



Local Environmental Quality Action Paper

November 2015



cadwch keep
gymru'n wales
daclus tidy

Why Local Environmental Quality matters

Introduction

Tackling persistent issues on Local Environment Quality (LEQ), such as littering, fly-tipping, graffiti and dog fouling, are some of the most important and tangible services that a local authority can provide. In addition to the visual impact there is growing evidence that poor LEQ has far-reaching and multiple effects for both communities and government authorities, since it stifles economic growth and is associated with higher rates of crime and anti-social behaviour.¹

LEQ issues are consistently at the top of the list of public concerns and a priority for many local authorities. Evidence suggests that deprived communities are more likely to suffer the worst environments. According to a 2004 report by the Joseph Rowntree Foundation:

“It serves to heighten their feelings of frustration and powerlessness. It fuels their belief that both local and national government are unable to deliver policies that reflect their concerns and address their needs. This, in turn, can reduce their willingness to engage in consultations about the future of their area and perpetuates their feelings of exclusion.”²

This correlation concludes that the community fabric is damaged, making communities less likely to engage and making social and economic renewal that much harder to achieve.

Two recent studies undertaken by Zero Waste Scotland showed that:

- The cost of litter on Health and Social Impacts amounted to a staggering £53million in Scotland alone.
- The associated links between LEQ and crime /anti-social behaviour amounted to a further cost of over £22 million.

Litter and dog fouling are a blight on our streets and landscapes and cause significant harm to environment, wildlife and people. The RSPCA receives over 7000 calls about wildlife which has been harmed by litter³, but this number is probably a lot higher as many instances will go unnoticed. Furthermore, much of our terrestrial

litter makes its way into the marine environment with the UN estimating that there are over 46,000 pieces of plastic in every square mile of oceans.⁴

Keep Wales Tidy research has identified a strong link between incidences of crime and poor LEQ. Over the course of 2011, surveys identified that 60 crimes were recorded on D grade streets, compared to just 7 on A grade streets.⁵ Whilst this early study was not conclusive in identifying the direct cause of the correlation, it has served to highlight the wider impacts and connection of poor LEQ on other social factors.

On the other hand, a focus on LEQ can be a catalyst for economic regeneration and should be considered as part of an area's economic programme to attract inward investment. Images of the local environment and quality of landscape are cited as the top environmental factors for inward investors.⁶ A pilot by the local council in St. Helen's, Merseyside and the Environmental Change Research Unit, which focused on LEQ improvement and quality of public space, demonstrated that over a period of 10 years, there was an increase in commercial investment in the town and a dramatic fall in unemployment from 19% to just 2.5%.⁷ Similarly, in a report carried out by White Young Green for the Welsh Government it was emphasised that LEQ issues can be a catalyst for, or are already delivering on, broader issues such as: economic regeneration, tourism, building public trust in local government, innovation and improved work methods and even reducing the fear of crime.⁸

Our litter behaviours and the quality of our local environment, cannot be separated from other aspects of our daily life - on our health, our safety, our economy and our pride of place. It remains a priority of our communities and presents a challenge for national and local government.

Is Wales getting cleaner?

In 2014, the All Wales Local Environmental Audit and Management System (LEAMS) Report (How Clean are our Streets?) shows that despite budget cuts, initiatives undertaken by local authorities have resulted in 96.5% of streets reaching an acceptable standard of cleanliness, compared with 95% back in 2012-2013.⁹

Whilst the overall picture for LEQ in Wales is good, poor LEQ standards are concentrated in busy urban areas and deprived communities.

Keep Wales Tidy recognises that significant improvements have been made in recent years, but there is still a great deal to be done to tackle common issues of LEQ and the impact that they have on the environment, society and our economy. Keep Wales Tidy has further concerns that LEQ standards will deteriorate, as financial constraints on local authorities increase and new lifestyle trends such as the increase in eating and drinking on the go generate additional litter. These trends will have a significant adverse impact on our communities in Wales unless action is taken.

Spotlight: Scotland

In 2014 Scotland released a 'Strategy for a Litter Free Scotland', presenting an integrated approach to creating safer, cleaner communities by tackling the problems of litter and fly-tipping. The focus of the strategy is on **personal responsibility** and emphasises prevention methods, building on the work of local authorities and reducing the need for costly enforcement measures. It recognises the consequences of Litter and fly tipping on other areas such as health, crime and wildlife and incorporates the requirement for waste reduction and higher recycling rates into the strategy.

Actions are based on the three interconnected strands of:

Information - Communication, Education and Community Action.

Infrastructure - Product design, opportunities for recycling e.g. Recycle on the Go schemes, guidance for councils, targeted support and funding and research and monitoring.

Enforcement – strengthening the enforcement system and provision of training for enforcement officers and magistrates.

The strategy also links with the development of a Marine Litter Strategy and wider street cleansing initiatives such as dog fouling.

See:

Scottish Government: <http://www.gov.scot/Resource/0045/00452542.pdf>



Persistent litter issues

Dog Fouling

Dog fouling affects 14% of streets surveyed in Wales, and frequently tops people's list of concerns regarding litter and refuse found on the streets. It is encouraging that 74% of Welsh people don't think there are any acceptable reasons not to pick up dog fouling, but a small number of dog owners acting irresponsibly can have a very significant and cumulative impact on local areas.

Local Authorities in Wales have adopted a combination of campaigns and enforcement to help tackle dog fouling. Posters and displays in public areas are the most frequently used method, while enforcement, media coverage, leaflet distribution, provision of free poop scoops, and dog waste bins are also used. A number of local authorities are also working with schools to educate children about dog fouling and the health risks associated with it.

Smoking related litter

Smoking-related litter, predominantly cigarette ends, was recorded on an average of 86% of Wales' streets in 2014-15. Since Keep Wales Tidy began street cleanliness surveys back in 2007-08, this litter type has consistently been the most common type of litter present on our streets, across all 22 local authorities.

Among Welsh litterers, half admitted to dropping cigarette ends, more than any other type of litter and almost 50% felt that there's no alternative but to stub them out on the floor. However, many don't even count cigarette ends as litter, despite the Clean Neighbourhoods and Environment Act 2005 redefining litter to include smoking-related litter¹¹.

Despite cigarette ends being small in size, they don't go unnoticed by people, with our research showing that they are the item seen most regularly by the public. Cigarette ends often find their way into tree grates, making them extremely difficult to clean up; or into water courses, where the toxic chemicals in the cigarette ends can contaminate water supplies¹². Contrary to popular belief, they are

not biodegradable. In fact, they are made from cellulose acetate, which can take up to 12 years to biodegrade¹³.

Dog fouling is of great concern to the general public, and Keep Wales Tidy research shows that people in Wales consider dog fouling as the problem which has the greatest impact on the look and feel of an area¹⁰. It is not only the visual impact of seeing dog faeces but also the health problems associated with it, namely toxocarasis which can lead to blindness. Initial work with the Wales Centre for Behaviour Change has been carried out in conjunction with Bangor University, discussions with a range of stakeholders found that many people do not realise that they can put dog fouling bags into a street bin and was found to be one of the barriers to responsible behaviour. Keep Wales Tidy believes that public education and awareness and law enforcement are the only long-term success measures for reducing dog fouling on our streets.

As with dog fouling, local authorities have adopted a number of methods to try to tackle the problem, including raising awareness, education campaigns, bins and portable ashtrays. The latter are good solutions for responsible disposal, as smokers don't like keeping hold of cigarette ends. However, design and location are important considerations (for bins) to encourage use and ease cleansing. Unfortunately, some smokers are reluctant to use such receptacles as they can be perceived as fire hazards.

As with other environmental crime, low enforcement levels in many areas, as well as the difficulty in catching offenders actually carrying out the offense, makes people think that they can get away with smoking-related littering and perpetuates the perception of some people that it is not an offence. Over recent years however, a number of Welsh local authorities have introduced private enforcers which has resulted in increased

enforcement activity and a zero tolerance approach, including for littering cigarette ends. Moreover, new powers introduced in the Anti-Social Behaviour Crime and Policing Act (2014) will make enforcement of this issue easier.

There is typically no single solution to reducing the problem, but in general, it is often best achieved through a combination of the following: appropriate bin provision, targeted

Chewing Gum

Keep Wales Tidy began collecting data on chewing gum staining in 2013-14. The results showed that 79.5% of streets in Wales had some presence of chewing gum staining¹⁴. What makes chewing gum litter a particularly difficult issue to tackle is that specialist, expensive and labour intensive equipment is required to remove it. While each piece of gum costs just 3p on average for the customer, the cleansing cost to local authorities is 50 times greater (£1.50 per piece)¹⁵. Although gum, like smoking material, when dropped, is defined as litter, the Code of Practice on Litter and Refuse and Associated Guidance 2007 states that local authorities aren't obliged to clean gum staining. Thus, the guidance, coupled with the high cost of cleansing and the fact that doing so can lead to damaged surfaces, means that many councils don't clean gum at all, or concentrate only on small areas adversely effected by the problem. Keep Wales Tidy research demonstrates however that the people of Wales believe that the problem has a negative impact on the areas

Fast Food, Fast Litter

Fast food litter is associated with food and more recently hot drinks, prepared and served quickly, and sold to be eaten / drunk immediately, generally on the move. It includes any food that is left, the packaging, including polystyrene and cardboard containers, paper wrappers, plastic film, cutlery, drinks cups / lids and straws. In 2013-14, Keep Wales Tidy's street cleanliness surveys (LEAMS) recorded fast food litter on an average of 18.4% of streets across Wales. This category includes fast food, packaging, cutlery and drinks-on-the-go.

In the BBC Panorama documentary 'Our Dirty Nation' (28th October 2013) it was highlighted that our growing fondness for fast food has

education, marketing and communication campaigns, provision of alternative solutions, such as pocket ashtrays, enforcement and appropriate use of legislative powers, effective cleansing and partnership working between the council, businesses and the community. There remains a great deal more that could be done by Industry, Government and businesses to tackle this problem.

in which they occur. Where action to tackle gum litter has been taken in Wales, it has been primarily through bins and advertising campaigns (namely through the Chewing Gum Action Group¹⁶ partners). Keep Wales Tidy have also been working with Gumdrop Ltd in pilot studies across Wales. Gumdrop Bins are the first bins in the world which have been produced specifically for gum disposal, but are also made from recycled gum and use the disposed gum to make Gum-Tec[®] products. A 6 month trial of Gumdrop bins in Hereford City Centre saw a reduction of gum litter by 39%.¹⁷

Over the last few years many Welsh local authorities have successfully bid to become chewing gum campaign partners with the UK-wide Chewing Gum Action Group (CGAG). The most recent advertising campaign in 2014, in which Blaenau Gwent County Borough Council was one of partners across the UK, led to an 38% reduction in gum litter overall.¹⁸

contributed to us dropping five times more litter today than we did in the 1960s.

More than half of all the fast food litter (55%) is most likely to be dropped in towns / cities, where it has a big impact. Fast Food litter has also been found in rural areas, far away from outlets, as a possible result of the increase of 'food on the go' and the resulting waste being dropped from cars. In a survey, in 2010, people across Wales identified waste associated with food as the type of litter which has the most negative impact on the look and feel of an area. Research in 2010 which looked into the perceived impact and extent of litter problems amongst the Welsh public showed that: "Waste associated with food is seen as the most

negatively impactful litter type. In terms of having the most negative impact fast food packaging was mentioned by the greatest proportion of respondents (71%) followed by cans or bottles (68%) and chewing gum (65%). The types of litter seen as having the least impact were those which biodegraded: pieces of food (mentioned by 31% of respondents) and fruit (26%).”¹⁹

As well as the direct impact on our streets, indirect impacts associated with fast food litter include:

- *Health* – fast food litter can foster harmful bacteria as well as attracting rats and birds which carry diseases.
- *Lost resources* -If packaging is not recycled the resources it is made from are lost and it could also result in the local authority failing to meet recycling targets. Fast food packaging is made up from many different materials, and more work needs to be done on the type of materials and alternatives which can be used. For example the Vale of Glamorgan Council is currently looking to alternatives to polystyrene trays for chips in Barry, so that the waste packaging can be recycled.
- *Damage to the marine environment* - Up to 80% of “plastic” marine litter starts off on our

Marine Litter

Marine litter currently poses a growing threat to the aquatic and coastal environment. Marine litter is any litter created and disposed of by humans which makes its way into our seas, oceans, lakes and rivers. Most marine litter consists of material that degrades slowly, if at all, so a continuous input of large quantities of these items results in a gradual build-up in the marine and coastal environment. This negative trend has been confirmed by a number of studies, clearly indicating that the situation with regard to marine litter is continuously getting worse.²²

Marine Litter poses a serious risk to wildlife and poses a risk to human health as the waste ends up in fish that we then consume. A study by Plymouth University showed that over a third of the 504 fish surveyed from British waters contained small pieces of plastics which the fish had ingested.²³ Plastic debris in our oceans also

streets, which means that fast food litter is contributing to this problem, particularly from coastal areas and tourist hot spots. This plastic debris is slowly breaking down into tinier and tinier pieces and accumulating in marine environments worldwide.

- *Increased clean-up costs and public hazards from grease.*

Recycling incentives alone cannot combat this issue as food and grease can contaminate the packaging. New ideas need to be explored to see if it is possible to develop either a rewards system and/or more recycling opportunities for specific types of waste like fast food packaging as well as business engagement to identify solutions. In line with the emerging EU approach to the Circular Economy and the Welsh Government’s Zero Waste ambitions²⁰, there is a need to consider how to make the Manufacturing, Service and Retail Sector more responsible for dealing with the end of life packaging found outside our homes, in the wider environment of Wales both on land and in the sea. DEFRA has produced a [‘Voluntary Code of Practice for Local Partnerships’](#) for the purpose of reducing fast food on the go and English councils who have implemented the code have seen a reduction of around 40%.²¹

poses a serious risk to wildlife as more than 1 million birds and 100,000 marine mammals die each year from becoming entangled in or ingesting marine litter.²⁴

It has been estimated that around 80% of marine debris is from land-based sources and the remaining 20% is from ocean based sources.²⁵ Rivers and sewers are the main pathways of litter entering our seas and increased incidences of flash flooding in urban areas in recent years have worsened this issue. In a 2015 study which looked at 4 European rivers, litter was found in all of the samples which were carried out, even in those areas with low population pressure.²⁶

There are a number of examples of effective and innovative work to tackle marine litter but a great deal more needs to be done to tackle the

issue and to raise public awareness of the sources and impacts of discarded litter. In a Europe wide survey by MARLISCO project (Marine Litter in European Seas - Social Awareness and Co-Responsibility) on the perceptions of marine litter, the key findings indicated that this was an issue of concern for the general public (particularly from respondents in the UK, Germany and Greece) but that there was not a great deal of awareness around the pathways of litter or the biggest issues.

The Welsh Government is currently working with Defra and other devolved administrations to implement a UK Marine Strategy under the Marine Strategy Framework Directive (2008/56/EC) (MSFD). The overarching aim of the MSFD is for Member States to put in place measures to achieve Good Environmental Status (GES) in their waters by 2020. Many countries have taken steps at the national level

and under regional organizations, such as OSPAR²⁷, to address the marine litter problem. Last year, OSPAR produced a Regional Action Plan for Prevention and Management of Marine litter in the North-East Atlantic for its member signatories (which includes the UK). Recommended actions focus largely on the issue of combating litter before it reaches the aquatic environment and emphasises effective industry engagement in order to promote extended producer responsibility

Clearly, it is much more effective to prevent litter reaching the aquatic system in the first place than to try to remove it once it has entered the marine environment. Effectively tackling LEQ issues on land is crucial to addressing the waste that ends up in our seas.



An avoidable cost

Keep Wales Tidy is a member of the [Clean Europe Network](#), an organisation with the vision of a Litter-Free Europe by 2030. The network estimates that clean-up costs alone throughout Europe amount to somewhere in the range of €10-13 billion.

Annual litter clean-up costs around £70 million in Wales²⁸, this figure does not include the indirect costs associated with litter and crime, anti-social behaviour, health or the economy. Specific studies on Wales's data is not yet available, but research from Zero Waste Scotland would indicate that this figure is at least doubled when indirect costs are taken into consideration.

According to a report by the Wales Tourism Alliance, the direct contribution of the visitor economy to Wales is £2.7bn which equates to 5.8% of Wales GDP (compared to 3.9% in England, 4.9% in Scotland and 2.1% in Northern Ireland) and that by 2020, tourism is projected to provide a total contribution of 6.9% of the Wales GDP, supporting 188,000 jobs and accounting for 13.7% of total employment.²⁹ There are a significant number of international examples which have demonstrated that experiences or perceptions of litter at

destinations impact visitor choice although more research is needed to assess the extent of the deterrent. Swedish research suggests that beach litter alone reduces tourism by between 1 and 5%.³⁰ Coastal towns across the UK have already been badly affected by the advent of cheaper foreign travel since the 1970's and many are now suffering from disproportionate levels of deprivation and unemployment compared to the Wales average. Given the figures above, a 5% reduction (from the Swedish research) in the visitor economy would have a significant impact on coastal communities as tourism tends to make a disproportionately large contribution to these economies.

This cost is avoidable!

Litter and associated LEQ issues are caused by individual behaviours and are not an inevitable product of society. Research from across the world demonstrates that awareness-raising campaigns, adequate litter provision, partnerships and enforcement are effective in tackling poor LEQ issues and often incur relatively small costs to implement, whilst the economic and social benefits of a cleaner environment are very significant.

An avoidable cost

Annual litter clean-up costs around £70 million in Wales, this is equivalent to:

- **2254 Nurses** (Based on a median annual salary of £31,095)
- **1,904 Secondary Teachers** (Based on a median annual salary of £36,789)
- **4,797 FT workers on the living wage** (Based on a 38 hour week at £8 p/h)
- **8,393 Students' tuition fees** (Based on the Average tuition fees of £8,338)
- **49,294 households fuel bills** (Based on a typical annual dual fuel bill of £1,420 each)

The European Commission is currently developing a Circular Economy Strategy. Due for release in late 2015, the Strategy aims 'to transform Europe into a more competitive resource-efficient economy, addressing a range of economic sectors, including waste'³¹ and forms a part of the Europe 2020 strategy for smart, inclusive growth. The economic

arguments for the shift toward the circular economy model are compelling and early research has suggested that the potential for local job growth is significant, especially in entry-level and semi-skilled jobs.³²

By connecting circular economy ambitions and zero waste targets with effective prevention and engagement locally, tackling poor LEQ issues can not only reduce costs but also has the potential to spur economic growth and investment.

The most effective interventions are those which address behaviours and lead to sustainable, long term change. A combination of social marketing, education, engagement and enforcement can contribute to a positive impact on individual litter behaviours. The single use

carrier bag charge is a good example of how policy can affect behaviour change and create a new social norm which has a significant impact on poor LEQ. Research is ongoing as to whether the charge can lead to other types of pro-environmental behavioural 'spillover' although early studies have suggested that this could be the case. A study in 2013 by Cardiff University found changes in self-reported 'environmental identity' that could produce positive behavioural change in the longer term.

Spotlight: Wales

On 1 October 2011 Wales became the first country in the UK to introduce a requirement to charge for single use carrier bags. Every retailer in Wales must now charge 5p per single use carrier bag, although some types of bags are exempted. The aim of the levy was to reduce the number of single use bags and their associated impacts on the Wales environment such as:

- The blight on the landscape and long lasting impacts caused by non-biodegradable materials
- The significant resource used in their manufacture and distribution
- The negative impact on wildlife, biodiversity and marine life

Before the charge, many carrier bags ended up as litter. Keep Wales Tidy estimated that 3.4 plastic bags were found in every kilogram of litter in Wales. That's around 2.7% by weight of all litter. It cost Welsh local authorities an estimated £1million to clean up bag litter every year and 86% of single use carrier bags ended up in landfill.³³

Retailers reported reductions in bags issued ranging from 45% at hot food outlets to 96% at grocers and 75% for clothes stores and is supported by around 70% of the Welsh population. Although there is a lot of research yet to be undertaken on whether the charge has had any impact on positive behaviour 'spillover' into other environmental areas, a study in 2013 by Cardiff University found changes in self-reported environmental identity that could produce positive behavioural change in the longer term.

The success of the charge has led other countries to follow suit with Scotland bringing in the charge in 2014 and England due to introduce the charge from 2015. The Welsh Government has proposed under the Environment (Wales) Bill that the charge be extended to other types of bags, including 'bags for life'.

See:

Welsh Government:

http://gov.wales/topics/environmentcountryside/epq/waste_recycling/substance/carrierbags/?lang=en

Carrier Bag Charge Wales:

<http://www.carrierbagchargewales.gov.uk/?lang=en>

Spotlight: Social Marketing

Social Marketing, sometimes referred to as 'Nudging' is defined as: "the application of commercial marketing techniques to social problems." In other words, it uses the same advertising and marketing techniques that used to sell commercial goods with the aim of encouraging behaviour change for the benefit of the community or society as a whole.

In order for social marketing to be effective, it is necessary to identify the negative behaviour and the barriers to the desired change and provide the infrastructure for the change to be implemented. For example, 'Don't mess with Texas' is a well-known social marketing scheme but in addition to the popular slogan, the state provided bins in problem areas and targeted specific groups of people who they had identified as more likely to litter. Although people commonly find littering to be a malpractice in social norms, if the proper receptacles are not available, behaviour may be inconsistent with their concern for not littering.

Social Marketing is increasingly being used by governments to tackle persistent problem issues. The UK Government has recently created an independent 'Nudge Unit' through their Behavioural Insights Team and are applying these techniques to a wide range of issues including charitable giving, organ donation and business engagement.

Many effective nudge efforts have been simple and cost-effective. In 2011, students in Copenhagen carried out an experiment where green footprints on the street directed people to bins, to see if it led to a reduction in litter. The experiment showed a 46% decrease in the litter dropped. A researcher from a Copenhagen based Nudge Research Unit explains that the footprints were 'a recognition of the fact that the citizens of Copenhagen actually do care about the state of the city streets, they just need a little nudge to effectively carry those concerns out in their busy every day lives' This experiment has been replicated in parts of Wales where it had a similar impact. The trial concluded that these low-cost, simple interventions should be implemented permanently.

Behaviour change is a complex science and not all social marketing experiments have been successful, which underlines the importance of pilot projects before full implementation. Effective campaigns build on already established social norms, such as the generally established perception that litter is 'wrong', the 'embarrassment' factor of being caught littering or 'brand shaming' to engage manufacturers with their responsibility for waste reduction.

See: <http://ctb.ku.edu/en/implement-social-marketing-effort>



Policy Link

- [Programme for Government in Wales](#)
- [Clean Neighbourhoods & Environment Act](#) (2005)
- [Climate Change Strategy for Wales](#) (2011)
- [Towards Zero Waste Strategy](#) (2010)
- [Anti-social Behaviour, Crime and Policing Act](#) (2014)
- [Environment \(Wales\) Act](#) (2016)
- [Wellbeing and Future Generations Act](#) (2015)
- [Local Environment Audit & Management Systems](#) (LEAMS)

Conclusion

Improving our LEQ is a critical issue for communities and government in Wales. It is not just an unsightly blight on our streets, but has a significant impact on our health, economy and social fabric. The costs associated with cleaning up litter is around £70million in Wales alone and this figure does not take into account the associated knock-on effect on the costs to our economy and tackling crime.

This is not an inevitable cost and there is extensive research and case studies throughout Europe which shows that smart solutions to the problem, such as social marketing, education

and innovation to tackle behaviour change can, and do, work.

There is no one solution to tackling LEQ - but effective partnerships with government, industry and community will have a big impact. Due to the far-reaching and cross-departmental nature of LEQ, Keep Wales Tidy believes that an integrated all-Wales Strategy is critical to addressing the problem and reducing the associated costs, so that we can become the cleanest part of the UK and set a standard that others will want to follow. This will be a major contributor towards a more responsible and vibrant Wales.

Recommendations

The following recommendations have been compiled from our own experience in the field and conversations with all 22 local authorities through the LEAMS and Enforcement Forums. They have also drawn on the experience and recommendations that came out of the Cleaner Wales Summit in 2009.

By working together we can make Wales the cleanest country in the UK.

An Integrated LEQ Action Plan for Wales

Keep Wales Tidy believes that the time is now right for Wales to develop and adopt a comprehensive and integrated LEQ action plan, which focusses on prevention, reducing costs by encouraging collaboration and identifying best practice. This would have a significant impact on communities and the challenges faced by local

authorities in keeping our streets and neighbourhoods clean. The plan would:

- Highlight the connection between poor LEQ and the impact on the economy, health and social regeneration.
- Utilise experience and learning from recent social marketing initiatives, as a way to incentivise behaviour change to create sustainable change.
- Focus on education and awareness-raising to instil positive behaviour from an early age.
- Form a critical part of the Welsh Government's Zero Waste Wales Strategy.
- Contribute towards Wales' development of Circular Economy initiatives including linking to private business and extended user responsibility
- Be comprehensive and have a broader reach than the Scotland strategy, including all

aspects of LEQ issues and link to the current fly-tipping strategy.

- Include guideline actions and enforcement provision on separate LEQ issues, including those detailed in this paper.
- Reduce the impact of terrestrial litter entering into the aquatic system and impacting on the marine environment.
- Include robust monitoring systems to measure progress.

Tackling persistent problems associated with LEQ and reducing the financial costs to society will demand a step change in collaboration and partnership. These problems cannot be tackled in isolation, or by Government acting alone. Tackling LEQ issues effectively will only be possible in partnership between central and local government, business and the community sector. It should be seen as a cross-departmental issue within the Welsh Government and local authorities. The Strategy will therefore need to be supported by a new National LEQ Forum to increase collaboration between Government, local authorities and private and community sector stakeholders. Separate working groups could be considered for issues such as Marine Litter and Roadside Litter.

Protection of local authority budgets for environmental quality interventions (including street cleansing)

Local authorities are facing difficult budget cuts - and further reduction in resources will inevitably adversely affect LEQ standards unless it is ring-fenced. When considering the cost-benefits of LEQ work, local authorities should consider the impact on other areas such as economic regeneration, tourism and potential investment, health, crime and anti-social behaviour.

Training & Guidance on relevant legislation

Further training on relevant legislation, more recently, the Anti-social Behaviour, Crime and Policing Act 2014 is needed. Further guidance would help Local Authorities use this new legislation in a consistent way. This would reduce costs and increase the effectiveness of enforcement across Wales. This training should be provided to a range of Local Authority staff, including Directors, heads of services, legal teams and on the ground enforcement staff, as well as Magistrates.

Recycling and Waste

Keep Wales Tidy supports the proposals contained in Part 4 of the Environment (Wales) Act in regard to the requirement of the public sector and business to segregate waste at the source, the ban on energy from waste and the business ban on food waste to sewers. However, Keep Wales Tidy are also aware that the current requirements for storage provision for waste /recycling in some existing premises are insufficient, and when planning permission or Change of Use is granted for new business, the area required does not always meet the storage requirements necessary for the different types of recycling. This can lead to public health issues, negative public opinion, as well as contributing to a poor local environment, strewn with litter on collection days.

Keep Wales Tidy would encourage all local authorities to:

- Provide bins with lids or covering to ensure that kerbside rubbish is not blown into the street
- Ensure that waste provision space is accounted for when change of use is granted
- Specifically include all RSL's and the housing sector in awareness campaigns
- Provide kerbside collection of batteries across Wales
- Support local businesses to make waste disposal convenient and inexpensive
- Consider partnerships with local business, town centre managers and Business Improvement Districts (BIDS) to develop innovative solutions to address fast food litter, drawing on the Voluntary Code produced by DEFRA.
- Ensure adequate provision of recycling and waste centres in each local authority.

Awareness and understanding is consistently among the top three barriers that prevent people from recycling, as such, Keep WT strongly supports a '**national restatement on the importance of recycling**' to accompany these proposed changes, as recently highlighted by the NAW Inquiry last year. (NAW, 2014)

Reducing Roadside litter

Keep Wales Tidy has identified the following ways in which litter can accumulate on the verges of and in the central reservations of motorway and trunk roads:

- Irresponsible disposal of litter by motorists;
- Litter having come from waste/recycling carriers,
- Litter resulting from road maintenance works, and
- Litter blown to the proximity from elsewhere.

Irrespective of how the litter along motorways and trunk roads comes to be there, it is particularly problematic to collect; there is a genuine health and safety issue due to the proximity of high-speed traffic. This may necessitate lane closures, the use of crash barriers and additional signage and therefore litter picking in such circumstances can be carried out at night, with a view to having the least impact on traffic. Consequently, the cost of such operations can be substantial.

The Cleaner Wales Summit in 2009 recommended a number of measures to reduce roadside litter:

- Working with DVLA to develop proposals to tackle litter from vehicles based on the process used to tackle speeding.
- Developing road signage that highlight the problem of road side litter.
- Local Authorities to publicise the cost of road clearance to the public and when roads are closed for cleaning to put up a sign stating the reason for the closure.

There is currently a legal loophole which makes it extremely difficult for councils to take enforcement action against vehicle litterers as they must prove who was responsible. By making registered keepers responsible for vehicle litter, in line with other driving penalty notices, people who commit this offence would no longer be able to avoid the penalties. Keep Wales Tidy strongly supports this change which would put environmental crime on an equal footing with other driving offences and would make enforcement easier and more effective.

Background to LEAMS

Through funding from the Welsh Government, Keep Wales Tidy has been collecting LEQ data through street cleanliness surveys since 2007. The Local Environmental Audit and Management System (LEAMS) surveys provide a 'snap shot' of litter and other local environmental quality indicators across Wales. We use this data to calculate a 'Cleanliness Indicator' for individual local authorities as well as for Wales as a whole, which we publish each year.

The Local Government Data Unit combines Keep Wales Tidy and local authority data to calculate the Street Scene Performance Indicator. The data is also used to:

- Assist the 22 local authorities across Wales on LEQ issues
- Inform the Welsh Government and other organisations
- Help shape Keep Wales Tidy's own research and work programme work

The current methodology and an explanation of how the CI is calculated can be obtained via the following link:

<http://www.keepwalestidy.org/policy-research/environmental-quality-surveys/leams>.

About Keep Wales Tidy

Keep Wales Tidy is an independent National Voluntary Organisation with Charitable Status. We are one of Wales' largest and most effective environmental charities, covering the whole country and influencing a wide range of organisations and communities.

Our approach leads to sustainable change: influencing behaviour and enabling individuals, groups and schools to take their own actions.

Our focus is on people and their connections with the environment.

We deal with far more than litter: our work encompasses biodiversity, access and recreation, health improvement, food growing, Coast Awards, Eco-Schools, and so forth.

Our work is underpinned by research and policy work including; Local Environmental Quality Surveys and developing advice for Government and other stakeholders.

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