



July 2019

## Girlguiding response to Deposit Return Scheme consultation

### About you

1. Would you like your response to be confidential? No

2. What is your name?

Alex Webber

3. What is your email address?

Alex.webber@girlguiding.org.uk

4. Please provide information about the organisation/business you represent. Which of the following best describes you? • Charity

What is the name of the organisation/business you represent? (Required. If you are responding on behalf of yourself please write 'individual')

Girlguiding

What is the approximate number of staff in your organisation? (If applicable)

250

5. Please provide any further information about your organisation or business activities that you think might help us put your answers in context. (Optional)

### Girlguiding

Girlguiding is the leading charity for girls and young women in the UK, with over 500,000 members. Thanks to the dedication and support of 100,000 amazing volunteers, we are active in every part of the UK, giving girls and young women a space where they can be themselves, have fun, build brilliant friendships, gain valuable life skills and make a positive difference to their lives and their communities. We build girls' confidence and raise their aspirations. We give them the chance to discover their full potential and encourage them to be a powerful force for good. We give them a space to have fun. We run Rainbows (5-7 years), Brownies (7-10 years), Guides (10-14 years) and Rangers/ The Senior Section (14-25 years). Registered Charity No. 306016. [www.girlguiding.org.uk](http://www.girlguiding.org.uk)

### Future Girl and the environment and plastics

In 2018, we launched our Future Girl consultation with our members, which had over 76,000 responses from girls and 16,000 from adult leaders on a range of issues that matter to girls and young women and changes they want to see for the future.

Our consultation showed that one of the top issues girls cared about was protecting the environment and reducing plastic use. Top issues for them included:

- Increasing recycling and reusing
- Stopping plastic pollution
- Tackling littering



July 2019

For example, 8,707 Rainbows (aged 5-7) and 16,645 Brownies (aged 7-10) chose 'people caring about the environment and recycling' as a top issue that's important to them. This also came up as an important issue for our Guides (aged 10-14) and Rangers / Senior Section members (aged 14-25).

And 34,376 Brownies said they want to live in a world where people care about the environment and recycling.

*"If you recycle it, it doesn't go in the sea and hurt animals." (Brownie)*

*"Plastic waste is choking our planet and we should stop it." (Brownie)*

*"I learnt that by 2060 there will be more rubbish than fish in the sea." (Brownie)*

Girls have been learning about protecting the environment and the dangers of plastic waste through activities in their units.

*"Our girls took this very seriously - we had skipping ropes tied around a dolphin (Brownie) to demonstrate how plastic can be lethal in the oceans." (Brownie leader)*

### **Involving young people**

Our response also includes quotes from our Advocate youth panel. Our Advocates are a group of 18 Girlguiding members aged 14 to 25 who lead the direction of Girlguiding's advocacy and research.

*"The Government should listen to young women's views on protecting the environment as it is our future which is in danger. We are growing up in a world which should hold many opportunities for us but instead these are being taken away from us. Young people care deeply about the environment and actively speak out about this as we want our future and those of future generations protected." (Isla, Advocate, 19)*

*"The longer we ignore girls and young women the more we tell them their voices don't matter; these are the young women of tomorrow, the young women who will shape the future and change the world but they can only do it if there's a world to change." (Abi, Advocate, 18)*

*"We have been told the fate of the environment rests on our generation, and yet the focus always seems to be on the future. Young people want action now. Plastic pollution and environmental disasters are happening now, and young people want to see change being made." (Emily, Advocate, 16)*

*"Young people... are the future generation who are most likely to be affected by problems facing the environment. As we have grown up with the ideas of recycling and reducing plastic young little things that can be done to help the environment are a normal part of everyday life for many young people." (Kate, Advocate, 19)*



July 2019

**6. Does your organisation have any recent experience of a DRS or related policy schemes? If so, can you please briefly explain your experiences?**

**7. Are you content for the UK government, or in Wales, the Welsh Government, or in Northern Ireland, DAERA to contact you again in relation to this consultation?**

Yes

**33. Which of the following should be obligated to host a return point?**

- a. Retailers who sell drinks containers in scope
- b. Transport hubs
- c. Leisure centres
- d. Event venues
- f. Other (please specify)

**Please briefly state the reasons for your response. Where available, please share evidence to support your view**

We agree that all of these would be good places to host return points - but there are other places that need to be considered to ensure that young people can utilise this scheme and not be excluded from it - such as shops on the way to schools, schools and other education settings, shopping centres, parks and other places young people are likely to be. These should be considered to make the scheme as easy to use as possible and with the best chance of success in terms of take up among young people. Such places should receive support from the scheme so they are not out of pocket from the set up and maintenance costs of hosting a deposit return box. Deposit return points should be accessible to young people and people with barriers to access - e.g. disability and financial exclusion - and the places they are located should reflect their needs and experiences.

To make sure return points are located where young people would use them, consultation with young people needs to happen - as, so far, their voices have not been heard in the development of this policy.

There has not been enough time allowed for us to meaningfully engage with our wider membership (beyond the youth panel members who have provided some of their views) on this issue but we will be doing this and we welcome the opportunity to share this information with you. We would also like to see the Government run a full consultation with young people on this policy.

As you can see, plastic reduction is extremely important to our members and they should have their chance to shape the policies that affect them:



July 2019

*“Reducing plastic is important to me because there are many products that I don’t believe need to be in plastic packaging - for example many fruit and vegetables - and by not selling them in plastic will also make the food products last longer as many sweat in plastic so as well as reducing plastic it will also reduce food waste.” (Kate, Advocate, 19)*

*“Reducing plastic is so important as it causes so much damage to beautiful places. I have seen this locally such as in the parks in our town but also on a much bigger scale. There were beaches and towns when I was travelling abroad ruined by plastic washing up on their shores, plastic that wasn’t always from there but had ended up there. It’s also devastating to see animals suffering from our mess such as birds and sea creatures eating and being caught in plastic. We are not only ruining our home but the homes of other creatures too.” (Isla, Advocate, 19)*

**34. What might the impacts be on those hosting: (a) Reverse vending machines? Where available, please share evidence to support your view. (b) Manual return points? Where available, please share evidence to support your view.**

As discussed in our response to the previous question, to make sure deposit return boxes are located in the wide range of places that would make the scheme more accessible to young people, it’s important that different potential hosting locations (such as schools and colleges) get funding and support from the scheme so they are not negatively affected by taking part and the opportunity to address young people’s concerns isn’t missed.

**36. Is there a de minimis level under which businesses who sell drinks in scope should be exempt?**  
I don’t have enough information

**Please briefly state the reasons for your response. Where available, please share evidence to support your view**

We don’t have a specific answer to this question but wanted to highlight it as an example of where the wording of this consultation (through the use of Latin phrases like ‘de minimis’ without definition) is inaccessible and is a barrier which could stop young people - and many others - from giving their views. To include young people and a range of people across society and engage them in the scheme, it’s important that communications about it are clear and accessible.

**40. For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund?**



July 2019

A deposit return scheme should be inclusive of everyone, including those with disabilities, and should be accessible and easy to use so that it meets people's needs.

As discussed in our response to question 33, deposit return boxes should be in place at a range of locations where young people are likely to be. Members of our youth panels told us that these should be easy to find and should be in places where they can use them independently (without help from their parents or other adults). As a major aim of the scheme is to change behaviours, we think engaging young people is particularly important, so they use the scheme - and other recycling methods like it - throughout their lives. As discussed, to meaningfully include and engage people in the scheme, specific action should be taken to involve young people through its development and implementation and all communications (from this consultation to advertising to instructions on how to return items) should be clear and accessible. We recommend working with ourselves and other youth organisations to support with engagement and testing communications with young people to ensure this happens.

Members of our youth panel told us about their personal experiences and why they feel recycling might be difficult for some young people:

*"My girls' school cannot recycle our plastic, as the cost is too huge through the council and otherwise. Many pupils take their plastic with them to recycle at home, but for some, this is not possible. No-one likes the situation, but there seems to be no alternative." (Emily, Advocate, 16)*

*"I have noticed it is hard to recycle when out and about some places. For example, you have to take plastic bottles home with you or just put them in general rubbish. Although I live in Leeds which has had a major push recently on providing recycling bins in the city centre which is amazing.*

*My sister has told me her university accommodation has recycling bins within the complex but individual flats and buildings do not, so therefore it isn't as easy to recycle. I have heard of people who also don't have any recycling in their privately rented accommodation. For young people who cannot drive yet or are not able to access a car, taking recycling to a recycling point such as at supermarkets can be a struggle and costs money on public transport." (Isla, Advocate, 19)*

*"Most young people attend school, college or university and this is where it is likely to be the most difficult for them to recycle because many of these places don't have any recycling bins or only a limited number. Whilst young people might want to recycle what they use in these places, it is difficult to do when the necessary facilities are not provided, and it is the decision of individual institutions as to what they provide." (Kate, Advocate, 19)*



July 2019

**41. What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities?**

Our youth panel members identified the different kinds of places that deposit return points could be located to make sure different kinds of areas have their needs met - e.g. urban and rural. Suggestions included outdoor spaces, such as parks and beaches (where a lack of bins - as opposed to a lack of knowledge or will to recycle - can lead to littering).

**46. Should there be an opportunity for retailers that don't stock drinks / those who may not be obligated to provide a return point to 'opt-in'? Yes No Neither I don't know / I don't have enough information**

**Please briefly state the reasons for your response. Where possible, please provide supporting information.**

Yes - and young people should be asked to identify which retailers they want to be part of this scheme.

As discussed, we believe it's important that deposit return points are available where young people are likely to be. As many of these - such as schools - may not sell items on a large scale or at all, opting in would be a positive way to involve them. They should be incentivised to take part and supported financially from the start, so they don't end up out of pocket by paying for any of the costs associated with hosting a box or point.

Members of our Advocate panel said how helpful it would be if there could be deposit return boxes next to vending machines, so that it's very easy and convenient to use them (as opposed to having to go and find one).

**52. How do you think deposits should be redeemed? Please tick all that apply.**

a. Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop-off points) b. Digitally (for example a digital transfer to a smartphone application) c. Cash d. Return to debit card e. Option to donate deposit to charity f. Other (please state) Please briefly state the reasons for your response. Where available, please share evidence to support your view.

We agree with all these options being used and think it's important that a wide range of ways to redeem deposits are used to meet people's different needs. For example, many - but not all - young people may prefer to use online methods and it's important to incentivise people to take part in the scheme as much as possible.



July 2019

**70. Based on the information above, and where relevant with reference to the associated costs and benefits outlined in our impact assessment (summarised below), which is your preferred DRS option? I don't know / I don't have enough information**

**Please state the reasons for your response. Where available, please share evidence to support your view**

Although we don't have enough information to fully answer this question, members of our Advocate panel suggested that the 'On the go' option could work best in terms of small bottles being easy and convenient to recycle. However, we would need to ask our wider membership, and we would like to see a wider group of young people consulted, before coming to a definite position on this.

**89. Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?**

Our main concern is that the scheme is accessible to children and young people and that they are included from the start. We'd be happy to work with the department to help make this happen. We're currently involved, through our membership in the British Youth Council, in supporting DCMS with the development of its youth panel so have experience of this and would want to see a similar model of including young people rolled out across Government departments.

We also noticed the point that a Deposit Return Scheme could initially have a negative impact on Local Authorities (due to 'good recycling' being recycled through the scheme rather than making money for the LA). We think it's important that the scheme considers ways to support and work with local recycling as this will have a positive impact on young people and communities.

Our youth panel members gave some further views about deposit return schemes. This included both positive feedback and their concerns about things that might stop them working effectively. Young people's concerns and suggestions should also be considered and addressed as part of this process.

*"I think a deposit return scheme will change the way plastic is viewed for the better. By giving people an incentive to recycle, it will encourage people to go out of their way to safely dispose of their plastic. The fun of returning bottles will ensure young children consider recycling in a positive light. Furthermore, the nation, especially young people, will be shown that change is happening, and that promises about the environment are being kept and acted on in real and hugely beneficial schemes." (Emily, Advocate, 16)*





July 2019

*“The idea is good and it has worked well in other countries as it provides a bigger incentive rather than just discarding recycling. I believe it would increase recycling as people would want the money back. However, there is a question on whether it would make that much of a difference as we have household recycling collected by the council and it is more convenient to recycle bottles at home than drive them to the deposit station. I have seen the scheme work really well at events rather than for household rubbish such as at Leeds festival where you get money for handing in cups and bottles back to the bar and lots of people do go around collecting them for money.” (Isla, Advocate, 19)*

Kate wasn't sure the scheme would incentivise people to participate and didn't want the scheme to replace the need to reduce the amount of plastic in products:

*“I am not sure... as people who already recycle will continue to do so with their home recycling systems and need no monetary reward for doing so. In addition, if there was less plastic in products or none at all we wouldn't need this scheme.” (Kate, Advocate, 19)*