

Keep Wales Tidy: Response to Welsh Government proposed '[Litter and Fly-tipping Prevention Plan for Wales](#)' March 2021

EQR@gov.wales



ORGANISATION: KEEP WALES TIDY, (Registered Charity no. 1082058) 33-35 Cathedral Road, Cardiff, CF11 9HB

CONTACT: Hanna Jones - Hanna.Jones@KeepWalesTidy.Cymru

Keep Wales Tidy is an independent environmental charity working across Wales to improve our environment for the benefits of people and wildlife. We have decades of experience in working with communities on Local Environmental Quality (LEQ) issues and work in partnership with local authorities, schools, eNGOs, businesses and other stakeholders to achieve our vision of a beautiful Wales that is cared for and that can be enjoyed by everyone. This consultation response is informed by our work with local partnerships and communities across Wales, many years of collected data and our expertise in the field of environmental behaviour change and campaigns.

A Litter & Fly-tipping Free Wales

Keep Wales Tidy welcomes the opportunity to respond to this consultation and supports the Welsh Government's vision of a transition to a **circular economy** and the **collaborative, cross-government approach** that this plan represents. We particularly welcome the focus the plan has on **prevention**, which we believe is critical in achieving a Zero Waste Nation. Furthermore, we are also encouraged by the focus on actions in this plan which are achievable and measurable.

We believe that Wales should be ambitious in this plan and should headline this plan to be a 'Litter Free' Nation by 2030. Together with existing efforts to promote the circular economy in Wales, we believe that Wales could be truly world-leading in this respect and that we could reach an aspiration of being a Zero Waste destination to the world. As such, whilst we welcome the actions in this plan, we would **thoroughly urge regular review of progress and actions and would encourage Welsh Government to take bold steps necessary towards prevention**, in particular in regard to single use plastics which is an increasing matter of urgency.

Keep Wales Tidy work closely with many Welsh Government officials to support, advise and develop issues around litter and fly-tipping and will continue to offer full support for delivering the actions proposed. We have provided a more detailed response to the questions in the consultation document but some key points have been highlighted below:

We fully support the focus on prevention at the heart of this plan and the focus on actions and promoting consistency across Wales.

- We believe there is a **need for a definition of both terms** (ie; Litter and Fly-tipping). Littering should also include 'litter from the air'. (See [question 1](#))
- We believe that it will be critical to the success of this plan for **data to be gathered frequently and consistently and for progress to be reviewed annually over a 5-year period when overall progress should be reviewed**. (See [Appendix A](#))

- We recognise that gathering data on litter and (in particular) fly-tipping is an ongoing process and support the efforts of a combination of agencies to continue to review and refine this. We would however, urge significant **caution in regard to measuring public perceptions** due to the correlation between socio-economic status (SES) and expected 'standards'. Green space inequity, for both quality and accessibility, is a persistent social justice issue which has been highlighted over the period of the Covid pandemic and is deserving of more robust and targeted measures to address.
- Waste reduction is a key element of this plan and we would urge **bold and urgent action on single use plastics in particular** and welcome further action on additional elements in the near future. We have included a number of specific and achievable policy examples that we would support as part of the plastic reduction agenda in [Appendix B](#) and through [1-6](#).
- Avoiding unnecessarily cumbersome waste policies (however well intentioned), ensuring easy, convenient and affordable access to waste services across all areas in Wales, whilst promoting all opportunities for reuse and repair is **the singular, most effective way to remove the structural and economic barriers that lead to domestic instances of fly-tipping**. This may require additional policy interventions for Welsh Government as councils are for example, currently considering introducing extra charging for waste sites.
- The area of enforcement is politically popular but woefully under-studied. **More evidence of enforcement efficacy** and intelligence as a preventative deterrent is required before committing additional Welsh Government / Local Authority resources to this issue.
- We would like the issue of introducing a **statutory duty to investigate fly-tipping** to be addressed as one of the outstanding actions in the previous Fly-tipping Action Plan (2015).
- Given the particularly significant economic and social impacts of poor LEQ, we would particularly welcome explicit and **direct support (minimally) of the respective Ministers for Economy, Tourism and Health**.

Our Litter & Fly-tipping plan

1. Do you agree that litter and fly-tipping should be covered under one plan? If not, please provide a reason for your answer.

We agree that the actions and themes needed to address litter and fly-tipping are broadly aligned, and therefore agree that both issues should be covered under the same plan. Furthermore, members of the public are affected by litter and fly-tipping and the negative impacts tend to be the same. The general public do not tend to distinguish between the two and neither do volunteers who work towards environmental improvements in their communities. However, we recognise that the behaviours that motivate fly-tipping are very different from littering, meaning that in many cases the audience and messaging will be different. We therefore understand the need to keep some actions separated. This will also hopefully prevent fly-tipping (which has the stronger criminal element) from taking over.

We feel it would be useful to **add definitions of litter and fly-tipping** as there can be differences of opinion on what is meant by these terms (particularly the latter). This would also provide an opportunity for the Welsh Government to take a strong stance and leading role in specifically mentioning that they consider **the intentional release of balloons and sky lanterns to be littering**.

2. Do you agree with themes we have chosen? Do you think they will help us achieve our ambitions? If not, what other themes do you think need to be included?

Yes, we agree with the five themes and are very pleased to see **prevention at the heart of this plan** which means that this document is more aligned to the Welsh Government's 'Beyond Recycling' approach, the waste hierarchy and circular economy ambitions.

As such, we are particularly pleased with the inclusion of the waste reduction theme. However, this section of the plan could be further strengthened with reference to our **on-the-go eating and drinking culture** (with its strong links to littering) and our **consumer and throwaway society** (which links to fly-tipping). These behaviours are at odds with the need to **value our resources and improve waste awareness**.

It's very positive to see Evidence, Monitoring and Evaluation having such a prominent place in the plan, as all actions should be **underpinned by a strong and reliable evidence base**. Whilst recognising that litter is an exceptionally difficult thing to capture true data about, multi-level, consistent approaches from a number of sources will support the necessary regular review of progress. See question responses [5](#) & [6](#) for more information.

We do believe that there is an opportunity to strengthen the link between consumer behaviours and the structures of disposal and retail such as waste services and businesses. This could be, for example, by ensuring that litter and fly-tipping is a more integral part of planning and licencing policy and are a statutory part of impact assessments.

3. Do you agree with the suggested actions in the waste reduction theme? If not, please provide reasons.

This theme is critical to prevention efforts and is a positive step towards increased responsibility from all actors and agencies. We also believe that the inclusion of waste and waste issues is an important part of encouraging the public to think about litter in the same way that the majority of the Welsh public view recycling participation and has been achieved by making it easy, convenient and affordable to do the right thing. This link, both in policy and communication is encouraging.

The inclusion of the actions to introduce **Deposit Return and Extended Producer Responsibility (EPR) Schemes** are very positive as we believe these will have wide reaching impacts. The current EPR proposals (in the Environment (UK) Bill which is pending ratification in Autumn 2021) recommends that producers pay 'up to and including the costs of litter'. Assuming that this is calculated to reflect true costs and allocated as such, this could create much needed funds to support councils and NGOs to undertake more activities and collaborative working.

Keep Wales Tidy is also pleased to see specific actions to address the **widespread and persistent and issues of dog fouling and smoking-related litter**. Dog fouling is of specific concern because of its health implications to humans and animals. On the other hand, smoking-related litter is a priority because is continually the most common type of litter and is more resistant to change than other litter items.

As part of a past consultation in regard to Single Use Plastics, Keep Wales Tidy and other eNGO's have previously suggested to Welsh Government a policy plan for tackling additional Single Use plastics and things such as sanitary items through various initiatives and items – this is submitted again, along with all relevant evidence and examples for information in [Appendix B](#). We welcome all Welsh Government efforts in this area, through this plan and through the Beyond Recycling conversations and look forward to urgent action on these issues.

4. Do you think other actions should be included under the waste reduction theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.

Under this theme, there is a strong reference to acting on transitioning from single-use items and to environmentally friendly solutions. This is very positive, but we would like to see this specifically include taking

action on litter from the air. Balloons, sky lanterns and fireworks create a short-lived visual spectacle, but their negative impacts have far-reaching and long-lasting effects on people, animals and the environment. Over recent years there have been repeated calls for action on these issues not only from a wide range of organisations, but also from the general public. Our [Litter from the Air paper](#) summarises our recommended actions on these issues, which are broadly aligned to the themes of this plan. **We believe that UK-wide legislation changes are needed to address these issues. We would like to see a ban on the deliberate release of balloons and lanterns as well as tougher fireworks laws.** We would like to see the ambition of **Wales becoming the first airborne litter free nation in the UK and tougher UK-wide fireworks laws which would see a ban on fireworks sales to the public.** It would be good to see such goals being aligned to the Clean Air Wales Proposals contribution of fireworks to issues of air pollution - an increasing environmental and public health priority for the Welsh Government.

Smaller adjustments we suggest to this theme are as follows:

- WR 6 (Ensuring that Welsh Government sponsored or funded events include provisions to prevent or reduce littering of single-use items) - While we understand that major events don't currently sit within the Welsh Government's remit, we suggest that these **provisions to prevent or reduce single-use items could be a stipulation of all grants and/or permissions** through various events funding and / or planning and licensing requirements.
- WR 10 (Support of projects which promote the reuse/repair agenda) - It is positive to see Refill Wales is specifically noted as an example. Other examples that could be supported include [Repair Café Wales](#) and [Benthyg](#).

5. Do you agree with the suggested actions in the waste evidence, monitoring and evaluation theme? If not, please provide reasons.

Yes, and we are particularly pleased to see actions included to improve the recording and reporting of **littering and fly-tipping on private land**. Members of the public are affected by the problems regardless of who is responsible for the land, yet there is currently a **gap in our knowledge** relating to the scale of the issues.

Litter is always going to be difficult to monitor as it varies with location, season and weather and moves around or breaks down into smaller parts. It is one of the most important issues to the public, but perceptions can be influenced by a wide range of factors. While it is important to monitor the public's perception of the issue, it is dependent on demographic and therefore highly variable. As a result, it is possible for this qualitative information to provide a misleading picture. This could be because in deprived communities (where litter tends to be worse), residents often become used to the issue and it becomes the norm. In contrast, research shows that in communities where there are less issues, *'there was a constant vigilance over controlling public space... Here residents appeared more likely to contact a range of agencies, notably the police, to tackle their problems.'*¹ Therefore, to get the best understanding of the situation, it is vital to **look at a combination of data sets** to provide the most complete picture, with examples provided below:

- Our Local Environmental Audit and Management System (LEAMS) surveys provide a useful snapshot of the litter problem. While they are limited to the street environment, the **information collected is reviewed annually so that we can adapt to current issues and areas of policy interest** and make the surveys as useful as possible. Additional information collected over the last few years to provide an evidence base for our partners in the Welsh Government and local authorities include chewing gum staining, polystyrene litter, drinks receptacles,

¹ Hastings, A et al. (2005). *Cleaning up neighbourhoods Environmental problems and service provision in deprived areas*. Available: <https://www.irf.org.uk/report/environmental-problems-and-service-provision-deprived-and-more-affluent-neighbourhoods>. Last accessed 10-02-21.

single use items and bagged dog fouling. We have also recently developed LEAMS to **include street locations so that the data can be mapped and analysed spatially.**

- The Marine Conservation Society's **Beachwatch** data provides a useful annual snapshot of beach litter.
- Details on the **composition of waste collected by local authorities** including bin compositions and street cleansing data also help provide a fuller picture of the situation. However, such studies have limitations, and these should also be acknowledged, unless there are plans to **repeat the analysis regularly to show how the situation is changing over time.**
- Some **community groups** also collect data, which helps monitor litter at a **local level.**

It is important that the data is collected for the **benefit of local authorities.** However, with fly-tipping specifically - where the **collection of data is currently inconsistent** - there is no real incentive to collect data as it reveals an otherwise hidden problem. It is important that the data isn't used to punish local authorities (Keep Wales Tidy has worked hard to avoid this happening with the publication of our All Wales LEAMS Report). We also recognise that with the budget cuts and pressures on staff, there may be limited capacity in local authorities to record the issue which inevitably leads to **under-reporting** (or in some cases, recording of no fly-tipping at all).

6. Do you think other actions should be included under the waste evidence, monitoring and evaluation theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.

While it is included under other themes, **no mention of roadside litter is specifically made under this theme.** The proximity of high-speed traffic means that there are serious health and safety issues which makes monitoring this issue extremely challenging. Therefore, there is currently very little information available to help us calculate the true scale of the problem. However, evidence collected by Keep Wales Tidy strongly suggests that roadside litter is increasing² and we are pleased that this plan makes this issue '*a priority*'. We therefore believe that an action should be included under this theme which commits **to collecting data on this issue** (as a minimum, it should be mentioned under EME 1). We understand that **new technology may be able to help** with this and should be explored.

Additional data that could be collected for the purpose of furthering this plan includes:

- Repair data by Repair Cafes and other initiatives
- Refill station numbers and data
- Local Authority bulky item / reuse collection data

Suggested data sets and timescales for review is included in [Appendix A](#).

7. Do you agree with the suggested actions in the education and behaviour change theme? If not, please provide reasons.

Yes, and the inclusion on the following actions are particularly encouraging:

- EBC 1 (Standardising messages and approaches) - The lack of standard practice across local authorities is one of the most significant barriers to progress in tackling the issues of littering and fly-tipping and **consistence is therefore a general principle that is required to underpin this entire plan** (particularly under the themes of Effective Enforcement and Efficient Operational Delivery - see below for more information).
- EBC 5 (Engaging with the private sector) - **Industry backing is vital**, but support has been promised but has generally been lacking. It is important that pending EPR changes are not seen as the only solution to effective industry involvement or viewed as the 'end point'. Direct and continuous engagement will be necessary, not

² Keep Wales Tidy. (2017). *Tackling Litter on our Roads*. Available: <https://www.keepwalestidy.cymru/Handlers/Download.ashx?IDMF=6adb74d9-b76b-4477-88a3-9b04ecb0dbdf>. Last accessed 10-02-21.

least to ensure that proposed alternatives are not creating new issues such as, for example, switching from plastics to so called 'biodegradable' materials.

- EBC 5 and 6 (Specific actions for smoking-related litter and roadside litter (including fast food)) - As previously mentioned these are particularly problematic and may require specific sub-groups to agree a consistent approach.
- EBC 8 (Considering spatial pathways) - This is a very **positive and holistic** way to approach the moving issue of litter and is considered a positive way to approach issues of consistency across local boundaries.
- EBC 15 (Extending environmental education to other providers in Wales) - Environmental education tends to focus on children, mainly at primary school level. This work is very worthwhile, but **older children and adults also engage in enviro-crime**, so extending this education provision will be beneficial and should be as **targeted** as possible. FEI's and HEI's are important in taking this forward and relevant umbrella bodies should be engaged.
- EBC 17 (Inter-departmental working within the Welsh Government) - Litter and fly-tipping are **complex issues which impact us all** and require a collaborative effort. Seeing Welsh Government lead by example in this area by engaging with several departments is extremely positive. Given the significant economic impacts of Poor LEQ, we would like to see explicit support for this plan particularly from the respective Economy, Tourism and Health Ministers. We would also urge Ministers and Members of the Senedd to recognise the correlation between LEQ and the social justice agenda.

8. Do you think other actions should be included under the education and behaviour change theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.

To change behaviour, it's important that the desired behaviour is **made as easy and convenient as possible**. This should therefore be central to the actions in this section.

Supporting people to make more positive environmental decisions is not simply a matter of raising awareness. More often than not, changing behaviour is a direct result of **removing the structural, economic and cultural barriers (whether actual or perceived) and making the 'right thing' easy, convenient and affordable for everyone.** It is important to recognise that policy and legislation – whether introduced at a national or local level can impact these behaviours. Whether it's local policies for a MWC or general communication on the 'Green Recovery', it should be recognised that these things *will* have an impact on how the public acts and interacts with these issues. The SUCB charge was more successful and well received in Wales because we were the first and the public felt some level of ownership over the policy – more bold and world leading actions can have a huge impact at a national scale, but can be easily undone by conflicting policies.

Crucially, it is also important to consider that **green space equity, poor LEQ, fly-tipping and their correlating social and economic impacts are experienced more severely in areas with lower SES.** This aspect has been highlighted over the Covid 19 pandemic. As such, this should be reflected in priorities and targeting interventions.

Lastly, if behaviour change is to be central to the Welsh Government policy, it is very important to note that the field of behaviour change is a relatively new discipline and there is still a lot of things we need to study and develop, particularly in the realm of environmental behaviours. For this reason, this element in particular will require resources and we must consider the fact that efforts may fail. **Behaviour change is a social science and is highly reliant on context, heuristics, locality and other factors although can be particularly effective when carried out properly with a high level of academic expertise and knowledge.** To this end, the Welsh Government may wish to define behaviour change in this context, noting that what is often called Behaviour Change by Governments is often just public policy – Just 13% of 200 cases in a recent OECD report on global behaviour change interventions could be considered behaviour interventions rather than public policy. These refer specifically to policy actions which are

informed and designed with applied behavioural psychology, examples in Wales include the single use carrier bag charge and the opt-out system for organ donation.

9. Do you agree with the suggested actions in the effective enforcement theme? If not, please provide reasons.

When asked what could be done to tackle environmental crime, **the public often see enforcement as the best solution**.^{3,4} Keep Wales Tidy agrees that while **enforcement should not be used in isolation**, it is an important tool which is particularly important for those who fail to respond to other forms of engagement. However, to be effective at changing behaviour, enforcement must be **visible**, otherwise the deterrent effect is diluted as people don't believe the threat. Therefore, we are pleased to see an action (EE 11) to **improve communication of successful enforcement action**. We would however, note that there is a danger of local authorities being seen as being over-zealous or being seen to be 'chasing money' unfairly, particularly in hard economic times.

Enforcement relies on being in the 'right place at the right time'. We would note that visible enforcement presence at scale is not possible, especially as many enforcement roles in local authorities are combined with more defined Environmental Health roles. In addition, increased enforcement also has additional costs related to back office support and Magistrates time and **should by no means be considered as an easy, simple or cost-effective solution to tackling littering at scale**.

Keep Wales Tidy recognises that local authorities currently take different approaches with enforcement and it is right that the Welsh Government supports local government. However, this **lack of consistency is a barrier to making progress** and we believe that the Welsh Government should **look to introduce a more standard way of working** across Wales so that people can expect the same fair and proportionate treatment wherever they are in Wales.

Note that the comments above relate to enforcement for littering only. Issues around fly-tipping enforcement are considered in the following section. We are particularly pleased with the inclusion of the following actions:

EE 5 (Legislation to help reduce littering from vehicles) - This legislation is **essential for enforcement to be a viable option** to tackle littering from vehicles. Collaboration with **Trunk Road Agencies** will be important in tackling roadside litter. This legislation would also facilitate **collaboration with the police** which is currently lacking.

EE 10 (Continue to support forums) - With the support of the Welsh Government, Keep Wales Tidy re-established the **National Enforcement Forum** in 2012. The forum brings together local authority enforcement practitioners and other key partners to provide opportunities for learning, problem solving, sharing good practice and networking. We hope that Keep Wales Tidy can continue to support this agenda in future but will require support to continue.

10. Do you think other actions should be included under the effective enforcement theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.

Despite being publicly and politically popular, there is little evidence that enforcement for littering is effective. **We would highly recommend a commissioned study at scale to assess the effectiveness of measures and various models before more resources are given to this issue by Welsh Government and / or Local Authorities**. For example, Keep Wales Tidy often sees high numbers of FPN's for littering being celebrated as a successful intervention despite the fact that this would indicate the opposite. It is prudent to note that without this evidence, this is the only section of the plan which can not claim to be preventative in nature but instead puts the

³ Beaufort Research (2010). *Litter in Wales: Understanding Littering and Litterers*. (Unpublished).

⁴ Churchill. (2016). *Mobile litter bugs: 7.6 million drivers admit to littering from their cars*. Available: <https://www.churchill.com/press-office/releases/2016/over-7-million-drivers-admit-to-littering-from-their-cars>. Last accessed 25-11-20.

responsibility for littering on to local authorities to address and not the individual. **More data is needed to assess the effectiveness of enforcement and fines for littering and in particular, how and where it can be actioned and communicated where it can best be used as a deterrent. This will help local authorities with developing a smarter and more consistent approach and will maximise the use of public resources.**

Running the National Enforcement Forum has given Keep Wales Tidy a unique insight into environmental enforcement in Wales. One issue which has been raised by practitioners over many years is the **need for training** - not only for the **enforcement staff** themselves but also for the **legal staff advising them** and also specifically for **magistrates as there is currently an inconsistent approach to fining**. Practitioners believe that this should help move towards a more consistent approach across Wales. Training we have provided in the past through the National Enforcement Forum has been welcomed and appreciated and has started this process (for example through the increased use of **Community Impact Statements**, which Keep Wales Tidy have been able to create). Another issue which has been raised by practitioners - this time at Fly-Tipping Action Wales' Enforcement Working Group - is that **the investigation of fly-tipping should be a statutory duty**. In fact, when asked what would improve the enforcement of fly-tipping, this was the **top action which has been requested repeatedly** to Fly-tipping Action Wales over a number of years. The current Fly-tipping Strategy (2015) acknowledges that *'Support for tackling fly-tipping within local authorities varies across Wales. This is mainly because the investigation of fly-tipping incidents is not a statutory duty for local authorities and therefore the resources they invest in tackling fly-tipping differ across Wales, depending on local priorities.'*⁵ As a result, in the document, the Welsh Government said it would consider whether making the investigation of fly-tipping a statutory duty would help. Unfortunately, to date, no change has been made to the legislation. Keep Wales Tidy believes that **changing this legislation could have an impact on deterrence and prevention** and importantly, contribute to far greater consistency across Wales - two things that this plan hopes to achieve.

EE 11 (Improving communication of successful enforcement action) – As previously mentioned, this is important because to be an effective deterrent, people need to believe that they will be caught and punished if they break the law. However, **this action this is needed for littering as well as for fly-tipping** and needs to be approached carefully due to some of the issues outlined above. The requirements for a definition of fly-tipping (in particular) will also be key here as Keep Wales Tidy has found that many people do not use the word fly-tipping to describe some common issues which local authorities would define as such.

11. Do you agree with the suggested actions in the efficient operational delivery theme? If not, please provide reasons.

We are pleased to see the **hard work and dedication of volunteers in communities across Wales being recognised** in the plan and support for their vital work continued. They work tirelessly to keep our communities, green spaces rivers and coast clean, helping clear not only litter but also fly-tipping. It's also positive to see an action to **separate recyclable litter at source**, which is something Keep Wales Tidy has been working towards in recent years. There have been problems to achieving this in some areas as local authority policy has made this difficult, so we hope that a **Wales-wide approach will help move this important issue forward**.

12. Do you think other actions should be included under the efficient operational delivery theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.

Street cleansing is one the most **tangible services that local authorities provide** and is sometimes the only service that many residents see. While prevention is the overarching aim of the strategy, **clearing litter and fly-tipping will**

⁵ Welsh Government. (2015). *A Fly-tipping Free Wales – Our strategy for tackling fly-tipping*. Available: <https://gov.wales/sites/default/files/publications/2019-08/fly-tipping-strategy.pdf>. Last accessed 11-02-21.

continue to be paramount to stop the negative environmental impacts of these issue. Research has not only shown that litter attracts litter but also that seeing others cleaning it is itself an anti-littering nudge,⁶ which highlights the importance of cleansing. The updating of the Code of Practice on Litter and Refuse and Associated Guidance will be helpful but **we feel that local authorities in particular can be further supported with cleansing** as this has been made so difficult in recent years with financial pressures. Keep Wales Tidy is aware that some local authorities are **using data to make cleansing operations more targeted and efficient** e.g. cleansing by standards met rather than frequency-based cleansing. We feel that this is a much more intelligent approach and would highlight the previous work in Carmarthenshire to this end and work currently being developed in Blaenau Gwent.

Likewise, bins continue to be an essential part of the solution and the aim should be to **remove the barriers which prevent people from binning their waste**, while making this desired behaviour as easy and convenient as possible. We recognise the importance of maintaining and emptying bins as bin cleanliness and the level of rubbish in a bin has shown to impact littering levels⁷. However, this comes at a cost and bins cannot be provided everywhere. Research shows that most local authorities don't have a policy relating to litter bins type or location.⁸ Therefore, while we support the actions in the plan to improve recycling-on-the-go and reduce the escape of litter from litter bins, Keep Wales Tidy believes that there is room to **consider litter bins in a more holistic way**, to include the following:

- The overall message for local authorities and town councils is 'right bin, right place'. This requires local authorities to be aware of the bins in the area and how much or how little they are used and placing them according to data, not as a reaction to public requests.
- Think about **all types of litter bins and receptacles** - for general litter, general recycling litter and specific litter types such as coffee cups, cigarette ends (bins and pocket ashtrays), dog fouling and chewing gum.
- There is an urgent need to **communicate with town and community councillors** on this issue who are often successful in their campaign to get a number of bins installed in a singular ward which are then not reviewed or maintained and believe, with all good intention, that they are helping to solve the litter problem.
- Any recyclable litter which ends up in a general litter bin is a waste of resources. Research has shown that coffee cups are more likely to be binned than littered,⁹ but there is a tendency to provide primarily general litter bins where the waste collected goes to landfill. Unfortunately, the vast majority of single use cups go to landfill, but recycling is possible and there is **potential to introduce more cup recycling bins** allowing the cups to be collected separately for recycling. Keep Wales Tidy trialled a project to [reduce cup waste and boost recycling-on-the-go](#) with Cardiff Metropolitan University.
- The lack of bins is often given as an excuse for littering and closeness of a bin is an important motivator for binning litter¹⁰. This highlights the importance of not only adopting a **targeted approach in locating new bins** but also **reviewing the location of existing bins** so that this finite resource is used in the most effective way possible.

⁶ Cialdini, R. B. et al. (1990). A Focus Theory of Normative Conduct: Recycling the Concept of Norms to Reduce Littering in Public Places. *Journal of Personality and Social Psychology*. 58 (6), 1015-1026.

⁷ Keep Britain Tidy. (2015). *How clean is England? The Local Environmental Quality Survey of England 2014/15*. Available:

https://www.keepbritaintidy.org/sites/default/files/resources/KBT_How_Clean_Is_England_LEQSE_Report_2015.pdf. Last accessed 23-11-20.

⁸ Priestley, W. (2017). Developing a successful 'bininfrastructure' - litter bin policies, strategies and procedures. Available:

<http://apse.org.uk/apse/index.cfm/members-area/briefings/2017/17-04-developing-a-successful-bininfrastructure-litter-bin-policies-strategies-and-procedures/>. Last accessed 11-02-21.

⁹ Keep Britain Tidy. (2020). *LITTER COMPOSITION ANALYSIS Summary Report*. Available:

<https://www.keepbritaintidy.org/sites/default/files/resources/20200330%20KBT%20Litter%20Composition%20Report%20-%20FINAL.pdf>. Last accessed 26-11-20.

¹⁰ Hubbub UK. (2019). *Drive Down Litter Impact Report 2019 Testing new approaches to roadside litter*. Available:

https://issuu.com/hubbubuk/docs/drive_down_litter_report_2019_digital_v2. Last accessed 02-11-20.

- Bin design is an important consideration. Most litter bins tend to be dark in colour so they tend to blend into their surroundings. **Increasing bin visibility** increases their use,¹¹ so it would be better for them to be highlighted, with the **consistent use of colour as well as text** (and logo, where appropriate). The lack of messaging on litter bins is a missed opportunity, but could be a **useful nudge to help change behaviour**. This should additionally be considered for all new developments and licensing applications.
- Since some smokers are reluctant to dispose of their cigarette ends in a litter bin in case this resulted in a fire, making sure that **all new litter bins include a metal stubbing plate** should help decrease the number of cigarette ends being littered.

Litter bin guidance for local authority and others may help move towards a more consistent, targeted and effective approach across Wales. In addition, whether bins in laybys help or hinder the roadside litter problem is a contentious issue.¹² Projects looking at the impacts of bin removal have been trialled in London parks,¹³ Scottish laybys¹⁴ and in various locations across Hertfordshire,¹⁵ with varied results, suggesting that **more research is needed**. Current trials in local authorities in Wales are already underway.

Fly-tipping is often the result of direct or indirect policy, structural or economic barriers. Local **authority waste policy** - in terms of provision, access and cost - **varies significantly across** Wales and as such are themselves **contributing to the fly-tipping problem**. Efforts therefore need to be made to **make these as consistent as possible**.

- Civic Amenity sites are often managed by different departments with differing agendas. While the key criteria for some departments would be reducing fly-tipping, other departments are being driven by the need to reduce costs and the amount of waste and competing priorities exacerbate problems. Sites across Wales also have **different procedures which causes confusion** amongst users. In addition, over the past few years, it is disappointing that **many waste disposal facilities have shut**, making it more difficult than ever for people to responsibly dispose of their waste and therefore increasing the likelihood of fly-tipping instances.
- Many local authorities **charge for waste disposal**, which not only adds cost but also takes away from the convenience of 'doing the right thing'. This can increase instances of fly-tipping but also sends the wrong message to residents and adds further complexity to achieving waste awareness. This is the case even when charges are nominal and even if exceptions are made for those receiving benefits.

In line with the principle of **creating and enabling environment** to make the responsible disposal of waste as convenient as possible, **the running of and access to all waste** (including recycling) **facilities should be made as easy as possible** and all **waste services should be offered free of charge**.

Avoiding unnecessarily cumbersome waste policies (however well intentioned), ensuring easy, convenient and affordable access to waste services across all areas in Wales, whilst promoting all opportunities for reuse and repair is **the singular, most effective way to remove the structural and economic barriers that lead to domestic instances of fly-tipping**.

¹¹ Keep Scotland Beautiful. (n.d.). *Local Authorities*. Available: <https://www.keepsotlandbeautiful.org/roadside-litter-campaign/take-action/local-authorities/>. Last accessed 02-11-20.

¹² Keep Wales Tidy. (2017). *Tackling litter on our roads*. Available: <https://www.keepwalestidy.cymru/Handlers/Download.ashx?IDMF=6adb74d9-b76b-4477-88a3-9b04ecb0dbdf>. Last accessed 25-11-20.

¹³ Tehan, R. and Turner, A. (2018). *Litter Innovation Fund (LIF) Final Report*. Available: <https://www.wrap.org.uk/sites/files/wrap/KBT%20Bin%20removal.pdf>. Last accessed 27-11-20.

¹⁴ Keep Scotland Beautiful. (2018). *Layby interventions on A75 a success*. Available: <https://www.keepsotlandbeautiful.org/news/2018/layby-interventions-on-a75-a-success/>. Last accessed 27-11-20.

¹⁵ Herefordshire Council. (2019). *Time to Bin Your Assumptions A Litter Innovation Fund Study*. Available: <https://www.herefordshire.gov.uk/downloads/file/17102/litter-innovation-fund-summary-report-january-2019.pdf>. Last accessed 27-11-20.

13. Our Litter & Fly-tipping Prevention Plan includes a number of actions. Which ones do you think should be a priority? Please give reasons.

For litter, we agree with the Welsh Government's priority of **tackling roadside litter**. We believe that the proposed **actions on single use items and DRS** will help prevent the problem but feel that the **change in legislation to enable this issue to be effectively enforced** is also essential on moving forward with this issue.

Other key areas to deal with litter more generally include the **separation of waste at source** as well as **engaging the private sector**.

For fly-tipping, we believe that **consistency in local authority waste policy** is essential in creating an enabling environment to help people do the right thing to prevent fly-tipping from happening in the first place. While not currently included in the plan, we feel that it's vital that an action be added whereby the Welsh Government **introduce legislation to make the investigation of fly-tipping a statutory duty**.

Also key to progressing in this area are actions relating to **fly-tipping on private land** as there are gaps in our knowledge in this area, while by law it's the landowners who are responsible for dealing with the issue when they themselves are the victims of the crimes.

Concerns have been raised at our National Enforcement Forum meetings about **the way Natural Resources Wales (NRW) have been dealing with some instances of fly-tipping**. This particularly relates to small-scale fly-tipping on Welsh Government managed land as well as larger scale instances on public and private land that NRW should be dealing with as per protocol (it is positive to see action in the plan relating to this protocol). Some local authorities feel that they themselves were the **only bodies currently taking action against small scale fly-tippers**. Keep Wales Tidy feels that collaboration and cooperation of all partners in local authorities, Welsh Government, NRW (FTAW), Housing Associations, other landowners and third sector partners is critical to tackling the issue of fly-tipping and efforts to restore and revive these relationships will be key to success in the future.

Welsh language questions

We would like to know your views on the potential impacts our Litter & Fly-tipping Prevention Plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

14. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

15. Please also explain how you believe the proposed Litter & Fly-tipping Prevention Plan could be formulated or changed so as to have positive effects, or increased positive effects, on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

- We want to see the Welsh language treated no less favourably than the English language.
- Consideration should be given to the terminology used in Welsh and English, to ensure that Litter and Fly-tipping Prevention Plan – and all related communications – are clear and consistent in both languages.
- Promoting consistency in terminology across both languages is vital reaching a position where they become second nature to Welsh speakers rather than the use of the English definition.
- Producing the Litter and Fly-tipping Prevention Plan in both Welsh and English would ensure that there is an opportunity for discussion to be held easily in both language across Wales.
- With 'Cymraeg 2050: A million Welsh speakers' long-term approach to the language, ensuring that the plan is produced in both languages will help in this aim.

- The quality of the Welsh (and English) language around the subject in turn will not be lost.
- Behaviour Change messages (when being used in terms of litter and fly-tipping) may have more effect towards individuals in their first language. Messaging must be considered carefully, with original copy drafted in Welsh.

16. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The document mentions the intention of the plan being an evolving one, and notes that the Litter Advisory Group could help provide an oversight of the plan’s progress but there is little detail on how it will be reviewed and kept updated or how often this will occur. With such an important plan, Keep Wales Tidy believes **regular monitoring and evaluation is essential** for progress to be made. We suggest an **annual review by the Advisory Panel** (who are key stakeholders), followed by the **publication of a progress report**. This would not only be good for **accountability**, but it would also help **ensure the progress of actions in the plan stay on track**.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please indicate here:

Appendices

Appendix A: Suggested data and progress review

SUGGESTED TIMEFRAMES AND ACTION FOR LFTPP REVIEW AND PROGRESS REPORTING

2021/22	2022/23	2022/23	2023/24	2024/25
Waste Evidence Group to consider data & methodologies				
Meeting and actions of sub groups (Note: Caru Cymru timescale)				
Litter Advisory group to oversee evidence gathering and annual reporting				Review Plan & 5 year progress report

SUGGESTED DATA SOURCES AND COLLECTORS

Data Source	Collector	Reporting frequency	Indicators (TBA by Evidence group)
LEAMS Surveys (/revised methodology TBA)	KWT	Annual (x 22 data sets)	TBA
LEAMS Data (/revised methodology TBA)	Local authorities	Bi-monthly	TBA
Beachwatch Data	MCS	Annual (1x event)	TBA

Waste Data Flow	Welsh Government	Quarterly	TBA
Flymapper	FTAW	Quarterly	TBA
FPN data - Litter	Local Authorities	Quarterly	TBA
FPN data – Fly-tipping	Local Authorities	Quarterly	TBA
Repair café data	Repair cafe Wales	Quarterly	TBA
Refill data	Refill Wales	Quarterly (?)	TBA
Street cleansing data	Local Authorities	Monthly / Quarterly	TBA
Volunteer no's	Third Sector (TBC)	Quarterly	TBA
Volunteer data (where possible)	Third Sector (TBC)	Quarterly	TBA
Local Authority reuse / waste centre data	Local Authorities	Quarterly	TBA
Campaign reach and feedback	Welsh Government / KWT / Local Authorities	Quarterly	TBA
Interventions and Trials	KWT (Caru Cymru)	Quarterly	TBA
Eco-Schools data and reach	KWT	Quarterly	TBA

Appendix B: Policy interventions for single use plastics

This set of proposals should be considered as the first stage and represents immediate, short term action. The second stage should be developed for some of the more prevalent issues and could include a suite of mechanisms which will be available to Welsh Government as a result of the Environment (UK) Bill which is expected (at the time of writing) to be finalised in 2021. .

We propose that as series of considerations should form part of the next stages for short / medium / long term actions to further promote reduction reuse and repair. Some suggestions for considerations and priorities have been outlined below. Some of these ideas are expanded upon in the appendices which also include links to further information and evidence reports.

The overall aim of future considerations should be to:

- Significantly reduce the prevalence of single use plastics
- Refocus efforts on reduction of waste overall
- Disincentivise ALL single use materials
- Clarify definitions for alternative materials such as biodegradables and compostable
- Promote reuse and repair
- Support reusable, sustainable items and ensure availability and affordability for all Welsh citizens

Stage 1 – Prevention and reduction (2020-2021)

- Passing the ban on Single Use Plastics
- Banning Single Use Carrier Bags and extending the charge to ‘Bags for Life’ ♦
- ‘Beyond Recycling’ Strategy *
- Litter Prevention (Wales) Plan*
- Development of a prevention focused fly-tipping strategy

Stage 2 – Reuse and promotion (2021- 2023)

- Restricting / regulating the sale of wet wipes
- Mandating for Refill stations and plastic bottle reduction measures and targets ([Appendix 1](#))
- Implementation of levy for Single Use Cups ♦ ([Appendix 2](#))
- Implementing a Deposit Return Scheme for the benefit of Wales ♦ ([Appendix 3](#))
- Taking action on sanitary products and promoting reusable products ([Appendix 4](#))
- Incentivising markets for secondary materials as part of Green Recovery Economic plan
- Invest in Repair apprenticeships ([Appendix 5](#))
- Mandating for 'repair' and white goods / WEE recycling ([Appendix 6](#))

Stage 3 – Legislating for sustainability (2021 – 2025)

- Regulation of biodegradables and compostables and policy recognition of single use nature of these alternatives.
- Consideration and implementation of penalty mechanisms for all single use materials

**Pending*

♦ *Fully or partially dependent on Environment (UK) Bill and Internal Markets (UK) Bill*

Appendix 1: Mandating for Water Refill Stations

The Welsh Government is committed to making Wales the world's first 'Refill Nation'. With support of Dwr Cymru and Hafren Dyfrdwy, [Wales Refill](#) (a campaign by City to Sea) has met it's target of making Refill stations available in every community along the Wales Coast Path.

This simple campaign has been successful and well-received but needs additional support to gain traction and profile. The concept of a 'Refill nation' could be part of a much wider tourist profile for Wales as a 'Zero Waste destination'. This can be supported by [mandating water fountains](#) in public areas and sports / recreation areas (on a per population basis). Refill stations at events, such as marathons or festivals could also be mandated as well as commercial zones such as Shopping centres, train and bus station and airports.

There are many examples of where water fountains/ the refill movement have been successful such as [Refill Bristol](#). Refill Bristol has estimated that if every Bristolian refilled a bottle once a week instead of buying a single-use plastic bottle, the city would reduce its plastic bottle consumption by 22.3 million a year. If replicated around the country, it could lead to a reduction in plastic bottle use in the hundreds of millions. ⁱ Another excellent example can be seen in the city of [Ljubljana](#) which won European Green capital in 2016. Thames Water is also supporting the city of [London](#) to implement hundreds of drinking fountains across the city.

The campaign 'Reduce, Reuse, Refill, Repeat' is a positive, easy and concise message for the Welsh public and for business and event organisers and represents a simple action for promoting the entire reuse agenda in Wales. We believe that the successful examples above could be replicated Wales wide with the right policy incentives. We would also echo the call from Refill that these policies could be introduced with measures to reduce Plastic Bottles by half by 2030.

Appendix 2: Implementation of levy for Single Use Cups

Coffee culture and food and drink 'on the go' is increasingly part of our social experience in the UK. This has led to a growing issue of disposable containers for food and drink, many of which are not recycled because they are consumed, by their very nature, are consumed outside of the home where recycling facilities are not usually

accessible. More than 2.5bn disposable cups are thrown away in the UK every year – enough to go around the world five and a half times.ⁱⁱ

Moreover, the materials that disposable cups are commonly made from are not easily recyclable. The plastic coating needs to be separated with special facilities (very few of which exist in the UK) so whilst recycling is possible, it does diminish the economic incentives for separation meaning that many cups end up in landfill. FoE Cymru state that only 1 in 4 cups in the UK market are actually recycled.ⁱⁱⁱ

Very early analysis from Keep Wales Tidy of Hubbub's 'In the Loop' campaign in Swansea has shown that paper cups account for around 10% of recycling and general litter bin waste (in both weight and volume). This demonstrates that, despite the efforts of many retailers to promote coffee cup recycling, there remains confusion from the public as to whether they are recyclable or not.

According to research by Eunomia, single-use cups can lead 'indirectly' to other items being littered. Whilst paper cups do not make up a high percentage of landfill as they weigh very little, by volume, they are increasing in prevalence. Studies from Keep Wales Tidy LEAMS surveys has shown that, whilst litter overall is decreasing, items associated with food and drink 'on the go' is rising and a persistent issue for local authorities, particularly on roadsides. Great British Beach Clean (GBBC) data shows that beverage containers and cups have risen 17% over the past 25 years in Wales. They are found 53 times on average per 100m of beach (GBBC 2018) (above the UK average of 42 per 100m). Keep Wales Tidy Street cleanliness surveys have also shown an increase in food and drink 'on the go' items over recent years.

The world's largest coffee chain, Starbucks, which hands out 4bn disposable cups worldwide, recently admitted the scale of the recycling challenge, after failing to meet some key targets, including getting customers to start using personal reusable cups. The company set a seven-year goal of serving 25% of drinks in reusable cups by 2015 and introduced a discount for use in their stores. In 2011 however, they were being used for just 1.9% of beverages.^{iv} Following the introduction of a 5p paper cup charge earlier this year, the number of Starbucks consumers using a reusable cup in stores located across London shot up by 156% in just six weeks.^v

This is mirrored in behavioural psychology interventions as a discount for doing the 'right thing' is not equal to a penance – even if the ultimate cost of the item / behaviour is equal. A field experiment carried out by Cardiff University in 2017 trialled a number of different interventions in cafes across the city to see if the use of single use cups could be reduced. It found that through clear messaging, the provision of reusable alternatives, and financial incentives, the use of reusable coffee cups can be increased by (on average) 2.3 to 12.5%.^{vi} The study suggests that that a charge may be more effective than a discount. These results are in line with prospect theory, which suggests that people are more sensitive to losses than to gains when making decisions.^{vii}

Like other levies or financial incentives, it is suggested that the higher the charge, the greater the take up. Keep Wales Tidy has been trialling a project on Cardiff Metropolitan University campus which aimed to increase the number of coffee cups separated for recycling and to promote re-use initiatives (reusables cups and Refill). Early results from the campaign showed that whilst cup recycling was not hugely increased, the sales of re-usable cups increased overall.

Appendix 3: Implement a Deposit Return Scheme for the benefit of Wales

There is extensive evidence across the world that Deposit Return Schemes are effective in changing behaviour, reducing litter and waste and increasing the quality of recycle.

From the recent DEFRA Consultation on a UK wide system; Keep Wales Tidy notes: *Given that the Scottish Government have already announced their Deposit Return System (DRS), we would strongly urge that Wales and England introduce a parallel system which would be the most effective option and reduce any administrative challenges. We particularly urge the Welsh Government to consider how to maximise the economic benefits of a DRS for Wales and to take the lead as the UK's most successful recycling nation, furthering their commitment to the transition to a more circular economy. A DRS has the potential to create jobs, revenue and stimulate the*

market for secondary materials and not opting into a scheme (or introducing a diluted scheme) could mean that these benefits are lost to Wales.

The DRS should also:

- Include all kinds of bottles and materials. Plastic, glass and aluminium cans should all be included. As many other materials as possible should be encompassed. This is in line with Scotland's plans.
- Have as few restrictions as possible on where they are returned to. Any supermarket, recycling centre or participating retailer should be able to take back bottles and give consumers' their deposit back.
- Not adversely affect household recycling, by including DRS statistics in local authorities' recycling targets to show kerbside and DRS rates together.

Appendix 4: Taking action on sanitary products and promoting reusable products

Sanitary items are prevalent in the environment, particularly in waterways and coastal areas. Not only do many of these contain plastic, they are also almost always single use by design. Although single use is the most desirable and affordable option for many of these items currently, we would highlight that the current alternatives on the market, particularly menstrual products and nappies are safe and affordable and may need support to push through the current market which is dominated by cheap plastic items.

Many of these items, used by individuals and health care workers, are improperly disposed of and cause similar issues to wet wipes, blocking waterways, polluting terrestrial and water environments and take many, many years to biodegrade.

Menstrual Products:

Menstrual products are one of the most commonly found single-use plastic items in marine litter. It has been estimated that an average woman disposes approximately 150 kilograms of tampons, pads, and applicators in her lifetime, around 90% of which is plastic.^{viii}

It is worth noting that plastic in sanitary items is not just a case of excess waste and the subsequent environmental harm, there is also the human health factor, especially if they are not used correctly. This is particularly true of menstrual products. Using tampons is a significant factor in Toxic Shock Syndrome according to the NHS— particularly if left in for longer than recommended or using "super-absorbent" tampons.^{ix}

We would also like to see some thought given to how these reusable products could be made more affordable; perhaps the Welsh Government could provide a way of making them available on an interest-free loan basis, where reusable products are paid in monthly instalments over a year so it doesn't have the unaffordable upfront price that makes it inaccessible to poorer families. We would like to see this explored for reusable menstrual products in particular, such as absorbent underwear, period cups and reusable, washable sanitary towels. Sex education should also recommend these above single-use alternatives which cause a tremendous amount of unnecessary waste, but such is their proliferation, girls and women will need a lot of education and support, as well as financial access, to ensure they are taken up.

Nappies:

Due to the inconsistency in kerbside recycling across each local authority in Wales, the provision for nappy collection is not widespread. Some local authorities collect nappies at kerbside and others do not, in many local authorities, Keep Wales Tidy has anecdotal evidence that nappies make up a significant proportion of domestic fly-tipped waste.

Although not commonly collected and even less frequently recycled, [NappiCycle](#) are an innovative recycling plant, based near Ammanford, Wales which offer recycling solutions for disposable nappies and have the capacity to cover every local authority. Nappies and AHP (Absorbent Hygiene Products) currently account for around 9% of waste in Wales and more innovation such as Nappicylce – from manufacture to end of life- is required to address this huge waste product ending up in landfill to promote similar circular solutions across Wales.

However, prevention must be at the heart of our efforts but unfortunately, reusable nappies are still unaffordable for many. There's a very good opportunity to tackle this with the Welsh Government's 'baby bundles pilot'^x. This has just started to be rolled out in Swansea and some include reusable nappies^{xi}. We fully support this and would like to see reusable wipes as well as nappies in all boxes, and guidance on how to use them. It's also great to see they are working with charities to develop a means of recycling and reusing products from them once a family is finished.

Appendix 5: Invest in Repair apprenticeships

The Welsh Government has made significant successes in recent years in regard to increasing household recycling participation and can now boast that we are in the best performing nations in the world. The recent 'Beyond Recycling' consultation (March 2020) demonstrated the myriad of opportunities to move beyond these targets and to concentrate our efforts on prevention and reduction of waste at source.

Repair Apprenticeships could be targeted at carpentry and electricians in the first instance and could be delivered through existing businesses and housing associations who already have apprenticeship support in place.

Upholstery businesses could also be included. The eventual aim would be to create a National Repair Enterprise for Wales, creating new local economic opportunities, supporting waste reduction and reducing carbon.

Stage 1: Skilling up for Repair

As well as learning trades 'for life', apprentices would focus on repairing WEEE/ Furniture, which is already collected by local authorities, they would also form part of a service to the public to repair items. This could be at a charged, per hour rate or subsidised for social housing tenants).

Stage 2: Building a Repair Economy

Many items have a second hand value once repaired or refurbished, there is the opportunity for the market of cheaper white goods (especially difficult to source for new housing tenants), through to more artisanal, 'upcycled' furniture.

Stage 3: A National Repair Service

Each local authority area could have a Repair Hub which is part of a National Repair Enterprise, responsible for ongoing recruitment, training and coordination of demand and logistics. The enterprise can also extend to public and private office furniture.

Creating repair apprenticeships with the aim of creating a National Repair Enterprise for Wales would create skills 'for life', would support reuse and repair efforts, reducing carbon emissions, waste sent to landfill and preserving valuable resources. If set up with housing associations, it could also provide much needed items at a lower cost, supporting new tenants of social housing in particular where debts are normally accrued.

- Over 2 million people in the UK are currently living without one essential household appliance and millions more living with broken or faulty items. The scale and impact of appliance poverty is serious and under discussed. (See: [Living Without Report, January 2020](#))
- A quarter of a million people in Wales are living without essential household appliances like fridges or washing machines.^{xii}
- 22 million pieces of furniture are thrown out in the UK and fewer than 1 in 10 people make attempts to repair.
- WEEE is the fastest growing waste stream in the UK and the UK is the 2nd biggest producer of WEEE in the world. Over 25% of current WEEE waste could be repaired or reused.

Appendix 6: Mandating for 'repair' and white goods / WEEE recycling

There are many fiscal and policy incentives that can be introduced to address the issue of excess waste of WEEE, white goods and other reusable and valuable waste streams such as textiles. As part of the Beyond Recycling Strategy a number of proposals were submitted by Keep Wales Tidy and other eNGO's. It is recommended that best practice from relevant initiatives be considered with the view to implementing a suite of incentives for Wales to promote the Circular Economy, reduce fly-tipping and address [appliance poverty](#) which is an increasing and serious issue for 14% of households in Wales. .

- Mandating companies which sell white goods to collect the old equipment when delivering new goods ([Netherlands](#))
- The establishment of reuse centres as collection, repair and resale hubs. ([Belgium](#))
- Building components exchange (Switzerland/[Germany](#))
- Tax breaks on repairs ([Sweden](#))

ⁱ Water.Org.uk , January 2018, Available: <https://www.water.org.uk/news-item/new-national-drinking-water-scheme-by-water-companies-to-cut-plastic-bottle-use-by-millions/> Accessed 12/10/20)

ⁱⁱ Smithers, R. The Guardian UK. 27 June 2014. 'World's first fully recyclable paper cup to hit UK high streets' Available: <http://www.theguardian.com/environment/2014/jun/27/recyclable-coffee-cup-uk-landfill-breakthrough> [7/9/15]

ⁱⁱⁱ FoE Cymru, 2019 <https://act.friendsoftheearth.uk/petition/introduce-25p-charge-single-use-cups-wales> [3.10.19]

^{iv} Smithers, R. The Guardian, 27 June 2014, *Ibid*

^v Edie (2018) <https://www.edie.net/news/5/Latte-levy--Was-the-Chancellor-right-to-reject-a-tax-on-disposable-cups/>

^{vi} Pourtinga, W. 2017 'Results of a field experiment to reduce coffee cup waste' Report to Bewley's Tea & Coffee Ltd. Cardiff University. 2017

^{vii} *Ibid*

^{viii} Reloop, Plastic-Free Periods, 2018, Available: https://www.reloopplatform.org/plastic-free-periods-menstrual-products-plastic-pollution/#_ftnref1 [Accessed: 15.10.20]

^{ix} NHS, September 2019, Available: <https://www.nhs.uk/conditions/toxic-shock-syndrome/> [Accessed: 15.10.20]

^x Welsh Government, 2019. [Written Statement: Update on baby bundles pilot.](#)

^{xi} Welsh Government, 2020. [Written Statement: Baby bundle pilot begins in Wales.](#)

^{xii} ITV News, 15 January 2020, <https://www.itv.com/news/wales/2020-01-15/quarter-of-a-million-people-in-wales-living-without-essential-household-appliances> (Accessed: 12/10/20)