https://www.zerowastescotland.org.uk/sites/default/files/ZWS%20DRS%20Report_MAIN%20REPORT_Final_v2.pdf

³ Deposit Return Evidence Summary 2017
<https://www.zerowastescotland.org.uk/sites/default/files/Deposit%20Return%20Evidence%20Summary.pdf>

The public consultation will seek views on the proposal to introduce a deposit return scheme for Scotland and the factors that will lead to the design of an effective scheme.

Who will it affect?

The introduction of a deposit return scheme will be applied across Scotland and does not specifically target particular groups or sections of society. The deposit return policy should reflect the fact that different people have different needs. Equality legislation covers the protected characteristics of: age, disability, gender reassignment, gender including pregnancy and maternity, race, religion and belief, and sexual orientation. The scheme has the potential to affect everyone so the scope of this interim equality impact assessment (EQIA) is extended beyond the list of protected characteristics to include wider socio-economic considerations; including people living in low income households and people living in remote rural areas and island communities.

A major benefit of the policy will be its impact on littering in Scottish neighbourhoods. Littering has been one of the most frequently reported neighbourhood problems in Scotland since 2006⁴, and disproportionately impacts on deprived neighbourhoods. Previous research suggests littering also imposes a real cost on society⁵.

The potential for the public to make charitable donations from deposits is an aspect of the deposit return scheme which seems of interest to many and this may also be a potential benefit. This was identified in the climate justice workshop, run by Scottish Government Research Team in February 2018; discussed in the Public Interest Workshop held on 15 March 2018 in Edinburgh and in the interview with the representative organisation for remote and island communities on 12 April 2018. The potential impact of this aspect of the policy will depend on the detailed scheme design.

What might prevent the desired outcomes being achieved?

The design of an effective deposit return scheme (DRS) for Scotland, which aims to increase the quantity and quality of recycling and reduce waste and litter, will be informed by evidence provided, including during the statutory consultation period.

Achieving the desired outcomes will be dependent on, and will involve a need for, businesses, across industries and sectors, and all consumers to take action to adopt new behaviour and adopt the regulations and responsibilities which may be placed on them by a deposit return scheme. Associated costs, deposit levels, timing, authorised return location(s), communication and regulation processes will impact on the desired outcomes being achieved.

The design of the options for the DRS will be informed by engagement and discussion with a broad range of stakeholders prior to and during the formal

⁴ Scottish Household Survey 2016, <http://www.gov.scot/Topics/Statistics/16002/PublicationAnnual>

⁵ Scotland's Litter Problem <https://www.zerowastescotland.org.uk/litter-flytipping/scotlands-problem>

consultation period. This interim equality impact assessment has been informed by the engagement and discussion undertaken to date on the design of the scheme. Consideration has been given as far as possible to potential impact based on the evidence gathered during this process leading up to the formal consultation.

Stage 1: Framing

Results of framing exercise

Since the introduction of a new DRS in Scotland will impact on everyone living in Scotland, there has been engagement with a broad range of stakeholders around the scheme design and its components, prior to the formal consultation.

The Scottish Government's Environment and Forestry Directorate is directing the design of the deposit return scheme. The Programme Board, established to oversee the process in the context of a wider action on extended producer responsibility policy, is chaired by the Scottish Government with representatives from Scottish Government, Zero Waste Scotland, Scottish Environmental Protection Agency and Highlands & Islands Enterprise. The Programme Board has considered a range of issues and helped make decisions about the interim EQIA's consultation scope and recommendations contained herein.

Under the guidance of the Programme Board, a team has undertaken a range of research activities. This has included inviting views on a one to one basis, holding workshops and group discussions, undertaken field trips to countries operating DRS systems, attending a climate justice workshop run by Scottish Government and holding strategic conversations with a broad range of stakeholders across the private, public and third sectors. A summary of activities is as follows:

- **Thirteen Sector Reference Groups:** including a Public Interest Reference Group which involved inviting national organisations and groups representing a variety of equality issues and interests to discuss and contribute to the design of a deposit return scheme in Scotland;
- **Regional workshops:** these were similar to reference groups but with a focus on specific issues that may apply to businesses in these regional areas such as rural or inner-city concerns and opportunities including Orkney, Western Isles, Aberdeen and Edinburgh;
- **One to one Interviews:** these covered a broad range of sectors including beverage, retail, hospitality, transport, logistics, resource management industry, packagers, public sector, local authorities and third sector organisations;
- **Field trips and conversations with overseas nations:** these were undertaken to understand experience regarding the variety of deposit return schemes operating and any equality impacts. Visits and/or conversations were held with Iceland, Norway, Estonia, Lithuania, Sweden, Germany, Denmark, Finland, USA, Canada, Malta;
- **Data gathering:** a range of evidence and sources on the numbers and statistics used to populate this framing exercise regarding people potentially affected by a DRS;

- **Evidence from existing large national and UK surveys:** these were primarily in relation to income, food and drink expenditure, age and littering;
- **Climate justice workshop** – run by Scottish Government and University of Edinburgh, where a DRS scheme was included as a worked example to identify the potential impacts of a scheme on those living with disadvantage.

Initial Summary Reflection

As this is an interim equality impact assessment it is not intended to be a definitive statement or a full assessment of impacts. It does however present preliminary and indicative impacts that will require further consideration by the Scottish Government to inform the decision-making process on the Deposit Return Scheme during and after the consultation has taken place.

In this interim EQIA we look at published evidence available and gathered so far under the protected characteristics as listed within the Equality Act 2010: Age, Disability, Sex, Pregnancy and Maternity, Gender Reassignment, Sexual Orientation, Race and Religion or Belief. In addition, as the scheme has the potential to affect everyone, the scope of this interim EQIA is extended beyond the list of protected characteristics to include wider socio-economic considerations and considers people living in poverty and/or in low income households, and those living in remote rural areas and island communities. Data and qualitative information has also been gathered from evidence arising from stakeholder workshops, some one-to-one interviews/discussions and the findings of the literature review.

It is important to note that the protected characteristics listed along with the 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.

Initial reflections from the evidence gathering and engagement to date indicate that the design of the scheme, and the changes this will bring, may potentially have an impact on some people and/or communities, directly or indirectly, and in different ways. This includes people with protected characteristics and other socio-economic challenges and the reflection has identified a broad range of potential impacts.

The initial indications of the main issues primarily are:

Protected Characteristic: Age

In relation to this protected characteristic the primary concern for older people is particularly with regard to accessibility and convenience of return locations as this may affect older people especially those with less mobility and/or long-term health conditions.

The engagement and participation of younger people in the scheme is important and presents both opportunities and challenges regarding the return of containers. For example, there is potential opportunity to incentivise young people to return their containers to redeem the deposit. The evidence suggests that many young people

individually purchase and consume soft drinks when they are out and about and 'on the go' and the scheme will need to work effectively for these products.

The indications are that using internet and social media to communicate and engage with young people, to encourage participation in the scheme, will be essential but that this is perhaps not the most effective communication medium for older age groups. Other non-internet based communication methodologies should also be considered.

Digitalisation of the scheme equipment, for example, the potential use of Reverse Vending Machines (RVMs), will need to take into account the levels of digital literacy across different age groups.

Protected Characteristic: Disability

Evidence from national surveys and research suggests that a high percentage of households in Scotland have someone who is disabled or has a long-term health condition. The national surveys and the census give broad patterns of disability, but do not consider the implications of different types of disability in different contexts.

The accessibility and location of return points, return methods and the return of the deposit is a critical design factor for the DRS. It should be taken into account that a broad range of disabilities and health issues exist and that some people may have complex and interconnected needs to be considered to enable them to participate in the scheme.

Human support for individuals and/or households, including those currently using local authority assisted kerbside services (including recycling), or assisted shopping services to use a deposit return scheme will require consideration.

Socio-economic Aspect: Living in Remote or Rural and/or Island Communities

The indications are that accessibility, convenience and storage are potentially issues for those living in remote rural areas and islands.

Socio-economic Aspect: Low Income Households

The evidence indicates that the initial outlay for deposits/deposit level on drinks containers and the subsequent temporary retention of those deposits until the containers are returned could potentially impact on those living on a low income.

Positive Impacts

Predicted Reduction in Litter

The initial evidence indicates that there will be a reduction in litter. It is difficult to predict the level of reduction in littering that may occur as a result of the introduction the DRS however, there is some evidence that a deposit return scheme would capture some material that is currently littered.

Potential Creation of Jobs

The available evidence gathered indicates that a deposit return scheme may potentially create jobs. Evidence from comparable overseas schemes is that these jobs can be filled by people who have been unemployed for a long time and those accessing supported employment schemes.

Potential Charitable Donations

Voluntary charitable donations of deposits are an aspect of the deposit return scheme which other countries have adopted and seems of interest to many. An increase in access to potential resources may be a potential benefit to a range of charitable, community and youth organisations.

Iteration of the Scheme Design

Some of the potential negative impacts that have been identified could be mitigated through the iteration of the scheme design and the planned consultation process. A more comprehensive EQIA will be developed, building on this interim EQIA, and will take into account the views of a wide range of stakeholders throughout the consultation period. The consultation includes specific material that identifies aspects of the scheme design that may impact on equality of opportunity. The full and final EQIA will consider how, through the design of the scheme, we can address any unintended or consequential impacts on people; enhance actions to reduce inequality; and take action to avoid discrimination. Where there are gaps in evidence, the policy team will look for evidence to fill these gaps by engaging directly with organisations representing relevant groups and communities.

There is also an opportunity through the iteration of the scheme design and the planned consultation process to give full consideration of how to maximise the potential positive impacts that may arise including; the potential to create jobs that are accessible to all; to facilitate donations to charitable organisations and communities; to improve access to return points; and reduce littering and improve perceptions of local neighbourhoods.

These submissions will be taken into account together with any additional evidence gathered during discussions at consultation events and from formal responses received.

Interaction with Other Policies (Draft or Existing)

European Union's Circular Economy Package

In May of 2018 the European Union's Circular Economy Package⁶ was approved. The legislation aims to move supply chains towards a circular economy maintaining the value of products, materials and resources in the economy for as long as possible. This includes more ambitious recycling targets than have been seen before and full cost recovery applied to a range of packaging materials placed on the market by producers.

UK Government's 'Sugar Levy' and Scottish Government's Minimum Unit Price on Alcoholic Beverages

We are aware that some other policies are likely to have some impact on retailers and small retailers in particular. This includes the UK Government's 'Sugar Levy' on soft drinks with a high sugar content and the Scottish Government's Minimum Unit Price on alcoholic beverages which will raise the price of drinks that are currently sold quite cheaply. These could impact financially on some retailers through increasing the cost of some products and may have an administrative burden, the cost of which may also impact on consumers too.

The full impact of the 'Sugar Levy' will only be determinable once drinks manufacturers have considered whether to reformulate drinks to avoid the 'Sugar Levy' and whether they will pass the cost of the levy onto consumers and therefore retailers. It should also be noted that the Minimum Unit Price on alcoholic beverages will not raise the price of all alcoholic drinks but rather increase the price of those that currently sell below the set minimum.

It should be noted that both of these policies come into force in 2018 and will therefore be in full effect by the time a DRS is established and implemented.

Extent/Level of EQIA required

The evidence captured in the next section entitled '***Data and evidence gathering, involvement and consultation***' has been drawn from a broad range of sources. Primarily evidence has been gathered from existing large national and UK surveys relating to income, food and drink expenditure, age and littering. Statistics have mainly been gathered from Scottish Household Survey 2016, the 2011 Census and the Office of National Statistics, especially from Family Spending in the UK in the financial year ending 2017 and Scotland's Health Survey 2012.

Previous research, other equality impact assessments, survey data and consultations carried out by Zero Waste Scotland including for example - the DRS Pilot Project and local authority assisted kerbside waste services tracker and feasibility studies have also been used to provide evidence.

⁶ http://ec.europa.eu/environment/circular-economy/index_en.htm

Cost of living and poverty related information was gathered using Cost of Living Analysis (June 2017) and research and evidence reviews including for example - Growing Up in Scotland 2009, Poverty and the Cost of Living: An Evidence Review; A Minimum Income Standard for Remote Rural Scotland 2013 and Work and Relationships Over Time in Lone-mother Families, 2017.

A full list of references are provided at the end of this document.

Stage 2: Data and evidence gathering, involvement and consultation

This section includes the results of the evidence gathering (including the framing exercise), including qualitative and quantitative data and the source of that information, whether national statistics, surveys or consultations with relevant equality groups.

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
AGE	<p>Littering</p> <p>People aged between 16 to 24 are more likely (35%) to report neighbourhood littering as very or fairly common, compared to 27% for those aged 60 to 74. The evidence suggests that litter is a social problem that particularly affects young people's perceptions of their own neighbourhood. Measures that reduce littering, such as the introduction of the deposit return scheme, could reasonably be predicted to have a positive impact on people's sense of neighbourhood generally, and particularly for young people.</p>	Scottish Household Survey 2016	
	<p>Recycling</p> <p>In previous surveys of household attitudes and behaviours associated with recycling and waste, self-reported recycling tends to increase with age. The 18-24 and 25-34 age groups typically report the lowest levels of recycling, and the 45-54, 55-64 and 65 plus age groups typically report the highest levels of recycling. Self-reported behaviour from nationally representative surveys gives a reasonable indication of variation in existing recycling behaviour with age.</p>	Analysis of Scottish 3Rs Tracker survey data 2013-2016, Zero Waste Scotland	<p>We were unable to source evidence on observed levels of recycling by different age groups in Scotland, so we have used evidence from previous surveys of self-reported recycling behaviours.</p> <p>During the consultation will we seek the views of relevant groups representing a range of ages for example, such groups</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
AGE			as, Youth Parliament, Young Scot and also groups representing older people, for example, Age Concern to provide more evidence in relation to this.
	<p>Young People</p> <p>The design of the DRS and the choices made regarding which products are included within it will determine which opportunities and challenges the scheme will face. The engagement of young people presents both opportunities and challenges and their participation in the scheme is important and critical for its effectiveness. Two examples of this are regarding:</p> <ul style="list-style-type: none"> • the potential of the deposit to incentivise young people to return their containers to redeem their deposit and; • the levels of purchasing of soft drinks by young people. 		
	<p>The first example is, in 2013, Zero Waste Scotland funded a number of ‘recycle and reward’ pilot projects to test the increase in recycling of drinks containers through offering incentives. The evidence suggests that younger people at school and/or college are incentivised to return containers, even ones they have not purchased, to redeem deposits in convenient locations that are accessible to them.</p>	<p>Recycle and Reward Pilot Projects – overview report, 2015, Zero Waste Scotland</p>	<p>The evidence from the Zero Waste Scotland pilot projects is by nature limited to a small number of specific contexts.</p>
	<p>The second example is that over 56% of children aged between 7-15years bought at least one soft drink within a two-week period, with the majority of drinks being</p>	<p>ONS, Family spending in the UK 2017</p>	<p>The ONS analysis does not split out soft drink purchase by young people according to income</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
AGE	<p>consumed away from the home. The average weekly child spending on soft drinks was £0.90. The popularity of buying soft drinks increased with age; 75% of 13-to-15-year-olds bought at least one soft drink within a fortnight, compared with 58% of 10-to-12-year-olds and 38% of 7-to-9-year-olds.</p>		<p>decile or similar. However, additional evidence was gathered from “Growing up in Scotland” research (below).</p> <p>We are not aware of any other UK or Scotland representative survey that captures personal adult expenditure on soft drinks.</p>
	<p>Over half (56%) of children from low income households drank soft drinks once a day or more, in contrast to only 30% of children from households in the highest income bracket. The deposit level and the temporary retention of the deposit could potentially have a disproportionate impact on young people from lower income families.</p>	<p>Growing Up In Scotland, 2009</p>	<p>We also explored the availability of data on drinks containers purchased by different age groups/socio-demographics with Kantar, an organisation that holds extensive data on and specialises in shoppers’ behaviour, but the nature of their methodology does not allow for robust analysis at this level.</p>
	<p>At the Public Interest Workshop on 15 March 2018 it was suggested that designing a simplified consultation document to engage more directly with young people in partnership with Young Scot was potentially a way to engage and explore issues with young people. This comment also probably applies to the population in general who want to understand the key points rather than the technical workings of the scheme which may be of more interest to business.</p>	<p>Public Interest Workshop on 15 March 2018</p>	<p>Zero Waste Scotland is producing a version of the consultation which ask only the questions that have direct relevance to the general public which will be phrased in simple, easy to understand language. This will be used as a way to get input from a wide range of people at public events, roadshows, community</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
AGE			engagement events and any activities which engage young people.
	<p>Older People Initial concerns have been raised regarding physical access to, for example, reverse vending machines (for instance - height and technical specifications) and convenience of the location of return points for people in older age brackets. This may be an area of concern as many older people can have limitations on mobility or long-term health conditions.</p>	Zero Waste Scotland interviews with stakeholders on 12 April.	<p>During the consultation period and scheme design we will build on the workshops and one to one interviews with equality groups to date by seeking to engage widely with groups across protected characteristics and those that may be affected by any of the socio-economic and geographical location aspects listed.</p> <p>The aim of this will be to gather views from the organisations representing people of different age groups regarding access and convenience of return locations, return methods and the methods for return of deposits to further our understanding of areas of concern and how these might be addressed.</p> <p>As part of the consultation, we will seek views on how best to</p>
	<p>Digital Communication Related to Age In 2016, one per cent of adults aged 16 to 24 reported not using the internet, compared to 28 per cent of those aged 60 to 74 and 67 per cent of those aged 75 and over. The method of accessing the internet also varies with age, for example, 93 per cent of 16 to 24-year olds use a mobile phone, compared to 45 per cent of those in the 60-74 years bracket. There is a clear relationship between age and internet use, with lower usage rates among older people. Communication on the DRS, which aims to encourage and maximise participation in the scheme across all ages, should involve a range of appropriate and accessible communications means and methods. The evidence suggests that using internet and social media are a good way of targeting young people but other ways of reaching and engaging older people may be more effective.</p>	Scottish Household Survey 2016	

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
AGE	<p>The evidence gathered from overseas visits to Norway and Sweden identified that sometimes the return rates for certain product types can be lower than expected. When this occurs then specific communication strategies have been adopted. For example, targeted advertising is undertaken by the schemes aimed at the age groups/demographics that consume the products that have lower returns.</p> <p>Both countries generally adopt a pro-active approach to encourage good returns rates in different ways. For example, the Norwegian system operator runs a dedicated platform to engage young people in a wide range of environmental issues. Sweden focuses on those groups who have the lowest recycling rates, including young adults in cities, as well as children and young people. In Sweden the system operator has partnered with the Swedish Floorball, a type of floor hockey, to target young people with their advertising to increase their awareness and visibility towards young people.</p>	<p>Evidence gathered by Zero Waste Scotland during overseas visits to deposit return schemes in various European countries including Iceland, Norway and Estonia, Sweden, Germany and Lithuania in Oct/Nov 2017 and Denmark and Finland in February 2018.</p>	<p>communicate the deposit return scheme to all consumers and use responses to inform wider data gathering and inform and create mitigating actions.</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
DISABILITY	Around 42% of households in Scotland contain at least one person who is long-term sick or disabled. This figure covers all household members, including children.	Scottish Household Survey 2016	National surveys and the census tells us about broad patterns of disability, but do not consider the implications of different types of disability in different contexts.
	In 2011, the proportion of people in Scotland with a long-term activity-limiting health problem or disability was 20 per cent (1,040,000 people), the same proportion as reported in 2001 (1,027,872 people).	2011 Census	
	In 2012, 28 per cent of men and 35 per cent of women in Scotland reported a limiting long-term condition or disability.	Scottish Health Survey 2012	
	In 2011 63,458 people in Scotland received home care services, of whom 21,379 were male and 42,079 were female. Numbers receiving these services by client groups were age 33,005 people; physical disabilities 16,568; learning disabilities 4,266; dementia 3,358; mental health problems 2,766; people in other vulnerable groups 2,411; and not known 1,084.	Home Care Services, Scotland, 2011	
	<p>Accessibility and Convenience</p> <p>The evidence gathered (above) from national surveys and similar suggests that a high percentage of households in Scotland have someone who is disabled or has a long-term health condition. The accessibility and location of return points, return methods and the return of the deposit is a critical design factor for the DRS with regard to people with disabilities and health issues affecting mobility.</p>		

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
DISABILITY			location types and return methods. Our work to engage widely with and build relationships with equality groups should inform and input into this.
	<p>Assisted Support Services Local authorities provide an assisted kerbside waste collection service (including recycling) to households with limited mobility. A deposit return scheme will require consideration of existing support for waste and recycling services. Some households might be assisted to return containers as part of help with food shopping. Age Concern also provide assistance with food shopping through a network of volunteers.</p>	Consultation with Zero Waste Scotland colleagues and three local authorities	National figures on the number of assisted recycling collections are not publicly available. In the time available, Zero Waste Scotland contacted three local authorities, who provide assisted waste collections to between 5% and 11% of households in their area.
	<p>Other Support Initial concerns have been raised regarding accessibility to the scheme for people who may need support regarding for example, literacy, numeracy, dyslexia, digital literacy, visual impairment and/or support for any other learning disability which require careful consideration in the design of the DRS. Return locations and methods should be accessible and take into account these aspects which could impact on people's ability to use the scheme. One crucial consideration in the scheme design is to ensure the presence of human support being available to provide assistance where and when appropriate. Consideration should be given for the initial introduction of the scheme as well as on an on-going basis where appropriate.</p>	Zero Waste Scotland interview with an adult learning organisation on 19 April 2018.	As part of the consultation, we will seek views from organisations representing people across a range of accessibility factors, including for example, Inclusion Scotland, Age Concern, Disability Equality Scotland, Learning Link Scotland and other appropriate representative organisations.

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
DISABILITY			
	<p>Inclusive Communication Stakeholders suggested there is an opportunity to create an Easy Read, or similar, version of the DRS consultation. This can provide more inclusive engagement by simplifying not just language but explanations, and concepts and will often include images as well as text.</p>	Zero Waste Scotland Interview with disability representative organisation on 12 April 2018.	The accessibility factors under consideration include: location and convenience of the return points; physical access to return points; the return method being 'user-friendly' and accessible for all in relation to understanding easily how to use the scheme taking into account levels varying levels of knowledge, skills and experience; digital skills regarding return methods and return of deposits.
	Zero Waste Scotland's experience of developing recycling and food waste information tools and materials for people with learning disabilities evidences that a variety of communication methods and materials can enhance participation.	Zero Waste Scotland Communication Materials.	
	Evidence from other countries with DRS schemes show that, if Reverse Vending Machines (RVMs) are part of the scheme design then these can have touchscreens, can play videos as well as display written instructions with different language options.	Evidence gathered by Zero Waste Scotland during overseas visits to deposit return schemes in various European countries including Iceland, Norway and Estonia, Sweden, Germany and Lithuania in Oct/Nov 2017 and Denmark and Finland in February 2018.	
	In the opinion of some of the participants in the public interest workshop clear DRS branding or a clear recognisable logo will act as a visual prompt and can help those with literacy or language barriers.	Zero Waste Scotland Public Interest Workshop held in Edinburgh on 15 March 2018.	
	The evidence from the overseas visits by Zero Waste Scotland staff is that the majority of DRS countries across	Evidence gathered by Zero Waste Scotland during overseas	

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
DISABILITY	Europe have a trademarked brand name, symbol or marking on the container to clearly highlight to the consumer that the container is subject to a deposit and part of the system making the system visible and recognisable to all.	visits to deposit return schemes in various European countries including Iceland, Norway and Estonia, Sweden, Germany and Lithuania in Oct/Nov 2017 and Denmark and Finland in February 2018.	
	<p>Potential Job creation</p> <p>One positive general point is that the scheme design may result in the creation of some job opportunities. Evidence from comparable overseas schemes is that these jobs can be filled by people who have been unemployed for a long time and those accessing supported employment schemes.</p>		

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
SEX / GENDER	<p>The large majority of lone parent households are headed by women and these households tend to experience high poverty rates: 34% were in poverty in 2014/15, compared with 26% of single working age women without children. For comparison, 16% of couples with dependent children were in poverty in 2014/15. These statistics have implications for child poverty, as women tend to be the main carers of children.</p> <p>A key issue in the design of the scheme will be the deposit level and the impact this has on low income households. Single parent households are a key group that will need to be considered in this context.</p>	Sourced from the Equality Impact Assessment for the Child Poverty (Scotland) Bill.	As part of the consultation, we will seek views on the deposit level, and potential temporary retention of deposit, is likely to have any disproportionate effects on women on low incomes.
	<p>Lone parent households often suffer from demanding schedules, which have an impact on family time. The DRS scheme will require all users to dedicate time to return containers. For households who are particularly “time poor” the scheme may have a disproportionately large impact on available time.</p> <p>Potential mitigation of this issue is to ensure that those who are ‘time poor’ have convenient access to return locations and can return containers with minimum additional effort; such as at a location they are already visiting.</p>	Work and Relationships Over Time in Lone-mother Families, 2017, Joseph Rowntree Foundation	As part of the consultation, we will seek views on the potential impact of the scheme on lone parent households from appropriate representative organisations.
PREGNANCY AND MATERNITY	We are not aware of any relevant existing evidence at this time on pregnancy and maternity in relation to the policy.		As part of the consultation, we will seek views on whether the scheme proposals will have any disproportionate effects on

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
			people because of pregnancy and maternity.
GENDER REASSIGNMENT	We are not aware of any relevant existing evidence at this time on gender reassignment in relation to the policy.		As part of the consultation, we will seek views on whether the scheme proposals are likely to have any disproportionate effects on people under the gender reassignment protected characteristic.
SEXUAL ORIENTATION	We are not aware of any relevant existing evidence at this time on sexual orientation in relation to the policy.		As part of the consultation, we will seek views from representative organisations on whether the scheme proposals are likely to have any disproportionate effects on people due to their sexual orientation.
RACE	<p>In 2011, there were approximately 200,000 Black, Asian and Minority Ethnic (BME) people in Scotland, making up just over 4% of the population. BME communities are largely concentrated in urban locations.</p> <p>We are not aware of any other relevant existing evidence on race in relation to the policy. However, in the opinion of some of the representative organisations attending the workshops there is the potential of language being a barrier for people newly resident in Scotland where English is not their first language or where language is unclear or too technical.</p>	<p>Census 2011</p> <p>Workshop run by Zero Waste Scotland on 15 March in Edinburgh with representatives from equality groups</p>	During the consultation period, we will engage with and seek views from representative organisations for example, national strategic organisations such as CEMVO Scotland and BEMIS Scotland and other appropriate representative organisations on whether the scheme proposals are likely to have any disproportionate effects on people due to their race.

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
RELIGION OR BELIEF	We are not aware of any relevant existing evidence at this time on religion or belief in relation to the policy.		As part of the consultation, we will seek views on whether the scheme proposals are likely to have any disproportionate effects on people of religion or belief.
GEOGRAPHICAL LOCATION (In particular remote/rural and island communities)	Households in remote rural Scotland require significantly higher incomes to attain the same minimum living standard as those living elsewhere in the UK. This is partly due to the costs of additional travel, but mainly caused by the higher cost of buying the same things as elsewhere, and the extra cost of keeping warm. Food shopping can cost between 10 and 50% more in remote rural areas, depending on where you live. Households rely on a mix of the local shop, travel to larger supermarkets some distance away, and online services where coverage is provided. The degree of reliance on the local shop for food shopping is strongly related to the distance to the nearest large supermarket. Households typically recognise the trade-off between paying higher prices at local shops, against maintaining a vital local service for those who are unable to shop elsewhere.	A Minimum Income Standard for Remote Rural Scotland, 2013.	We explored the availability of data on drinks containers purchased in more rural parts of Scotland from Kantar, an organisation that holds extensive data on and specialises in shoppers' behaviour, but the nature of their methodology does not allow for robust analysis at this level.
	Accessibility and Convenience The evidence above suggests that to enable participation by everyone in Scotland, a DRS scheme will require sufficient coverage of return points in remote and rural areas.		As part of the consultation, we will seek views on whether the scheme proposals are likely to have any disproportionate impacts on remote rural and island services.

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
GEOGRAPHICAL LOCATION (In particular remote/rural and island communities)	<p>Online Shopping A comment was raised at the Stornoway Regional Workshop that a number of people, who are not in the main islands town, do their grocery shopping online rather than travel to the main town to do shopping.</p>	<p>Regional workshop run by Zero Waste Scotland in Stornoway, Western Isles on 29 March.</p>	<p>Zero Waste Scotland requested information from grocery retailers in relation to online shopping (including rural), but has not managed to source this information at this time.</p>
	<p>The proportion of households with home internet access is highest (86%) in remote rural areas, and lowest in remote small towns (79%).</p>	<p>Scottish Household Survey 2016</p>	<p>As part of the consultation, we will seek views on whether the DRS policy proposals and design are likely to have any disproportionate effects on people living and working in remote rural and island communities.</p>
	<p>The Norwegian deposit return scheme includes a “take-back” element for online purchases, where households can return a sealed bag of empty containers via the delivery van. Deposits are then refunded to the customer account. The consultation sets out a range of considerations around this including online retailers and home delivery companies within the scope of the DRS.</p>	<p>Evidence gathered by Zero Waste Scotland during overseas visits to deposit return schemes in various European countries including Iceland, Norway and Estonia, Sweden and Lithuania in Oct/Nov 2017 and Denmark and Finland in February 2018.</p>	
	<p>Storage on Island Communities In small island communities, space for the storage of waste can be very limited (and focused on harbourside locations prior to ferry transport). This problem can be further exacerbated by relatively large numbers of visitors. In the opinion of the representative organisation, the frequency of collection of containers will be a key determinant of the success of the scheme in an island context. Bad weather will impact on the ability to transport drinks containers off island, and could also present challenges for a reverse logistics type model.</p>	<p>Interview with representative organisation with experience of working in rural/island communities on 12 April.</p>	

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
GEOGRAPHICAL LOCATION (In particular remote/rural and island communities)	Small Retailers There are examples from other DRS countries where small retailers are exempt from the scheme or where they are reimbursed for the cost of accommodating returns. There is often an exemption to “take back a proportionate amount to that sold”. Therefore, a small retailer could legitimately refuse to take back large amounts of returns due to storage space and ask the person to go to an automated take back point, typically located at larger store.	Evidence gathered by Zero Waste Scotland during overseas visits to deposit return schemes in various European countries including Iceland, Norway and Estonia, Sweden, Germany and Lithuania in Oct/Nov 2017 and Denmark and Finland in February 2018.	
LOW INCOME	People on Low Incomes People on low incomes have seen their earnings grow at a lower rate than the cost of living since the 2008 recession.	Cost of Living Analysis, 2017	As part of the consultation, we will seek views from representative organisations on whether the scheme proposals are likely to have any disproportionate effects on people living on low income and/or living in poverty.
They are more likely to pay more for essential goods and services (energy, food) than the rest of the population. This may be through a lack of information/competition, differential pricing strategies and restricted access to better deals (e.g distance to supermarket without a car). In a detailed study of life in low income families in Scotland, fuel and food were identified as the main spending priorities.	Poverty and the Cost of Living: An Evidence Review, 2014		
Using UK-level data, for the lowest earning 10% of UK households (equivalised disposable income deciles), <i>food and drink (excluding out of home purchases)</i> makes up 16.5% of their <i>total weekly household expenditure</i> , compared to 8.5% for the highest earning 10% of households (all UK households 11.9%). Lower income households are therefore more susceptible to changes in	Life in Low Income Families in Scotland 2003.		

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
	food and drink prices.		
	<p>Deposit Levels The additional cost of deposits, and the temporary retention of the deposit could therefore be particularly significant for people managing on already tight budgets.</p>	ONS, Family Spending in the UK 2017	
LOW INCOME	<p>Product Type Household expenditure on food and drink categories that are potentially within the scope of the policy is not proportionate across income deciles. For example, for the lowest earning 10% of UK households, <i>milk</i> makes up 4.3% of their <i>food and non-alcoholic drink</i> spend, compared to 2.2% for the highest earning 10% of households (all UK households 3.2%). Conversely, the lowest earning UK households spend 1.7% of their overall household expenditure on alcoholic drinks, compared to 5.3% for the highest earning households (all UK households 3%). The inclusion of certain types of products within the scheme could have a particular impact on low income families.</p>	ONS, Family Spending in the UK, 2017	
	<p>Recycling and Participation In previous surveys of household attitudes and behaviours associated with recycling and waste, people were asked how they last disposed of commonly recycled items (which included glass bottles, drinks cans and cartons). People who own their home typically report higher levels of recycling, whereas those who live in privately rented and socially rented tend to report lower levels of recycling. Levels of recycling were typically lower for people living in purpose built flats and tenements.</p>	Analysis of Scottish 3Rs Tracker Survey Data 2013-2016, Zero Waste Scotland	

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
<p>LOW INCOME</p>	<p>In a previous study of factors affecting the gross recycling performance of local authorities in England, the most significant were levels of deprivation (with lower yields associated with higher levels of deprivation), the range of materials targeted (with wider ranges of materials targeted achieving higher dry recycling yields) and fortnightly refuse collections (being associated with higher dry recycling yields in comparison to weekly refuse collections). However, it is difficult to use evidence from existing kerbside recycling services to predict participation in deposit return schemes, where the incentives are quite different.</p>	<p>Factors Influencing Recycling Performance, 2015</p>	
	<p>In the US, there is evidence that some people on a low income or living in poverty, including people who are homeless, collect drinks containers and return these to the scheme to redeem the deposit to supplement their income.</p>	<p>Cash Recycling, Waste Disposal Costs and the Incomes of the Working Poor: Evidence from California, 2008.</p> <p>The Effect of Income on Recycling Behavior in the Presence of a Bottle Law: New Empirical Results, Bevin Ashenmiller Occidental College 2006.</p>	<p>This evidence is, by nature, limited to these specific schemes in these country-specific contexts.</p>
	<p>Evidence from some of the European schemes visited by the Zero Waste Scotland team show that some European schemes have installed “holders” on litter bins, for people to leave their containers for homeless people to collect so that they do not have to search through other waste for</p>	<p>Evidence gathered by Zero Waste Scotland during overseas visits to deposit return schemes in Norway in October 2017 and Denmark in February 2018.</p>	

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
	these containers.		
	<p>Internet Use and Income Level</p> <p>Gaps in internet access and use remain amongst certain groups including those in deprived areas, those in social housing and those on low incomes. 23 per cent of adults living in the 20 per cent most deprived areas in Scotland reported not using the internet compared with 15 per cent in the rest of the country.</p>	Scottish Household Survey 2016.	
	<p>Home internet access varies with household income, although the gap is lessening over time. In 2016, 63 per cent of households with incomes of £15,000 or less had home internet access, increasing to 98 per cent of households with incomes over £40,000. Among those that have internet access, a lower proportion of adults in social housing were confident in their ability to use the internet than those in private rented housing and those who own their own homes. Those aged over 45 and those on incomes between £6,000 - £20,000 consistently reported being less confident than average.</p> <p>The evidence indicates that internet access and confidence in using it varies by tenure and household income. This should be considered when designing the DRS and in relation to communication on the scheme and how it works to enable everyone to be able to participate in the scheme. It may also be a consideration if the scheme design involves digital literacy, for example if Reverse Vending Machine (RVMs) are part of the scheme.</p>	Scottish Household Survey 2016.	

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)	Data gaps identified and action taken
MARRIAGE AND CIVIL PARTNERSHIP	The Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example HR policies and practices. This policy does not relate to work therefore we have not considered it for this interim EQIA.		N/A

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

At this stage of the interim equality impact assessment, the qualitative scoring of the potential impacts (negative, positive and neutral) have been considered for each of the protected characteristics and the other specified characteristics already listed in this interim EQIA. 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 at this interim stage of the EQIA and will be subject to further review and revision after the consultation has taken place and during the system design.

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	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to age.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts on older and younger people. This will be dependent on the preferred design option agreed following the consultation and any mitigation measures that may be put in place to address areas of concern.</p> <p>Older People</p> <p>The evidence suggests that to advance equality of opportunity then the design of the DRS should ensure that return locations are convenient and provide good access for older people and especially those who have restricted mobility due to disability or health condition(s).</p> <p>The indications from the evidence suggest that human presence to provide support may be required, initially and perhaps over a period of time, to enable older people to use</p>

				<p>return method effectively, especially if this is by digital means.</p> <p>Young People</p> <p>The engagement of young people presents both opportunities and challenges and their participation in the scheme is important and critical for scheme effectiveness. To advance equality of opportunity and create chances to directly engage with young people by producing, in partnership with Young Scot, materials to engage and involve young people in the design of the scheme.</p> <p>By designing accessible and convenient return locations and deposit methods, the evidence suggests that this will cater more for young people who purchase drinks ‘on the go,’ and enable and encourage them to return containers and redeem deposits more easily.</p> <p>On a positive note, a key objective of the DRS is to support a reduction in litter, and if this is the case, the evidence indicates that there is a likelihood that young people may see less litter in their neighbourhoods and view these from a more positive perspective, especially those young people living in areas of deprivation.</p> <p>Communicating on DRS with Older and Younger People</p> <p>The evidence shows that there is a clear relationship between age and internet use, with lower usage rates and accessibility among older people and higher use among younger people. By communicating on the deposit return scheme using a range of appropriate, accessible and inclusive means and methods, including internet and social media, will advance equality of opportunity by maximising understanding of the</p>
--	--	--	--	---

				scheme and potentially enhancing participation.
Promoting good relations among and between different age groups	X			The deposit return scheme design could potentially promote good relations between different age groups by helping to reduce littering in local communities. People from all age groups could, as a whole community, collectively view and take pride in their neighbourhood from a more positive perspective.

Do you think that the policy impacts people with disabilities?

People with disabilities	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The Deposit Return Scheme should, after consultation, be designed in such a way that it does not create unlawful discrimination related to disability.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts on people with disabilities. This will be dependent on the preferred design option agreed following the consultation and any mitigation measures that may be put in place to address areas of concern.</p> <p>Indications are that there is likely to be job opportunities created through the DRS. Evidence from comparable schemes overseas indicates that these could be filled by people who consider themselves disabled. This information was gathered on a range of overseas visits by Zero Waste Scotland staff to deposit return schemes in various European countries including Iceland, Norway and Estonia, Sweden and Lithuania in Oct/Nov 2017 and Denmark and Finland in February 2018.</p> <p>The evidence from national surveys and similar suggests that a high percentage of households in Scotland have someone who is disabled or has a long-term health condition. The accessibility of return points, methods and the return of the deposit is a critical design factor for the DRS with regard to advancing equality of opportunity for people with disabilities and health issues affecting mobility.</p> <p>Local authorities provide an assisted kerbside waste collection service (including recycling) to households with</p>

				<p>limited mobility. A deposit return scheme will require consideration of existing support for recycling services. At this stage national figures on the number of assisted collections are not publicly available so this requires consideration to ensure people using this service are not disadvantaged.</p> <p>Other accessibility factors should be considered to advance equality of opportunity to participate in the scheme, including for example, location and convenience of the return point, physical access to return points, the return method being 'user-friendly' and accessible for all.</p> <p>Evidence shows that developing information tools and materials, which have a clear visible branding and/or logo for people with a range of knowledge, skills and experience can advance equal opportunity to participate.</p> <p>There is the potential opportunity to create an Easy Read, or similar, version of the DRS consultation specifically to enable inclusive engagement. This would simplify language, explanations, concepts and include images as well as text.</p> <p>National surveys and the census tells us about broad patterns of disability, but do not consider the implications of different types of disability in different contexts. This is complex and requires consideration to enable the DRS to ensure it is not having an adverse impact on equality of opportunity.</p>
Promoting good relations among and between disabled and non-disabled people			X	The DRS scheme design is unlikely to impact on the promotion of good relations between disabled and non-disabled people.

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	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to gender.
Advancing equality of opportunity			X	<p>The large majority of lone parent households are headed by women and these households tend to experience high poverty rates.</p> <p>To advance equality of opportunity, the design of the scheme should consider the potential impact of additional cost of deposits, and the temporary retention of the deposit on people on low incomes managing on already tight budgets.</p> <p>Lone parent households can also often suffer from demanding schedules, which have an impact on family time. The design of the scheme will require all users to dedicate time to return containers. To advance equality of opportunity care would be taken during the design stage to ensure convenient access to return locations. This would mean that minimum additional effort would have to be made if the return location was somewhere that the person was already visiting. This in turn should enable enhanced participation by lone parent households.</p>
Promoting good relations between men and women			X	The DRS scheme design is unlikely to impact on the promotion of good relations between men and women.

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	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to pregnancy and maternity.
Advancing equality of opportunity			X	We are unaware of any relevant and existing evidence, at this time, on pregnancy and maternity in relation to the policy. The consultation will seek views from representative organisations on whether the policy proposals are likely to have any disproportionate effects because of pregnancy and maternity.
Promoting good relations			X	The DRS scheme design is unlikely to impact on the promotion of good relations between pregnant women and other people.

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	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to gender reassignment.
Advancing equality of opportunity			X	We are unaware of any relevant and existing evidence, at this time, on the gender reassignment protected characteristic in relation to the policy. The consultation will seek views from representative organisations on whether the policy proposals are likely to have any disproportionate effects on transgender people.
Promoting good relations			X	The DRS scheme design is unlikely to impact on the promotion of good relations between transgender people and others.

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	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to sexual orientation.
Advancing equality of opportunity			X	We are unaware of any relevant and existing evidence, at this time, on the sexual orientation protected characteristic in relation to this policy. The consultation will seek views from representative organisations on whether the policy proposals are likely to have any disproportionate effects on people due to their sexual orientation.
Promoting good relations			X	The DRS scheme design is unlikely to impact on the promotion of good relations between people of different sexual orientation.

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	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to race.
Advancing equality of opportunity			X	We are unaware of any relevant and existing evidence, at this time, on race in relation to the policy. The consultation, will seek views from representative organisations on whether the policy proposals are likely to have any disproportionate effects on people due to their race.
Promoting good relations			X	The DRS scheme design is unlikely to impact on the promotion of good race relations.

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	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to religion or belief.
Advancing equality of opportunity			X	We are unaware of any relevant and existing evidence, at this time, on religion or belief protected characteristic in relation to this policy. The consultation should help to identify any areas where the policy proposals may have disproportionate effects on people due to their religion or beliefs.
Promoting good relations			X	The DRS scheme design is unlikely to impact on the promotion of good relations among people of religion and belief and others.

Do you think that the policy impacts on people living on low income or living in poverty?

Living on Low Income/ Living in Poverty	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to people living on a low income and/or living in poverty.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts on people living on a low income/in poverty. This will be dependent on the preferred design option agreed following the consultation and any mitigation measures that may be put in place to address areas of concern.</p> <p>Indications are that there is likely to be job opportunities created through the DRS. Evidence from comparable schemes overseas indicates that these could be filled by people who have been unemployed for a long time. This information was gathered on a range of overseas visits by Zero Waste Scotland staff to deposit return schemes in various European countries including Iceland, Norway and Estonia, Sweden and Lithuania in Oct/Nov 2017 and Denmark and Finland in February 2018.</p> <p>The evidence shows that people on low incomes have seen their earnings grow at a lower rate than the cost of living since the 2008 recession. They are more likely to pay more for essential goods and services (energy, food) than the rest of the population and fuel and food were identified as the main spending priorities. The indications are that low income households are more susceptible to changes in food and</p>

				<p>drink prices.</p> <p>To advance equality of opportunity, the design of the scheme should consider the potential impact of additional cost of deposits, and the temporary retention of the deposit on people on low incomes managing on already tight budgets.</p> <p>The design of the scheme should also consider the ways in which discarded containers can be returned and deposits donated to charitable organisations and causes. For example, as seen in other countries, people can elect to individually donate a deposit or another example is that charitable organisations could potentially collect drinks containers directly at events to reclaim the deposit.</p> <p>As identified in the Climate Justice Workshop run by Scottish Government and attended by Zero Waste Scotland staff in February 2018 <i>“The value of the deposit may incentivise people to collect litter from the streets to return, which is expected to improve the local environment and increase recycling. There are some risks to consider regarding which members of society might be doing this kind of informal recycling work, and whether this is fair or desirable.”</i></p>
Promoting good relations			X	<p>The DRS scheme design is unlikely to impact on the promotion of good relations between people living on low income and others.</p>

Do you think that the policy impacts on people living in remote rural/ island communities?

Living in remote rural/ island communities	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The Deposit Return Scheme should, after consultation, be designed in such a way that it will not create unlawful discrimination related to people living in remote rural or island communities.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts on people living in remote rural and island communities. This will be dependent on the preferred design option agreed following the consultation and any mitigation measures that may be put in place to address areas of concern.</p> <p>Rural households rely on a mix of the local shop, travel to larger supermarkets some distance away, and online services where coverage is provided. To advance equality of opportunity the DRS scheme design will require sufficient coverage of return points in remote and rural areas.</p> <p>In small island communities, space for the storage of waste can be very limited (and focused on harbourside locations prior to ferry transport). This problem can be further exacerbated by relatively large numbers of visitors. The frequency of collection of containers, and external factors such as bad weather and challenges for a reverse logistics type model are key determinants for the success and thus the design of the scheme. To advance the equality of opportunity for rural and island communities these should be considered.</p> <p>The potential impacts on small local retailers should also be</p>

				<p>taken into account.</p> <p>There is potential opportunity for remote rural and island communities eg Development Trusts to benefit from charitable donations from the tourists and visitors not redeeming their deposits themselves and who leave their containers behind them in the community.</p>
Promoting good relations			X	<p>The DRS scheme design is unlikely to impact on the promotion of good relations between people living in remote rural areas and islands with those living on the mainland.</p>

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

<p>Have positive or negative impacts been identified for any of the equality groups?</p>	<p>This interim review has identified at this stage a range of potentially positive and negative impacts of the design of the DRS. The qualitative scoring of these potential impacts, both negative and positive, have been considered for each of the protected characteristics and the other specified characteristics as listed in this interim EQIA.</p> <p>This qualitative 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 all the potential impacts at this interim stage of the EQIA and will be subject to further review and revision after the consultation has taken place and as part of the scheme design.</p> <p>This design of the DRS will include an effective monitoring and evaluation framework and as part of this it is essential to ensure that both positive and negative impacts will be closely monitored and evaluated. Information and data gathered to continually assess the potential positive and negative impacts as outlined by the final and full equality impact assessment when completed will be identified.</p> <p>This should provide on-going information on how the deposit return scheme is performing in terms of being as inclusive as possible for those protected characteristic groups and others potentially affected by socio-economic issues and geographical location. It will also enable the DRS operator / administrator to learn how best to deal with and mitigate for any issues arising from the design affecting the identified groups.</p>
<p>Is the policy directly or indirectly discriminatory under the Equality Act 2010⁷?</p>	<p>There is no evidence, so far within this interim EQIA that the policy is directly or indirectly discriminatory under the Equality Act 2010.</p>
<p>If the policy is indirectly discriminatory, how is it justified under the relevant</p>	<p>N/A</p>

legislation?	
If not justified, what mitigating action will be undertaken?	N/A

Describing how this Interim Equality Impact analysis has shaped the policy making process so far

The interim equality impact analysis has helped to highlight areas where there is limited evidence on people with protected characteristics and the other characteristics included within this interim EQIA. It can therefore help us to shape our plans for engagement during the consultation so that we consult with representatives of the people potentially affected, as well as representatives of people with the other protected characteristics, to ensure that there are no unintended consequences from the proposed design of the deposit return scheme.

Within the consultation itself, we have highlighted a number of areas where there are potential impacts on different groups to allow consultees to consider these in commenting on aspects of the design of the scheme.

Evidence available and gathered during the consultation will help inform the full and final equality impact assessment which will be completed at the end of the consultation period.

Monitoring and Review

The design of the DRS will integrate equality impact monitoring and evaluation into its framework from the outset. We believe it is essential to ensure that any identified positive and negative impacts will be closely monitored and evaluated and relevant information and data gathered to continually assess the potential positive and negative impacts outlined by the full and final equality impact assessment when completed.

This should provide on-going information on how the deposit return scheme is performing in terms of being as inclusive as possible for those protected characteristic groups and others affected by low income or remote rural locations. It will also enable the DRS operator / administrator to learn how best to deal with and mitigate for any issues arising from the design affecting the identified groups.

In the full and final equality impact assessment an outline of how equality monitoring and evaluation will be integral to the DRS scheme will be explained and a plan of how to measure progress on equality issues identified including:

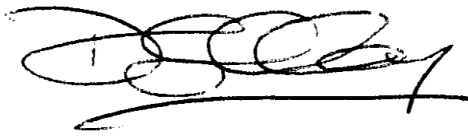
- when the monitoring and evaluation will take place;
- who is responsible for undertaking it;
- evidence that it is integral to the regular monitoring and evaluation mechanisms devised for the DRS

This may include for example:

- Regulator role and responsibility;
- Infrastructure and logistics provisions;
- Infrastructure and equipment provisions to ensure accessibility (e.g. ramps, height etc);
- Communication provisions around understanding the system/new infrastructure and how to use the system;
- Provision of additional or intermediate support for any identified disproportionate effects on people with protected characteristics, for example such as older consumers;
- Frequency and speed of deposit reimbursement

Stage 5: Authorisation of EQIA

Declaration I am satisfied with the interim equality impact assessment that has been undertaken for the Consultation on the Design of a Deposit Return Scheme for Drinks Containers in Scotland and give my authorisation for the results of this interim assessment to be published on the Scottish Government's website.

A handwritten signature in black ink, appearing to read 'Donald McGillivray', with a horizontal line underneath.

Name: Donald McGillivray

Position: Deputy Director, Environmental Quality and Circular Economy

List of References

Programme for Government in 2017

<http://www.gov.scot/Publications/2017/09/8468/downloads>

Review of Feasibility Study for a Deposit Return System for Drinks Containers 2015

<https://www.zerowastescotland.org.uk/sites/default/files/Review%20of%20feasibility%20study%20for%20a%20Deposit%20Return%20System%20for%20Drinks%20Containers.pdf>

A Scottish Deposit Refund System 2015

https://www.zerowastescotland.org.uk/sites/default/files/ZWS%20DRS%20Report_MAIN%20REPORT_Final_v2.pdf

Deposit Return Evidence Summary 2017

<https://www.zerowastescotland.org.uk/sites/default/files/Deposit%20Return%20Evidence%20Summary.pdf>

European Union's Circular Economy Package 2018

http://ec.europa.eu/environment/circular-economy/index_en.htm

Analysis of Scottish 3Rs Tracker survey data 2013-2016, unpublished, Zero Waste Scotland

Recycle and Reward Pilot Projects – overview report, 2015, Zero Waste Scotland,

<https://www.zerowastescotland.org.uk/litter-flytipping/recycle-reward-pilot>

Family Spending in the UK, 2017, ONS

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/financialyearending2017>

Work and Relationships Over Time in Lone-mother Families, 2017, Joseph Rowntree Foundation, <https://www.jrf.org.uk/report/work-relationships-lone-mother-families>

Cost of Living analysis, 2017, <http://www.gov.scot/Topics/Statistics/Browse/Social-Welfare/IncomePoverty/CostofLiving>

Poverty and the Cost of Living: An Evidence Review, 2014, Joseph Rowntree Foundation, <https://www.jrf.org.uk/report/poverty-and-cost-living>

Life in Low Income Families in Scotland, 2003, <http://docs.scie-socialcareonline.org.uk/fulltext/sjrfinds6.pdf>

A Minimum Income Standard for Remote Rural Scotland, 2013, Highlands and Islands Enterprise, <http://www.hie.co.uk/regional-information/economic-reports-and-research/archive/a-minimum-income-standard-for-remote-rural-scotland.html>

Factors Influencing Recycling Performance, 2015, WRAP

<http://www.wrap.org.uk/collections-and-reprocessing/collections-and-sorting/kerbside-collections/reports/factors-influencing-recycling-performance>

Scotland's Census 2011, <http://www.scotlandscensus.gov.uk/>

Scotland's Health Survey 2012, <http://www.gov.scot/Publications/2013/09/3684>

Home Care Services, Scotland, 2011, <http://www.gov.scot/Publications/2011/11/28115445/1>

Equality Impact Assessment for the Child Poverty (Scotland) Bill

<http://www.gov.scot/Publications/2017/02/5028/1>

Cash Recycling, Waste Disposal Costs and the Incomes of the Working Poor: Evidence from California, 2009, [University of Wisconsin](#)

[Presshttps://www.jstor.org/stable/27759695?seq=1#page_scan_tab_contents](https://www.jstor.org/stable/27759695?seq=1#page_scan_tab_contents)

The Effect of Income on Recycling Behavior in the Presence of a Bottle Law: New Empirical Results, 2006, Bevin Ashenmiller Occidental

College <https://ideas.repec.org/p/occ/wpaper/10.html>