



# Domestic Fly-tipping in Wales – Identifying Barriers, Creating Solutions

Keep Wales Tidy, 2022

# Contents

Contents.....	2
Executive summary .....	4
Introduction .....	6
Scale and nature of the problem .....	7
Data issues .....	8
Key issues: Domestic fly-tipping .....	9
Identifying solutions.....	10
Structural barriers and solutions .....	11
Waste collections .....	11
Access to HWRCs.....	14
Bulky item collection.....	17
Political pressures .....	19
Removal targets .....	19
Enforcement .....	20
Communal bin stores and HMOs .....	22
Economic barriers and solutions.....	24
Housing inequality .....	24
Charging – bulky waste collection .....	25
Options for reuse / repair / borrowing.....	25
Access to vehicles .....	26
Social barriers and solutions .....	28
Charging and permit systems – HWRCs.....	28
Illegal traders .....	29
Use of public bins.....	29
Understanding the term fly-tipping.....	31
Finding solutions .....	33
Tables of issues and potential solutions .....	33
Appendices.....	40
Appendix 1. Example decision map and influence points .....	40
Appendix 2. Sample of local authorities’ waste charging policies and approach to bulky waste provision and information about alternatives to bulky waste disposal by council .....	41
Appendix 3. Keep Wales Tidy local authority (Caru Cymru issues update) fly-tipping survey .....	42
Appendix 4. Prevention through policy: Traveller sites .....	44
Appendix 5. Prevention through policy: Student areas .....	46

References .....	47
------------------	----





# Executive summary

Levels of fly-tipping in Wales remain unacceptably high damaging the communities which endure it and costing councils across Wales millions to remove. Fly-tipping has far-reaching social, economic and environmental impacts and is a persistent problem across all council areas in Wales, both urban and rural. Keep Wales Tidy has spent time researching this issue from a behavioural perspective and is positive about engaging councils in implementing solutions and removing barriers through a more holistic and consistent approach. This approach is embodied in the Caru Cymru programme, in partnership with all councils in Wales and Cardiff University, which offers positive inspiration to the people and communities of Wales to value and engage with caring for their local environment. This paper focuses on fly-tipping from households (primarily domestic waste and bulky goods and appliances). It aims to draw on best practice and put forward fresh solutions with an under-researched and undervalued behavioural perspective on the issue. It is timely as the Welsh Government is considering the first '[Litter & Fly-tipping Prevention Plan for Wales](#)'<sup>1</sup> and is intrinsically linked to the circular economy ambitions of the '[Beyond Recycling Strategy](#)' (2021) and the need to reduce waste at source.

Welsh Government has recently published the [summary of responses](#)<sup>2</sup> to the proposed Litter & Fly-tipping Prevention Plan for Wales and many of the issues noted here are reflective of the comments from the consultation. Our approach is also aligned to a recent publication by Keep Britain Tidy on '[Insights to tackle householder fly-tipping](#)'<sup>3</sup> which considers the values, motivations and barriers of households in proper waste disposal and related waste policies.

Although many suggestions here focus on councils, these should not be seen as isolated recommendations, but rather the beginning of a strategic and truly preventative approach which will require both short-term actions and long-term commitment by all levels of government, from ministers to civic community stakeholders.

Being sure that all incidences of fly-tipping are consistently recorded is challenging, however, it is possible to see common trends and sources in the national data. The character of fly-tipping has changed in recent years, and we now see a greater prevalence of domestic waste and less instances of commercial and industrial waste being disposed of improperly. The information captured as to what is being fly-tipped is a valuable source of data when informing how to address the issue and what barriers may exist. The distinctive nature of this discussion document is to take a holistic approach to the problem of fly-tipping, capturing how structural, economic and social barriers are impeding progress in its reduction. It also focuses on a behavioural approach to understanding the problem, as individual motivations, behaviours and values can be critical in developing preventative action. The suggested solutions have been developed using a COM-B method of behavioural change which is especially useful for considering 'user' perspective, barriers and solutions.<sup>4</sup>

The paper recognises that waste behaviours are complex, and it is not the case that any one solution can be identified which will solve the problem. However, by revising how we consider the issue of fly-tipping, we can begin to consider a more effective approach for national, local and community engagement. This is critical as, unlike littering behaviours, a growing body of evidence is demonstrating that the barriers to prevent fly-tipping are often structural in nature and are therefore best addressed at a policy level. Wales is a world leader in household recycling participation, and we recognise that there are many instances of good practice by local authorities, working with Fly-tipping Action Wales, as they work towards reducing waste and increasing recycling with limited budgets and resources.

However, there is evidence that some waste policies can collectively undermine the aim of behaviour change which increases recycling and reuse. As Wales makes the transition towards a more circular economy, promoting reuse and repair and other preventative activities, public engagement and understanding of waste is a vital element for success. Positive behaviour change occurs when the desired behaviour is made easy, convenient and affordable – this has been demonstrated in household recycling collection to great effect in Wales. However, in the desire to reach targets or save resources, the cumulative effect of measures such as charging for bulky waste removal, rigid rules around collections and access to Household Waste Recycling Centres (HWRCs), and lack of support for those on lower incomes can inadvertently lead to an increase in improper waste disposal such as fly-tipping. It is necessary therefore, to review all related waste policies at both national and local levels to ensure that there is a consistent and common thread that is promoting positive waste behaviours.

Rather than viewing fly-tipping as an isolated problem, it is proposed that it is considered through the wider lens of waste reduction and prevention. It is not suggested that implementation of any one solution proposed here will solve fly-tipping instances alone, but we urge decision makers to consider the whole suite of approaches and the messages (or lack of messages) about the ease, convenience and affordability of waste disposal. To really address these challenges, councils will need to adopt a more systems-based approach to waste reduction and promoting the circular economy. This must minimally include waste, housing, enforcement, regeneration and economic development teams, communications and council members to consider the necessary requirements and unintended consequences of any waste related policy to develop a truly preventative approach. Partnership with appropriate community groups and third sector organisations, including housing associations also forms a key part of the solution.

Specific issues relating to holiday waste and the increase in ‘fly-camping’ are not addressed in detail here but are covered in another Keep Wales Tidy paper on the issues of tourism and waste management due to be published in 2022.

This research has been informed by published journal studies, project reports, several surveys of householders and councils as well as available data on fly-tipping instances and costs, and a review of all council websites. The issues which potentially lead to domestic fly-tipping are addressed in turn and are followed by outline proposals for solutions in each area<sup>1</sup>. These solutions are diverse, including new forms of communication, reviews of waste policies and infrastructures, staff training and strategic engagement with members of the community and the organisations who interact with them. It is recognised that councils are working with limited resources and whilst some of these solutions may appear unfeasible, it is argued that preventative activity will save far more in the long-term and will be far more cost-effective than relying on reactive enforcement.

Keep Wales Tidy’s approach is to encourage an open-minded rethink of the issues behind fly-tipping. The ideas in the following table are not intended as a prescriptive action plan but should be considered as part of an integrated strategy and no one solution will solve the issue alone. The suggestions include things that we know some councils are already carrying out as good practice. Some items will also require further discussion and innovative approaches to be put into use. We would hope that this can be used as a guide for councils and other policy makers to review current policies and practice to establish an environment which promotes responsible waste behaviours and avoids unintended consequences.

---

<sup>1</sup> Separate but related research by Keep Wales Tidy is also being undertaken into the behaviours and motivations around waste reduction and repair activities and our research into tourism will consider the specific issues of fly-camping and waste from holiday lets.

# Introduction

Broadly defined, fly-tipping is the illegal and unauthorised disposal of waste. This can apply to domestic waste, commercial or industrial waste, from black bags to tyres, mattresses to building rubble. Fly-tipping is a criminal offence and penalties for being found guilty of fly-tipping waste range from a Fixed Penalty Notice to imprisonment depending on the scale and nature of the crime. In the same way that we have seen litter trends change over the past decade which have reflected various social and cultural changes, we have also seen changes in reported fly-tipping trends which have seen a general decrease in commercial fly-tipping and a general overall increase in domestic fly-tipping. In particular, we have seen an increase in general 'black bag' waste across Wales and a widespread and persistent issue with household waste in public bins.

This paper primarily addresses the widespread issue of domestic waste from households, not commercial or industrial waste. As we are taking a behavioural approach to the issue here, it is important to note that the motivations that affect domestic fly-tipping are very different to commercial instances or that of organised crime and therefore it is not useful to consider these simultaneously. Taking a behavioural approach to the issue means that the focus is on the barriers (and potential solutions) to the proper disposal of waste, whilst many other studies tend to split up the problem by perpetrator type (for example industrial, traders, households). In order to truly understand the nature of the problem, a greater exploration looking specifically at the issue of domestic waste and the common barriers, motivations and perceptions of waste disposal by the public in Wales is needed. By looking at these key challenges, we hope to be able to share some new insights on the problem and consider how to improve national and local policy and critically, how to create a more consistent public message to promote responsible waste behaviours.

It is recognised however that in relation to household waste certain groups do require specific interventions such as those that could be considered 'transitory' populations (students, travellers and holidaymakers for example) and some of these are considered in the [appendices](#). Keep Wales Tidy is also acutely aware of some of the additional problems such as the increase in 'fly-camping' which have been exacerbated over the period of the COVID-19 pandemic which saw restrictions on international travel and an increase in domestic visitors which brought a different audience to our countryside. Fly-camping and other issues relating to visitor management and waste have been considered in more depth in Keep Wales Tidy's research into tourism and litter.

Other persistent issues around fly-tipped waste such as private land and investigatory duties are not considered here at length as they are less pertinent to the behavioural discussion but policymakers at a national level should also consider this factor when creating or amending policy.

Whilst awareness raising is a key element in prevention, there is an urgent need to consider this issue in the context of waste and recycling policies enacted by local councils to ensure that there are no unintended consequences. This is not designed as a criticism of any individual policy but does serve to highlight the critical need for joined up decision making, scaling up and replication of best practice. The majority of fly-tipping campaigns have placed the onus entirely on the householder but, without due consideration of the structural, cultural and economic barriers to waste disposal for households across Wales, this is unlikely to challenge the behaviour or address the problem at source. There may even be some instances where well intentioned policies are unintentionally promoting fly-tipping.

Unlike littering behaviours, a growing body of evidence is demonstrating that the barriers to prevent fly-tipping are structural and are therefore best addressed at a policy level.

Fly-tipping will occur where perceived benefits exceed perceived costs, where weaknesses in collection and disposal services provoke those with waste to get rid of, and where those producing and disposing of waste are ignorant of their responsibilities for or methods of disposing of it lawfully.<sup>5</sup>

This exploration is timely and relevant as the Welsh Government is considering the first '[Litter & Fly-tipping Prevention Plan for Wales](#)' and is intrinsically linked to the circular economy ambitions of the '[Beyond Recycling Strategy](#)' (2021) and the need to reduce waste at source.

As such, it is strongly recommended that the focus going forward is on prevention and waste reduction and that consideration is given to how this could be achieved through repair and reuse initiatives and other interventions to address excess consumption and increase understanding of the value of waste in society.

It is important to note that many members of the public do not associate with the term 'fly-tipping' and consideration is needed as to how public messaging is translated into a simple and effective message using commonly understood language.

## Scale and nature of the problem

Fly-tipping has been found to cause a wide range of problems to the natural, social and economic environment, such as disease transmission, soil contamination, the attraction of other crimes to affected neighbourhoods, increased fear of crime, substantial clear-up costs and discouragement of inward investment.<sup>6</sup>

According to 2020/21 data, of the 41,071 incidences recorded, the top 3 waste types were: 'other' household (18,514), household black bags (11,459) and white goods (2,236).<sup>7</sup> The majority of instances were the size of a small van or car boot-load or less.<sup>8</sup>

It is unsurprising that most fly-tipping incidences are recorded in areas of higher population and that clearance costs are indicative of the scale and nature of the waste. This demonstrates a shared challenge across Wales, one that cumulatively costs us over £2 million per year for clearance alone.<sup>9</sup>

It should be noted that 2020/21 covered a period of the COVID-19 pandemic and subsequent lockdowns where many local authorities reported that the issue of fly-tipping worsened, a fact attributed largely to the closure of Household Waste and Recycling Centres (HWRCs) in that time. However, clearance costs were still close to £2 million in the preceding years (£1,769,582 and £1,714,051 in 2019/20 and 2018/19 respectively).<sup>10</sup>

Although instances have dropped over the past 15 years since the baseline figures, the 41,071 incidences recorded in 2020/21 were only the 6<sup>th</sup> highest figure recorded since 2006/7 despite the pandemic. However, given the issues of data recording and lack of a statutory duty on local authorities to investigate instances, it is hard to know what these figures are attributed to. Data is largely reflective of the resources and the preceding decade of austerity that severely challenged the resources of local authorities to undertake any non-essential services and where many waste and litter management activities have become mostly or wholly reactive will likely mean significant underestimates.

## Data issues

Data on fly-tipping is extremely challenging and it is impossible to gather an entirely 'true' picture of the problem due to the nature of the crime. Fly-tipping often occurs in hidden areas in remote and isolated locations and is not restricted to public land. The departments in local authorities which are responsible for dealing with the problem vary, as do the resources available across each area. Natural Resources Wales (NRW) has responsibility for some instances and types of fly-tipping which are not clearly defined and has sometimes led to confusion or tension between them and local authorities.

Although the accuracy and scale of recording instances vary across local authorities, data collection methods for capturing instances are relatively robust although analysing the data is not as straightforward as is often reported. Incidences alone are not a useful analysis tool without consideration of population size, spatial analysis and the context of local resources. Similarly, prosecution data and cleansing costs can be more indicative of local authority resources rather than the true nature and scale of the crime as many instances go unnoticed or unreported. Hence, current fly-tipping data is useful in providing us with a national 'snapshot' but is not able to answer the more complex issues behind the crime. Even the definition can vary across local authorities with some, for example, recording side waste (waste outside of the designated containers) put out for kerbside collection on the wrong day as fly-tipping whilst others do not.

Fly-tipping Action Wales (FTAW) has developed a spatial reporting tool 'FlyMapper' so as to standardise and build on the evidence base and a few local authorities use this to good effect. Other local authorities use other systems and various platforms as well as a number of them having public reporting apps for fly-tipping, litter or other 'street scene' issues. Unless there are changes to policy (such as introducing a statutory duty to investigate which is backed up through an increase in resources and capacity) or a system wide change such as the development of a centralised, shared back-office system for reporting and enforcement, it is unlikely that all local authorities will be able to support a uniform system.

Despite the issues outlined above, current data does provide a useful tool to identify what is being fly-tipped. From a behavioural perspective, this is perhaps the most important factor to identify trends and motivations so as to begin to analyse the potential barriers and solutions attributed to respective waste streams.

In considering the trends, commercial fly-tipping (large scale fly-tipping from organised crime) has reduced over the years but both the data and subsequent conversations with local authorities have demonstrated that domestic waste has seen a relative increase and is certainly the most widespread issue.

It should also be noted that although not covered in great detail in this paper, fly-tipping in the form of domestic waste being put next and / or in a public street bin has seen a significant rise in recent years with every local authority reporting this as a growing issue. Whilst waste next to (or on top of) a bin is often referred to by local authorities as fly-tipping, it is suggested that many of these instances are likely to be considered by the public as responsible behaviour as many will see it as being 'in the right place' for disposal by council rounds.



## Key issues: Domestic fly-tipping

In Keep Wales Tidy survey of local authorities on fly-tipping (2021)<sup>11</sup>, most respondents identified households as the primary perpetrators.

Out of the 22 local authorities, 17 responded to our fly-tipping survey, providing us with a clear picture of the issues across Wales. Of these 17 local authorities, 8 responded stating that householders were the main perpetrators, making up 47% of the fly-tipping issues in their county and another 2 said it was a mixture of householders and others including illegal traders / organised crime.

The survey results also showed that 9 out of 17 local authorities were experiencing household waste as the most prevalent in the form of general waste (black bags, nappies, and garden waste). A further 5 out of the 17 local authorities suggested that household waste in the form of bulky household items, including white goods and DIY materials were the most prevalent.

The survey provides a picture of how both smaller items and single bags of mixed waste arising from household activities and heavier items such as fridges and furniture are still commonly being left on Welsh streets, particularly on rural roads but also on urban streets and housing estates, as well as common land.

Given that all local authorities in Wales operate kerbside recycling systems and waste disposal sites, issues of general household waste indicate an excess of generated waste, a lack of understanding or awareness of waste disposal and / or some other form of barrier to disposal which can be structural, economic, or societal / cultural which can be real or perceived.

Bulky items and appliances are probably what most people think of when they consider the term 'fly-tipping'. This includes white goods such as washing machines and cookers as well as electrical items, furniture and furnishings. This type of household waste needs particular review as it relates to a number of social and economic issues which are interrelated, and it is unhelpful to view this in isolation to other factors which are discussed in more detail below.

Hence, this is not only a challenge for fly-tipping and waste but a number of other policy areas such as the circular economy and poverty alleviation as the following statistics show:

- 22 million pieces of furniture are thrown out in the UK per year and fewer than 1 in 10 people make attempts to repair.<sup>12</sup>
- A quarter of a million people in Wales are living without essential household appliances like fridges or washing machines.<sup>13</sup>
- Waste Electrical and Electronic Equipment (WEEE) is the fastest growing waste stream in the UK and the UK is the 2<sup>nd</sup> biggest producer of WEEE in the world (from 5<sup>th</sup> in 2015 which demonstrates how quickly the problem is increasing).<sup>14</sup>



Hence, part of the solution must also include embedding and diversifying options for reuse and repair in our communities which contribute to consumption and waste reduction.

Communal or House in Multiple Occupation (HMO) bin areas were not raised as an issue from the local authority survey results specifically, but these areas do tend to attract significant problems of fly-tipping and improper waste disposal. Every local authority will be able to identify specific areas where these geographical and structural issues are causing problems with waste presentation, recycling participation and fly-tipping. The sharing of bins between a block of flats for example, may present many barriers such as lack of capacity which could prove to generate a perpetual cycle of waste dumping if there is no adequate bin store or additional space provided for communal bins. Fly-tipping next to the bins or elsewhere in the vicinity is almost certain to occur if there is not enough capacity for all residents and / or if they are subject to persistent misuse.

Another key issue identified for domestic fly-tipping is the use of public bins to dispose of domestic waste or domestic waste found next to public bins. Public bins may be used if a resident has excess waste and doesn't have access to a vehicle to dispose of it at the local recycling centre and /or doesn't have sufficient capacity or frequent collections. It is worth noting however, that although this is technically classed as fly-tipping and should be actively discouraged, in most circumstances, it is highly likely that this activity is considered to be responsible behaviour as residents believe they are correctly disposing of waste at a waste 'collection point' where they would have a reasonable expectation that it would be collected by the council and disposed of correctly. The rationale for this behaviour should not therefore be seen as synonymous with fly-tipping which occurs on other areas of land which are often hidden and / or remote in nature.

## Identifying solutions

Using a COM-B model<sup>15</sup> for identifying barriers and solutions through a behaviour change perspective, a number of key issues have been identified in the sections below. Several sources have been used to gather information in regard to barriers including a local authority survey<sup>16</sup>, public surveys and interviews with local authorities and housing associations.<sup>17</sup> Excerpts from the surveys have been used below where appropriate. In addition, Keep Wales Tidy has undertaken an audit of local authority websites to understand how easy and accessible waste disposal information is from the point of view of residents.

The social, economic and cultural factors below have been identified through the triangulation of data collection and solutions have been developed in conversation with the stakeholders at different stages. For each barrier, we have applied the COM-B model and have considered the 'user journey' which consider the decision points and influence points which affect behaviour or which suggest a structural review. An example of a 'user journey' and identified influence points can be seen in [Appendix 1](#).

The key to changing behaviour is to make it easy and convenient to do the right thing. From the barriers that have been identified below, not only is correct waste disposal not always easy and convenient but on occasion, unintended consequences of well-intentioned waste policies can almost make it appear that fly-tipping is the rational thing to do, even if it's still recognised as immoral or illegal.

## Structural barriers and solutions

Structural barriers are those which relate to infrastructure or the processes and policies which have been introduced. It includes systems of waste collection and 'binrastructure' from a resident view as well as issues which can affect these systems such as those directly affecting local authority staff and resources.

This section is the easiest to change but requires time to address. A systems process approach by local authorities and councils and direct conversations with communities is the recommended approach to addressing these issues.

Changing behaviour relies on making it easy and convenient to do the right thing. These issues relate primarily to ease and convenience.

## Waste collections

With increasing recycling targets to meet, the frequency of household general waste collections across Wales have decreased to allow for the prioritisation of recycling and to meet the local needs of residents. Most local authorities in Wales have implemented a fortnightly collection for general waste, whilst some have a 3 weekly or even monthly collection for non-recyclable waste. Less frequent general waste collections have, in most cases, served to increase recycling participation and yet there is no evidence of any correlation with fly-tipping increases as a direct result of these changes alone.

It is considered likely that housing type, context and other waste policies and perceptions play a more significant role in waste behaviours which are more complex and more nuanced than collection frequency alone. However, less frequent collections of general waste from households may be more effective in more rural authorities where the population and population density are lower and recycling participation is higher. In more urban areas, where the population is higher and HMOs more concentrated, a decrease in the frequency of collections may result in excess waste due to existing structural barriers discussed above. Rather than considering this at a local authority scale, it may be worth considering how collections could work in relation to housing type and density.

Each local authority has different levels of charges or consequences if waste isn't presented how they expect. Some local authorities charge for 'extra waste' or side waste, whilst others will consider this a fly-tipping offence. A combination of a viable threat plus excess waste generation could result in fly-tipping as a means of avoiding fines or penalties. As the policies vary for each local authority, it is difficult to promote a consistent 'right' and 'wrong' approach to waste presentation and this poses a significant challenge in communication.

Many local authorities have a standard general waste bag limit for collection which will undoubtedly serve to motivate recycling but if any excess bags are not collected, they will be left or moved elsewhere or perhaps mis-reported as a 'missed' collection. Missed collection policies also vary across Wales and how each local authority processes and resolves them. Some stating that missed collections must be reported within 24 hours, otherwise the missed collection will have to wait until the next collection day. Authorities have varying number of staff engaged in communicating and educating residents which again means that practice in dealing with problematic presentation of waste and recycling is variable.

Individually, and especially cumulatively, these fixed (stricter) policies may increase the appeal of fly-tipping. There is limited statutory control or best practice guidance to ensure that the overall service balances education and positive reinforcement for improving recycling behaviours with the penalties to the wider community when households fail to follow procedure.

Another factor relating to waste collections is varying approaches local authorities have towards nappy collections. Both national fly-tipping data and anecdotal evidence from community volunteers report nappy tipping is a common and increasing issue with some areas reporting higher rates than others. Many authorities now offer a free nappy collection service at kerbside, whilst others do not yet have this service. Of the local authorities that don't yet offer this service, many do encourage the use of reusable nappies and offer incentives for households to reduce nappy waste by providing vouchers towards the purchase of reusable nappies. Although this initiative is most welcome, reusable nappies can still be too expensive an option for many households. They are also not targeted at other households who may use nappies or similar items, such as carers. Without separate nappy collections, general waste bins soon fill up and will be counted as excess bags or additional side waste which can (and does) end up as fly-tipping.

The only consistent factor in recycling participation, regardless of the system and frequency implemented, is the lower take up in areas of deprivation where household incomes are also lower than the national average. Although fly-tipping can never be justified, the desire to avoid penalty charges cannot truly be seen as an irrational behaviour. The key to addressing this is not necessarily to remove the 'stick' entirely but to ensure that flexibility is built into waste policies and to ensure that support to increase recycling and dispose of waste properly can be given when an issue arises.

"I had extra bags but I complained they wouldn't take it and they said I could be done for fly-tipping, but I complained and now I have the biggest bin available, so I don't do it anymore and so job done."<sup>1</sup>

Every local authority should be working to increase their recycling rates and have the authority to choose the frequency and collection which works for them. It is worth noting however, that a combination of increased council tax and less frequency of service has angered residents in recent years and the consequences may be felt in waste presentation as a few people may use this as a form of protest. Communication which emphasises the environmental, rather than the economic would be recommended as an approach to address this. However, it is argued here that the frequency and collection type is less of an issue than the additional regulations and 'sticks' which are applied to efforts to increase compliance and how this is communicated. As the primary alternative to waste disposal, the application of waste policies also extends to the operations and rules around HWRCs which are outlined in more detail below.

In our review of local authority website information, whilst recycling collections days were prominent, we found the approach, messages and instructions were varied in regard to additional waste disposal options. Anecdotally, we know that many 'myths' prevail in local communities about what happens to our recycling and what the penalties are for non-compliance with waste policies are. The nature of the medium mean that the negative experiences are amplified on social media despite being a tiny minority of actual experiences. This would suggest that a social media strategy should be a key part of any local authority waste policy.



## **Solutions:**

### **Communication and messaging**

- Automated notification service that residents can sign up to for reminders of waste collection days.
- Flexibility of responses to complaints which listens and responds to household concerns.
- Social media strategies as part of waste strategies to combat prevailing myths and misconceptions.

### **Community education and engagement**

- In line with best practice in Wales, each complaint in regard to presented waste should be followed up by an officer to identify the issue for individual households. The officer should have the discretion to provide what is needed to meet the needs of the resident depending on the issue and should be followed up.

### **Review of authority policy**

- Reconsider the effectiveness of particularly stringent policies in regard to kerbside collection, particularly if penalties or refusal of collection is a substantial part of council communications and approach. (Note that we do not refer here to frequency of collections, rather the approach to engagement, participation and communication which is signalled by accompanying waste policies and council rules.)
- Waste policies need to be considered alongside housing and enforcement staff in a systems wide approach which take into account demographic data including (but not limited to) deprivation, education and literacy levels, HMOs, families with small children, households with carers, transitory populations. This can be achieved by having a meaningful Equality, Diversity and Inclusion (EDI) strategy in place and undertaking EDI impact assessments across relevant policy areas and applying to council decisions.
- Missed collection reporting systems are generally well placed on local authority apps and websites. If a household reports a missed collection within 24 hours, authorities should aim to resolve with 24 hours where possible. 'In cab' technology has been used to good effect and can save time and costs.
- Whilst nappy recycling options are not yet widespread, nappy collection services are a critical service that all local authorities should be providing to those who need it. This should be in addition to promoting reusables. Both need to be promoted consistently and frequently through pre-identified channels such as GPs, home care groups, maternity wards and local social media groups and childcare businesses.
- Greater material collection at kerbside will increase recycling and capture a greater variety of waste material.

## Access to HWRCs

The rules for the use of Household Waste Recycling Centres (HWRCs) vary considerably between each local authority in Wales. From the types of waste that can be disposed of, to the type of vehicle that can be used to enter the site, to the frequency of visits and whether a booking slot is required or not.

HWRCs play an important role in tackling fly-tipping as it is the sole alternative destination of any waste not collected at kerbside. Like any other service, the experience of attending a HWRC will not only dictate future willingness to engage with the service but will be heavily influenced by and through the experience of other users in the area.

During the COVID-19 pandemic, some local authorities made changes to the opening hours of their HWRCs, with significantly reduced hours or temporary closure of sites or some shut completely. The reopening of sites saw many sites at capacity with many facing queues to enter. Even before the pandemic, budgetary constraints had seen some HWRCs close for good or open on reduced hours or reduced days. Although it is very difficult to correlate fly-tipping instances with HWRC changes, limiting access in any way inevitably makes waste disposal less convenient. From a behavioural perspective, a negative or unsuccessful experience in using the HWRC will have a significant impact on motivation. Some social media discussions have even seen people defending fly-tipping because of actual (or perceived) challenges to using the local recycling centre.

Increasing the closure of recycling centres in local authorities will almost certainly have an impact on fly-tipping incidents as residents may feel increasingly 'out of options'. The closure of HWRCs is contrary to local government ambitions to increase recycling and they will only become more important as new recycling targets and materials are introduced. Rather than considering HWRCs as an easy way to cut budgets, they should be maximised to their full potential. There are a number of examples of 'Tip Shops' (ie; designated areas of HWRCs where donated items are sold on) in Wales and many are profitable endeavours which highlight the potential for local authorities to create value from the waste they collect whilst providing a vital service to the community and to low-income households. They could also be developed as skills and training venues for a variety of foundational economy and trade development such as repair apprenticeships or upcycling business opportunities.

Changes since the COVID-19 pandemic are likely to have caused confusion amongst residents with changes to the operations of their local recycling centres. Some residents may have assumed their local recycling centre would be open as usual and that the same practice applied once some local restrictions were lifted. If bookings are required since the pandemic, some residents may not be aware of this or not have checked the new opening hours of the site and therefore their visit could be wasted. This could then be an opportunity for an increase in fly-tipping as most of the time residents make special trips to the recycling centres, making sure they have a worthwhile visit at times when it is most convenient to them.

One change that a lot of local authorities have made since the pandemic is the introduction of a booking system for HWRCs. Residents must book a time slot to attend the site, giving them a specified time to dispose of their waste. Whilst there is a lot of positive feedback for this, some residents may not be aware of this system. Whilst the booking system may work for some, it adds an additional layer of 'effort' on to the concept of 'doing the right thing'. Some local authorities also restrict the number of times residents can attend their local recycling centre within a month or a 12-month period for example, an ill-conceived policy which we would strongly urge is removed.

Of all of the respondents who indicated that they had visited their recycling centre, 45% of respondents indicated that they had experienced a problem in disposing of their waste.<sup>18</sup>

HWRCs also have varying rules on what waste is accepted at the site. For example, most local authorities have multiple HWRCs within the county, yet they may not all accept the same waste. Not all have domestic licences for accepting domestic waste. It is not always clear until the point of entry what is and is not accepted which means that residents may be turned away with their waste in their car and limited options for disposal.

Additionally, they also vary in the type of vehicle that is allowed to enter the sites, whether a permit is required, and the frequency of visits allowed. Most sites do not allow trade vehicles to enter or vans over a certain length and height. People carriers and light vans are often turned away despite not being commercial vehicles. Again, the rules for each site are not usually made clear before the point of entry. These changes ultimately could lead to an increase in fly-tipping, particularly in the area surrounding the HWRCs, as people who have their waste packed up in the vehicle and are turned away, dispose of it in frustration. Furthermore, HWRCs are often situated on industrial estates and can provide hidden and isolated areas which are more prone to fly-tipping.

A cursory glance at any local social media pages and community group discussions demonstrates the level of activity of discussion around HWRCs, possibly more than any other aspect of waste, perhaps with the exception of commentary on littering and dog fouling. Not only are there numerous negative reports of being refused entry but many 'myths of the tip' persist (many relating to car types, permit requirements and waste types accepted) and are exacerbated through these conversations, adding to confusion and general concerns about how to use these sites. These experiences have been seen to actually defend instances of fly-tipping when highlighted on social media.

Local authority websites generally promote locations and opening hours well but are often not enlightening in regard to HWRC rules, particularly around vehicle types and permit requirements. Fear of refusal or uncertainty about access to HWRCs may rule out accessing this service entirely for some people.

The following statements come from people who admitted to having fly-tipped waste in the past:



"We don't have a vehicle large enough to carry large items, hires a van for it. Can't get a permit for tip cause can't get van reg from hire company ahead of time, only have a 2-hour window to get rid of items".<sup>1</sup>

"Once many years ago. Hired a van purposely to clear old/junk items from my house before leaving. Was refused at the gate, no vans allowed, no exceptions. So tipped it in frustration".<sup>1</sup>

The distance to some sites and the restrictions on residency within a local authority area can also be an issue for certain residents. For example, in Denbighshire, residents of Llangollen are closer to a HWRC in Wrexham, than the closest one to them in Denbighshire which is in Ruthin. Denbighshire County Council provide a mobile HWRC every 2<sup>nd</sup> and 4<sup>th</sup> Saturday from 9am to 11am for residents in Llangollen. It's a similar situation for Corwen residents where there is a mobile HWRC site every 1<sup>st</sup> and 3<sup>rd</sup> Saturday of each month between 9-11am. This barrier presents a lack of convenience for residents living in these towns representing geographical and time constraints imposed on residents, but mobile HWRCs help remove this barrier.

Lastly, the term HWRCs should be avoided when communicating with the public. Each region will have their own term for the local recycling centre, most commonly referred to as 'The Skip' or 'The Tip', sometimes as the 'Recycling Centre'. Local authority communication should use the local language to refer to their centres and to promote their use.

## **Solutions:**

### **Review of authority policy**

- HWRCs play a critical role in waste infrastructure as they are the sole alternative destination for excess household waste if it can't be reused and therefore need to be made easy and convenient. Their role in tackling waste and waste crime needs to be strengthened in every local authority and a consideration to be given to the barriers to access these sites for example permits, vehicle type. A suggestion to review whether all barriers are required at each site, or if some flexibility could be introduced.
- Standardisation of rules across HWRCs, especially in regard to vehicle types, which aim to reduce the fear / concerns of accessing these sites. Simplification of processes and avoidance of unnecessary restrictions to reduce any additional 'effort load' to HWRC use will increase participation, use and recycling materials.
- Access to HWRCs should be granted regardless of car type for domestic waste disposal.
- An option for permits to be issued at each HWRC on the spot if required for domestic large vehicles (for instance hired vans).
- Exploration of cost benefits for free bulky waste collection or a mobile service collection aimed at hotspots where transport ownership is low and fly-tipping instances are high.
- Review the advice and use of skip amnesties (the provision of a skip for excess waste servicing a particular area).
- Review waste sites and make it easier for households to use waste sites which are closest to them even if it's outside of their local authority area.
- Establishing a 'Tip Shop' is an additional reason for visiting a HWRC, there are a number of revenue generating opportunities from these endeavours as well as opportunities for supporting skills and training.



## Bulky item collection

All local authorities in Wales now offer a bulky collection service for the collection of certain large items from households such as sofas, fridges, and wardrobes for example. Nearly all these local authorities charge for the service, just one council offers a single bulky waste collection for free each year.

Charges for this service range from £6 for a single item to £50 for between 1 to 6 items. Several councils set limits on the number of items that can be collected. As of January 2022, some councils still had restricted or no bulky waste collection due to prioritising other services on account of the COVID-19 pandemic and associated restrictions.

These services, however, for the most part are not advertised enough via local authority websites and are therefore not widely known about by residents. Given the variations in the service across Wales, and the many changes in availability since the COVID-19 pandemic, it would be unsurprising if many residents are not familiar with how this service works even if they are willing / able to pay.

For residents that are aware of these services, some may find it too expensive to dispose of their bulky waste in this way, this is especially the case in lower income areas where common policies which charge set payments for a maximum number of items are just not affordable. For example, £50 for a maximum of three items (around the average offer in Wales) is a substantial sum for a household couple on Universal Credit. Concessions are not offered to those on benefits or low incomes and, on the basis of information on council websites, no advice is offered about how these residents can get any help with paying for these charges if the option to reuse or recycle are not appropriate. Although it should be noted that many housing associations may offer discretionary services to tenants in some areas where they have the means to do so, this is not a regular or advertised service and is at the associations' expense.

Most residents that opt for the bulky collection service most likely choose this option because of no access to a vehicle etc, therefore this option would be ideal for them. However, the fixed nature of the service may provide additional barriers to using this service. For example, the item may not be collected for over a week after the booking is made, which may be too long for some residents. This will especially be true for those that don't have the space to store the item(s) such as those in HMOs or student housing. In a situation where the home must be vacated on a specific day as is the case with students and others who have reached the end of a tenancy, the organised collection may well not fit with their leaving date.

Items that have to be left outside for space reasons can also be damaged by weather to such an extent that they can't be reused and / or repaired which is another example of policy in contradiction with ambition. Items must be presented at kerbside, presenting a barrier for those without the physical capacity or assistance to do this. This issue has also been recognised by local authority staff when considering what might motivate households towards improper waste disposal.

While there are also several charities and social enterprises across Wales which will collect items from households, what they can collect, radius of collection and charging is variable. Information about these services is not necessarily easy to find for all households. The availability of this information on council websites is also inconsistent and more could be done to develop [Wales Recycles](#) into an even more comprehensive resource for this purpose.

When households acquire new furniture and white goods, disposal of an item being replaced is often needed alongside this. Companies delivering white goods and some delivering furniture such as beds will offer disposal at the time of delivery typically starting at a minimum of £15 per item but can be in excess of £100. Opportunities for white goods and other electricals to be recycled have increased with the Electrical Retailer Take-back rules<sup>19</sup> introduced in January 2021 although only pertain to 'small WEEE'. However, while items taken to the retailers' stores can be left for free, collection at the same time as delivery incurs a charge. This additional charge can typically be opted into at checkout when paying for the new item. There is a likelihood that this additional expense will be avoided particularly by those on tight budgets.

## **Solutions:**

### **Communication and messaging**

- Councils should improve the way they use their websites and advisory services to provide localised and up-to-date information to residents about all disposal options, including links to the national / database websites to incentivise reuse and repair.

### **Community education and engagement / landlords and housing**

- Council joint working with housing associations, private landlords and bodies who work with people who have a higher likelihood of finding disposal of bulky items problematic (including student support organisations and housing support teams).
- Local authority joint working with housing associations, private landlords and bodies who work with people who have a higher likelihood of finding disposal of bulky items problematic (including student support organisations and housing support teams). This could help get information to households at the right time and also in identifying gaps in existing bulky waste services.

### **Review of authority policy**

- Exploration of cost benefits for free bulky waste collection or a mobile service collection aimed at hotspots where transport ownership is low.
- Consider introduction of a minimum service in each local authority. For example, 3 items free per year.

### **National policy and initiatives**

- An easily searchable database of Welsh charities and organisations that can help with collection (building upon the type of information currently available on Wales Recycles (<https://walesrecycles.org.uk/>)) to include information of radius covered and types of items accepted.
- Regional examples exist but more is needed through councils to promote as a 'standard' option' to promote their use to local residents across Wales. Examples include: A repair directory funded by Welsh Government is available for Mid and South Wales at [Repair Efficiency Wales](#)).
- Similarly, for South East Wales there is a website ([Used furniture Newport](#) ([wastesavers.co.uk](https://wastesavers.co.uk))) demonstrating the various reuse shops across this area of Wales.

## Political pressures

As fly-tipping is a common source of complaints to councils and councillors, it is not surprising that there is a great deal of political pressure to tackle the issue. However, this can lead to short term interventions and campaigns or even reactive policies which can have unintended consequences.

Responses need to be strategic rather than reactive and without clear, viable alternative provision (as discussed above), taking a 'hardline' approach is likely to backfire. New approaches to tackling fly-tipping (or indeed other changes to waste policies) may also need understanding and support from the local councillors when residents are initially wary of change.

Given the constant discussion and many prevailing myths over 'tip rules' and recycling, local councillors should be fully versed in answering common questions around these issues and should champion the options available to residents and the 'correct' policies and procedures to follow so that they can provide residents with accurate information.

### **Solutions:**

#### **Review of authority policy**

- A concise local authority waste or litter and fly-tipping strategy could set out the influences on fly-tipping and provide a plan for long term approach to the problem which councillors could in turn use in responding to constituent complaints about fly-tipping.
- Training for cabinet members should be delivered every term to avoid reactive policies and over-reliance on enforcement.

## Removal targets

Relating to political pressures, some councils are rightly proud of their success in removing fly-tipping within 24 hours of being reported. However, this also runs the risk of reinforcing the perception of the public that the council will simply take away whatever they put out. This is reinforced by the fly-tipping survey results, where 10 out of 17 local authorities said that they believe households aren't disposing of their waste correctly due to the fact 'they don't believe there is anything wrong with leaving it out as the councils clear it'. By removing fly-tipped waste immediately, the perpetrators will eventually see it as a service and will be unlikely to change their behaviour to using the local HWRC, paying for a bulky item to be removed, or reporting missed collections when it can be collected and disposed of free of charge and without inconvenience. This in turn increases the risk that residents conclude that the small risk of being caught disposing of an item illegally is counteracted by it being the simplest and cheapest way of disposal, especially if other challenges exist in terms of other means of waste disposal. In turn for the fly-tipper, the harm done by fly-tipping may be rationalised and reinforced by seeing the item rapidly disappear with no apparent difficulty.

Removing fly-tipping within 24 hours of it being reported, does demonstrate the efforts that the local authority street cleansing teams go to, to ensure all council land is free of fly-tipping. However, the removal of potential evidence without any investigation does affect the targets that local authority enforcement teams must meet for investigating incidences of fly-tipping.

A compromise here would be to introduce crime tape (or similar intervention) within the 24-hour period and clear within 48 hours. This changes the message to perpetrators, enforces the nature of the crime and make it visible to others that it is not acceptable behaviour.

Conversely, a similar issue can arise from government applied waste reduction targets which do not incentivise fly-tipping removal (particularly on private land where there is no statutory requirement) as recovery and disposal are reported and may be adverse to local authority and national government ambitions and set targets.

## **Solutions:**

### **Communication and messaging**

- Consider applying 1) crime tape as standard practice for 24-48 hours before removal and / or 2) using chalk paint stencil messaging which communicates that fly-tipping doesn't just disappear and has a cost. This has been successfully used by an authority in London and is now being trialled in a number of other areas in the UK.<sup>20</sup>
- Any new indicators or targets for fly-tipping needs to be thoroughly interrogated to ensure that there are no unintended consequences.

### **Review of authority policy**

- Increase flexibility or remove targets in problem areas and review practice so that officers can respond in a way which fits the context and situation.
- Ensure that street scene and the enforcement teams have the same targets for removal and investigation.
- Waste reduction targets (and disposal costs) can also disincentivise removal (especially on private land).
- Post-sort of fly-tipping can also maximise recycling.

## Enforcement

Enforcement activity by local authorities is used to varying extents and in differing ways across Wales. There is no statutory duty to investigate fly-tipping which is likely to lead to resources for this within local authorities taking second place to other statutory duties such as collection and disposal of household waste.

Keep Wales Tidy has found that there is no correlation between enforcement and compliance unless there is a clear and visible threat of getting caught, this is the case regardless of the level of penalty or the level of penalty information messages.<sup>21</sup> Hence current approaches to enforcement are unlikely to either capture or dissuade most small-scale perpetrators of domestic fly-tipping.

Proposals which are yet to be published in the Welsh Government Litter & Fly-tipping Prevention Plan to increase publicization of successful convictions may support this. The vast range of places that fly-tipping can occur means it is a moving target which would require far greater resources to reach a situation where perpetrators feel there is a strong likelihood of getting caught and may simply be unrealistic with current resource capacity.



While gathering the evidence for a successful prosecution is costly of time and money for local authorities, the penalties imposed by magistrates' courts can be variable and do not always send strong messages about the seriousness of the crime committed. Keep Wales Tidy has long called for training for magistrates on environmental crime to increase understanding of the impacts as well as increasing consistency in approach across Wales.

Compared to the total numbers of serious fly-tipping incidents, the numbers of fixed penalties and prosecutions are small. Councils can issue fixed penalty fines of between £150 and £400 but their use varies across Wales. Total numbers in Wales have fallen from 1084 to 568 from 2018-19 to 2020-21. There were 139 prosecutions in 2018-19, 31 in 2019-20 and 17 in 2020-21.<sup>22</sup>

It is worth noting that enforcement is not a preventative practice and occurs after the crime has taken place. For the purpose of a deterrence, a significant review is needed of existing systems and practice to make this a credible approach across Wales. Keep Wales Tidy has recently carried out a review of enforcement for littering and dog fouling and believe that many of the challenges are similar when applied to fly-tipping. It is argued that until there is a systemic review of enforcement for environmental crime which addresses the process, approach, systems and technology used as well as resource capacity, enforcement will continue to be patchy.

## **Solutions:**

### **Community education and engagement**

- Current guidance emphasises engagement and communication and should be followed. Unlike littering and dog fouling where many clearly understood alternatives exist (such as putting litter in a bin or taking it home), the options for general waste disposal are not as clearly defined or as widely understood. It is suggested above that fly-tipping can occur as a direct result of wanting to avoid enforcement and penalties elsewhere in the waste disposal process. Issuing fines at every stage will not encourage the correct behaviour but could even exacerbate the problem.
- A national review of the efficacy of enforcement for fly-tipping (similar to the one undertaken by Keep Wales Tidy for littering) should be considered as part of the Litter & Fly-tipping Prevention Plan for Wales.

### **Review of authority policy**

- Fly-tipping enforcement needs to be strongly targeted to specific areas as the current belief in getting caught is extremely low for this crime. The lack of resources available to authorities to establish a visible presence means that hyper-local targeting is likely to be more effective. The effective and consistent collection of data will support an intelligence led approach.

### **National policy and initiatives**

- Review of enforcement for fly-tipping to address training, magistrates, regulations, data and back-office systems and penalties.
- Further work to establish the benefits of introducing a fly-tipping awareness course, as an alternative to fines and / or could be additionally applied at the point of a court sentence.

## Communal bin stores and HMOs

Around 12% of people in Wales live in flats and apartments<sup>23</sup>. There are an estimated 19,000 houses in multiple occupation (HMOs) in Wales<sup>24</sup>. HMOs are more common in areas with large student populations and can also provide housing for other younger people and single people on benefits who are priced out of self-contained accommodation.

Blocks of flats commonly have shared areas for bin storage and the lack of space can often lead to a lack of capacity for the waste generated in the building. Communal bins also tend to be kept in bin stores and may be some distance from the residents own front door. This may contribute to lower rates of recycling participation and greater quantities of residual bin waste as they have less of a direct 'ownership' over the waste they are disposing of. In some cases, these bin areas are already unattractive areas, being cramped, dirty and poorly lit. These types of communal areas often attract fly-tipping by others as well as residents themselves and are particularly difficult to manage or enforce. Communal bins can also be big trade bins rather than smaller wheelie bins. The heavy lids of these bins can make access difficult for older people or people with disabilities.

Some social housing organisations have recognised the connections between types of bin storage area and communal bins with fly-tipping. They are trialling changes to see if greater provision of individual bins rather than large communal bins is beneficial.<sup>25</sup> A quick win solution to this problem is to invest in making bin areas aesthetically pleasing and bringing in aspects of nature to the bins and bin stores itself which has shown some success in various pilots.

Private landlords of HMO properties also have an important role in making sure bin / recycling arrangements best enable tenants to recycle and dispose of waste responsibly. Tenants look to their landlord to provide accurate information on this.<sup>26</sup>

HMOs typically expect tenants to share bins as a single household which makes consistency with recycling hard and enforcing practices even harder. In HMOs there is also the possible issue of who is responsible for putting the bins out on collection day and emptying the bins in the property in the first place. If no one takes responsibility and the bins collections are missed, then this will inevitably lead to a backlog of waste and the potential for fly-tipping.

### Solutions:

#### Communication and messaging / landlords and housing

- Communications with residents at HMOs need to be addressed to individuals rather than 'the householder'.
- Private landlords need to be encouraged to give correct information and adequate facilities to HMO tenants about recycling / waste collections and how to dispose of bulky items.
- Guidance for private landlords to improve consistency of best practice and correct information about waste disposal through existing networks and forums.
- Consideration of licensing / planning regulations are needed before granting HMOs (where possible).
- Make bins and bin stores feel safer more attractive and aesthetically pleasing, especially by introducing natural landscaping to the design while ensuring the area is not hidden from public view.

- Communications with residents at HMOs should take into account that each resident may not consider themselves to be part of the household and may not communicate effectively with each other. Communications need to be addressed to individuals rather than “the householder”.
- Private landlords need to be encouraged to give correct information and adequate facilities to HMO tenants about recycling / waste collections and how to dispose of bulky items. There is potential for this to be included in tenancy agreements and supported by HMO additional licensing arrangements. Landlords can be supported with the right resources to do this.
- Make bins and bin stores more attractive and aesthetically pleasing, especially by introducing nature aspects (for example flowers, birds and foliage) to the design which has shown a reduction of misuse in these areas. This nudge technique is a low budget intervention but will require maintenance to ensure the design is kept fresh and clean.

### **Community education and engagement**

- Support residents with how they store and separate waste within their home – offer small recycling bags for their flats / HMOs to encourage residents to separate their recycling before putting into the bins. This exercise needs to be carried out across tenant services and other departments.
- One of the most successful attempts at increasing recycling participation has been to ‘gamify’ the process and create goals for communities / housing blocks to reach and ways to monitor progress. Again, this would need to be carried out and monitored carefully to ensure there are no unintended consequences.

### **Review of authority policy**

- Provision of more planning design guidance for communal bins areas through, for example, the [Place Making Wales Charter](#) to ensure that waste / litter facilities reflect how people actually use the space.
- Include conditions in Supplementary Planning Guidance and HMO additional licencing schemes on adequate recycling and waste facilities.

### **Physical infrastructure and interventions**

- Review bin types in problem areas and develop common design guidance for communal facilities which include ease of use, accessibility, visibility, safety, and aesthetics.

## Economic barriers and solutions

Regardless of structural changes or enforcement, if people cannot afford to do the right thing, in one way or another, they cannot do what is being asked of them.

Economic barriers relate to socio-economic factors which relate to waste behaviours. In this context, it relates to charging policies (and therefore overlaps somewhat with some of the waste policies above) but also considers the wider socio-economic and social justice issues which relate to many of our communities.

It is important to recognise that there may need to be a different approach in harder to reach communities. They may require more infrastructure, more engagement or may even require a different policy approach altogether. For local authorities, it is important to engage with housing associations and housing departments when determining waste policy as we have found that it is often the case that they are left out of initial discussions. The unequal impacts on poorer households, seems largely unrecognised in relation to issues of waste, recycling and reuse issues.

## Housing inequality

The amount of physical space available to individual households is highly variable with social and private tenants more likely to be overcrowded and owner-occupiers more likely to be “under-occupiers” (more bedrooms than needed for size of household).<sup>27</sup> Those more likely to have less space are those living in houses in multiple occupation (often younger people such as students) and those dependent on benefits (as benefits may be reduced for “under-occupancy”). In many cases, the design of new property developments or conversions (including change in use permissions) do not take into account the need for adequate storage for bins and recycling containers. This is particularly pertinent to businesses and change of use permissions as the Welsh Government mandates separation of waste at source regulations meaning more space is required.

Increasing social housing and increasing tenant security and affordability is the only real answer to overcrowding and undesired HMOs. However, through identifying and tailoring services to areas where HMOs are common and using planning controls, it would be possible to reduce problems in the future. Placing increased responsibility on landlords to take a lead in addressing these issues with tenants would also help achieve consistency of approach.

### **Solutions:**

#### **Review of authority policy / landlords and housing**

- Specific guidance and information targeted at these areas. Prioritisation of resources for locations which face more difficulties in handling waste and recycling.
- Highlight the landlord’s responsibility to organise extra bins or extra waste if the property is limited on space (this could be included in HMO licencing conditions).
- Waste and recycling teams can benefit from liaison with housing and planning officers in understanding where these issues may apply.



## Charging – bulky waste collection

As outlined in the ‘Bulky item collection’ section above, bulky item charging varies significantly between authorities and often is not considered affordable, convenient or particularly easy. Information available on council websites does not suggest that there are concessions for those in receipt of benefits (although we have heard from local authorities that this is the case in some areas) so even a small charge can be a significant proportion of a claimant’s income.

Statistics show us that:



- Over 2 million people in the UK are currently living without one essential household appliance and millions more are living with broken or faulty items. The scale and impact of appliance poverty is serious and under-discussed.<sup>28</sup>
- A quarter of a million people in Wales are living without essential household appliances like fridges or washing machines.<sup>29</sup>

As well as consideration of bulky items collection policy and the provision of services (to both donate and buy) from HWRC ‘Tip Shops’, part of the solution to these issues can lie in joined up thinking where options for reuse, repairing and borrowing are promoted and how circularity behaviours can increasingly become the norm.

## Options for reuse / repair / borrowing

There is an opportunity to reduce waste through encouraging repair and reuse activities. Repair Café Wales have supported over 275 volunteers with the opening more than 42 cafés across the country<sup>30</sup> (2022), this indicates the presence of a great deal of interest in repair activity but, despite this, while 60% of people were aware of other organisations who would accept furniture for reuse / repair in their area (mainly charity shops), only 37% of people stated that they had made use of these services. Increasing repair and reuse is a complex issue which can only be addressed through a multifaceted approach, however, Keep Wales Tidy can make some preliminary recommendations (below) which will be explored further in future research.

## Solutions:

### Review of authority policy

- Consideration of offering free collection of a small number of items each year or a mobile service collection aimed at hotspots where transport ownership is low. A benefit analysis could compare the cost of this versus the costs of levels of fly-tipping.
- Routes for households and organisations supporting them to get assistance with the costs of removal of bulky waste where financial hardship is a barrier could be identified and publicised.
- Repair and reuse activities to be included in discussions around financial education, working with non-governmental organisations (NGOs), banks and residential housing associations to produce information on local repair services and disseminate this information amongst people who are reaching out for financial education, could help increase awareness of repair services and provide a service for people from low-income backgrounds.
- Focus advertising and marketing campaigns for repair initiatives around local institutions such as schools, prominent businesses, local newspapers.
- Keep Wales Tidy is supportive of the introduction of a repair apprenticeship scheme which would create more jobs in the circular economy and provide vital repair services, this is an option when thinking about how to upscale the repair / reuse initiatives present already in Wales.

## Access to vehicles

Lower income households and students are less likely to have access to a vehicle to make a visit to the local HWRC and therefore this restricts their option for disposal.<sup>31</sup> From the 2011 census, it was estimated that 298,519 (23%) of households in Wales did not own or have access to a car or van.<sup>32</sup> This makes accessing free disposal of unwanted items or waste at a HWRC more difficult and increases the probability that they will need to use the council's or another chargeable service.

As discussed earlier in the case of HWRC vehicle types, if hired vans are not permitted as one-off entry points for disposing of excess waste, this eliminates many options for waste disposal and can be seen as contrary to active travel ambitions which aim to reduce car use overall and promote walking and cycling options.

17% of respondents cited a lack of transport as their main issue when trying to dispose of excess waste.<sup>33</sup>

“Because of lack of transport and low income to pay for them to take it away.”  
(anonymous respondent who admitted to fly-tipping<sup>34</sup>)

## Solutions:

### Landlords and housing

- Engagement of universities and private landlords in providing students with better knowledge and understanding of options for disposing of unwanted items. This could include information about charities and social enterprises who offer free collection of some items.
- Social landlords could have policies directed to helping lower income families with costs of waste removal and could even be targeted as specifically as to focus on areas where no access to a vehicle is particularly high.
- Social enterprises, often already active in this field, could increase their services to target the particular difficulties low-income households with no vehicle access may experience with waste disposal.

Expansion of materials collected at the kerbside would also support efforts to reduce improper waste disposal through the provision of additional options and services. In particular, clothes and textiles and Waste Electrical and Electronic Equipment (WEEE) materials which would be destined for skips and charity shops and would not currently be covered by local authority collections at kerbside or be considered as bulky items and so end up in domestic waste if there is no access to transport to donate elsewhere.



## Social barriers and solutions

Social barriers here relate to the understanding and values held by members of the public. It includes some of the widely held beliefs and perceptions (whether true or false) in regard to waste and waste disposal including things which may be perpetuated by word of mouth, the media and even the language used. Although some of these could be considered structural, the primary purpose of this section is to drive messaging and public engagement and inform how, and where, that engagement can take place.

Changing behaviour relies on making it easy and convenient to do the right thing. These issues relate to the values and understanding of what the 'right thing' is to do. However, it is important to note that a focus here will only be partially successful if the structural and economic barriers are not addressed.

## Charging and permit systems – HWRCs

Of those people who had experienced issues at their HWRC site when trying to dispose of waste, a third indicated that the reason was associated with the cost of removal / disposal service (either private or local authority charging or permits), another third indicated that they had experienced problems relating to the prohibition of large vehicles or vans at a local recycling site.<sup>34</sup>

Most people (68%) who have used a civic amenity site have not been refused entry but of those who have, 40% of respondents said the reason was associated with their car type.<sup>35</sup>

Most local authorities require residents to have a permit if their vehicle is over a certain length. These permits come at a cost and often also limit the number of times residents can access the HWRC.

### **Solutions:**

#### **Review of authority policy**

- Simple and standard guidelines for access to HWRC both online and at site entrances.
- Removal of charges for any domestic waste and / or domestic vehicles [up to and including small vans (not registered for business use) and people carriers].
- Removal of permit requirements for hired vans or ability to buy permit at the point of entry.
- Simplification of permit systems and maximum limits on the charges.

## Illegal traders

There is financial incentive for some rogue tradespeople working in fields which produce household waste (for instance building, joinery, grounds and garden maintenance) to dispose of this improperly. Additionally, there are people offering a waste removal service and undercutting the market rate by disposing of the waste illegally.

Householders' legal duty to check that the person taking their waste is a registered waste carrier continues to be promoted in campaigns by Fly-tipping Action Wales. It is important that householders understand that disposal needs to be legitimate. However, overreliance on this message places prominence principally on the householders' vigilance rather than protecting them from rogue individuals and may put too much emphasis on the householder being suspicious of tradespeople they are inclined to trust.

The behaviour that needs to be addressed is that of illegal traders and is where penalties and emphasis should be directed. Legislation and penalties need to reflect the environmental, social and economic costs of the crime. Whilst householders should be aware of rogue traders, the current burden assigned to householders to check their credentials with Natural Resources Wales is over-emphasised and potentially burdensome. Furthermore, anyone who knowingly uses rogue traders are likely doing so because they have ruled out legitimate options as too difficult or expensive which would indicate structural and economic barriers which are out of their control.

### Solutions:

#### Communication and messaging

- Use of social media to help residents understand how to look out for illegal traders.
- Monitoring of Facebook Marketplace (and other sites) of those offering a removal service.

#### National policy and initiatives

- Strengthen regulations to address rogue traders. Make it illegal for anyone to advertise services without an authorised permit. Increase the penalty onus on the traders, rather than the current emphasis on households.

## Use of public bins

Use of public bins for domestic waste may either occur or become a temptation when householders find the ability to get rid of waste for reasons of cleanliness, is from their perspective, unreasonably delayed because of refuse collection arrangements.

Unightly and ill-maintained street and trade waste bins may also be a contributing factor in attracting fly-tipping as was found in fly-tipping research carried out in Edinburgh.<sup>36</sup>

Keep Wales Tidy's research<sup>37</sup> found that circumstances where this can be the case included:

- Having been on holidays or being ill and hence unable to put the bins out on proper day (citing bag limits)
- Odorous items such as cat litter, fish packaging and nappies which people felt could not be kept in the house (this was exacerbated by the hot weather over summer)
- Full bins (citing bag limits)



Wishing to dispose of rubbish from a car is a common reason for using public bins (cited numerous times in the 2018 survey). Other situations where households are in transit also increase the likelihood of wrongful use of public bins including:

- Gypsies and Travellers who are travelling and have no access to a waste service or cannot access HWRCs due to no proof of residence / vehicle size
- Van-lifers who live on the road but may be unable to access HWRCs on account of the size of the vehicle and residency issues
- Holidaymakers needing to dispose of waste from holiday lets

Householders can regard all bins as provided and emptied by local councils and therefore not recognise that leaving additional rubbish by a public waste bin or recycling is harmful. Research in England has uncovered clear evidence that a percentage of the population does not recognise items left in this way as fly-tipping.<sup>38</sup>



Waste from holiday homes and holidaymakers are particularly hard to address as the regulations which cover these premises are not clear as to the responsibilities and provision required of the hosts and guests.<sup>2</sup>

Where this is an issue, it is not currently recommended that bins are removed as this may disperse the issue to less accessible areas which are harder to address. It is worth considering the key demographics in the area where this is a problem and targeting messaging at the suspected perpetrators accordingly (whether that is holiday homes, businesses or residential).

---

<sup>2</sup> This is addressed in more detail in Keep Wales Tidy's research paper on tourism.

## Solutions:

### Review of authority policy

- Waste disposal in / near bins and improperly presented side waste should not be counted as fly-tipping but should be a part of local authority bin strategies and audits. Additional guidance is required.

### Physical infrastructure and interventions

- Bininfrastructure i.e. the type and location of public bins and messaging displayed in the vicinity of the bin can be used to discourage fly-tipping. (See Keep Wales Tidy bininfrastructure guidance.)
- Development of clear bin messaging that uses plain language and relevant images of the type of unacceptable items to clarify that dumping bags of waste and other items along the bin is not allowed.
- Test ground markings near bins.
- Consider removal of bins from laybys as there is some evidence that in certain contexts these increase fly-tipping. Although note that removal of bins may serve to simply move the issue to another location which is harder to manage / dispose of.
- Consider the condition and impression created by public bins, where these give an uncared-for image they increase the risk of fly-tipping.

## Understanding the term fly-tipping

While fly-tipping is a useful generic term used by bodies dealing with waste and waste crime to describe the range of events (ie. black bags by bins and in laybys, white goods left on streets and country lanes, large scale dumping in the countryside), the word is not well-connected with how many people may talk about disposal and can increase the risk that they don't respond to "no fly-tipping" messaging.

Research carried out by Keep Britain Tidy found that when shown photos of various types of fly-tipping, of the group surveyed, only 1% identified all incidences of fly-tipping correctly. They were more likely to realise that bulky items left on the street constitute fly-tipping but infrequently realised that black bags by litter bins, cardboard packing by recycling bins and black bags by household bins were also fly-tipping.

Messaging should reflect the language of the target audience and common terms need to be identified. Similarly to HWRCs often being referred to as 'the Tip', which is widely understood, the words 'rubbish' or 'litter' are commonly used to refer to improperly-disposed of waste, regardless of the size or type of the waste.

There is some evidence to say that different communities from outside of the north-west region of Europe are more likely to fly-tip as they may have less established social norms.<sup>39</sup> Any fly-tipping campaign should consider the communities they are trying to address and the cultural and language barriers that may exist and whether first language communications may be required, whilst being mindful not to 'point a finger' directly at any minority communities in particular.

## Solutions:

### Communication and messaging

- Use of simple-to-understand language when describing waste. The term “fly-tipping” may not always be best. Consider the need for communication in other appropriate languages for people with limited English or Welsh language skills.
- Use of tools such as [Funnelback](#) by local authorities can help ensure people searching using different expressions will be directed to the right information on websites.

## Finding solutions

This section brings together the suggested solutions which have been developed through Keep Wales Tidy behavioural and systems-based approaches to the problem of fly-tipping. Here they are grouped by the kind of solution required to address issue types. It should be considered as part of whole systems thinking about waste policy, rather than an end in itself. It is recognised that each local authority is different and may not be able to implement all suggestions.

### Tables of issues and potential solutions

Table 1 – Communication and messaging

Issue to which barrier relates	Solutions
Household waste collections	<ul style="list-style-type: none"><li>- Automated notification service that residents can sign up to for reminders of waste collection days.</li><li>- Flexibility of responses to complaints which listens and responds to household concerns.</li><li>- Social media strategies as part of waste strategies to combat prevailing myths and misconceptions.</li></ul>
Bulky items collection	<ul style="list-style-type: none"><li>- Councils should improve the way they use their websites and advisory services to provide localised and up-to-date information to residents about all disposal options, including links to the national /database websites to incentivise reuse and repair.</li></ul>
Communal bin stores and HMOs	<ul style="list-style-type: none"><li>- Communications with residents at HMOs should take into account that residents may not consider themselves to be part of a household and may not communicate effectively with each other. Communications need to be addressed to individuals rather than “the householder”.</li><li>- Private landlords need to be encouraged to give correct information and adequate facilities to HMO tenants about recycling / waste collections and how to dispose of bulky items.</li><li>- Guidance for private landlords to improve consistency of best practice and correct information about waste disposal through existing networks and forums.</li><li>- Consideration of licensing / planning regulations are needed before granting HMOs (where possible).</li><li>- Make bins and bin stores more attractive and aesthetically pleasing, especially by introducing natural landscaping to the design while ensuring the area is not hidden from public view.</li></ul>
Illegal traders	<ul style="list-style-type: none"><li>- Use of social media to help residents understand how to look out for illegal traders.</li><li>- Monitoring of Facebook Marketplace (and other sites) of those offering a removal service. Potential to carry out joint work with Trading Standards.</li></ul>

Issue to which barrier relates	Solutions
Understanding of the term fly-tipping and other waste related language	<ul style="list-style-type: none"> <li>- Use of simple-to-understand language when describing waste. The term “fly-tipping” may not always be best. Consider the need for communication in other appropriate languages for people with limited English or Welsh language skills.</li> <li>- Use of tools such as <a href="#">Funnelback</a> by local authorities can help ensure people searching using different expressions will be directed to the right information on websites.</li> </ul>
Removal targets	<ul style="list-style-type: none"> <li>- Consider applying 1) crime scene tape as standard practice for 24-48 hours before removal and / or 2) using chalk paint stencil messaging which communicates that fly-tipping doesn't just disappear and has a cost. This has been successfully used by an authority in London and is now being trialled in a number of other areas in the UK.</li> <li>- Any new indicators or targets for fly-tipping needs to be thoroughly interrogated to ensure that there are no unintended consequences.</li> </ul>

Table 2 - Community education and engagement

Issue to which barrier relates	Solutions
Household waste collections	<ul style="list-style-type: none"> <li>- In line with best practice in Wales each complaint in regard to presented waste should be followed up by an officer to identify the issue for individual households. The officer should have the discretion to provide what is needed to meet the needs of the resident depending on the issue and should be followed up.</li> </ul>
Enforcement	<ul style="list-style-type: none"> <li>- Current guidance emphasises engagement and communication and should be followed. Unlike littering and dog fouling where many clearly understood alternatives exist (such as putting litter in a bin or taking it home), the options for waste disposal are not as clearly defined or as widely understood. It is suggested above that fly-tipping can occur as a direct result of wanting to avoid enforcement and penalties elsewhere in the waste disposal process. Issuing fines at every stage will not encourage the correct behaviour but could even exacerbate the problem.</li> <li>- A national review of the efficacy of enforcement for fly-tipping (similar to the one undertaken by Keep Wales Tidy for littering) should be considered as part of the Litter &amp; Fly-tipping Prevention Plan for Wales.</li> </ul>
Communal bin stores and HMOs	<ul style="list-style-type: none"> <li>- Support residents with how they store and separate waste within their home – offer small recycling bags for their flats / HMOs to encourage residents to separate their recycling before putting into the bins.</li> <li>- One of the most successful attempts at increasing recycling participation has been to ‘gamify’ the process and create goals for communities / housing blocks to reach and ways to monitor progress. Again, this would need to be carried out and monitored carefully to ensure there are no unintended consequences.</li> </ul>
Bulky waste collections	<ul style="list-style-type: none"> <li>- Council joint working with housing associations, private landlords and bodies who work with people who have a higher likelihood of finding disposal of bulky items problematic (including student support organisations and housing support teams).</li> </ul>



Table 3 – Review of authority policy

Issue to which barrier relates	Solutions
Waste collections	<ul style="list-style-type: none"> <li>- Reconsider the effectiveness of particularly stringent policies in regard to kerbside collection, particularly if penalties or refusal of collection is a substantial part of council communications and approach. (Note that we do not refer here to frequency of collections, rather the approach to engagement, participation and communication which is signalled by accompanying waste policies and council rules.)</li> <li>- Waste policies need to be considered alongside housing and enforcement staff in a systems wide approach which take into account demographic data including (but not limited to) deprivation, education and literacy levels, HMOs, families with small children, households with carers, transitory populations. This can be achieved by having a meaningful Equality, Diversity and Inclusion (EDI) strategy in place and undertaking EDI impact assessments across relevant policy areas and applying to council decisions.</li> <li>- Missed collection reporting systems are generally well placed on local authority apps and websites. If a household reports a missed collection within 24 hours, authorities should aim to resolve with 24 hours where possible. ‘In cab’ technology has been used to good effect and can save time and costs.</li> <li>- Whilst nappy recycling options are not yet widespread, nappy collection services are a critical service that all local authorities should be providing to those who need it. This should be in addition to promoting reusables. Both need to be promoted consistently and frequently through pre-identified channels such as GPs, home care groups, maternity wards and local social media groups and childcare businesses.</li> <li>- Greater material collection at kerbside will increase recycling and capture a greater variety of waste material.</li> </ul>
Access to HWRCs	<ul style="list-style-type: none"> <li>- HWRCs play a critical role in waste infrastructure as they are the sole alternative destination for excess household waste if it can’t be reused and therefore need to be made easy and convenient. Their role in tackling waste and waste crime needs to be strengthened in every local authority and a consideration to be given to the barriers to access these sites for example permits, vehicle type. A suggestion to review whether all barriers are required at each site, or if some flexibility could be introduced.</li> <li>- Standardisation of rules across HWRCs, especially in regard to vehicle types, which aim to reduce the fear / concerns of accessing these sites, simplify processes and avoid unnecessary restrictions and reduce any additional ‘effort load’ to HWRC use will increase participation, use and recycling materials.</li> <li>- Access to HWRCs should be granted regardless of car type for domestic waste disposal.</li> <li>- An option for permits to be issued at each HWRC on the spot if required for domestic large vehicles (for instance hired vans).</li> <li>- Exploration of cost benefits for free bulky waste collection or a mobile service collection aimed at hotspots where transport ownership is low and fly-tipping instances are high.</li> </ul>

Issue to which barrier relates	Solutions
Access to HWRCs	<ul style="list-style-type: none"> <li>- Review the advice and use of skip amnesties (the provision of a skip for excess waste servicing a particular area).</li> <li>- Review waste sites and make it easier for households to use waste sites which are closest to them even if it's outside of their local authority area.</li> <li>- Establishing a 'Tip Shop' is an additional reason for visiting a HWRC, there are a number of revenue generating opportunities from these endeavours as well as opportunities for supporting skills and training.</li> </ul>
Bulky item collection	<ul style="list-style-type: none"> <li>- Exploration of cost benefits for free bulky waste collection or a mobile service collection aimed at hotspots where transport ownership is low.</li> <li>- Consider introduction of a minimum free service in each local authority for example 3 items free per year.</li> </ul>
Political pressures	<ul style="list-style-type: none"> <li>- A concise local authority waste or litter and fly-tipping strategy could set out the influences on fly-tipping and provide a plan for long term approach to the problem which councillors could in turn use in responding to constituent complaints about fly-tipping.</li> <li>- Training for cabinet members every term to avoid reactive policies and over-reliance on enforcement.</li> </ul>
Removal targets of fly-tipped waste	<ul style="list-style-type: none"> <li>- Increase flexibility or removal targets in problem areas and review practice so that officers can respond in a way which fits the context and situation.</li> <li>- Ensure that street scene and the enforcement teams have the same targets for removal and investigation.</li> <li>- Waste reduction targets (and disposal costs) can also disincentivise removal (especially on private land).</li> <li>- Post-sort of fly-tipping can also maximise recycling.</li> </ul>
Enforcement	<ul style="list-style-type: none"> <li>- Fly-tipping enforcement needs to be strongly targeted to specific areas as the current belief in getting caught is extremely low for this crime. The lack of resources available to authorities to establish a visible presence means that hyper-local targeting is likely to be more effective. The effective and consistent collection of data will support an intelligence led approach.</li> </ul>
Communal bin store and HMOs	<ul style="list-style-type: none"> <li>- Provision of more planning design guidance for communal bins areas through, for example, the <a href="#">Place Making Wales Charter</a> to ensure that waste / litter facilities reflect how people actually use the space.</li> <li>- Include conditions in Supplementary Planning Guidance and HMO additional licencing schemes on adequate recycling and waste facilities.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>- Waste and recycling teams can benefit from liaison with housing and planning officers at the local authority in understanding where these issues may apply.</li> <li>- Specific guidance and information targeted at areas of housing with particular waste problems. Prioritisation of resources for locations which face more difficulties in handling waste and recycling.</li> </ul>
Options for reuse /repair /borrow	<ul style="list-style-type: none"> <li>- Consideration of offering free collection of a small number of items each year. A benefit analysis could compare the cost of this versus the costs of levels of fly-tipping.</li> <li>- Routes for households and organisations supporting them to get assistance with the costs of removal of bulky waste where financial hardship is a barrier could be identified and publicised.</li> </ul>

Issue to which barrier relates	Solutions
Options for reuse /repair /borrow	<ul style="list-style-type: none"> <li>- Repair and reuse activities to be included in discussions around financial education, working with Non-Governmental Organisations (NGOs), credit unions, banks and Registered Social Landlords (RSLs) to promote different reuse, repair, borrowing and rental options.</li> <li>- Focus advertising and marketing campaigns for repair initiatives around local institutions such as schools, prominent businesses, local newspapers.</li> <li>- Introduce repair apprenticeships in anchor institutions (such as colleges and housing associations) who are already engaging with relevant trades and skills.</li> </ul>
Charging and permit systems – HWRCs	<ul style="list-style-type: none"> <li>- Simple and standard guidelines for access to HWRC both online and at site entrances.</li> <li>- Removal of charges for any domestic waste and / or domestic vehicles (up to and including small vans and people carriers not registered for business use).</li> <li>- Removal of permit requirements for hired vans and / or ability to buy temporary permits at the point of entry.</li> <li>- Simplification of permit systems and maximum limits on the charge.</li> </ul>
Use of public bins	<ul style="list-style-type: none"> <li>- Waste disposal in / near bins and improperly presented side waste should not be counted as fly-tipping but should be a part of local authority bin strategies and audits. Additional guidance is required.</li> </ul>

Table 4 – Physical infrastructure and interventions

Issue to which barrier relates	Solutions
Communal bin stores and HMOs	<ul style="list-style-type: none"> <li>- Review bin types in problem areas and develop common design guidance for communal facilities which include ease of use, accessibility, visibility, safety and aesthetics.</li> </ul>
Use of public bins	<ul style="list-style-type: none"> <li>- Binfastructure i.e. the type and location of public bins and messaging displayed in the vicinity of the bin can be used to discourage fly-tipping. (See also Keep Wales Tidy binfastructure guidance.)</li> <li>- Development of clear bin messaging that uses plain language and relevant images of the type of unacceptable items to clarify that dumping bags of waste and other items along the bin is not allowed.</li> <li>- Test ground markings near bins.</li> <li>- Consider removal of bins from laybys as there is some evidence that in certain contexts these increase fly-tipping. Although note that removal of bins may serve to simply move the issue to another location which is harder to manage / dispose of.</li> <li>- Consider the condition and impression created by public bins, where these give an uncared-for image they increase the risk of fly-tipping.</li> </ul>

Table 5 – National policy and initiatives

Issue to which barrier relates	Solutions
Bulky item collection	<ul style="list-style-type: none"> <li>- An easily searchable database of Welsh charities and organisations that can help with collection (building upon the type of information currently available on Wales Recycles (<a href="https://walesrecycles.org.uk/">https://walesrecycles.org.uk/</a>) to include information of radius covered and types of items accepted.</li> <li>- Regional examples exist but more is needed through councils to promote as a 'standard' option' to promote their use to local residents across Wales. Examples include: A repair directory funded by Welsh Government is available for Mid and South Wales at <a href="#">Repair Efficiency Wales</a>.</li> <li>- Similarly, for South East Wales there is a website (<a href="#">Used furniture Newport (wastesavers.co.uk)</a> demonstrating the various reuse shops across this area of Wales.</li> </ul>
Enforcement	<ul style="list-style-type: none"> <li>- Review of enforcement for fly-tipping to address training, magistrates, regulations, data and back-office systems and penalties.</li> <li>- Further work to establish the benefits of introducing a fly-tipping awareness course as an alternative to fines and / or could be additionally applied at the point of a court sentence.</li> </ul>
Illegal traders	<ul style="list-style-type: none"> <li>- Strengthen regulations to address rogue traders. Make it illegal for anyone to advertise services without an authorised permit. Increase the penalty onus on the traders, rather than the current emphasis on households.</li> </ul>

Table 6 – Landlords and housing

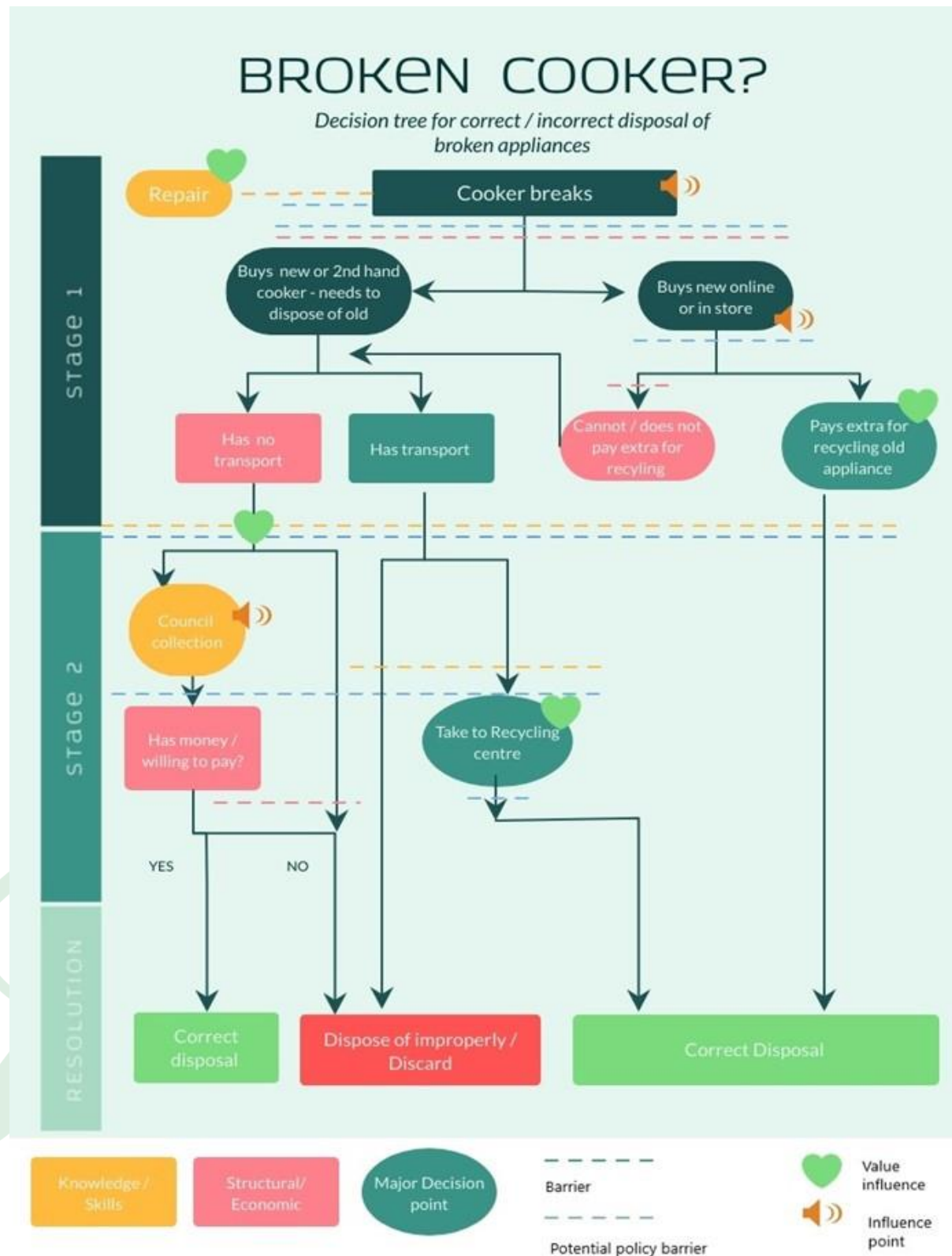
Issue to which barrier relates	Solutions
Bulky items collection	<ul style="list-style-type: none"> <li>- Local authority joint working with housing associations, private landlords and bodies who work with people who have a higher likelihood of finding disposal of bulky items problematic (including student support organisations and housing support teams). This could help get information to households at the right time and also in identifying gaps in existing bulky waste services.</li> </ul>
Communal bin stores and HMOs	<ul style="list-style-type: none"> <li>- Communications with residents at HMOs should take into account that each resident may not consider themselves to be part of the household and may not communicate effectively with each other. Communications need to be addressed to individuals rather than "the householder".</li> <li>- Private landlords need to be encouraged to give correct information and adequate facilities to HMO tenants about recycling / waste collections and how to dispose of bulky items. There is potential for this to be included in tenancy agreements and supported by HMO additional licensing arrangements. Landlords can be supported with the right resources to do this.</li> </ul>

Issue to which barrier relates	Solutions
Communal bin stores and HMOs	<ul style="list-style-type: none"> <li>- Make bins and bin stores more attractive and aesthetically pleasing, especially by introducing nature aspects (for example flowers, birds and foliage) to the design which has shown a reduction of misuse in these areas. This nudge technique is a low budget intervention but will require maintenance to ensure the design is kept fresh and clean.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>- Highlight the private landlord's responsibility to organise extra bins or extra waste if the property is limited on space (this could be included in HMO licencing conditions).</li> </ul>
Access to a vehicle	<ul style="list-style-type: none"> <li>- Engagement of universities and private landlords in providing students with better knowledge and understanding of options for disposing of unwanted items. This could include information about charities and social enterprises who offer free collection of some items.</li> <li>- Social landlords could have policies directed to helping lower income families with costs of waste removal and could even be targeted as specifically as to focus on areas where no access to a vehicle is particularly high.</li> <li>- Social enterprises, often already active in this field, could be supported to increase their services to target the particular difficulties low-income households with no vehicle access may experience with waste disposal.</li> </ul>



# Appendices

## Appendix 1. Example decision map and influence points



Appendix 2. Sample of local authorities' waste charging policies and approach to bulky waste provision and information about alternatives to bulky waste disposal by council\*

\*on basis of information available on council website February 2022

	Charge for waste and recycling containers and replacements?	Bulky waste charges per item or collection	Bulky waste reduction for certain benefits?	Green waste charge? (NB green waste in all cases collected 9 months per year)	Does the council page on bulky waste provide alternatives to removal of unwanted bulky waste by the council?
Council A	No.	£6 per item	No	No	No. A separate page has information re. a waste shop at the HWRC but does not link the two.
Council B	Residual bin replacement charge (unless proof of damage by binmen).	£40 up to 5 items	Yes	£32 minimum	Bulky waste page also provides a link to local charity who refurbish furniture and suggestion of using freecycle/freegle.
Council C	Residents must supply own residual waste bags. No charge for replacement food waste caddy and reusable recycling bags.	£15 for 1 – 3 items	No	£32 minimum	Page explains bulky waste service is provided by a local community enterprise who refurbish goods. Same page has links to other charities who accept furniture and links to freecycle, eBay etc.
Council D	Years supply of residual bags provided. No charge for other recycling container replacement.	£20 for 10 items	No	£47 minimum	Page explains bulky waste service is provided by a local community enterprise who refurbish goods. No other information.

## Appendix 3. Keep Wales Tidy local authority (Caru Cymru issues update) fly-tipping survey

### Caru Cymru – Fly-tipping Questionnaire

Dear All,

Two years ago, we asked you what the top LEQ priorities were in your area. You told us that dog fouling, roadside litter and fly-tipping were all high on your list and so, as part of Caru Cymru, we will be looking at developing national resources to support efforts across the country on these things.

We have already been working on a national dog fouling campaign and we have held a number of discussions with Welsh Government and fast-food retailers about roadside litter – we know that these issues continue to be very relevant and persistent issues for all our partners, and we will be discussing these campaigns with you in more detail in the coming months.

In regard to fly-tipping however, we thought it would be useful to try and get more information about this as we know a great deal has changed in the past two years, not least due to the Covid pandemic.

We have put together a quick survey to get your feedback on this issue which will feed directly into our work in this area. The survey is predominantly made up of multiple-choice questions and should take no longer than 10 minutes to complete.

Your input is vital to our work, and we would appreciate a response from all of our partners to engage in this issue further.

### Questions

#### To what extent is tackling fly-tipping a priority issue in your area?

- Scale 1-5 (Lowest priority to highest priority)

#### What is the main reason for your answer?

- (Comment)

#### What is the most prevalent form of fly-tipping in your area? (Please choose 1 option)

- Domestic fly-tipping – Household waste (for example black bags, nappies, garden waste)
- Domestic fly-tipping – Household items (for example bulky items / white goods, DIY materials)
- Commercial fly-tipping – (for example illegal traders, 'van men')
- Industrial fly-tipping – (for example large scale industrial waste such as tyres)
- Other (please specify)

#### Do you think the COVID-19 pandemic has had an effect on fly-tipping in your area? (Please choose 1 option)

- Increased significantly
- Increased a little
- No change
- Decreased a little
- Decreased a lot

**Are there any areas which are particularly problematic for fly-tipping?** (Please choose 1 option)

- Laybys
- Rural roadsides
- Housing estates
- Industrial estates
- Urban streets or alleyways
- Rivers / waterways
- Other

**Who do you think are the primary perpetrators of fly-tipping in your area?** (Please choose 1 option)

- General households
- Illegal traders
- Students
- Organised crime
- Other

**Is there a particular time of year that fly-tipping is worse than others?** (Please choose 1 option)

- Summer
- Winter
- Autumn
- Spring
- All equal

**What do you believe is the biggest barrier for the local authority in tackling fly-tipping in your area?** (You can tick up to 3 answers)

- Lack of capacity (for example staff time)
- Lack of resources (for example costs for removal)
- Lack of support from Natural Resources Wales (NRW)
- Lack of support from police / other agencies
- Lack of regulation / legislation (please specify)
- Issues of land ownership (for example private land)
- Other (please specify)

**Do you have any ideas on how this might be overcome?**

- (Comment)

**What do you believe is the biggest barrier to households in your area disposing of their waste responsibly?** (You can tick up to 3 answers)

- They find it difficult to access waste sites due to site rules / restrictions
- They find it difficult to access waste sites due to closures or distance
- They can't afford to get rid of waste correctly
- They don't know what to do with excess waste
- They are duped by illegal traders
- They don't believe there's anything wrong with leaving it out as councils will clear it
- Other (please specify)

**Do you have any ideas on how this might be overcome?**

- (Comment)

**Generally speaking, do you think that households in your area:**

- Understand that it is a crime to fly-tip? Yes / No
- Believe that they will get caught? Yes / No

**Are there any policy or legislative issues that you consider to be significant barriers when trying to tackle the issue of fly-tipping? (You can tick up to 3 answers)**

- Support from NRW
- Fly tipping on private land
- Lack of resources to raise awareness.
- No statutory duty to investigate
- Lack of regulation around illegal traders
- Policies made by local councils (for example for the purpose of cost reduction to services)
- N/A – there aren't any policy barriers
- Other (please specify)

**Lastly, do you offer a free nappy collection service in your area?**

- Yes
- Yes – but only if they fit certain criteria
- No

**Any other comments?**

- (Comment)

## Appendix 4. Prevention through policy: Traveller sites

As of January 2017, there were 115 local authority traveller sites and 934 pitches in Wales. Travellers were identified as one of the four perpetrator groups in the ENCAMS report (1998). This is perhaps because traveller sites often do not have the same provisions for waste collection as permanent residents but may also be attributed to some of the trades most commonly associated with the traveller community such as building, garden work or scrap dealing.

A report in 2003 on local authority traveller sites in England fly-tipping was identified by site managers as a problem on two thirds of sites. While this is most commonly attributed to the activities of site residents, non-resident dumping is also identified on six out of ten sites with a problem. This is recognised by Gypsy / Traveller residents, who feel that they get blamed for other people's tipping – while sometimes also acknowledging that some members of their own community may fly-tip. This highlights the crucial need for greater community cohesion around these sites, both existing and new with the aim of changing perceptions.

Romany Gypsies and Irish Travellers are legally recognised as ethnic groups and protected from discrimination by the Race Relations Act (1976, amended 2000) and the Human Rights Act (1998). In terms of health and education, they are one of the most deprived groups in Britain.



- Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average.
- Gypsy and Traveller mothers are 20 times more likely than the rest of the population to have experienced the death of a child.
- In 2003, less than a quarter of Gypsy and Traveller children obtained five GCSEs and A\*-C grades, compared to a national average of over half.

Tackling the problem of fly tipping in these communities is therefore much more complex in terms of education and communication of proper disposal and the possibility of the combined small trader status of some members of the community. Additionally, traditional methods of communication by local authorities (for example campaigns / flyers) may be ineffective due to the high level of illiteracy rates in the traveller community and therefore a more concerted communication effort has to be made in these areas. The success of this will be largely down to the relationship of the community with the site manager.

The Welsh Government [Good Practice Guide in Designing Gypsy Traveller Sites in Wales](#) makes several recommendations for waste disposal on these sites which urges equal access to waste collection and infrastructure as other members of the community.

'Each pitch should have standard domestic waste disposal arrangements in compliance with current legislation and regulations. If additional waste disposal facilities are required such as skips, they should be suitably located within easy reach of but screened from individual pitches and other buildings on site. Fly-tipping and dumping, whether by site residents or the local settled community, is a persistent problem on some sites and is an issue for site managers. Disposal facilities should be regularly cleared to ensure the cleanliness of the site and discourage tipping.

Residents of a Gypsy Traveller site should also have the same access to collection services provided by the local authority as afforded to other forms of housing, for example some local authorities arrange a collection service for larger items of furniture but by appointment only.<sup>40</sup>

Business support or employability officers should also have a role in these communities to highlight duty of care obligations but also to identify any members who may have repair skills which can be harnessed to contribute towards the zero waste and circular economy ambitions of Wales and to engage with fly-tipping reduction through repairing of white goods or furniture repair which could generate income.

In their guide to '[Managing and delivering Gypsy and Traveller sites](#)', the Chartered Institute of Housing notes: 'It is important to recognise that a strong approach to the physical environment requires a consistent set of management practices, so that tipping isn't cleared only for it to reappear. Particularly in communal spaces and access roads, where there is less of a feeling of 'ownership', site residents may feel less able to 'challenge' anyone who is tipping waste. If management is outsourced, quality of service needs to be checked to ensure a strong focus by the contractor on maintaining the physical environment of the sites.'<sup>41</sup>

In regard to unauthorised encampments, temporary refuse and recycling facilities by the local authority should be provided, as well as liaison with the travellers about their use. Council officers can also use this as an opportunity to discuss the proper disposal of business-related waste and the need for waste carrier licences as members of the community may also be undertaking work in the area. The creation and use of a gypsy and traveller encampment protocol by the council should include these items and makes it clear to officers and councillors what process will be followed when encampments arise.

## Appendix 5. Prevention through policy: Student areas

In areas where there is a high student population, it would be worth considering this demographic separately due to their transient nature and the possible lack of 'ownership' they may feel over an area as a short-term resident. Responsibility for fly-tipped waste outside a student property is currently the sole responsibility of the resident. However, as many students leave during the holidays and many may not be native to the UK, there is a significant potential for confusion over recycling processes or other options for disposal through local authorities. Furthermore, local authority literature is not released with the consideration of academic terms in mind so important information may be missed. Additionally, local authority leaflets may be lost on many international students.

There is a role for universities and student unions to be the platform for this communication at the start and end of every term, but we should also consider the role of property landlords (or estate agents where relevant) in communicating legal responsibilities within tenant contracts. University cities may wish to outline responsibilities on bins themselves as a permanent reminder to the household, graphics and visual information will likely be more effective where there are many international students.

Local authority and university partnerships that coordinate 'skip days' have proven successful in some areas by targeting specific times of year such as after the Christmas holidays or at the end of the academic year.

'Durham City Council, for example, operate a special skip service aimed at the large proportion of students moving out of residences in the summer months. Students often have unwanted furniture at such times and know of no place to take it or have no means to take it to a legitimate waste disposal site.'<sup>42</sup>

# References

- <sup>1</sup> Welsh Government (2021) Consultation document: A litter and fly-tipping free Wales
- <sup>2</sup> Welsh Government (2022) *Summary of responses- Consultation on litter and fly-tipping prevention plan for Wales*
- <sup>3</sup> Keep Britain Tidy (2022) *Beyond the tipping point*
- <sup>4</sup> Social Change UK, (2019), *A guide to the CommB Model of Behaviour Change*, Available: [https://social-change.co.uk/files/02.09.19\\_COM-B\\_and\\_changing\\_behaviour\\_.pdf](https://social-change.co.uk/files/02.09.19_COM-B_and_changing_behaviour_.pdf) [Accessed: 17.3.22]
- <sup>5</sup> Webb, B et al (2006) *'Fly-tipping: Causes, Incentives and Solutions'*
- <sup>6</sup> Webb, B et al, *Ibid*
- <sup>7</sup> Welsh Government, Stats Wales, updated December 2021, *Recorded fly-tipping incidents by waste type*. Available: <https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Fly-tipping/recordedflytippingincidents-by-wastetype> [Accessed: 17.3.22]
- <sup>8</sup> Welsh Government, Stats Wales, updated December 2021, *Recorded fly-tipping incidents by size*. Available: <https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Fly-tipping/recordedflytippingincidents-by-size> [Accessed: 17.3.22]
- <sup>9</sup> Welsh Government, Stats Wales, updated December 2021, *Clearance Costs of Fly-tipping by Local Authority*. Available: <https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Fly-tipping/clearancecostsofflytipping-by-localauthority> [Accessed: 17.3.22]
- <sup>10</sup> Welsh Government, Stats Wales, updated December 2021, *Fly-tipping*. Available: <https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Fly-tipping> [Accessed: 17.3.22]
- <sup>11</sup> Keep Wales Tidy (2021), *Local Authority (Caru Cymru: Issues Update) Fly-tipping Survey*.
- <sup>12</sup> Nicholson, K, 10 October 2018, Resource.co, *22 million pieces of furniture thrown out every year in the UK*, Available: <https://resource.co/article/22m-pieces-furniture-thrown-out-every-year-uk-12892>
- <sup>13</sup> 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: 17.3.22]
- <sup>14</sup> Langley, J. July 6 2020, LetsRecycle.Com, *UK second largest producer of WEEE*, Available: <https://www.letsrecycle.com/news/uk-the-second-largest-producer-of-weee/> [Accessed: 17.3.22]
- <sup>15</sup> Social Change UK, (2019), *A guide to the CommB Model of Behaviour Change*, Available: [https://social-change.co.uk/files/02.09.19\\_COM-B\\_and\\_changing\\_behaviour\\_.pdf](https://social-change.co.uk/files/02.09.19_COM-B_and_changing_behaviour_.pdf) [Accessed: 17.3.22]
- <sup>16</sup> Keep Wales Tidy (2021), *Local Authority (Caru Cymru: Issues Update) Fly-tipping Survey*.
- <sup>17</sup> Keep Wales Tidy (2018), *Fly-tipping and Household Waste Survey*.
- <sup>18</sup> Keep Wales Tidy (2018), *Ibid*
- <sup>19</sup> Gov.UK, 2021, *Electrical waste – Retailer and Distributor responsibilities*; Available: <https://www.gov.uk/electricalwaste-producer-supplier-responsibilities/take-back-waste-in-store#:~:text=You%20must%20take%20back%20all,boug> [Accessed: 17.3.22]
- <sup>20</sup> Newham Council, August 2021, *Newham shortlisted for national awards for their work to reduce fly-tipping* <https://www.newham.gov.uk/news/article/679/newham-shortlisted-for-national-awards-for-their-work-to-reduce-fly-tipping> [Accessed: 17.3.22]
- <sup>21</sup> Keep Wales Tidy, 2021, *'Rethinking enforcement for littering and dog-fouling'*
- <sup>22</sup> Welsh Government, Stats Wales, updated December 2021, *Fly-tipping offences by type*. Available: <https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Fly-tipping/numberofflytippingenforcementactions-by-type> [Accessed: 17.3.22]
- <sup>23</sup> InfobaseCymru, 2011 Census, *Housing & Accommodation*, Available: <https://www.infobasecymru.net/IAS/themes/2011census/housingandaccommodation> [Accessed: 17.3.22]
- <sup>24</sup> Welsh Government, Updated March 2022, StatsWales: *Houses in Multiple Occupation by Local Authority*. Available: <https://statswales.gov.wales/Catalogue/Housing/Hazards-and-Licences/housesinmultipleoccupation-by-area> [Accessed: 17.3.22]
- <sup>25</sup> Newport City Homes, January 2020, *A new approach to Fly-tipping*. Available: <https://www.newportcityhomes.com/httpportalnewportcityhomescomabout-us/httpportalnewportcityhomescomabout-usnews/a-new-approach-to-tackle-fly-tipping/> [Accessed: 17.3.22]
- <sup>26</sup> Keep Britain Tidy, 2021, *Understanding waste management in houses in multiple occupation – a tenant perspective*, Available:

<https://www.keepbritaintidy.org/sites/default/files/resources/Understanding%20Waste%20Management%20in%20HMOs%202021.pdf> [Accessed: 17.3.22]

<sup>27</sup> Welsh Government, (2014), *2011 Census data – characteristics of households in Wales*. Available: <https://gov.wales/sites/default/files/statistics-and-research/2018-12/140225-2011-census-characteristics-households-en.pdf> [Accessed: 17.3.22]

<sup>28</sup> Turn2Us, January 2020, *Living Without* Report, Available: <https://www.turn2us.org.uk/T2UWebsite/media/Documents/Communications%20documents/Living-Without-Report-Final-Web.pdf> [Accessed: 17.3.22]

<sup>29</sup> ITV News, 15 January 2020, *Quarter of a million people living without essential household appliances*, Available: <https://www.itv.com/news/wales/2020-01-15/quarter-of-a-million-people-in-wales-living-without-essential-household-appliances> [Accessed: 17.3.22]

<sup>30</sup> Repair Cafe Wales. 2022. *Get Involved*. Repair Café Wales. Available at: <https://repaircafewales.org/get-involved> [Accessed: 17.3.22]

<sup>31</sup> ONS UK, 2022, *Personal and Household finances*, Available: <https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances> [Accessed: 17.3.22]

<sup>32</sup> Welsh government, 2021, *Consultation on New Transport Strategy*: Available: <https://gov.wales/sites/default/files/consultations/2020-11/supporting-information-transport-data-and-trends.pdf> [Accessed: 17.3.22]

<sup>33</sup> Keep Wales Tidy (2018), *Fly-tipping and Household Waste Survey*.

<sup>34</sup> Keep Wales Tidy (2018), *Ibid*.

<sup>35</sup> Keep Wales Tidy (2018), *Ibid*.

<sup>36</sup> Zero Waste Scotland, 2015

<https://zerowastescotland.org.uk/sites/default/files/ECC%20Flytipping%20Project.pdf>

<sup>37</sup> Keep Wales Tidy (2018), *Ibid*.

<sup>38</sup> Keep Britain Tidy *Understanding and Tackling Fly-tipping in London*, 2017, Available: <https://www.keepbritaintidy.org/sites/default/files/resource/Understanding-and-Tackling-Fly-Tipping-in-London-Final-Report.pdf> [Accessed: 17.3.22]

<sup>39</sup> Keep Britain Tidy, 2018, *ibid*

<sup>40</sup> Welsh Government, 2015, *Designing Gypsy & Traveller Sites*, Available: <https://gov.wales/sites/default/files/publications/2019-03/designing-gypsy-and-traveller-sites.pdf> [Accessed: 17.3.22]

<sup>41</sup> Chartered Institute of Housing, 2016, *Managing and delivering Gypsy and Traveller Sites*, Available: <https://www.cih.org/publications/managing-and-delivering-gypsy-and-traveller-sites-negotiating-conflict> [Accessed: 17.3.22]

<sup>42</sup> Flytipping Action Wales, *Good practice Guide* <https://www.flytippingactionwales.org/en> [Accessed: 17.3.22]

