Equality Impact Assessment for The Deposit and Return Scheme for Scotland Regulations 2020 (as amended by the Deposit Return Scheme (DRS) for Scotland Amendment Regulations 2025) and the Deposit and Return Scheme for Scotland (Designation of Scheme Administrator) Order 2025

May 2025

Scottish Government
Riaghaltas na h-Alba

EQUALITY IMPACT ASSESSMENT – RESULTS

April 2025

Title of Policy

The Deposit and Return Scheme for Scotland Regulations 2020, as amended by the Deposit Return Scheme (DRS) for Scotland Amendment Regulations 2025; and the Deposit and Return Scheme for Scotland (Designation of Scheme Administrator) Order 2025.

Summary of aims and desired outcomes of Policy

1. The Scottish Government is committed to creating a more circular economy where products and materials are kept in a high-value state of use for as long as possible – maximising resources to benefit the economy and the environment. Material consumption and waste are primary drivers of nearly every environmental problem Scotland currently faces, from water scarcity to habitat and species loss.

2. It is recognised that fresh interventions are needed to bring about the systemic and behavioural change necessary to fulfil these aspirations. The Deposit and Return Scheme Scotland for Scotland Regulations 2020 (as amended by the Deposit and Return Scheme for Scotland Amendment Regulations 2025) and the Deposit and Return Scheme for Scotland (Designation of Scheme Administrator) Order 2025 (hereafter referred to as the DRS legislation) will establish a Deposit Return Scheme (DRS) in Scotland and help to support these changes.

3. The DRS forms a key part of the Government's commitment to moving towards a circular economy and playing its part to tackle the climate emergency. A circular economy, based on sustainable consumption and production, is essential to power Scotland's transition to a fair, green and sustainable economy, and critical to meeting our obligations to tackle the twin climate and nature emergencies.

4. In a Joint Policy Statement published in April 2024[1], the Scottish Government alongside the other UK Governments, committed to working together to introduce a UK-wide Deposit Return Scheme in October 2027. In November, the Welsh Government announced that they would not be proceeding with the four nation joint DRS process.[2] However, the Scottish Government alongside the UK Government and the Department of Agriculture, Environment and Rural Affairs (DAERA) in Northern Ireland, have agreed to proceed with DRS on a three-nation basis. The Scottish Government shares an ambition to increase recycling rates of single-use drinks containers to at least 90%, to significantly cut littering, and to expand opportunities to collect and reprocess high quality materials.

5. The main policy driver for the DRS legislation is to promote and secure an increase in recycling of materials, forming part of the Scottish Government's response to the global climate emergency by ensuring the targeted materials are collected in larger quantities and separately to other materials.

---

[1] Defra, 2024. Deposit Return Scheme for drinks containers: joint policy statement.
[2] Welsh Government, 2024. Written Statement: The Development of a Deposit Return Scheme for Wales.

6. The primary objectives of a DRS are:
   i. Reduce littering of drinks containers
   ii. Increase recycling rates of drinks containers
   iii. Increase the quality of recycled material to encourage closed loop recycling and circularity to ensure materials remain in use for as long as possible.

i. Reduce littering of drinks containers

7. A DRS targets consumers' behaviour rather than solely producers or delivery bodies. It instigates wider behaviour change which could have wider effects on society in terms of environmental awareness. A DRS adds a monetary value to the packaging of drinks containers which is proven to reduce littering of drinks containers in nations which have introduced a DRS.

8. The DRS will complement wider policy initiatives to tackle litter in Scotland. The National Litter and Flytipping Strategy[3] sets out a refreshed approach to tackling litter and flytipping in order to protect and enhance Scotland's environment; ensure safer and cleaner communities and contribute to a thriving circular economy for Scotland. The recent update in October, the National litter and flytipping strategy: update and year 2 action plan[4] sets our actions for the next year of the strategy. This includes rolling out an education programme nationally, targeted behaviour-based interventions and continuously improved data collection.

---

[3] The Scottish Government, 2023. National Litter and Flytipping Strategy.
[4] The Scottish Government, 2024. National litter and flytipping strategy: update and year 2 action plan.

ii. Increase recycling rates of drinks containers

9. It is estimated that the recycling rate for aluminium and steel cans in Scotland is around 74%, and 65% for polyethylene terephthalate (PET) plastic, including materials sorted from residual waste[5].

10. Scotland is committed to reducing the impact of plastic waste.[6] Scotland is a signatory to the Ellen MacArthur Foundation's New Plastics Economy global commitment[7] to end plastic pollution, both as part of the wider UK and also in its own right as the Scottish Government.

iii. Increase the quality of recycled material to encourage closed loop recycling and circularity to ensure materials remain in use for as long as possible

11. A DRS will ensure that material collected is of a high enough quality to be reprocessed. If drinks containers are returned that do not meet the required quality (i.e. they were contaminated or were not empty) they will not be accepted. This would be the case for both Reverse Vending Machines (RVMs) and manual return points. The consumer would risk losing their deposit until the drinks container was presented meeting quality standards. Therefore, consumers are incentivised to return high quality materials.

12. A DRS enables the separate sorting of drinks containers at source by material as opposed to being collected as part of kerbside services

[5] Zero Waste Scotland, 2024. DRS Material Recycling Update. Analysis suggests average recycling rates in Scotland for cans ~74% and for PET ~65%. Discounting materials sorted from residual waste, the recycling rate for cans is estimated to be 58%.
[6] The Scottish Government, 2024. Managing Waste: New plastics economy global commitment.
[7] Ellen MacArthur Foundation's New Plastics Economy global commitment.

where materials streams are often mixed. This will reduce the level of contamination from other materials and packaging types, and reduce the amount of recycling that is subsequently rejected.

13. A DRS will support Scotland’s resource efficiency and circular economy goals by increasing the quality and quantity of recycling for select single-use drink containers. In so doing, the DRS will contribute to the achievement of Scotland’s existing circular economy and waste policies and their targets, and will also help to reduce single-use drinks container litter in Scotland’s terrestrial and marine environments.

Directorate: Environment and Forestry
Division: Circular Economy
Team: Deposit Return

Final EQIA

14. Undertaking an Equalities Impact Assessment (EQIA) is an iterative process which has been conducted throughout the planning for a Deposit Return Scheme (DRS) in Scotland.

15. This final EQIA is the fourth iteration to be published as part of this process and builds on the previously published interim and full assessments.

16. An interim EQIA was published[8] as part of the Scottish Government's public consultation on the design of a DRS for single-use drinks containers which took place between 27 June and 25 September 2018. The interim EQIA provided preliminary and indicative insight into the risk of unintended equality impacts as a result of introducing DRS.

17. An independent analysis[9] of the consultation responses was completed by Griesbach & Associates and Jennifer Waterton Consultancy. This was published by the Scottish Government on 21 February 2019.

18. A full EQIA[10] was published in July 2019 as part of the launch of the preferred design for DRS. The full EQIA focused on some of the potential issues identified in the interim EQIA and considered what mitigations could be put in place to reduce these.

---

[8] The Scottish Government, 2018. A Deposit Return Scheme for Scotland, interim Equalities Impact Assessment.

[9] Griesbach & Associates and Jennifer Waterton Consultancy, 2019. Deposit Return Scheme Consultation: analysis of responses.

[10] The Scottish Government, 2019. A Deposit Return Scheme for Scotland - Equality Impact Assessment.

19. A further full EQIA was published alongside the final Deposit and Return Scheme for Scotland Regulations in 2020[11]. That EQIA did not identify additional equality impacts. Rather it provided information on the mitigating actions adopted and planned to address the potential equality impacts identified in the previous interim and full EQIA. This document should therefore be read in conjunction with the previous interim and full EQIAs, as together all documents constitute the complete EQIA for DRS in Scotland.

20. The previous iterations are expanded upon in this EQIA where relevant. This document will discuss relevant issues and mitigations which are relevant to the Deposit Return Scheme for Scotland Amendment Regulations 2025 and the Deposit and Return Scheme for Scotland (Designation of Scheme Administrator) Order 2025. This includes issues identified previously through earlier iterations, and expanding as required where changes agreed to the DRS design have the potential to further impact across the protected characteristics groups.

Executive summary

21. This Final Equality Impact Assessment (EQIA) has been carried out to identify potential impacts resulting from the introduction of a Deposit Return System in Scotland, and specifically the changes to DRS policy since the publication of the Joint Policy Statement[12] which are given effect to in the Deposit Return Scheme for Scotland

[11] The Scottish Government, 2020. A Deposit Return Scheme for Scotland. Final Equality Impact Assessment.
[12] Defra, 2024. Deposit Return Scheme for drinks containers: joint policy statement.

Amendment Regulations 2025 and the Deposit and Return Scheme for Scotland (Designation of Scheme Administrator) Order 2025.

22. Specifically, the EQIA considers impacts on equalities groups based on the three tests it is required to address:
    - Does this policy eliminate discrimination for each of the 9 protected characteristics (PCs). If not, is the discrimination justifiable? Can it be mitigated?
    - Does this policy advance equality of opportunity for PC groups?
    - Does this policy foster good community relations between people of PC groups?

23. In alignment with previous EQIA iterations, some impacts for those with protected characteristics remain relevant. Findings suggest some elements of the DRS legislation could have a negative impact on individuals included in the Age and Disability protected characteristic groups.

24. Other factors investigated in relation to other protected characteristics do not appear, at this stage, to raise significant equality-related issues. However, this will be kept under review once the scheme launches.

25. In 2018, when developing DRS policy, a variety of stakeholders were contacted to assess the impact of the policy for different groups of consumers. This included: meetings with representative

organisations, groups, and one-to-one interviews. Further detail can be found in the 2018 Interim Equalities Assessment.[13]

26. This final EQIA examines the key features of the scheme which are most likely to impact on public participation in DRS. Specifically, the accessibility and convenience of DRS for consumers who are reliant on online shopping are considered.

27. It is important to note that the protected characteristics are not independent of each other and some people may be affected by complex and interconnected issues related to disadvantage at any one time. It is also recognised that this intersectionality applies to those experiencing socio-economic disadvantage, as highlighted in the Fairer Scotland Duty Assessment (FSDA)[14] and those living in Island communities (ICIA).[15]

Background

28. The responsibility for waste and recycling is within devolved competence in Scotland. Deposit return schemes (DRSs) will be launched across the UK in October 2027, with one covering Scotland and another for England and Northern Ireland. The three governments are committed to delivering schemes that are interoperable, and as simple as possible for consumers and businesses, whilst achieving the economic and environmental goals of the policy. The three governments have agreed to jointly launch the DRSs in October 2027. The Welsh Government continues to develop

[13] The Scottish Government, 2018. A Deposit Return Scheme for Scotland, interim Equalities Impact Assessment.
[14] The Scottish Government, 2025. Fairer Scotland Duty Assessment.
[15] The Scottish Government, 2025. Island Communities Impact Assessment.

its approach to DRS.

29. The Scottish Government initially announced the design of a Scotland only DRS on 8 May 2019 and published draft Regulations on 10 September 2019.[16] The DRS design and Regulations were informed by extensive public consultation, international best practice and engagement with a broad range of stakeholders.

30. In order to move forward with a scheme in conjunction with other parts of the UK, some modification is required to the existing DRS legislation in Scotland. The main changes which impact directly on consumers are:

- Changing the launch date of the scheme from October 2025 to October 2027.
- Removing glass drinks containers from the scope of the scheme.
- Removing mandatory takeback services for scheme articles purchased online.
- Minimum size of container has increased to 150ml from 100ml.
- The scope of return point obligations on retailers is reduced. Groceries retailers must operate a return point at any retail premises in Scotland unless they have an exemption. They are automatically exempt if the retail premises of the groceries retailer has limited retail space (less then 100m2), and is situated in an urban area. A groceries retailer can apply for an exemption from operating a return point if there is an alternative return point within reasonable proximity; or on the grounds that the location, layout, size, design, or

[16] The Scottish Government, 2019. The Deposit and Return Scheme for Scotland Regulations 2020: accompanying statement and proposed regulations.

construction of the retail premises does not permit, or cannot reasonably be altered to permit, the operation of a return point.

- Designating the scheme administrator and giving it functions, including, setting the deposit level, which may be a variable or flat rate depending on the size of the container.

31. There is ongoing support for the introduction of DRS in the UK. In 2021 DEFRA published a consultation to examine the design of DRS in England, Wales and Northern Ireland.[17] Responses to this consultation continued to show support for the introduction of a DRS in the UK. Supporting those consultation findings, a polling exercise by TOMRA Collection in 2024 also highlighted strong support for the introduction of DRS across the UK.[18]

Final Scheme Design

32. The scheme will include plastic bottles made from PET plastic (the most common type of plastic bottle for products such as fizzy drinks and bottled water), aluminium and steel cans. These will be ‘scheme articles’.

33. The final scheme design enables consumers to take the containers from scheme articles back to, and redeem their deposit from, registered return points.

[17] Defra, 2021. Introducing a Deposit Return Scheme in England, Wales and Northern Ireland.
[18] TOMRA Collection, 2024. Polling shows strong UK public support for deposit return scheme roll out.

34. Return points can choose to install reverse vending machines (RVMs) to drinks containers and return deposits. Alternatively, they will have the option to collect drinks containers manually.

35. Return points will not be required to accept drinks containers that are broken, soiled or not empty. Where a retailer does not sell a type of drink due to religious belief, they will not be required to accept the return of such drinks containers.

36. Businesses that sell drinks to be opened and consumed on-site only, such as pubs and restaurants, do not have to charge the deposit to their customers and will only be required to retain the scheme articles sold for consumption on the premises of sale for collection by the SA.

37. As part of the Joint Policy Statement, the three nations agreed to move forward with a DRS which does not include a mandatory requirement for retailers selling drinks online to provide a takeback service for containers. Deposits will be applied to online purchases of scheme containers.

The Scope of the EQIA

38. As with previous iterations of the EQIA for DRS, this EQIA assessed the impact of DRS on protected characteristic groups. In particular, this EQIA focusses on the impact from the amendments to existing DRS policy which are given effect to in the Deposit Return Scheme for Scotland Amendment Regulations 2025 and the Deposit and Return Scheme for Scotland (Designation of Scheme Administrator) Order 2025. This includes removing the mandatory requirement for larger retailers selling drinks online to provide a takeback service for

containers.

39. Building on each previous EQIA iteration, further work was undertaken to ensure relevant research and data was updated and findings from relevant consultations were taken into account.[19] Ongoing and previous stakeholder engagement considerations have also considered throughout the development of the DRS, supporting Scottish Government policy decisions for the forthcoming DRS design.

Key Findings

40. A limited number of impacts have been continuously identified throughout the iterative EQIA process from the initial interim EQIA in 2018. These have been discussed and addressed in-depth in the previous EQIA iterations.

41. As part of this EQIA, some negative impacts have been identified by the amendments being made to existing DRS policy, on the following protected characteristics: disability and age.

42. In particular, the removal of the obligation for some larger retailers to provide online takeback is likely to impact on disabled and older individuals, including those who may rely on online food deliveries.

43. Other factors investigated in relation to the additional protected characteristics do not appear, at this stage, to raise significant equality-related issues. This may be due to a lack of available

[19] This includes the 2018 Deposit Return Scheme for Scotland Consultation, along with those on behalf of the UK, Welsh and Northern Ireland Governments.

published information and the individual circumstances of those impacted. The Scottish Government will continue stakeholder engagement with relevant representative groups, as DRS policy progresses to ensure we are informed of any unforeseen impacts.

44. In addition to the impacts considered, it is important to note that the protected characteristics considered within this EQIA are not independent of each other. Some people may have to deal with complex and interconnected issues.

Takeback: Accessibility and convenience of consumers participating in the scheme.

45. AGE. Aligning with previous EQIAs, a primary concern for older people is in regard to accessibility and convenience of return point locations.

46. Not all consumers will be able to access a return point, as some rely on online food shopping. Online shopping has increased in recent years with online grocery shopping accounting for 13.1% of all grocery sales. In 2022 30.3% of consumers were found to do some level of online grocery shopping.[20] This is projected to increase in coming years with ~25% across all age groups estimating they will do most of their grocery shopping online; however, it is not clear if this will be delivered or click and collect. In total 60% of those surveyed stated they purchase beverages online as part of their grocery shopping, and it is likely drinks containers within the scope of DRS will be included in such purchases.

[20] Spryker, Appinio, 2022. The Complete Guide to Online Food Retailing in the UK: 2022 and Beyond.

47. As there is no longer a mandatory requirement for takeback of any drinks containers bought online, older people may be more affected. In particular, those with less mobility and/or long-term health conditions that rely on online food deliveries or other distance sales may have more limited ability to return containers in person and as such may be unable to redeem their deposits.

48. In the UK one in five (19%) of people aged 80-84 say they have difficulty shopping for groceries.[21] Reasons include difficulty getting to food shops, accessibility instore, lack of adequate rest facilities, and difficulty carrying goods to and from the supermarket. It is reasonable to assume the same would be the case for returns, therefore some older people may struggle to return drinks containers to return points.

49. Average equivalised household disposable income across the UK by age group of the chief household economic supporter (CES) for 2021/22 was lowest in the 16-24 age group (£27,596 per year).[22] Disposable income for other age groups ranges from £31,085 (65+) to £40,926 (25-34). This shows that the youngest and oldest are most likely to have the least disposable income, and may be at higher risk of being impacted if they cannot physically return their containers and redeem their deposits. This also relates to lower income and associated issues which are discussed further in the accompanying Fairer Scotland Assessment.[23]

---

[21] Age UK accessed November 2024. Help with Shopping.
[22] Office for National Statistics, 2022. FOI request. Household disposable income by age group 2022.
[23] The Scottish Government, 2025. Fairer Scotland Duty Assessment.

50. DISABILITY. In Scotland, an estimated that 27% of the population has a long-term physical or mental health condition[24] (1.5 million people) in 2022-23. This is above the UK average of 24%.

51. It is reasonable to consider there may be some disabled individuals with certain conditions which limit their ability to access return points with their empty containers.[25] As such, they will be at higher risk of not being able to redeem their deposits.

Mitigations Considered

52. Mandatory takeback obligation. The DRS legislation will no longer contain an obligation for retailers to provide takeback services if they sell drinks online. This means that there is no longer a formal mitigation within the DRS legislation against the risk that consumers that are reliant on distance sales and unable to access a return point will be able to reclaim their deposits.

53. Most retailers of drinks and their representative organisations operating in Scotland have consistently raised concerns about the requirement to operate a mandatory takeback service under the Deposit and Return Scheme for Scotland Regulations 2020. Retailers have advised that the costs of developing and operating a mandatory service could be disproportionate and could result in certain grocery items, including but not limited to drinks within the scope of the DRS, being withdrawn from online sales.

---

[24] Department for Work and Pensions, accessed November 2024. Family Resources Survey, financial year 2022-2023, United Kingdom.
[25] Systra on behalf of Defra, 2021. Defra DRS Research Full Report Final with appendices.

54. There is therefore a high risk that inclusion of a mandatory takeback obligation within DRS legislation, as an approach to mitigating any potential impact of the scheme upon those reliant on distance grocery sales, could have the unintended consequence of restricting access to online grocery items. This would negatively impact all consumers in Scotland, including those with protected characteristics.

55. The risk that grocery sales, or at least drink sales, could be withdrawn was considered low in previous impact assessments since there was an expectation that a takeback service would be mandatory across the UK. The 2023 Government Response on Introducing a Deposit Return Scheme for drinks containers in England, Wales and Northern Ireland[26] stated an intention to "Ensuring a takeback service is offered in respect of online purchases, particularly by large online grocery retailers, from day 1".

56. However, the risk that some or all distance grocery sales could be restricted or withdrawn in Scotland increased following confirmation that the equivalent DRS Regulations in England and Northern Ireland do not include any provisions on mandatory takeback of scheme articles purchased online. This was a material change since the development and publication of our previous EQIAs. Continuation of the obligation in the DRS legislation would have required retailers selling scheme articles online to develop a takeback service in Scotland only; given previous concerns expressed by retailers about the mandatory takeback service requirements it seems unlikely that

[26] Defra, 2023. Introducing a Deposit Return Scheme for drinks containers in England, Wales and Northern Ireland.

this service could be provided in Scotland only, which increases the risk of retailers withdrawing online drinks sales instead.

57. Voluntary services. There is scope for takeback services to be developed and provided on a voluntary basis. The amended provision in the DRS legislation allows for any person to apply to the SA to be registered to provide takeback services. This could be an individual, a retailer, a third sector organisation, or the SA could provide such a service themselves.

58. This may mitigate the risk that consumers are unable to reclaim their deposits, but will be dependent upon action taken by persons or businesses voluntarily.

59. Mandatory takeback is not a requirement of existing Deposit Return Schemes which operate in other countries, and remains a relatively rare service, even with the most established DRS schemes in Europe. Those takeback services that do exist, for example Pantahemma in Sweden, are small scale and are not mandatory. They have been implemented to answer growing consumer demand from those who shop online[27]. Currently, there is not a proof-of-concept model of a successful and large-scale takeback service.

60. Scheme Administrator support. The scheme administrator will be providing a service to the public, and is therefore prohibited from discriminating based on protected characteristics and must make reasonable adjustments (s29 Equality Act 2010[28]). Takeback may be an important tool for the SA to improve accessibility and meet legal

[27] Pantamera, Press Release.
[28] Equality Act 2010.

collection targets. The success of a DRS, and viability of the SA, is dependent upon consumers being able to return scheme packaging.

61. While there is no obligation upon the SA to provide takeback, the SA application process required any SA candidate to detail how it would support accessibility requirements. This included how the candidate would consider the collection and return of in-scope containers for consumers with accessibility requirements and how they would consult with stakeholders regarding DRS accessibility.

62. The SA candidate also had to detail how accessibility considerations will be captured in guidance provided to return point operators. This included wheelchair access to reverse vending machines and / or kiosks containing return points and the provision of manual returns support for those unable to access main return points.

63. The proposed designated SA candidate for DRS in Scotland, UK Deposit Management Organisation Limited, has committed in its application to continuous improvement in ensuring equality of access of the DRS. This includes engagement with disability advocacy groups to understand any additional needs and incorporate their feedback into the scheme. By prioritising accessibility and inclusivity, the SA is aiming to create a DRS that is equitable and beneficial for all members of society.

64. The SA has also committed to supporting retailers and other stakeholders who wish to offer takeback services, particularly where it will maximise the return of drinks containers from consumers with accessibility requirements. This could involve home collection services, where empty containers can be collected from homes of

individuals who are unable to visit return points. It will be for the SA to determine the exact terms of each registered takeback service.

65. The SA candidate will consider encouraging community collection points which could provide accessible locations for returns and increase return rates for consumers. These have proved popular with consumers taking part in the scheme in the Republic of Ireland.

66. Return points. The DRS Regulations require that groceries retailers such as supermarkets and convenience stores host a return point unless they are in urban areas and the shop premises are smaller than 100m2. However, any groceries retailer which is not automatically exempt can also apply to the SA to be granted an exemption from operating a return point if they meet certain criteria.

67. This will ensure that there will be an effective network of return points. The DMO will be required to ensure that there are enough return points in rural areas. The proposed designated SA candidate has committed to designing a DRS that properly serves the rural and island communities in Scotland, creating a flexible, accessible and community-focused system.

68. There will be no time limit on returning containers, so this will also support consumers who cannot regularly access a return point to redeem their deposit.

69. The SA will also work with retailers on return point functions, particularly regarding the specifications of manual return points and RVMs. It is in their interest to ensure return points are widely available to support their efforts to meet the legal collection targets for

empty containers. The SA will also consider how the usability of the machines to ensure the needs of all consumers are catered for.

Recommendations and Conclusion

70. It has been identified that some elements of DRS legislation could have a negative impact on older and disabled individuals. This would apply particularly to individuals that are significantly housebound and /or rely on online grocery deliveries.

71. Without the previous mitigation provided for within DRS Regulations of a mandatory online takeback service for containers, there is increased risk that these individuals may not be able to redeem their deposits.

72. Some partial mitigations are in place to reduce the likelihood of this risk, including the provisions to allow organisations to register with the SA to provide a takeback service, as well as requirements through the SA application process and operational plan to ensure accessibility, and ensuring a comprehensive network of return points.

73. However, this risk cannot be fully mitigated in the absence of a mandatory takeback obligation, meaning that older and disabled consumers may be disproportionately impacted by the scheme.

74. This risk must be balanced against the risk that a mandatory takeback obligation may increase the risk that some online grocery sales are withdrawn in Scotland, restricting access for older and disabled consumers that rely on grocery deliveries.

75. The approach taken to managing the accessibility risks associated with distance sales is in line with international deposit return schemes. No existing DRS includes a mandatory takeback service, and there is not a proof-of-concept model of a successful takeback service on the scale that would be required across the UK.

76. The Scottish Government will continue to work with the SA as they develop their operational plan, including its progress towards takeback services for those who cannot physically access a return point.

77. It is important to recognise that there will also be positive impacts across Scotland from the introduction of a DRS. While not applicable to just the Protected Characteristics Groups, they will be of potential benefit to those individuals as much as others. Outlined more fully in the interim EQIA[29], these include an increase in the number of drinks containers recycled, reduction in litter and potential job creation opportunities through the collection and reprocessing of the returned containers.

78. The Scottish Government along with the UK Government and DAERA will monitor the implementation and delivery of DRS under the three-nation DRS Project Board. We will use this as mechanism to monitor and review this EQIA and the impact on Protected Characteristics Groups.

[29] The Scottish Government, 2018. A Deposit Return Scheme for Scotland, interim Equalities Impact Assessment.

79. If issues arise as part of the implementation and delivery of the scheme, these will also be considered from an equality perspective using the data and evidence available at any given point.

80. The three governments have committed to keeping takeback services under review to ensure that consumers are not adversely impacted. This includes the option to re-introduce mandatory takeback, if insufficient takeback services or alternative measures are available for consumers who cannot physically access return points. We will work alongside Scottish Government Equality colleagues as we progress this work to align with wider Scottish Government strategies that embed accessibility in service design.

81. There is also a statutory duty to review the DRS within five years of its launch. The EQIA will be maintained as necessary to support any review, or future policy changes to the scheme, to evaluate the impact of the scheme on those with protected characteristics.

Scottish Government
Riaghaltas na h-Alba

This publication is available at **www.gov.scot**

Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-83691-580-5 (web only)

Published by The Scottish Government, May 2025

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1578974 (05/25)