

Accessibility Consultation for Re-turn, Ireland's Deposit Return Scheme (DRS)

Phase 1 and 2 Summary Report

O'Herlihy Access Consultancy

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Statement on Language

The findings in this report have been informed by information provided by Return, their stakeholders, cited references and the methods outlined. OHAC has relied on that information being accurate and up to date. The consultations were informed by the National Disability Authority's (NDA's) "Ethical Guidance for Research with Disabled People"¹ document and "Participation Matters - Guidelines on implementing the obligation to meaningfully engage with disabled people in public decision making."²

Reported results from stakeholders consulted reflect a perception of the approved representative sample of stakeholders. Any projection to the wider stakeholder group is subject to a level of bias in the method of sample selection. OHAC's role is advisory and not subject to standards issued by any regulatory body.

The report follows the NDA's guidance on disability-related language, "National Disability Authority Advice Paper on Disability Language and Terminology."³ It uses both "disabled people" and "people/persons with disabilities". "Disabled people" aligns with the social and human rights model of disability, recognising that societal barriers create disability. "People with disabilities" emphasises personhood first and is the term used in the UN Convention on the Rights of Persons with Disabilities. Some individuals prefer not to use either term.

Acronyms, Initialisms & Key Terms

Table 1: Acronyms and initialisms used in this report.

Abbreviation	Meaning
DPO	Disabled Person's Organisation
DRSI (CLG)	Deposit Return Scheme Ireland (Company Limited by Guarantee) – referred to as 'DRS' and or 'the scheme' in the report

¹ [Link to Ethical Guidance for Research with Disabled People](#)

² [Link to Participation Matters](#)

³ [Link to Advice Paper on Language and Terminology](#)

Abbreviation	Meaning
OHAC	O'Herlihy Access Consultancy
NDA	National Disability Authority
RVM	Reverse Vending Machine
S.I.	Statutory Instrument
UN	United Nations
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities

Table 2: Key Definitions of those involved with the DRS.

Term	Definition
Advisory Group	<p>As part of the overall good governance for the consultation process, Re-turn has established a DRS Advisory Group to provide support and advice to Re-turn and OHAC during the delivery of the consultation. This Advisory Group consists of members of disability representative organisations and Scheme stakeholders, including:</p> <ul style="list-style-type: none"> • Re-turn, as the approved scheme administrator. • The Department of the Climate, Energy and the Environment with responsibility for national policy and the governing legislative framework for DRS, and oversight of the approved body. • Retailers, direct point of contact with consumers at the point of purchase and point of return. • Producers, ultimately responsible for meeting the scheme performance objectives and for funding of the scheme. • Representatives from the Disabled Person's Organisation Network, the Disability Federation of Ireland, and the National Disability Authority.

Term	Definition
Consumer	Consumer is outlined as the person who is acting for purposes unrelated to the business or scheme.
Producer	Producer can be defined as any person, irrespective of the selling technique used, who is first to place in-scope drink containers on the market.
Retailer	Retailer means any person who for the purpose of trade or otherwise - in the course of business sells or otherwise supplies in-scope drink containers to a final consumer.
Distributor	Distributor can be defined as an agent who supplies the in-scope drink containers to retailers.
Community	Member of the community (e.g., Fundraisers, Clubs, Charities, Schools).
Manufacturers or RVM Suppliers	Manufacturers are defined in this report as organisations who supply RVM's (reverse vending machines). These are also known as RVM Suppliers.
Respondents	Disabled people who took part in the review process, regardless of whether it was via survey, focus group, semi-structured interview or in-store observation.
Re-turn	Scheme Administrator appointed by the Minister in July 2022 to implement the Deposit Return Scheme (DRS) in Ireland.

1 Introduction

1.1 Overview of the Deposit Return Scheme

Ireland's Deposit Return Scheme (DRS) is a national project introduced by the Department of the Environment, Climate and Communications to encourage recycling of single-use drink containers.

Re-turn is the not-for-profit, private company that administers the DRS in Ireland.

See the following link for further information about Re-turn and the DRS: [Link to Re-turn website](#).

Consumers may return containers at a retail store through the use of a Reverse Vending Machine (RVM). The RVM's scan and verify the containers before issuing a refund, in the form of a voucher. The voucher can be redeemed within stores, either against purchases or for cash.

1.2 Accessibility of the DRS

Following the launch of the DRS in Ireland in February 2024, Re-turn received feedback from the public describing barriers within the scheme that made it challenging for people with disabilities to use.

In response to the feedback received, and the advice and input of the Advisory Group, Re-turn engaged O'Herlihy Access Consultancy (OHAC) to help them better understand the challenges within the scheme for people with disabilities through an independent national consultation. OHAC is Ireland's leading consultancy in Accessibility, Disability Inclusion, Universal Design and specialist Accessibility Training. OHAC has a team of expert Access Consultants, with vast professional and lived experience, who worked with Re-turn to address the accessibility of the scheme in line with the OHAC mission to 'Make Everyday Life Fully Accessible'.

OHAC undertook an in-depth consultation process to understand the accessibility challenges of the DRS. There was an initial phase of consultation (Phase 1) that identified a range of barriers for further exploration. This report focusses on Phase 2, a collaborative consultation process with disabled people to achieve a detailed understanding of their lived experience of the DRS.

2 The Accessibility Consultation

The accessibility consultation sought to understand the barriers to accessing the DRS experienced by disabled people. The consultation adopted the Design Council's Double Diamond method, which emphasises the importance of understanding the problem deeply before jumping into solutions.

2.1 Demographic Context

In the 2022 Census 22% of the Irish population (over 1.1 million people) reported having experienced at least one long-lasting condition or difficulty.⁴ These included conditions such as:

- Blindness or partial sight (6% of the population).
- Deafness or hearing impairment (5%).
- Difficulty with basic physical activities (7%).
- Intellectual or cognitive disability (2%).
- Difficulty with learning, remembering or concentrating (5%).
- Psychological or emotional condition or mental health issue (5%).
- Difficulty with pain, breathing or any other chronic illness (9%).

Census figures do not capture everyone affected by disability. The true number is higher when including temporary disabilities and the impact of Ireland's ageing population. As people age, mobility often reduces due to conditions such as arthritis, weaker muscles, or stiff joints. Ireland's population aged 65+ is expected to grow from around 781,400 in 2022 to 1.81 million by 2057.⁵

Mobility can also be affected at different life stages or due to temporary circumstances. For example, pregnancy, injuries (like a broken leg or sprained ankle), or recovery from surgery can limit mobility for a period of time.

This data reinforces the importance of providing accessible solutions and ensuring the design of inclusive products.

2.2 Legislative Context

⁴ [Link to Disability Census of Population 2022 Profile 4 - Disability, Health and Carers](#)

⁵ [Link to Age Friendly Ireland's Article On The Central Statistics Office Statistics](#)

There are several national and international laws that protect people with disabilities from discrimination. This summary outlines key legislation influencing accessibility in Ireland, but it is not an exhaustive list and should not be taken as professional or legal advice.

The primary statute for the DRS is S.I. No. 33/2024 Separate Collection (Deposit Return Scheme) Regulations 2024, which requires retailers and return points to ensure that bottle and container return facilities are visible and easily accessible.

The Equal Status Acts 2000-2015 bans discrimination in goods and services. Service providers must make reasonable accommodations for people with disabilities so they can access services.

Workplaces must also meet accessibility needs under S.I. No. 299/2007 Safety, Health and Welfare at Work (General Application) Regulations 2007, supported by Health and Safety Authority guidance.

Internationally, the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) protects the human rights of disabled people across areas such as education, health, accessibility, employment, and transport.

The Building Control Act 1990–2007 and associated regulations require that buildings provide suitable access and use for all.

2.3 Multi-Stakeholder Engagement

The DRS involves multiple stakeholders including Government, Re-turn, producers, retailers, distributors, and RVM suppliers. Each stakeholder is subject to different requirements, but accessibility and inclusivity of the scheme will benefit from collaboration and pro-active engagement by all stakeholders with the ultimate aim of implementing improvements.

In addition to those involved in delivering the DRS, people with disabilities are essential stakeholders in efforts to improve its accessibility. Their active participation in identifying barriers and creating solutions is a key element to ensuring the scheme is inclusive and accessible.

3 Aim and Scope of the Accessibility Consultation

The aim and scope of the consultation were to:

1. identify the key accessibility and inclusion challenges experienced by people participating in the DRS.
2. collect data to depict the kinds of challenges faced by people with disabilities.
3. gather qualitative and quantitative data to inform subsequent phases of the wider project.

3.1 Steps Involved in The Consultation.

The consultation was approached in two phases.

Phase 1 focussed on:

- Assessing the range of possible challenges in accessing the DRS.
- Carry out site and RVM design assessments-
- Identifying key stakeholders to ensure that the engagement during Phase 2 considered them.

Phase 2 involved:

- More in-depth activity that built on the output of Phase 1.
- Conducting engagement sessions through two primary sources: a Survey and a Public Session Consultation Process.

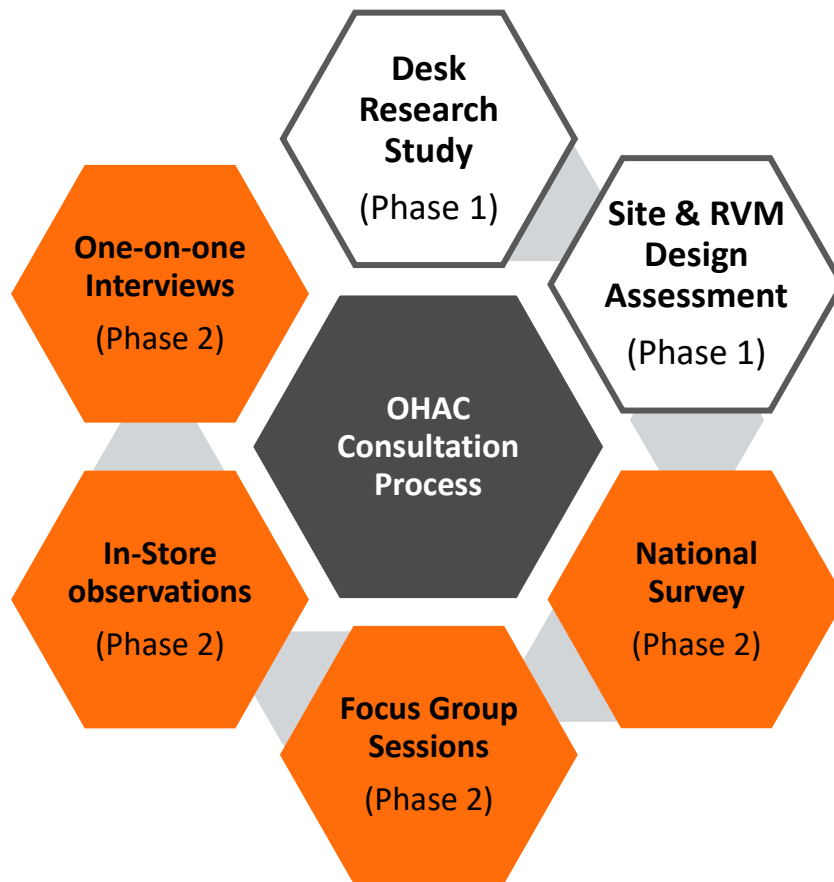


Figure 1: OHAC Consultation Process

3.2 Brief Summary of Phase 1

Phase 1 was the discovery phase of the consultation, involving OHAC gathering information to help understand the problem, rather than assuming an understanding of the accessibility challenges in the DRS. This involved desk-based research, assessing against best practice guidance and international standards, as well as field research assessing the accessibility of the DRS in situ and the RVM design. Also, during Phase 1, key stakeholders were identified for engagement in Phase 2.

3.3 Phase 2

Phase 2, which is the focus of this report, built on the outputs of Phase 1 and formed the basis for Re-turn's understanding of the accessibility challenges of the DRS.

3.3.1 Overview of Phase 2 Consultation Process

Phase 2 involved seeking the insights and experiences of disabled people through two primary sources, a survey and a public session consultation process.

Survey Consultation process:

- The survey was available online in standard and easy-to-read formats.
- It was open for five weeks.
- The target respondents were people with a range of different disabilities who had experience of engagement with the DRS.
- A total of 249 responses were received between the standard and easy-to-read formats.

Public Session Consultation Process:

This involved three data collection methods designed to capture rich qualitative data about people's lived experiences of participating in the DRS:

- Three focus groups were conducted online and face-to-face to maximise participation.
- Six in-store sessions involved observing disabled people using the RVM's and discussion on their experience.
- Eighteen people participated in one-to-one interviews.

3.3.2 Data Limitations

The data gathered in Phase 2 is neither representative of all people who have disabilities in Ireland, nor can it be generalised. The findings are based on a limited sample size of respondents who participated in the consultation process. The value of the findings is that they provide rich qualitative data and a depiction of the lived experiences of people with disabilities participating in, or trying to participate in, the DRS.

4 Summary of Phase 2 Outcomes

The outcomes from Phase 2 present key insights gathered from respondents regarding the DRS. They focus on both its perceived benefits and the barriers to accessibility and inclusion. While many respondents acknowledged the positive

aspects of the scheme, particularly its role in promoting recycling and sustainability, concerns were raised about its accessibility.

4.1 Perceptions of the Benefits of the DRS

Respondents highlighted several perceived benefits of the DRS. These benefits have been broken down into the following four categories:



Figure 2: Perceived benefits of the DRS

Respondents felt the DRS helped raise awareness about sustainability and encouraged recycling as part of Ireland's circular economy. Many appreciated the option to donate vouchers to local charities, and overall, the financial incentive was seen as a strong motivator to participate.

4.2 Views on Accessibility and Inclusion Barriers

The main observations from those consulted in the review demonstrate that the DRS for many people who have disabilities is not fully accessible or inclusive.

Respondents identified several accessibility and inclusion barriers within the DRS, including poor planning for accessibility, limited early engagement with key stakeholders, inadequate accessible information, a flawed complaints process, and insufficient consultation with disabled individuals prior to its launch.

Of the survey respondents, 20% stated that they do not participate in the DRS. Respondents to the survey cited many reasons they did not or could not participate in the DRS. These included:

- Difficulty finding an RVM that is in working order.
- Lack of staff to help when required.
- Difficulty finding an RVM that caters to their needs.
- Difficulty finding or accessing the information needed to participate in the DRS.
- Physically unable to participate.
- Limited access to transport and RVM's in rural areas.
- Environmental barriers (e.g. weather).
- Cost barriers associated with the DRS.
- Other (no nearby RVM's, interface is not user friendly, etc.).

4.2.1 Barriers Associated with Design

There were various barriers associated with the design and functionality of the RVM's that made it challenging for persons with disabilities.

- Inability to use the RVM independently.
- Inaccessible instructional guidance.
- Lack of visual contrast and tactile indicators.
- Health and safety risks.
- Barriers associated with reach range.
- Barriers for ambulant disabled persons.
- Repeated errors while using the RVM.
- Barriers associated with the sensitivity and variability of the RVM's.
- Multi-sensory barriers.
- Management and maintenance of the RVM's.

4.2.2 Barriers Associated with In-Store Experience

The main barriers associated with in-store experience that were identified are:

- In-store support
- Location of the RVM's at retailers
- Health and safety risks

Some respondents reported that in-store staff lacked disability awareness due to insufficient training. The area around RVM's was often difficult to access for those using mobility aids or carrying multiple bags. Additionally, strong smells from returned containers attracted wasps and bees, posing risks for users with allergies.

Depending on where the RVM was positioned in the store, it could present barriers for people with reduced mobility or sight. 63% of respondents surveyed had a preferred RVM. Overall, this was because of the design of the RVM itself and how accessible the RVM was in the retailer environment.

The primary reasons for preference of an RVM included:

- Reach range: the bottle / entrance point at an accessible point.
- Trained staff to help assist.
- Good lighting.
- A call button to ask for help.
- On-site instruction information.
- Accessible parking near the RVM's.
- Step free access to the RVM's.

4.3 Recommendations for Improving the DRS

Although recommendations were out of scope for Phase 2, various themes to improve the DRS emerged from respondents. Improving the accessibility of the existing RVM's, sustained and meaningful engagement to disability-proof the DRS, accessible customer service and complaints, multi-sensory information provision, home collection scheme, digital solutions to improve the DRS, and

an increase in the supply of external RVM's (outside of stores) were all suggestions coming from consultation respondents.

5 Next Steps

The main objective of the consultation process was to gather qualitative and quantitative data to understand the key accessibility and inclusion challenges experienced by people participating in the DRS and to inform subsequent phases of the wider accessibility project.

The next phase (phase 3) will involve developing solutions to overcome some of the barriers to access to the DRS. Three initial workstreams have been identified:

- Workstream 1: Enhance access to the RVM's through a set of guidelines that retailers can use in their stores.
- Workstream 2: Improve the usability of the RVM's, now and into the future.
- Workstream 3: Make all information and communication from Re-turn more accessible.

This work involves the principles of co-design and consultation with people with disabilities, and other stakeholders, to explore practical and effective ways to improve the accessibility of the DRS.

6 Acknowledgement

Re-turn is committed to ensuring that Ireland's Deposit Return Scheme is accessible, inclusive, and easy for everyone to use.

Thank you to all participants, organisations, and individuals who contributed to this consultation and continue to help us improve accessibility across the scheme.

7 Alternative Formats

If you require this document in an alternative format, please let us know.

We can provide it in:

- Braille
- Large print
- Audio version

Please contact info@accessconsultancy.ie or call +353 1 415 12 85, to request your preferred format. We aim to respond to all accessibility requests within 10 working days.

8 References

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