



Merton CIL's response to the consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

March 2019

Acknowledgements

We would like to thank the members of Merton CIL's Craftivism and Chat group who discussed the consultation at their meeting in February 2019.

Summary response

This is Merton CIL's response to the consultation by the Department for Environment Food and Rural Affairs (DEFRA) on the introduction of a deposit return for bottles and other packaging for drinks including plastic cups, cans and potentially cartons and sachets. We refer to bottles in this response but are comments relate to everything covered by the proposed scheme.

The scheme would introduce an additional cost on bottled drinks as a deposit that would be paid back to the customer when they return the bottle.

The consultation document is online at

https://consult.defra.gov.uk/environment/introducing-a-deposit-return-scheme/supporting_documents/depositreturnconsultdoc.pdf

Further information is available here:

<https://consult.defra.gov.uk/environment/introducing-a-deposit-return-scheme/>

We welcome the general principle that the deposit return scheme should be as equitable as possible to groups including Disabled people.

However, we believe there will be difficulties with achieving this and the scheme will have a greater impact on the lives of Disabled people than those of the general population.

The reasons for this are outlined below.

Background

About Merton CIL

Merton CIL is a pan-Disability user-led Deaf and Disabled People's Organisation which has been supporting Deaf and Disabled People in the borough for over 10 years. We work with people with all types of impairment including physical impairments, sensory impairments, mental health service users, people with learning difficulties and people with chronic illness or long-term ill-health. Many of our service users have more than one impairment, and many are also carers and/or parents. Deaf and Disabled People don't have to be members to use our services but we do have an ever-growing membership who shape our direction and focus as an organisation. At the time of writing, we have 317 members.

Our advice and advocacy service worked with 332 people last year, providing 1,592 sessions of advice on a range of issues including social care, benefits, housing and hate crime. Many of the service users we support experience problems with a range of issues that are often interlinked. We reached 1,641 people through events and outreach, and 2,225 people followed us across our social media platforms.

While Merton CIL's main role is to provide advice and advocacy support for individuals, we also engage with local consultation and co-production by responding to initiatives like this consultation. Many of our consultation responses are focussed on issues to do with access and inclusion.

National context: Disabled People experience multiple inequalities

Disabled People are facing disadvantage and inequality across key areas of our lives¹, and are experiencing health inequalities as a consequence².

In particular, Disabled People are disproportionately impacted by the policies of welfare reform, with social care users particularly affected by

¹ The Equality Act 2010: The Impact on Disabled People, House of Lords Select Committee on the Equality Act 2010 and Disability, 2016

² Is Britain Fairer? Equalities and Human Rights Commission, 2015

the cumulative impact of benefit cuts and social care cuts.³ Barriers to employment, accessing the community, hardship and homelessness follow.⁴

Disabled people have poorer health and lower life expectancy,⁵ and perceived discrimination is associated with an increased likelihood of psychological distress.⁶

Laws and regulations already in place to support disabled people, such as the Equality Act 2010, and the United Nations Convention on the Rights of People with Disabilities (UNCRPD), are not being effectively adhered to^{7,8}.

In fact, Deaf and Disabled people are disadvantaged across multiple areas of our lives including:

- **Education:** Higher numbers of Disabled People with no qualifications, low qualifications and restricted learning opportunities
- **Employment:** Disabled People face multiple barriers to employment
- **Transport:** One in five Disabled People have difficulty using transport⁹ and cuts to concessionary fares and local public transport services are leaving some Disabled People isolated and unable to travel as and when they need.
- **Environment:** Lack of accessible buildings and changes to city street scenes such as shared surfaces impact Disabled People's

³<https://www.equalityhumanrights.com/sites/default/files/cumulative-impact-assessment-report.pdf>

⁴ Evidence of Breaches of Disabled People's Rights Under the UN Convention on the Rights of Persons with Disabilities, Inclusion London, 2015

⁵ Is Britain Fairer? Equalities and Human Rights Commission, 2015

⁶ Perceived Discrimination and Psychological Distress in Sweden, S Wamala, G Bostro, K Nyqvist, British Journal of Psychiatry, 2004

⁷ The Equality Act 2010: The Impact on Disabled People, House of Lords Select Committee on the Equality Act 2010 and Disability, 2016

⁸ Dignity and Opportunity for All: Securing the Rights of Disabled People in the Austerity Area, Just Fair, 2014

⁹ Implementation of the Right of Disabled People to Independent Living, House of Lords House of Commons Joint Committee on Human Rights, Twenty-third Report of Session, 2010–12, p. 59

ability to access goods, services, civic centres, justice and the wider community.

- **Information:** Disabled People are less likely to be accessing the internet and inaccessible information in other formats can impact people's access to information, healthcare, etc
- **Benefits:** The welfare benefit reforms that the government brought in through the Welfare Reform Act 2012 are having a significant and disproportionate negative impact on Disabled People¹⁰
- **Poverty:** Key poverty metrics for Disabled People are high and increasing¹¹
- **Housing:** There has been a sharp rise in the number Disabled People who have been experiencing evictions and homelessness because of rent arrears either when housing benefit has been stopped due to sanctions, or housing benefit has not been granted because a Disabled Person has found 'fit for work' after a WCA¹²
- **Public attitudes and safety:** Disabled People are more likely to be victims of crime and Hate Crime has been identified as a serious issue affecting Disabled People. The benefits scrounger rhetoric perpetuated by the media and government has been identified as one of the drivers of this issue.¹³
- **Civic participation:** Disabled People, some ethnic minorities and people aged 75 and over were less likely than others to perceive that they could influence local decisions.¹⁴
- **Health:** In England, the proportion of Disabled People who reported bad or very bad health increased between 2008 and 2012, whereas there was a reduction for non-disabled people.¹⁵

¹⁰ Evidence of Breaches of Disabled People's Rights Under the UN Convention on the Rights of Persons with Disabilities, Inclusion London, 2015, p. 13

¹¹ Evidence of Breaches of Disabled People's Rights Under the UN Convention on the Rights of Persons with Disabilities, Inclusion London, 2015, p. 12

¹² Evidence of Breaches of Disabled People's Rights Under the UN Convention on the Rights of Persons with Disabilities, Inclusion London, 2015, p. 17

¹³ Implementation of the Right of Disabled People to Independent Living, House of Lords House of Commons Joint Committee on Human Rights, Twenty-third Report of Session, 2010–12, p. 60

¹⁴ Is Britain Fairer? Equalities and Human Rights Commission, 2015, p. 7

¹⁵ Is Britain Fairer? Equalities and Human Rights Commission, 2015, p. 51

Disabled People have lower life expectancies¹⁶ and are experiencing declining mental health because they had lost support services¹⁷ and/or the stress caused by benefit assessment processes.¹⁸

All of these factors have informed our response to the consultation and our understanding of the factors which might impact Disabled People if deposit return schemes are implemented.

Consultation Response

Options to have deposits on all bottles or just 'on the go' bottles

The consultation document sets out two main ways for the scheme to work. The first would be to apply it to all bottles including bottles bought for use in the home, with milk bottles being the only exception. The second option is to apply it to 'on the go' bottles that are bought for drinks outside the home. The proposed size for this is bottles of less than 750ml.

The option for the deposit scheme to apply to all bottles, including those used at home, raises particular concerns about the impact on Disabled people.

Merton CIL's members already report experiencing difficulties with recycling at home.

"I feel like I'm an unpaid refuse collector."

It is common sense that anyone needing support with independent living will need assistance with an activity like recycling. But while people are being expected to do more to recycle, Merton CIL's evidence shows that Disabled people are getting less support with independent living.¹⁹

¹⁶ Is Britain Fairer? Equalities and Human Rights Commission, 2015, p. 52

¹⁷ Evidence of Breaches of Disabled People's Rights Under the UN Convention on the Rights of Persons with Disabilities, Inclusion London, 2015, p. 8

¹⁸ Evidence of Breaches of Disabled People's Rights Under the UN Convention on the Rights of Persons with Disabilities, Inclusion London, 2015, P. 15

¹⁹<https://www.mertoncil.org.uk/a/36664810-36928722>

With support for Disabled people to live independently already extremely stretched in most places, sorting out bottles and then going to collect the deposit adds a further task for carers and personal assistants who are already overstretched and under pressure.

Where people have help with shopping, either from formal service providers or from unpaid carers such as family members or friends, the collection and return of bottles will add a complication to the process which means it is unlikely to happen.

Many of our members also have limited space in their housing and will find it difficult to store bottles for later return.

We believe it is very likely that this will mean many Disabled people will be paying the higher prices for bottles and not be able to recover the deposits on some and possibly all of the bottles they use.

This means they will be left out-of-pocket and be disproportionately affected financially by the proposed scheme in comparison to the general population. Bottles can already easily be placed in domestic, kerbside recycling at present and the 'all in' option will penalise people who do this.

The 'on the go' option appears to have less impact on Disabled people, subject to access issues being addressed.

Bottle return arrangements

We welcome the attention given to ensuring the bottle arrangements will be as accessible as possible to everyone including Disabled people. However, we believe it will be difficult to achieve full accessibility for Disabled people.

We showed videos of reverse vending machines on Youtube to a group of our members and all the machines we looked at posed access problems.

This included the height of the machines being out of reach and the controls appearing difficult for people with impaired dexterity and people with visual impairments.

For example:



<https://www.youtube.com/watch?v=k3wPkkmh2Q4>



<https://www.youtube.com/watch?v=7cAqoe8kM3Q>

It should be possible to address these issues through the technology that is introduced but it is concerning that there is little evidence of this happening where similar schemes already operate.

There are other proposed options such as returning bottles to shops. This is likely to present other access barriers for Disabled people. While the shop where the person buys the bottle is obviously accessible to that person, they may not have the options to return it there, and collecting their deposit from other retailers may be less accessible. In particular, the consultation makes several references to returns being made through small shops but these can have particularly limited access.

The additional task of returning a bottle may also be more than a matter of inconvenience for a Disabled person who has an impairment impacting levels of fatigue, or who has limited hours of support available.

Return of the deposit

The consultation sets out several options for how deposits will be returned to people, including vouchers, smartphone apps, debit cards and cash.

We believe that there should always be a cash option. The recent Access to Cash review²⁰ highlighted that Disabled people are a significant portion of the 47% of people who they identified as still needing to use cash because of difficulties with cashless methods. Reasons for this include difficulties with using smartphones or needing to be able to give cash to a carer to do shopping.

This is not to say that cashless methods would be inaccessible to all Disabled people. Using a contactless debit card can be easier than using cash for some Disabled people, so having a variety of options will be key.

Conclusions

We would encourage the Department to give careful consideration of the potential financial impact of the deposit return scheme on Disabled people. We have particular concerns about the option to include all bottles as this will be more difficult for people who need support with independent living, than existing home/kerbside collections are.

The systems used for collecting bottles must also be made accessible and include an option to have deposits returned in cash.

²⁰ <https://www.accesstocash.org.uk/media/1087/final-report-final-web.pdf>