

[litter-and-fly-tipping-prevention-plan-wales-consultation-document 0.pdf \(gov.wales\)](#)

Consultation Response Form

Your name:	Deep Sagar
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Our Litter & Fly-tipping plan

Question 1: Do you agree litter and fly-tipping should be covered under one plan? If not, please provide a reason for your answer.
Comments: We feel they should be kept separate, as the cause for each we feel is different. Fly-tipping is a premeditated action usually carried out by criminals or persons/ organisations not willing to use legitimate and legal disposal routes, in the main to avoid costs of treatment and disposal. Littering is a social problem caused by individuals' impulsive behaviour usually and probably affected by others and how well the location is catered for.

Question 2: Do you agree with themes we have chosen? Do you think they will help us achieve our ambitions? If no, what other themes do you think need to be included?
Comments: We agree with the five themes you have chosen but believe the greatest effort needs to go into: (i) Evidence, monitoring and evaluation, (ii) Education and behaviour change, and (iii) Effective enforcement. Understanding of litter in particular is limited; more research to be clearer about who litters, what, why and when and what could be done to reduce would help under (i). Present qualitative understanding that 80% of us litter; cigarettes, chewing gum, fast-food wrapping and soft-drink bottles are the prominent components, and that peer behaviour and "broken-windows" aid or reduce, needs to be deepened and qualified. Education and behaviour change apply to both litter and fly-tipping. Penalties under (iii) need to increase for fly-tipping to be more reflective of the harm caused and costs of clearance. The deterrent effect of naming and shaming needs to be realised by publication of names of all penalised in a central repository. In addition,

consistency in enforcement is necessary. The Welsh Government could consider a mini-regulator for these two subjects and given the size of the costs and occurrence this could be justified.

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

Comments:

We support the principle of waste reduction. Encouraging industry across all packaging materials to go back to Reduce, Reuse, Replace and Recycle and encouraging the plastics industry – which appear to be being singled out – to more quickly develop single-use alternatives is our recommendation. (Reducing the amount of single-use plastics as a priority needs to avoid use of alternatives which could have effects such as higher lifecycle carbon dioxide emissions.) Forthcoming Extended Producer Responsibility (EPR) and Deposit Return Scheme (DRS) proposals will probably have impact and we suggest a phased approach – first, encourage industry; should scale and reach not be increased in reasonable time then consider regulation or extra cost imposition. We would ask you to be careful about unintended consequences, eg as reported for plastic in tampons, and remember that the cost of clearing litter is the same regardless of whether the littered item is plastic or any other material.

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

Comments:

We are concerned over so-called bio-degradable packaging materials and the addition of oxo-degradable packaging as this could lead people to increase litter as they perceive those don't harm the environment.

We also suggest trials with main manufacturers of cigarettes, chewing gum, fast-food and soft drinks so that they offer packaging to consumers for storing litter to bring back to designated points as well as their funding directly of local authorities to improve availability of bins as well as general care in usual litter points such as parks.

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

Comments:

We welcome any proposal to develop data standards for reporting, and support training for local authorities and others. We would welcome this being adopted consistently across the UK.

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

Comments:

For fly-tipping we feel more emphasis on and development of digital waste tracking should be a priority as well as revision to waste carriers' licensing and duty of care regulations. These could help in reducing fly-tipping.

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

Comments:

We support the proposals outlined to encourage behavioural change. It is vital to better understand why this social problem exists, the role of culture, and the complexity of intent around fly-tipping. However, behaviour will take a long time to change, and the importance of standardised messages cannot be overstated. Campaigns need to be undertaken on duty of care arrangements for both householders and businesses.

We also feel that litter-bin location and design could be developed to fit behaviour, based on research.

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

Comments:

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

Comments:

We support proposals to review enforcement and provide a coordinated or consistent approach to assisting through new legislative powers and additional statutory guidance for local authorities. Any review should seek to ensure guidance and enforcement are carried out consistently across the nation. We also support introduction of legislation to address littering from vehicles but suggest it is consistent with legislation in place in England to allow penalties to be applied.

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

Comments:

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

Comments:

We believe provision of services has to fit in with behaviour, particularly as behavioural change will take some time to have effect. We support technological advances referred to in the consultation with the use of 'smart' bins being a way of providing facilities for people to properly dispose of litter, while ensuring efficiencies in emptying bins can be developed by the collector, in many cases the local authority. There are examples in Paris where smart bins are linked to CCTV so if material starts building up adjacent to the bin because it's full, operatives can be quickly deployed to empty the bin and remove accumulations. It is believed McDonalds are undertaking some work along these lines using drones. Additionally, EPR and DRS could play an important role in efficient operational delivery. Producers under EPR are likely to want to contribute to communications and indeed community litter-picks; some members of the ACP are part of such organisations.

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

Comments:

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

Comments:

We recommend Evidence, Monitoring and Evaluation, Education and Behaviour Change, and Effective Enforcement having priority with a separate plan for litter and another for fly-tipping. We should emphasise that with all the categories in Efficient Operational Delivery synergy between all the UK nations needs to be realised to ensure the consumer does not come across conflicting messages.

Welsh language questions

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

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

Comments:

We do not see why the proposed plan would have any detrimental effect on the Welsh language.

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

Comments:

Having messages in both English and Welsh everywhere, eg on bins, is the answer but there are costs of doing this that the Welsh Government is aware of. We support the language policy as culturally appropriate.

Other comments

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

Comments:

Thank you for this opportunity. We would be happy to support or advise the Welsh Government further.

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

