



Welsh Government

Consultation – Summary of Response

A Litter and Fly-tipping Free Wales

Litter and Fly-tipping Prevention Plan
for Wales

31 March 2022



Overview	Summary of responses to the consultation on the Litter and Fly-tipping Prevention Plan.
Action required	None. This document is for information.
Further information	<p>Enquiries about this document should be directed to:</p> <p>Address:</p> <p>Environmental Protection Division Welsh Government Cathays Park Cardiff CF10 3NQ</p> <p>Email:</p> <p>EnvironmentalProtectionDivision@gov.wales</p>
Additional copies	<p>This document can be accessed from the Welsh Government's website at:</p> <p>https://gov.wales/litter-and-fly-tipping-prevention-plan-wales</p>
Related documents	<p>The consultation on the Litter and Fly-tipping Prevention Plan for Wales is available at:</p> <p>https://gov.wales/litter-and-fly-tipping-prevention-plan-wales</p>

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Introduction

We would like to thank everyone who responded to our consultation. It is not the intent, nor would it be possible, to reflect every comment received in this report. The purpose is to give an overview of the responses and give an indication of the kinds of issues and concerns raised in relation to our draft Litter and Fly-tipping Action Plan.

How data is reviewed and presented in this document

This Summary of Responses document covers both the full and the easy read versions of the consultation document. As both documents were distinct, they have been summarised and handled in this response as separate elements. However, views and comments expressed in both have been taken into account.

In addition, we received a number of responses which did not follow the consultation question structure and we also held a small number of online workshops which included representatives from Local Authorities, the Third Sector and private landowners. Brief notes capturing views expressed at these workshops are included in Annex 1 of this document.

Responses to the consultation

There were 377 responses received to the consultation. A total of 355 respondents commented on the full consultation document and 22 respondents provided views on the Easy Read version of the document. This can be broken down as follows:

Responded to full consultation with comments or partially answered questions via online portal	47
Responded to full consultation and answered all questions via online portal	255
Responded to full consultation and answered all questions via electronic mailbox	53
Total responses to full consultation	355

Responded to Easy Read version online	12
Responded to Easy Read version via electronic mailbox	10
Total responses to Easy Read	22

An overview of the various sectors and organisations who responded is provided in the table below:

Members of the public	227
Other	36
Voluntary Sector	34
Community Council	28
Local Authority	14 (22*)
Public Body	11
Charity	10
Town Council	9
Total	377

**Including multiple responses from the same Local Authority*

Language of response

The full and easy read versions of the consultation were available in both English and Welsh with individuals having a choice to respond in the language of their preference. Responses were split between the two languages as follows:

English	374
Welsh	3

Responses to the full consultation document

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

Q1				
	Yes	No	Not stated but responded/ Did not know	No answer/ Not answered question
Numbers	223	67	31	34
Percentage	63%	19%	8%	10%

The table above shows the majority of respondents were in favour of combining litter and fly-tipping under one plan. Of those who agreed, a large number provided little or no additional information to justify this position. Of those who did, the prevailing view was that a single Litter & Fly-tipping Prevention Plan (the Plan) would provide a more consistent and coherent approach to dealing with littering and fly-tipping offences in Wales. However, this support was often caveated with cautionary advice that the Plan should avoid adopting a “one-size-fits-all” approach given the complex and often differing nature of the two offences. It was this difference between offences that was often cited by those who opposed combining the two issues, with many respondents believing the complexities involved in fly-tipping in particular meant a separate, standalone plan was needed.

Whilst there were differing views expressed in favour and in opposition of developing one plan, a number of common themes were identified throughout the responses and an overview of these is provided below.

Views on the behaviour of litterers and fly-tippers

Whilst respondents often recognised fly-tipping and littering were two different offences, some felt the motivation or rationale for committing them were principally the same i.e. offenders were lazy or selfish, in that they did not care about the impact of their actions on the environment or others. This viewpoint was rejected by a number of respondents, particularly those working in Local Authorities, who felt the two offences were very much different, with littering considered a spontaneous, thoughtless act and fly-tipping a more deliberate, premeditated offence undertaken by criminals.

On this basis, respondents often felt the motivations and behavioural routes for both offences required distinct approaches to addressing them. In relation to fly-tipping, there was significant support for any punishment to be more punitive, with many favouring higher fines or prison sentences. For littering, whilst there was a similar sentiment around fines, a larger number of respondents felt more focus should be placed on changing behaviours and educating people about the impacts of discarding litter.

Others noted the scale of waste involved in fly-tipping offences was larger than that of littering offences and, therefore, dealing with it required different approaches. Consequently, these respondents were often in favour of developing two separate plans, albeit with linkages between the two issues. Natural Resources Wales commented on the difference between a householder fly-tipping their own waste and someone benefitting financially from offering a waste service, then illegally disposing of the waste. Whilst financial motivation was considered a key driver for both, it was felt the scale of the offence would differentiate the approach for dealing with fly-tipping. It was suggested that large scale, organised fly-tipping was likely to be an indication of organised waste crime and a separate, more focused action plan would cover these type of offences. This could then potentially sit under this Plan. Further discussions on the issue was offered.

Several respondents expressed concerns about covering the two offences in one plan, however they felt this approach could be supported as long as there was clear distinction provided in the Plan that allowed litter and fly-tipping to be addressed separately. Other respondents felt that whilst the two offences were different, the impact was the same i.e. both caused damage to the environment and society as a whole. On this basis, respondents felt it was justified the two issues were dealt with under one plan as it would provide an opportunity to improve awareness raising and change behaviours.

Providing strategic focus and consistency of approach

A number of respondents supported the need for a consistent, integrated approach under one plan. Some respondents felt a single plan offered a simpler, more streamlined approach, thus making it easier for the public to engage with the actions and in turn, this would help with future collaborative working. For example, One Voice Wales noted the need to integrate the work of Local Authorities, Town and Community Councils and volunteers to help tackle poor local environment quality in communities. A response from South Wales Fire & Rescue Service highlighted how fires relating to litter and fly-tipping were dealt with under one category (refuse) and they used this integrated approach when working with stakeholders. They believed one plan would help support the work they were already undertaking in this area.

Some respondents expressed concerns over the resourcing of the Plan if both issues were covered and queried whether all the actions could be delivered if adequate funding was not made available.

Wider Local Environment Quality Plan

Whilst a number of respondents agreed with a joint plan, some questioned the absence of other environmental offences. Of particular concern was the limited references to dog fouling, with a large number of respondents highlighting the prevalence of this issue within communities. Others, such as the Chartered Institute of Waste Management Wales, queried the exclusion of other local environment quality issues such as fly-posting and graffiti. One respondent suggested domestic

waste collection offences should also be included in the Plan, for example waste offences under section 46¹ of the Environmental Protection Act 1990.

Local Authority waste policies

A number of respondents, predominately members of the public, disagreed with the focus of the Plan and often suggested Local Authority waste management systems were to blame, particularly in relation to fly-tipping. On this basis, they often disagreed with the Plan's approach. Whilst these concerns and complaints were common themes throughout the consultation, the main areas of contention raised under this question are outlined below:

- Household Waste Recycling Centres – Comments often related to the perceived lack of adequate provision (particularly in more rural areas which required long round trips), the inability to access facilities in neighbouring authorities in some regions and the use of booking systems for some sites. Others felt there were too many restrictions on what could be disposed of (for example some quoted the inability to dispose of black bin bags) and others suggested small businesses/ tradespeople should have access rather than having to pay to dispose of waste elsewhere. It was often felt these were unnecessary barriers and discouraged people from “doing the right thing”.
- Domestic waste collection services and litter bins – Concerns here focused mainly around the provision of small household residual waste bins and/or reduced collection of these bins, difficulties experienced in areas of multiple occupancy and overflowing litter bins. Again, respondents often felt these were contributing to littering and fly-tipping.
- Recycling - Comments here often focused on potential opportunities for littering from perceived inadequate recycling containers and items being blown from collection vans or dropped by staff during collection.

Other comments

One respondent agreed with our approach on the basis it should be subject to review after five years. The Federation of Small Businesses suggested the Plan required further alignment with the Circular Economy Strategy Beyond Recycling.

Keep Abergavenny Tidy suggested these issues should have a dedicated Welsh Government Minister and for any actions/ activities from the Plan to be regularly publicised. Another respondent suggested the establishment of one central body to oversee waste issues in Wales, reasoning this would allow for a national approach and remove any variations in how Local Authorities operated.

¹ Under section 46 of the Environmental Protection Act 1990 a waste collection authority (Council in Wales) may by notice require occupiers of premises to present their household waste for collection in a specified way. This means that a householder who puts their waste out on the wrong day or in the wrong place could be issued with a Warning Notice or fined if the Warning Notice is ignored.

Indicative quotes

Yes, both litter and fly-tipping have far-reaching environmental, economic and social impacts and we support the commitment to tackle these twin issues under one plan. The public may not distinguish between the two and we agree that the actions and themes needed to address both issues are broadly aligned. However, we also recognise that fly tipping has a stronger criminal element and does pose some unique challenges, particularly in relation to motivations and messaging, and we therefore understand where different approaches are required within the plan.

National Trust Cymru

*Yes. They are both indicative of a particular mindset and it is the people with this mindset who need to be targeted. **Anonymous response***

*I disagree. Littering is a matter of thoughtlessness and carelessness and needs to be countered by education and awareness raising backed up by Legal sanctions. Fly-tipping is a more serious matter involving criminal intent, avoidance of costs of disposal, costs and inconvenience [sic] to land owners, whether private or public, potential danger to people and animals and degradation [sic] of the environment.. Tackling it requires effective detection, which is very difficult and deterrent [sic] penalties for those found guilty. I think this requires its own plan. **Dr J Boddy***

*No. WESA believes each merits their own specific strategy. Motivations behind fly tipping and littering can be very different and often need to be tackled in different ways. The motivation behind fly tipping of commercial and industrial waste is in a large part financial gain – i.e. avoiding the cost of legal responsible disposal whereas littering is largely a consequence of laziness, negligence or ignorance. Notwithstanding the above, both practices would benefit from a comprehensive and well-funded national awareness raising campaign to highlight the importance of producers taking full responsibility for the waste they produce. **Welsh Environmental Services Association***

*“Ultimately, we believe that littering and fly tipping sit within a spectrum of poor attitudes and mis-understanding about the environment and our impact upon it. In bringing the two issues together, there is an opportunity to promote a joined up approach to education and awareness raising about those impacts and reduce the creeping socialization that leads from littering to low level fly tipping and potentially the opportunity of rogue [sic] /criminal waste disposal contractors to exploit a lack of interest in the disposal of waste. **Monmouthshire County Council***

*A unified, capstone, plan would be useful. It will need to be integrated with other plans, or referenced by them as well. When developing this plan look at where this needs to occur. A key aspect is to ensure that the plan will be relevant. If it is not resourced, and the delivery & outcomes managed it risks ending up becoming another document on a shelf. **Anonymous response***

Welsh Government response

We welcome the support for our proposal to include litter and fly-tipping in a single, strategic plan. We believe this approach will provide the opportunity to develop a more integrated and collaborative means of dealing with waste issues across Wales. It also reflects the experiences of those working in our communities, who often have to deal with these issues regardless of its nature and source. A single plan will help harness this expertise and knowledge.

The Plan will also complement and support other strategies across Welsh Government, in particular Beyond Recycling – a strategy to make the circular economy in Wales a reality. This commits the Welsh Government to taking action that will help reduce the opportunities for littering and fly-tipping. For example, it includes actions aimed at supporting innovation in the materials we use (like bioplastics), ensuring the recycling of more materials and supporting re-use.

We also recognise concerns were raised during the consultation of adopting this single Plan approach, particularly given those committing these offences may have differing motivations for doing so. We acknowledge these concerns and confirm it is not our intention to adopt a blanket “one size fits all” approach to any actions or programme of work. To address this we will review the draft Plan to ensure these distinctions are made clearer where necessary. This will include reviewing the comments made by Natural Resources Wales (NRW) in relation to providing clarity around the definition of fly-tipping and waste crime, the latter of which is often linked to wider illegal activity.

In relation to calls for the inclusion of other local environment quality issues (for example fly-posting), this will be kept under review as the Plan is developed and implemented. If a particular issue is found to have become more prevalent or considered to be a significant concern, we will review and update the Plan as and when necessary. We acknowledge the immediate concerns raised in relation to dog fouling in the consultation and will review the Plan to determine how best to reflect this issue in the final document.

Question 2: Do you agree with the 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?

	Q2			
	Yes	No	Not stated but responded/ Did not know	No answer/ Not answered question
Numbers	245	13	42	55
Percentage	69%	4%	12%	15%

Respondents were overwhelmingly in favour of the themes included in the Plan, with 157 of those who agreed providing no further or additional comments. However, 88 of those respondents who agreed, often caveated their support with requests for additional specific actions (rather than a new or different theme) or slight amendments to an existing theme. As the majority of the actions put forward by these respondents were raised and/ or covered elsewhere in the consultation, we have only provided a brief summary of these views under this question.

Suggested additional themes/ specific actions

- Actions to improve or change Local Authority waste management practices – As with Question 1 a large number of respondents, predominately members of the public, advocated changes were needed to Local Authority waste services, particularly the operations on Household Waste Recycling Sites. Several respondents who disagreed with the suggested themes also suggested the inclusion of these types of actions.
- Actions to improve or prioritise enforcement action - A number of respondents who both agreed and disagreed with the themes suggested there was a need for a greater emphasis on enforcement action. Examples included a greater use of CCTV to help catch offenders.
- Actions to address specific littering issues - Another common thread throughout the responses to this questions was the need for more actions on specific waste issues, for example roadside litter, fast food litter, marine litter and tourism related litter.
- Actions to improve monitoring and/ or evaluation – Actions provided included the need for the recording of wider impacts, for example economic impacts and the need to measure any changes resulting from an action. This included suggestions to better inform the public of any changes.
- Actions to improve communication – Suggestions for actions to develop hard hitting messages to help ensure people were aware of the impact of their behaviours and the need to focus on encouraging more positive behaviours.

- Delivery of the Plan – Several respondents agreed with the themes but questioned the level of support available to deliver on the Plan. Some sought greater clarity on who was responsible for the actions and for the need for clear targets. Others questioned the use of terms such as “support” and “potential funding” as it was felt these were inadequate to ensure future delivery. Some respondents also highlighted the lack of clear, defined timescales.

Proposed changes to the document structure and wording of themes

A small number of respondents, whilst agreeing with the themes, suggested minor changes to the current wording in the Plan.

One respondent suggested amending the **Enforcement** theme to **Sanctions and Enforcement**. Other suggestions for this theme included changing it to **Effective Regulation** or **Legislation and Enforcement**. Clwydian Range and Dee Valley AONB suggested amending the theme to **Penalties and Enforcement**.

Another respondent suggested amending **Education and Behaviour Change** to **Education and Changing Behaviour**.

One respondent recommended changing the **Waste Reduction** theme to **Reducing Waste**. It was felt this would provide greater clarity for the public. However, Caerphilly County Borough Council suggested the theme needed to specifically reference recycling and the Marine Conservation Society suggested the name be changed to **Resource Reduction**. The latter felt this would help emphasise the principle of using less in the first instance and align with the aims of the Welsh Government’s Circular Economy Strategy – Beyond Recycling. Gwynedd Council suggested the same proposed change.

The Neighbourhood Services Countryside and Planning Scrutiny Committee at Merthyr Tydfil County Borough Council suggested including definitions for the themes to help explain what they were referring too. Another asked for greater clarity around the meaning of the theme “**Operational Delivery**”. A small number of respondents suggested the **Evidence, Monitoring & Evaluation** theme should be cross-cutting rather than a standalone theme.

Other respondents suggested the diagram itself should be amended, with the Gower Society suggesting it was “back to front” with the arrows leading to prevention rather than away from it. Another respondent suggested more context was required to help differentiate activities in a domestic and commercial setting.

A small number of respondents suggested the circles in the current diagram should differ in size or be “weighted” to help illustrate the relative importance of the individual themes. However, views varied as to which themes were considered more important, with some respondents suggesting a greater emphasis on the **Education and Behaviour Change** theme and others on **Enforcement**. Priority of the latter was particularly supported by responses from manufacturers and producers. Llanbadoc Community Council suggested the diagram should be included at the end

of the document rather than at the front, noting “*as the evidence provided for the key themes leads you to confirming the overall approach as summarised in the diagram, after reading and absorbing the evidence*”.

Suggested additional themes

A number of respondents whilst agreeing with the proposed themes, also suggested additional themes. Again, there were similarities in the suggestions and these have been grouped below for ease of reference:

- Disrupting waste crime – This was suggested by Natural Resources Wales and was in reference to comments expressed in Question 1 which called for a greater distinction in offences currently identified in the document as “fly-tipping”.
- Incentivise – Two respondents suggested more emphasis was needed on rewarding businesses and individuals for doing the “right thing” rather than focus purely on potential “punishments” for not complying.
- Community Cohesion/ Neighbourhoods or Collaborative Working – Wales Safer Communities Network advocated for a theme that focussed on encouraging people to take pride in their local environment and part of their community. A small number of respondents suggested this could be extended beyond communities and for the theme to look at improving wider collaboration and partnership working.
- Environment - Wales Safer Communities Network also proposed a specific theme which highlighted the impacts on the environment and which would allow a greater connection with existing legislation, for example the Well-being of Future Generations (Wales) Act 2015.
- Infrastructure or Built Environment Design – A small number of respondents, primarily Local Authorities, referred to the need for a theme which focused actions on planning and infrastructure development. This was predominately in relation to the need for new developments to take account of litter and waste requirements (for example, the building of a new fast food outlet). Torfaen County Borough Council noted their action plan included a section on Infrastructure Review and Investment. Another respondent suggested there was a greater need for public sector organisations/ departments to work closer together to avoid scenarios in which littering or fly-tipping became a problem.
- Dog Fouling and/ or other local environment issues – There was strong support from several respondents for a specific theme on dog fouling and others suggested this be extended to include other issues like fly-posting etc.

- Responsibility – One respondent suggested a theme was required on Occupier Responsibility (in which an occupier of a premise was responsible for keeping the area outside clean) and another suggested a Private Owner Responsibility theme.

Responses opposing the themes

Only a small number of respondents opposed the themes outright. One respondent thought they were “largely specious” and another felt the actions/ themes would take too long to implement with limited impact in the short term. One respondent suggested more was needed to address the litter that was already in the environment rather than focus solely on preventing it in the future.

Indicative quotes

We agree with the five themes highlighted within the plan, and consider that each element is fundamental in preventing littering and fly-tipping. **Wrexham County Borough Council**

Yes, we agree with the five themes and are very pleased to see prevention at the heart of this plan which means that this document is more aligned to the Welsh Government’s ‘Beyond Recycling’ approach, the waste hierarchy and circular economy ambitions. As such, we are particularly pleased with the inclusion of the waste reduction theme. However, this section of the plan could be further strengthened with reference to our on-the-go eating and drinking culture (with its strong links to littering) and our consumer and throwaway society (which links to fly-tipping). **Keep Wales Tidy**

I disagree with your themes. At no point have you considered how to make publicly accessible waste facilities easier to use. If it were easier to dispose of waste legally, flytipping [sic] wouldn't be a viable alternative given the fines and penalties proposed. **Anonymous respondent**

“No. It is the same old story, all talk and no action”. **Anonymous respondent**

“We are In agreement with the principles of the themes that are being put forward. We feel that if these plans are undertaken by government and local authorities it should make a huge difference. Unfortunately this plan will be useless, unless considerable funding comes from government to support local authorities. We feel also that any funding that is given should be ring fenced by the government for the purpose it was intended for. **MAGPIES Action Group in Marshfield**

Welsh Government response

There was broad support for the themes included in the Plan and whilst a number of additional themes were suggested, we believe the original five effectively capture the areas of work needed to deliver the Plan. On this basis, we do not intend to increase the number of the themes included in the Plan. However, consideration will be given as to whether some of the suggested themes put forward, for example incentivising positive environmental behaviour and improving collaborative working, can be incorporated into the wider context of the Plan.

A number of respondents suggested amending the title of the existing themes. Following further consideration, we now intend to amend the following:

- Waste Reduction Theme will be changed to Reducing Waste Theme
- Education and Behaviour Change Theme will be changed to Education and Changing Behaviour Theme

We also acknowledge the comments made in relation to clearly defining the aims and focus of the themes, in particular in relation to Operational Delivery. We will review and amend these to reflect the feedback we received during the consultation. Consideration will also be given to how best to reflect the cross-cutting nature of the Evidence, Monitoring and Evaluation Theme.

A number of helpful comments were made in relation to the existing diagram used to reflect how the five themes contribute towards preventing litter and fly-tipping in Wales. These are now being considered and reviewed to determine how best to reflect the visual representation of our preventative approach.

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

Q3				
	Agree	Disagree	Not stated but responded/ Did not know	No answer/ Not answered question
Numbers	239	15	44	57
Percentage	67%	4%	13%	16%

Due to the structuring of the questions, a number of respondents took the opportunity to suggest additional actions in Question 3 rather than Question 4. There were also a number of similar themes and suggestions occurring across both sets of questions. Where possible, our analysis has taken account of similarities and on this basis we have provided one Government response to both questions.

Whilst there was overwhelming support (239 responses) for the actions included in the theme, a number of respondents who agreed took the opportunity to suggest additional actions and comments. These have been broadly categorised as follows:

Further actions to encourage re-use, refill or recycling

A number of respondents provided examples of specific products which required action to encourage re-use, for example the Nappy Alliance advocated the benefits of encouraging the use of re-usable nappies. The Welsh Local Government Association also suggested consideration be given to scoring companies more highly on public procurement exercises if they offered refill/ re-usable services and products. Some respondents suggested more direct actions to encourage the catering and hospitality sector to move away from single use items, for example by including certain stipulations when they applied for licensing renewals.

Other respondents took the opportunity to raise concerns or make complaints about specific aspects of Local Authority recycling services. The Marine Conservation Society suggested there should be less actions focussing on recycling and more promotion of re-use, noting two of the three actions on this issue related specifically to carrier bags. The organisation also called for stronger links to be made with the Welsh Government's Circular Economy Strategy, *Beyond Recycling*, for the Welsh Government to support the Basel Convention Ban Amendment² and to adopt and enforce the "UK Right to Repair Law" once introduced.

One respondent suggested the Welsh Government should adopt the European Union scheme for consumable packaging known as the Der Grüne Punkt or Green Dot system³.

² The Basel Convention Ban Amendment -

<http://www.basel.int/Implementation/LegalMatters/BanAmendment/Overview/tabid/1484/Default.aspx>

³ Der **Grüne Punkt**/ The Green Dot system - <https://www.gruener-punkt.de/en/>

Wider collaboration and global scale of issues

One respondent noted the need for UK wide actions in the Plan and others commented on whether actions to address Welsh manufacturing/ production practices would be undermined if the cheaper, less-environmentally “friendly” products were imported from outside the UK.

Several respondents advocated for greater engagement with Town and Community Councils, noting any research under this theme could be supported by local community activity.

Actions on specific products, items or issues

As with previous questions, some respondents took the opportunity to focus their suggestions on actions on specific issues. These included actions on the following:

- “Scores on the doors” scheme – Similar to the scheme operating for food hygiene standards, it was suggested this could be used to rate how much packaging and single use products a business used.
- Fast food outlets – This included actions that placed greater responsibility on companies to deal with littering of their products.
- Dog fouling - The National Federation of Women’s Institutes noted successful interventions from their campaigns had often come when focussed at a local level.
- Sanitary products – For actions to be included to improve access to sustainable alternatives (for example vending machines) and taxing non-compliant items.
- Disposable BBQs – The Country Land and Business Association Cymru suggested a requirement for such products to include guides on how to dispose of them safely.
- Cigarette filters/ butts and chewing gum – In addition to the calls for stronger actions on these items, Japan Tobacco International UK provided evidence of the work they had undertaken to help educate and raise awareness amongst smokers of disposing of filters correctly.
- All litter and not just plastic – A small number of respondents queried the focus of actions in this theme on single use plastic and suggested other littered items like aluminium foil crisp packets should also be targeted.
- Business focussed actions – Asda noted a large number of actions were focussed on the consumer, however businesses themselves also generate waste and this is often fly-tipped on their sites.

Removing the barriers to people disposing of waste responsibly

A number of respondents who agreed with the actions also made comments on how people dealt with their waste and in particular, the perception that it was currently difficult to “do the right thing”. Similar sentiments were expressed by those who disagreed with the actions (see below). The National Farmers’ Union Cymru and Country Land and Business Association Cymru, both organisations who represent private landowners, felt more needed to be done to remove the excuses for fly-tipping, particularly accessing Household Waste Recycling Centres. The Country Land and Business Association Cymru suggested a review was needed of the existing public waste management system and that more accessible and economical options should be provided for households and businesses.

Wrexham County Borough Council asked for changes to be made to the existing waste carrier licence process and for improvements in how licence holders are monitored. They noted their experience had shown that householders often employed the service of these businesses with the belief they were legitimate and the waste would be disposed of correctly. However, this was often not the case and felt the current system did not provide enough safeguards.

Wording and implementation of proposed actions

Several respondents questioned the timescales of a number of actions under this theme, arguing urgent, immediate action was required rather than long-term milestones. Several respondents felt the actions lacked detail, in particular on how they would be resourced and supported. Whilst some agreed with the actions, they also indicated disappointment they did not go further than currently stated.

Other concerns raised in relation to the implementation of the Plan focused on potential unforeseen or unintended impacts of the actions in this theme. For example, one respondent noted the potential for products to become more expensive if businesses had to switch from plastic. A small number of Local Authority respondents also highlighted the potential loss of materials for Local Authorities if a Deposit Return Scheme was introduced and the impact this would have on meeting statutory recycling targets. In a similar vein, Asda suggested they may have to remove existing recycling facilities for items such as clothes on their property if they were required to make room for facilities for drinks to be returned.

The Marine Conservation Society suggested several amendments and additions to the wording used under this theme. This included providing specific definitions for terms like “environmentally sustainable options” and “sustainable alternatives”. Linked to this was a request to include an action to help address public confusion and misunderstanding around the use of the term “biodegradable”. Other amendments suggested the term “Support” should be amended to reflect “invest” and for action WR6 to be amended to reflect a commitment in Beyond Recycling to take action to remove unnecessary single use items from events and other showcase activities in Wales.

Responses opposing the actions

Of the small number of respondents who opposed the proposed actions under this theme, the comments and suggestions made were often similar to those who agreed with the actions. A common objection to the actions related to the sentiment that unless changes were made to how Local Authorities allowed residents to dispose of their waste, then problems would remain. This included changes to how Household Waste Recycling Centres operated, or an increase in their number to improve access, and removal of costs associated with the removal of bulky items.

One respondent noted a large number of products found littered often originated outside of Wales and questioned how the Welsh Government could influence things like packaging design. Another felt the actions to address plastic and packaging were too limited and a proposed phase approach was inadequate given the immediate concerns around plastic pollution. Respondents from the plastic or packaging industry also questioned the focus of this phased approach and argued these actions should be much broader to encompass other materials.

Others were also unconvinced the actions included in the Plan would have any impacts on littering or fly-tipping and argued they did not go far enough. This sentiment was often followed by a request to increase the level of fines available. One respondent raised concerns the actions focused too much on penalising people and more should be done to incentivise good behaviour. It was proposed this could be achieved by ensuring waste had a value so people did not litter it and by rewarding businesses who created less waste.

A small number of responses from packaging producers outlined concerns about the use of the term “more environmentally friendly sustainable options” in some of the actions if this was not supported by full Lifecycle Analysis work. It was suggested this could potentially lead to the use of equally harmful products which either did not fully biodegrade or used unsuitable materials.

Indicative quotes

*Yes, preventing waste and valuing waste as a resource are key to ensuring our society lives more sustainably. **Natural Resources Wales***

*Broadly yes, although we do question whether sufficient pressure will be placed on businesses and manufacturers to take responsibility for and minimise the source of litter through appropriate or nil packaging, noting the legislative proposals related to this issue. Prevention is better than cure, thus any proposals to ban certain products such as single use plastics which contribute to the littering problem should be identified and implemented. **Torfaen County Borough Council***

For me this theme underpins the whole action plan. I fully support the actions and the identification that there is a need to give incentives to encourage the return of recyclable packaging. This type of scheme seems to work well in other parts of Europe. I also welcome the action to reduce the amount of packaging that cannot be

recycled and feel that industry should be legally required to reduce packaging.

Anonymous response

No. I have seen strategy after strategy over the last few decades and not one that works. Your suggested actions are pointless until all Councils are forced to deal with this problem and recycling centres are forced to accept all waste for free every day of the week, with CCTV systems in place. **Anonymous response**

No - educating fly tippers will do nothing, they already know they are doing wrong. Exploring schemes to dispose of waste responsibly and at no or low cost, plus significantly increasing the fines and penalties of offenders, such as seizing and crushing the offending vehicles used. **Anonymous response**

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.

Q4				
	Yes	No	Not stated but provided response/ Did not know	No answer/ Not answered question
Numbers	229	55	11	60
Percentage	65%	15%	3%	17%

As noted previously, some respondents took the opportunity to suggest additional actions when responding to Question 3 and, therefore, often referred back to that response. Of those who did respond to this question with suggested additional actions, a large number reflected similar views and comments as those expressed in Question 3. A brief overview of these suggestions are provided below.

Further actions to encourage re-use, refill or recycling

A number of respondents suggested further actions were required under this theme to either encourage people to prevent waste generation in the first place or to recycle more of it if this was not an option. Potential actions included improving the operation of Household Waste Recycling Centres, providing more support for recycling, repair and re-use schemes and raising awareness of those schemes already operating in local communities. One respondent suggested consideration should be given to offering financial incentives to encourage people to recycle more of their goods.

A small number of respondents suggested actions that focused on capturing potentially recyclable “on-the-go packaging” materials by either improving the recycling infrastructure on our streets or improving the sorting of litter from litter picking activities.

Some respondents used this question to express concern that existing recycling targets were distorting the focus of the actions and there should be more focus on preventive measures. Others suggested any actions on recycling should also include improvements on monitoring and reporting on where the recycling goes after people have disposed of it.

Actions to address fast food litter/ disposable items/ single use plastics/ packaging

As with other questions throughout this consultation, there was a significant focus by respondents on actions to address “on-the-go” food packaging, particularly in relation to fast food outlets. Suggestions included greater use of financial penalties, the introduction of charges or bans on single use items commonly littered (not those just made of plastic) and greater incentives to encourage the re-use of products (for

example a discount if you used a re-usable cup). Other respondents requested the extension of the proposed Deposit Return Scheme to include other items like crisp packets and for more or improved environmental labelling on products. Another popular proposal was to require fast food outlets to include the car registration details or some other form of identification which would create a link back to its origin or allow for enforcement action against the litterer.

Actions to address problematic or specific waste issues

A number of respondents suggested actions to address specific items or to deal with specific problems. These included:

- Agricultural practices - Several respondents suggested there was a need to focus on waste associated with agriculture, particularly plastics. The Farmers' Union of Wales requested the existing plastic silage wrap recycling scheme be extended to other plastic products such as feed barrels.
- Home composting - A small number of respondents requested actions around supporting home composting and even the development of a specific strategy on the matter.
- Hygiene products - Particularly single use nappies and wet wipes.
- Difficult to recycle items - A number of respondents referred to targeting products that were either not currently recyclable or where recycling facilities were not widely available. Such items included cat litter, mattresses and the large bags used by builders' merchants to deliver materials.
- Waste from specific sectors – For example construction and hospital waste.
- Litter from the air - Keep Wales Tidy called for an action to address littering from items such as balloons.
- Food waste - Torfaen County Borough Council suggested actions were required to help reduce food waste.
- Roadside litter - Whilst often linked with suggestions to address fast food litter, some respondents sought additional actions to tackle litter from vehicles. This included measures to deal with debris falling from the back of open refuse/waste collection vehicles and the development of a specific roadside litter strategy. A response from schoolchildren, gathered via the Pupils 2 Parliament project, suggested more litter bins designed for cars.
- Dog fouling - As with other questions there was support for specific actions to tackle dog fouling, including one respondent calling for the microchipping of pets.

- Multinational/ large companies - Some respondents suggested actions were needed to address issues associated with large-scale businesses, for example the use of packaging by supermarket chains. However, one respondent questioned the value of Welsh specific actions if goods were being imported into the country from elsewhere in the world.

A number of actions were put forward under the Waste Reduction theme which we believe, due to their focus, would be more suitable for inclusion in one of the other four themes in the Plan. These actions are also common with responses to other questions in this consultation.

Actions to address domestic waste and street bin collections

A number of respondents made comments or suggestions about improving service provision in relation to household domestic waste and litterbin collections. These included general complaints about bins being too small, recycling containers being open to the environment (causing littering on windy days), infrequent waste collections and criticism of the Welsh Government's Waste Collections Blueprint⁴ requirements. Other respondents requested that rules be relaxed in relation to side-waste (leaving domestic waste bags next to bins), for more frequent emptying of dog and litter bins and the employment of Litter Wardens. A small number of respondents suggested the provision of community skips to help reduce the amount of bulky waste being fly-tipped or other measures to deal with this type of waste.

In relation to actions dealing specifically with fly-tipping, one respondent noted the consultation document stated that 70% of fly-tipped waste originated from households and, therefore, this should be the primary focus for action in this theme.

Actions to improve enforcement

A number of respondents used this question to advocate for more actions to improve enforcement and for a tougher stance to be taken on these types of offences. This included support for higher fines and for the ensuring these are enforced. A range of other indirect actions were suggested on the basis it was believed they would help reduce littering and these included raising the alcohol age limit to 21, raising the driving age limit to 21 and points on driving licences for littering offences.

Action to improve reporting

A small number of respondents suggested actions should be included to help improve how Local Authorities respond to complaints or reports of incidents from the public.

⁴ Welsh Government Collections Blueprint - <https://collectionsblueprint.wales/>

Other comments

A small number of respondents felt actions under this theme should be based on best practice elsewhere in the world and, given the global nature of waste management, it was important we learn from other countries. Others suggested we also needed to share any best practice with others. One Voice Wales noted that given the scale of issues such as “plastic pollution” there was a need to work with other Governments across the world to find adequate solutions.

National Trust Cymru stated that in relation to action WR(6) (for Welsh Government sponsored or funded events to include provisions to prevent or reduce littering of single use items) that this stipulation should cover all Welsh Government funding and not those limited to events. Torfaen County Borough Council suggested waste reduction should be included in the procurement service contracts of all Local Authorities in Wales.

The Marine Conversation Society suggested several additional actions under this theme, including the need to recognise micro-plastics as litter, for a greater focus on the chemical impacts of littering and improving our understanding of the environmental impacts of alternative materials.

Several respondents suggested more actions were needed under this theme to help support those Town & Community Councils, community groups and volunteers who were working hard to address these problems “on the ground”. This included providing more financial support for large scale clean up events and ensuring communities were more involved in taking forward the Plan.

Indicative quotes

Designing out the top 5 (or 10) fly tipped materials will dramatically help with fly tipping reduction. For example tyres, builders ton sacks, mattresses etc - whether these items can also be incorporated into a 'bulky item' deposit return scheme. How do other countries deal with this type of waste? **Anonymous**

Stop charging businesses to get rid of waste make it free so they do the right thing. **Anonymous**

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. **Advisory Committee on Packaging (ACP)**

Whilst LARAC support the principle of waste reduction in accordance with the waste hierarchy the alternatives to single use items are also important. In the short to medium term there will continue to be a demand for single use items. Redesigned single use alternative items need to be readily recyclable. Alternatives to SUP are commonly compostable or wooden items which may not be compatible with kerbside recycling collection systems. Consideration of not only the environmental consequence of the product but also the ability for sorting and for users to understand correct disposal of the alternatives requires to be factored in. If an alternative produce creates less waste, but is not easily recyclable this can be counterproductive and lead to higher contamination of kerbside recycling.

A revised approach to the Extended Producer Responsibility Scheme for packaging is an important step for a fairer distribution in the costs for the collection and recycling/disposal of packaging. Shifting the burden away from local authorities and back to the producer should provide a greater incentive for better design in addition to taking responsibility for the costs of their product through to end-of-waste status.

Local Authority Recycling Advisory Committee (LARAC)

Welsh Government response (Questions 3 and 4)

How to address the creation, management and disposal of household waste was a prominent theme throughout the consultation, attracting a significant number of views and opinions. A wide range of suggested actions were submitted on how best to achieve this, a number of which will now be considered in further detail and discussed with key partners. These include:

- Strengthening the Plan's links with our Circular Economy Strategy, *Beyond Recycling*, to ensure issues like public service procurement and encouraging re-usables are effectively captured.
- Expanding the existing actions to include dog fouling.
- Extending the focus of our actions to other single use plastic items or other single use items regardless of material.
- Providing greater clarity around the use of terms such as "biodegradable" and "environmentally sustainable".

It should be noted the Welsh Government is already taking forward a number of actions suggested by respondents in the consultation, and these include:

- Introducing an Extended Producer Responsibility scheme for packaging in Wales by 2024. This will mean businesses who placed packaged products on the market pay the full net costs for the post-consumer end of life management of that packaging material.
- Introducing a UK Plastic Packaging Tax by 1 April 2022. This aims to encourage the use of recycled rather than new plastic within plastic packaging. This will in turn stimulate increased levels of recycling and collection of plastic waste, diverting it away from landfill or incineration.
- Introducing a Deposit Return Scheme for drinks containers by end of 2024. The proposed deposit return scheme for drink containers will include glass and PET plastic bottles, steel and aluminium cans, up to 3 litres in size.
- Introducing regulations to require all non-domestic premises to separate key recyclable materials to drive up the quantity and quality of recycling from businesses and the public sector and further improve consistency in the range of waste materials collected for recycling.
- Reviewing and updating our Collections Blueprint (the Welsh Government's recommended service profile for the collection of household waste) to ensure an expanded set of materials are collected with a focus on capturing high quality recyclable material.

- Promoting and improving [My Recycling Wales](#) which allows people to track their local recycling and see the end destinations of our materials.
- The Beyond Recycling Strategy, Net Zero Wales Plan and Programme for Government make commitments to support more repair and re-use across Wales from town centre hubs to the evolution of Household Waste Recycling Centres to eco-parks. The Welsh Government recognises that reducing consumption and recognising value in waste is vital in achieving zero waste by 2050.
- Introduce a mandatory electronic waste tracking system to track where wastes end up and to provide annual information on industrial, commercial, construction and demolition waste produced in Wales. Businesses and organisations from across the UK are invited to [join](#) the waste tracking user panel. Panel members will be invited to take part in targeted research to help us understand user needs and to test software as it is developed. There is also a regular waste tracking [newsletter](#) people can [sign up](#) to.

In relation to Local Authorities, the development and implementation of waste policies are ultimately matters for individual authorities. However, over the last 20 years, the Welsh Government has set a clear strategic target towards zero waste, providing investment in recycling collections and infrastructure and setting statutory recycling targets. This has seen a transformation in our recycling rate from less than 5% at the start of devolution to over 65% today. Several Local Authorities have already reached the 70% target set for 2024-25. The amount of household waste generated in Wales is also decreasing. We are working with Local Authorities and other key partners to develop new statutory recycling targets beyond 70% in line with our ambition to reach 100% recycling and zero waste by 2050. We continue to provide support to Local Authorities to improve their recycling services by investing in infrastructure and providing access to specialist advice and support.

Importantly our foundational success in recycling provides a platform to reduce consumption through repair, re-use, remanufacturing, refurbishing and refill. For example, our Circular Economy Fund has already supported 180 projects across Wales to make the transition to a circular economy. From a Remakerspace at Cardiff University bringing academics, businesses and communities together to improve design, to the Naked Takeaway Scheme in Mold using re-usable containers at local takeaways. The Programme for Government commits to supporting 80 re-use and repair hubs in town centres across Wales building on some award-winning successful examples including Llandrindod Wells and Newtown.

Through our existing funding of the *Caru Cymru* programme (led by Keep Wales Tidy) and Fly-tipping Action Wales, we are seeking to improve how authorities collaborate, share best practice and adopt consistent approaches when dealing with poor environmental quality issues. We intend to use this Plan to help deliver this on a strategic and national level. However, we will review the views expressed in this consultation and determine whether the proposed actions can be strengthened further.

We also acknowledge the comments made in relation to timescales (in particular the lack of definitive dates) and intend to update these as the Plan is finalised.

Question 5: Do you agree with the suggested actions in the Evidence, Monitoring and Evaluation theme? If not, please provide reasons.

Q5				
	Agree	Disagree	Not stated but provided response/ Did not know	No answer/ Not answered question
Numbers	201	19	41	94
Percentage	57%	5%	12%	26%

The majority of respondents (57%) were in favour of the actions outlined under this theme and of those who agreed, only a small proportion provided additional comments. Of those who did, an overview has been provided below.

Proposed Data and Evidence Group and provision of data

A number of respondents agreed with the proposal under EME(1) to establish a Data and Evidence Group. However, some suggested additional members to those organisations outlined in the consultation document. These included members of the public, members of Town & Community Councils, representatives for business and industry and those working in the rural and agriculture sector.

In addition to the inclusion of members to an evidence gathering group, other respondents suggested alternative sources of information and data to those outlined in the consultation document. This included Surfers Against Sewage (for volunteer litter picking data and Plastic Free Community activity), Wildlife Trust Wales (to capture work being undertaken by their River Guardian Officers) and National Trust Cymru (it was noted various data sets were captured on their estates via in-house recording systems). However, the Marine Conservation Society noted if organisations were to be asked to provide data then there was a need for additional support and funding to help undertake this.

A number of respondents provided specific suggestions on who could supply data and evidence. A response from OpenLitterMap suggested a greater emphasis should be placed on “Citizen Science” and highlighted the work their company undertook in this area. The Marine Conservation Society also supported this approach and advocated the provision of training to help improve data quality obtained from volunteers and community groups.

Monitoring, reporting and evaluation

Several respondents suggested specific targets or Key Performance Indicators were needed to help measure the impacts of any actions developed. The Chartered Institute of Waste Management Wales suggested the inclusion of National Well-being Indicator 26⁵ to help monitor whether people were satisfied with the areas they

⁵ [Wellbeing of Wales: National Indicators](#)

lived in. The Vale of Glamorgan Council advocated a review of the existing performance indicator which requires Local Authorities to remove waste within a specified timeframe, as this meant fly-tipping may be removed without a thorough investigation for evidence taking place.

Wales Safer Communities Network suggested combining actions EME(1) and EME(6) (review existing monitoring and develop baseline) and for EME(1) to help deliver EME(7) (develop a reporting dashboard) as part of the Group's work programme. Natural Resources Wales offered to assist with any actions focused on developing datasets. The Marine Conservation Society suggested any work to develop reporting dashboards should include a review of international and national best practice.

Other respondents expressed concerns over the potential for any monitoring of the Plan to become burdensome and detract time/ resources away from tackling the problem (those opposed to the actions expressed similar views). One respondent noted there was a need for any reporting mechanism to be accessible and easy to understand for members of the public. Others suggested it was important a common and consistent approach be developed, with one respondent suggesting monitoring should be allocated to a designated body or organisation. The Association of Convenience Stores noted any need to record processes or data in the retail sector should not place a burden on businesses.

The reporting of fly-tipping and littering incidents was also raised by a small number of respondents, with one respondent suggesting a need for a formal process for councillors to report problems. One Voice Wales commented on the need for improvements in how people living in rural areas can report incidents. Some respondents felt Local Authorities were not doing enough to investigate and gather evidence when incidents were reported.

A number of respondents, whilst supporting the actions, felt there was a need to improve the separation of those actions focussed on littering and those on fly-tipping, noting different approaches would be required to monitor and evaluate the Plan's success.

Fly-tipping data and FlyMapper

In relation to fly-tipping data collection, a number of respondents advocated the need for a unified approach and for better sharing of data between partner organisations. This included support for the existing FlyMapper data gathering system to be rolled out nationally and for Local Authorities to be able to link this with existing, internal reporting technology. Swansea County Council noted the variation in the systems used by Local Authorities to record data was a potential barrier. Newport City Council expressed similar concerns, highlighting that even within the Local Authority a coordinated approach was difficult as different teams would deal with littering and fly-tipping incidents. It was suggested this issue needed further review.

The Vale of Glamorgan Council suggested undertaking a review to determine whether FlyMapper could be expanded to include other local environment quality issues such as littering. The National Farmers' Union Cymru requested the use of FlyMapper technology to be extended to private landowners.

Other comments

Keep Wales Tidy expressed reservations around focussing actions and aims around the perception of littering as this was often dependent on demographics and was subject to a number of variables. Instead, it was felt there was a need to explore combining datasets to help provide a more rounded picture. This could include street surveys via the existing LEAMs mechanism, data collected from beaches by the Marine Conservation Society, litter composition analysis and community group data.

The Marine Conservation Society requested for EME(2) and EME(4) (both relate to data recording for fly-tipping) to be extended to include littering, noting previous recommendations for Local Authorities in Wales to utilise GIS mapping to help identify littering hotspots. The organisation also suggested further research was needed to help understand the potential environmental impact of littering and fly-tipping, for example the leaching of chemicals from products into waterways.

One Voice Wales suggested a cost-benefit analysis of lawful waste disposal was required as it was felt the current policies in operation were providing a major disincentive. One respondent disagreed with the compositional analysis research quoted in the document suggesting, in their experience, that aluminium cans and plastic bottles were the most littered items. Gwynedd Council requested for LEAMs street cleanliness surveys, if they were to remain in use, to remove or limit the random nature of how streets were currently selected.

As with previous questions, there were a number of calls for specific actions linked to the reporting and monitoring of dog fouling incidents.

Respondents who disagreed with actions

A small number of respondents opposed the actions outlined under this theme and this was often based on the sentiment this type of work was considered a "waste of time" and/ or resources. It was felt the problems should already be obvious and more effort was needed to take action against offenders. Another respondent questioned the timescales involved, noting more immediate action was required.

A response from the Neighbourhood Services Countryside and Planning Scrutiny Committee, Merthyr Tydfil County Borough Council suggested the actions under this theme were vague and would be too difficult to measure. Instead, it was suggested the theme should be cross-cutting and integrated into all the other themes instead.

Respondents representing packaging and product manufacturers opposed the actions in this theme, noting litter should be measured by count and not weight. They also suggested the number of fixed penalties issued by Local Authorities should be the key indicator.

Monmouthshire County Council expressed the view that the actions developed were neither new nor innovative and suggested further work was needed.

Indicative quotes

*Excessive monitoring is time wasting and needlessly expensive and bureaucratic. Spend more on education and small enabling schemes than monitoring [sic]. It will be obvious when things are working. **Anonymous***

*We feel that there is too much emphasis on collecting statistics and not enough on getting the work done. **Graig Community Council***

We agree with the need to gather evidence and monitor and evaluate the effectiveness of policies and actions. We are pleased to see that private and common land is also to be included in this process. We are concerned that some private land owners may not have the capacity to provide the information you need or not see the point of doing it particularly if the only incentive they have is that they have to bear the cost of removing the fly tipping themselves.

*However, care should be taken that within the evaluation process, that the lack of data does not become an excuse for inaction - the evidence is plain for us all to see, piling up in our countryside while surveys and data are being gathered. **Cymdeithas Twmbarlwm Society***

As identified by the minister and throughout the plan, it is recognised that litter can cause social as well as environmental and financial impacts such as direct short-term public health issues (injuries) and indirect, long-term impacts on quality of life (recreational opportunities, loss of aesthetic value and loss of non-use value). Research has identified that 'uncared areas can result in negative impacts on community spirit, well-being and health, whilst well cared for locations increase positive emotions and encourage physical activity and social integration'. It is important, therefore, that this impact is measured and monitored. National well-being indicator 26, which indicates the percentage of people satisfied with their local area as a place to live could be potentially used for this purpose.

*CIWM Cymru Wales recommend that when developing a reporting dashboard to help evaluate the progress being made with the implementation of the Plan, consideration is given to a well-being indicator. **CIWM Cymru Wales***

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

Q6				
	Yes	No	Not stated but provided response/ Did not know	No answer/ Not answered question
Numbers	131	41	7	176
Percentage	37%	11%	2%	50%

A large number of respondents (176) either did not respond to this question or referred to their answer provided under Question 5. A small number of respondents suggested further actions were required, however did not provide any additional information. Of those who did, similar themes and comments were made to those provided in the previous question.

More actions to help understand behaviour

Several respondents suggested additional work was required to help understand why people littered or fly-tipped and to help understand how people “felt” about these issues. To achieve this, a range of proposals were put forward including undertaking attitudinal surveys and working with offenders and behavioural scientists. Ceredigion County Council noted that investment in Local Authority waste and recycling services had made it easier for people to dispose of their waste, therefore, they felt other factors were likely at play when it came to illegal activity.

More actions to allow a wider range of data to be collected

As with responses to Question 5, a number of respondents suggested there were opportunities to utilise the data gathered through volunteer and community action. This could include the amount of waste collected, the number of hours volunteers spent clearing up areas and using data collected by organisations such as Keep Wales Tidy. Flintshire County Council noted gathering this type of information could also help address some of the issues which arise when community groups arrange litter picks independently of the Council and then dispose of the waste at Household Waste Recycling Centres.

The Marine Conservation Society felt the Plan provided an opportunity to engage positively with members of the public, through empowering citizen science and public voice. It was felt members of the public need to be considered and listed as “owners” through the provision of training and upskilling. This would help strengthen a sense of shared responsibility.

Keep Wales Tidy suggested data from repair cafes, refill stations and other similar initiatives could be included as part of a wider “dashboard” approach to monitoring the success of various policies. Information on Local Authority bulky waste and re-use collection services was also identified as a potential data source, this approach was supported by the South Wales Fire & Rescue Service. Other respondents

suggested the current actions should go further and include monitoring the sales of products to help identify any potential trends in consumer behaviour.

Several respondents felt further actions were required to help improve the gathering of data from rural areas, green spaces and roadside verges. Whilst many acknowledged the logistical difficulties this posed, it was felt the lack of evidence in these areas would make it difficult to monitor and evaluate the success of the Plan. Keep Wales Tidy recommended including roadside litter under the remit of the proposed Task & Finish Group in EME(1). One respondent noted the need for any monitoring mechanisms to reflect different environments and locations, for example rural and urban areas. A number of respondents also advocated for inclusion of private landowners in any reporting requirements. In relation to “blue spaces” and rivers, it was suggested Natural Resources Wales could be used to support this type of work.

One respondent proposed gathering data on the location and number of litter and recycling bins across Wales (so called “binrastructure”). This would also help with the development of actions under the Waste Reduction and Efficient Operational Delivery theme.

The Federation of Small Businesses recommended the inclusion of economic data (for example, impacts on businesses, footfall and costs to business) into any reporting dashboard.

Lisvane Community Council highlighted the need to base any actions included in this theme on best practice and learning from elsewhere, an approach supported by other respondents. In particular, it was felt consistency was key and one respondent suggested a central waste management organisation could be used to monitor and evaluate the Plan. One respondent suggested examining and learning from the dashboard tool established by Public Health Wales to track the COVID-19 pandemic.

The National Trust Cymru noted there was no reference to monitoring marine litter. Another respondent suggested data on PPE/ facemask litter and Wales Safer Communities Network also identified the need for data on items which potentially posed a health risk, for example drugs related litter and glass.

Actions to improve the use of technology

A number of responses commented on the need to include actions which would help improve the use of new and novel technologies. Suggestions included the use of drones and satellite imagery in relation to tackling fly-tipping and utilising social media to help gather evidence of incidents reported by the public. Others advocated the greater use of surveillance technology, for example CCTV cameras and trail cameras. A response from OpenLitterMap advocated using the technology they had developed.

Actions to improve the reporting of incidents

Some respondents provided examples of difficulties or issues they had experienced in reporting offences and the apparent lack of communication on whether the matter would be dealt with. Consequently a number of respondents suggested actions to help improve this aspect.

Swansea City Council advocated a single point of reporting for the various types of offences and the Welsh Local Government Association requested that existing processes be streamlined to help improve reporting practices. It was felt that different organisations were often doing the same thing when it came to data gathering but using different mechanisms. It was suggested this could be addressed via Keep Wales Tidy's *Caru Cymru* programme. Several respondents referred to the need to standardise the reporting of fly-tipping.

In addition to improving how people report incidents and data, some respondents felt more could be done by the Welsh Government to publicise the results they publish. Others felt any data gathered to support the Plan needed to be reported on a regular basis.

Litter composition

Responses from packaging manufacturers and producers called for all litter items to be counted, irrespective of whether it was packaging or not and the material it was made of. Other responses requested litter was recorded by number rather than just weight. The Chartered Institute for Waste Management Wales referred to advice and recommendations on litter data collection made by the Advisory Committee on Packaging Litter Task Force Report.

A response from Circulogic highlighted the need to consider the wider litter composition work being progressed under the Extended Producer Scheme for packaging and how this could be utilised in the Plan. Monmouthshire County Council asked for more litter composition studies to help improve recycling-on-the-go. Neath Port Talbot Council also supported more regular use of such studies, noting they could potentially be used to address litter and fly-tipping issues associated with Houses of Multiple Occupancy or flats which often require communal bins and waste storage areas.

Other suggestions

One respondent requested an action to develop a performance monitoring system that would allow comparison of Council services and to place these into a league table.

The Marine Conservation Society noted the Plan makes reference to “understanding the source, levels and impacts of littering”, however commented there was no specific action included to achieve this. To address this, it suggested either commissioning new research or funding a relevant organisation to undertake studies to understand both the environmental and social impacts of littering. The Marine Conservation Society also recommended establishing quarterly inter-disciplinary

stakeholder progress meetings and publishing annual reports. It was suggested this would help provide a platform for partners to contribute the most up-to-date knowledge and share constructive feedback as the Plan develops. The National Trust Cymru noted the need for specific timescales for any actions which required the reporting and monitoring of data.

Monmouthshire County Council noted the existing actions focussed heavily on improving the collection of fly-tipping data, however very little had been provided in relation to litter. An example of such improvements was provided by Swansea City Council who felt there was currently duplication in effort with regards to both Local Authorities and Keep Wales Tidy undertaking street surveys for the LEAMs reporting. Neath Port Talbot Council also suggested reviewing the current LEAMs system, in particular how areas were selected to ensure every ward had an equal chance of being chosen for auditing.

The Advisory Committee on Packaging highlighted the need for digital waste tracking to be made a priority, for the waste carrier licence scheme to be revised and changes to be made to existing duty of care regulations.

Indicative quotes

People should be fined for not recycling, because at the moment I see so much recycling put out that is not acceptable or too many black bags instead of recycling.

Anonymous

I always think any Plan should be a moveable feast that develops based on impact it currently feel actions outlined are appropriate. **Anonymous**

Evaluation should include analysis of wider economic costs, which could include the types of areas and business demographics and sectors in those areas particularly affected by litter and fly tipping, engagement with business on how it affects business and footfall in their area, and the business opportunity costs within the circular economy created by litter and fly tipping. **Federation of Small Businesses**

Statutory targets, reporting, league tables, publicising councils action or inaction on this more. **Jane Ball**

Companies should have a 'Food hygiene rating' style 'Eco rating' based upon how much waste their business produces and what they are doing to combat this. It should be easier to find out what is good and bad, just as you can when you buy a sugary drink, or chocolate bar with the coloured system on the packaging. Why not the same for shops? This should be easy to understand and access, in a traffic light system. **Lauren Goodland**

Welsh Government response (Questions 5 and 6)

We welcome the numerous offers made by a range of organisations under this theme to provide additional data and/ or evidence to help support the delivery of the Plan. We will now approach these organisations individually to learn more about the information they hold and determine whether this is suitable for the inclusion in any monitoring tool we may develop. A number of nominations were also suggested for our proposed Data & Evidence Group and again we will approach these organisations to identify suitable candidates.

Once established, the Data & Evidence Group will be tasked with reviewing the numerous indicators put forward in the consultation and to explore the feasibility of incorporating these into a form of “dashboard”. We believe this approach will help address some of the concerns raised in the consultation over the potential for duplication of effort or the creation of a reporting mechanism which is too burdensome to use. Whilst we acknowledge some respondents opposed the need to focus on data and evidence gathering (on the grounds this was overly bureaucratic), we believe this is an integral part of delivering and monitoring the Plan.

Some respondents also queried the need for a standalone theme for Evidence, Evaluation and Monitoring, suggesting this should be a cross-cutting theme instead. Whilst we agree to some extent with this viewpoint and do intend to ensure this type of approach is reflected in the final plan, we believe a specific theme is required to help improve the wider recording and monitoring of fly-tipping and littering in Wales.

It should also be noted that since the consultation on the Plan, work to monitor and report on littering has also been undertaken at a United Kingdom level to support the development of a new Extended Producer Responsibility scheme for packaging. The Welsh Government is directly involved in the development of this work programme and, depending on the outcomes of this work, we may seek to incorporate this into our existing data gathering process.

Work also continues in relation improving consistency of data and why people litter or fly-tip in the first place, our Plan will be updated to reflect this. We will also address the observation made by respondents of a lack of actions to help understand the source, level and impacts of littering in Wales.

As with other sections in the Plan we intend to update and include specific timescales against agreed actions once the Plan is finalised.

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

Q7				
	Agree	Disagree	Not stated but provided response/ Did not know	No answer/ Not answered question
Numbers	233	6	37	79
Percentage	66%	2%	10%	22%

The majority of respondents (66%) agreed with the actions included under this theme, with only six respondents disagreeing. Over half of the respondents who agreed (137) did not provide any additional comments. Of those who did, a broad overview of the actions and suggestions made are provided below. Whilst respondents primarily focussed on littering under this question, some reference was made to ensuring wider awareness around waste prevention and management.

Actions to focus on schools and young people

Several respondents stressed the importance of engaging with children at an early age, noting this provided an opportunity to instil positive environmental behaviour, particularly if supported via school education. However, some queried whether this would continue if the parents did not practise similar behaviours. On this basis, a number of respondents felt engaging with adults was equally important and for any actions to be extended beyond school education.

A number of respondents raised the apparent disparity between young children in primary school and those in secondary school when it came to positive environmental behaviours. Whilst some provided anecdotal evidence, for example, increased levels of littering around local secondary schools compared to primary schools, no definitive evidence was provided to support this assertion. However, there was a general sentiment from many that any positive environmental behaviours learnt by a child at a young age became less apparent as they became older. One respondent suggested further research was needed to understand why this was the case.

A response from Keep Abergavenny Tidy, who noted evidence of youth disengagement via their voluntary work, suggested further actions were needed to address the existing school curriculum for older children. Another respondent noted there were greater opportunities for children to access single use items, for example via vending machines, in secondary schools compared to primary schools. One respondent provided an example of how one school used a reward mechanism (allowing children to go into the local town if the schoolyard was kept clean) to encourage responsibility and positive behaviour amongst its pupils.

Actions to support positive environmental behaviours

In addition to the above comments, a large number of respondents advocated for general actions aimed at addressing people's behaviour. Suggestions ranged from working more closely with academics and experts, to conducting a review of best practice elsewhere in the world.

A response from Flintshire County Council noted its experience of undertaking litter enforcement and the views expressed by some members of the public that littering was not considered a "serious" offence. It was felt any actions in this theme should make people understand the environmental impact of littering and to ensure it is seen as being socially unacceptable. Several respondents suggested there was a greater need to focus on incentivising or rewarding positive behaviour rather than solely punishing bad behaviour. One respondent felt taking such an approach would enable responsible waste management be seen as a "social norm".

However, another respondent questioned whether this would be possible given that littering had long been an issue and it was felt many people had now just accepted it as normal (particularly in relation to roadside litter). Other respondents, whilst in favour of the actions included in the Plan, also questioned whether such negative behaviours could be changed given most people were possibly already aware of the impact but chose to ignore it anyway. It was felt other factors were to blame for offences being committed rather than ignorance or lack of information.

Actions to improve communication and awareness raising

There was general support for the development of a national campaign or the use of awareness raising messages. Opinions varied on how best to promote these, with suggestions ranging from the use of more localised campaigns using posters and signs to online/ digital content using social media or TV adverts. A number of respondents suggested the use of celebrities to help engage with younger audiences. However, one respondent questioned whether there was sufficient evidence to support the use of national campaigns, noting they were often expensive to run and appeared to have limited success.

The proposal to standardise messages and approaches (Action EBC(1)) was supported by a number of respondents, particularly by Local Authorities who felt a pan Wales approach would help improve consistency in how the public viewed these issues. Retailer representatives such as the Association of Convenience Stores and environmental charities such as Keep Wales Tidy shared similar views.

Other respondents suggested the need for any campaign to link up with specific sectors or groups. For example, the National Farmers' Union Cymru suggested any campaign should include a rural/agricultural focus to ensure the impacts and possible harm to the environment, livestock etc arising from littering and fly-tipping

were demonstrated. One Voice Wales highlighted the importance of engaging with and focussing on local communities. A number of respondents felt any messages used should be hard-hitting, with images showing the environmental impact of people's actions and for these to connect with people's concerns i.e. dog fouling impacting children's ability to enjoy greenspaces. While it was recognised drawing attention to these issues was important, National Trust Cymru suggested there was also a need to highlight the hard work of the volunteers and communities who were dedicated to tackling these issues.

Actions targeting businesses and encouraging responsibility

Whilst some respondents suggested actions that focused on individual responsibility and behaviour, some felt there was a need for actions to address the practices of businesses and corporations. As with other questions in this consultation, there was a particular focus on actions to address fast food and "on-the-go" litter and for these companies to contribute more financially.

In relation to EBC(5) (Engaging with the private sector), Keep Wales Tidy noted that industry backing was vital, however it felt that whilst support had been promised in the past, this had not been forthcoming. It was suggested the upcoming changes proposed via the new Extended Producer Responsibility scheme for packaging, should not be seen as the only solution to effective industry involvement or viewed as the 'end point'. The response advocated for direct and continuous engagement to ensure that proposed alternatives are not creating new issues, for example, switching from plastics to 'biodegradable' materials.

The British Soft Drinks Association noted whilst businesses had a role to play, everyone was responsible for effective waste management and to help facilitate such behaviour, improvements were needed to the infrastructure to capture recyclable materials. A response from Nestlé highlighted how they, as a multinational company, had played their part in tackling environmental issues through events such as the Great British Beach Clean. The Association of Convenience Stores also noted that any actions around communications and campaigns needed to involve businesses to ensure they were workable within their operating capabilities.

Other comments

A small number of respondents recognised the importance of education and awareness raising, however it was felt this would only be part of the solution. These respondents often suggested such actions should be supported by tougher penalties and the threat of enforcement action being taken. Other respondents felt any educational activities should be supported by action on the ground for example, involving children and local communities in litter picks. By doing this, the participants would see the scale of the issue and the impacts this has on an area.

As with actions in other themes, some respondents queried the use of terms like “work with” and “ongoing” in the Plan’s action table. It was suggested more specific details were required if the Plan was to be adopted and owned by others.

Of those who opposed the actions included in the Plan, this was often done so on the basis it was felt education was too “soft” an approach and harsher penalties were the only solution. Another respondent queried whether any of the actions would have an impact on fly-tipping.

Indicative quotes

*“We feel that this plan misconstrues the main cause of litter and fly-tipping, ignoring the socio-economic inequalities that result in this behaviour. The education and behavioural change theme focuses primarily on the idea that people are unaware that they should not litter or fly-tip, and do not appreciate the negative impact that such actions have on the environment. However, most of the fly tipping and litter that we encounter at Asda, is in the area surrounding our recycling centres. It is our view, that this demonstrates that customers and small businesses are attempting to do what they can to dispose of their unwanted items in an appropriate manner and are aware of the environmental repercussions if they do not”. **Asda***

In Usk we asked the Town Council to produce a simple sticker which we asked each high street business to display in their windows showing support for a litter free Usk. There is still much to do in Usk but this kind of initiative may help and can certainly lead to more people taking responsibility in their own area, particularly if it is part of a highly visible new strategic approach.

*We also saw an online initiative called Commit to Your Street. We do this successfully in Usk. (See @CommitUsk on twitter. A simple google map is used to highlight the street that an individual or family has volunteered to keep litter free. We’ve been doing this for a number of years and it works. **Usk Litter Action Volunteers***

*We welcome the education and behavioural change theme and we agree that everybody in Wales should be able to, and know how to, store and dispose of their waste safely, legally and responsibly, and recognise the damage irresponsible actions can have on the environment and wider community. However, we strongly believe that this needs to go further with consideration of not just Welsh citizens, but the wider tourism audience and the role that visitors have to play in creating a greener, cleaner Wales. **National Trust Cymru***

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.

Q8				
	Yes	No	Not stated but provided response/ Did not know	No answer/ Not answered question
Numbers	189	30	20	116
Percentage	53%	8%	6%	33%

A large number of respondents (189) agreed that additional actions were required under this theme, however a high proportion of these suggested actions were similar to comments and suggestions made under Question 7. For completeness, these views are included in the analysis below, however, they are not the primary focus of the summaries provided.

Enforcement rather than education

As with responses to other questions in this consultation, enforcement action was considered to be the main solution to educating and changing behaviour by a large number of respondents. The actions suggested were broadly similar to those expressed under other questions and consisted mainly of the view that more/ higher fines were the only solution to these problems. The Chartered Institute of Waste Management Cymru suggested a specific action was required to ensure magistrates and enforcement agencies were aware of the range of enforcement sanctions available to them to help tackle litter and fly-tipping.

Actions to support or promote campaigns and awareness raising

Similar to comments made under Question 7, there was broad support from respondents for the need of an awareness campaign for littering. Again, a range of views were provided on the scale, scope and nature of such a campaign. In addition to a national campaign, some respondents also highlighted the need for more focused, targeted messaging. For example, Natural Resources Wales advocated the use of specific campaigns in relation to fly-tipping.

A number of respondents made suggestions on the tone of a campaign, with a small number favouring hard-hitting messages that highlighted the impacts of littering and fly-tipping. It was suggested this would also need to include the financial and social impacts created by these offences and not limited to the environmental damage they can cause. The Marine Conservation Society stressed the importance of making people aware of the pathway of litter from the land to the rivers and sea.

However, a small number of respondents felt there was also a need to raise awareness of the positive action being taken to address these issues, for example the hard work being undertaken by volunteers and Council workers in keeping areas clean.

In addition to utilising campaigns to raise awareness, several respondents advocated the use of litter picks and beach cleans as a means of making people aware of the impacts of littering. This suggested action often referred to using this method to target schoolchildren, particular in incidences where the school was considered a source of litter in the local community.

Actions to support awareness at a local level

A number of respondents whilst welcoming plans for consistency of messages and campaigns at a national level, also noted the importance of engaging with communities at a local level. It was felt by tailoring messages that were relevant to people's day-to-day experiences this would ensure greater "buy-in" to any campaign and help instil a sense of pride in place. The Federation of Small Businesses highlighted the potential role of local businesses in helping to deliver such local messaging given their stake and interest in their local communities.

Improvements to the existing curriculum

With respect to actions focused on school education (particularly EBC(13), EBC(14) and EBC(15)), One Voice Wales queried the lack of reference to the new curriculum or the Welsh Baccalaureate. Several other respondents suggested there was a need for specific actions that would either require changes to the current curriculum or ensure greater engagement with those in secondary school education. Other respondents suggested a specific focus was needed on the circular economy. The Welsh Local Government Association also advocated for actions that would ensure a more consistent approach was taken when it came to environmental education in Wales. As with responses to Question 7, several respondents made the link between secondary schools and local littering issues.

Education outside of the school setting and education for adults

Whilst respondents recognised the need to engage young people through formal education, some felt the existing actions under this theme were too narrow and should be expanded to extend beyond schools. This included:

- Actions that engaged youth groups and organisations set-up to work with young people for example, outdoor recreational/ learning centres (Wales Council for Outdoor Learning suggested a number of amendments to ensure outdoor organisations were represented in the owner sections);
- Higher and Further Education settings;
- Adult education – this could be through workplaces for example; and
- Businesses – The Welsh Environmental Services Association highlighted concerns over businesses using cheaper services and for this waste to be dumped illegally. Reference was made to the support provided to the "*Right Waste, Right Place*" campaign.

Other comments

A common focus of responses to this question was the need to improve people's awareness of existing recycling and re-use schemes. For example, Asda advocated for more actions to help educate people on what can and cannot be recycled locally, the location of recycling facilities and transport routes to get there. Mold Plastic Reduction suggested an action was needed to improve awareness of local repair and re-use schemes.

Ceredigion County Council highlighted the need for further research to identify potential barriers to people accessing Household Waste Recycling Centres and other waste facilities. This was supported by several other respondents who felt waste policies were a contributing factor to fly-tipping. The Welsh Local Government Association suggested there was a need for consistent recycle segregation across regions (where possible) to help make the schemes more user friendly, particularly when it comes to visitors to Wales. As with other questions, several respondents identified the lack of actions specifically focusing on dog fouling and dog owners.

One respondent noted the need for a formal monitoring and evaluation framework to help monitor actions. Several respondents suggested there was a need to identify best practice elsewhere (Japan was referred to in a number of responses) and for working collaboratively to help ensure any messages were shared widely. Some respondents highlighted the benefits of working with academic and research organisations to help understand why people behaved the way they did. Keep Wales Tidy sought clarification on what was meant by Behaviour Change in the document and suggested defining the intentions of this work more clearly.

Indicative quotes

*More community service for those people who are guilty of these crimes. If they had to clean up the area they might look after it more. **Anonymous***

*As a matter of priority, environmental awareness programmes need to link the issue of littering to people's own experiences to make the issue directly relevant to them. Sharing of a breakdown of research into littering behaviours of different demographics, for example, would make this issue relevant and real. For behaviour to change, there needs to be a clear understanding of the impact of littering on the environment as well as society. Underpinning this is a need for awareness of the role that the ocean, which collects our inland litter, has on our lives. With increased awareness of the interconnected nature of our world, the littering issue becomes more impactful and young people are more likely to take relevant actions. Co-creation of any new resources and a period of testing and review across demographics would ensure that messaging and approach work for the intended audience. I would also suggest expanding focus beyond schools to youth groups and to ensure that inland and coastal communities are targeted. **Marine Conservation Society.***

Welsh Government response (Questions 7 & 8)

A wide range of opinions were provided under this theme, with a large number of respondents advocating the use of stricter enforcement either as a way of changing behaviour or punishing those who fail to do so. Whilst enforcement is captured under a separate theme, we acknowledge the strength of feeling expressed by respondents on this issue and will review the existing actions to ensure there are appropriate links between the two themes. However, whilst there were strong views expressed on the need to adopt a tougher stance, particular in relation to fly-tipping, many respondents favoured a “carrot and stick” approach, particularly when it came to littering. Again, we will reflect upon the views and suggestions provided to ensure a balance is provided between these two approaches.

We also acknowledge the numerous comments made in relation to how programmes, actions and information on litter and fly-tipping are currently communicated to citizens. Whilst data and awareness campaigns are often published online by the Welsh Government and its partners, we recognise there is scope for improvement. We will now look at whether other mechanisms can be used to help improve how we and our partners do this. Of particular interest is how we can better utilise technology to engage with those directly linked to the community, for example Community & Town Councils and volunteer groups. The prevalence of online working and use of virtual meeting software during the COVID-19 pandemic has presented us with potential new opportunities in how we engage with a much wider audience than before.

There were also strong views provided on the role of children and formal education settings in tackling these problems. A particular perception was the role secondary school settings played in contributing to local littering levels and how to address this is something we intend to explore further as part of the Plan’s development. We also recognise the need to engage with other types of educational providers and settings (for example, outdoor pursuit organisations), again this will be reviewed as the Plan is finalised. We will work with our Eco-schools Programme and others including the Wales Youth Parliament to discuss this further.

In relation to queries around the role of behavioural change expertise in the development of Welsh Government policies in this area, a representative from the School of Psychology at Cardiff University is a member of our Litter & Fly-tipping Advisory Group. Our funding of the *Caru Cymru* programme, led by Keep Wales Tidy, also includes a number of projects which are being developed utilising behavioural science and used to gather evidence on a range of issues including dog fouling and littering from vehicles. Further clarity on this work and what our intentions of this work are will be included in the final Plan.

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

Q9				
	Agree	Disagree	Not stated but provided response / Do not know	No answer/ Not answered question
Numbers	201	8	58	88
Percentage	57%	2%	16%	25%

The issue of enforcement, in particular how best to undertake such action, was a recurring theme in responses throughout the consultation. On this basis, a number of views and opinions provided under Questions 9 and 10 have already been expressed and captured elsewhere in this document. However, in relation to the actions under this specific theme, there was broad support for their inclusion and only a small number opposed them (often on the premise the actions did not go far enough). Again, as with other responses to other questions, despite agreeing with the actions, some respondents took the opportunity to express views and provide comments on the issue.

Need for additional resources and funding to implement actions

Whilst a large number of respondents agreed with the actions included in this theme, some of this support was often caveated with comments about ensuring sufficient funding and resources to support their implementation. For example, Torfaen County Borough Council noted that whilst reference was made in action EE7 for Local Authorities to play a greater role in enforcement action on common or private land, this would not be possible unless additional resources were provided. Additionally, Ceredigion County Council noted the consultation acknowledged the difficulties facing Local Authorities in dealing with litter and fly-tipping, however felt there was insufficient detail on how such issues would be addressed.

Actions to improve consistency in approach

A number of respondents questioned whether the actions outlined would be effective if Local Authorities and other enforcement bodies operated different local policies. On this basis, there was support for actions which would help improve consistency across Wales and a number of respondents welcomed a review of enforcement activity. However, LARAC noted that such an approach should include sufficient flexibility to allow Local Authorities to adapt to local circumstances if needed.

A range of potential actions to encourage consistency was provided, this included the standardisation of training for enforcement officers, placing a duty on Local Authorities either to investigate offences (particularly in relation to fly-tipping), or to carry out enforcement action and making improvements in the sharing of data. Another respondent suggested a central, national body should be established to oversee and coordinate a national response to enforcement.

The Marine Conservation Society, Ceredigion County Borough Council and a small number of other respondents questioned apparent inconsistencies in language used under this theme. In particular, it was noted that action EE(2) referred to encouraging Local Authorities to develop a consistent approach to enforcement, however it was felt this contradicted earlier statements in the document about supporting Local Authorities “regardless of their approach”.

Actions to improve communication and visibility of enforcement action

A number of respondents supported proposals in the Plan to improve awareness raising of enforcement action and its outcomes, particularly when it came to ensuring this was communicated effectively to local communities. Some respondents felt education of the impacts and costs of these offences would help provide the rationale as to why fines and financial penalties were needed. Newport City Council suggested the development of a bespoke communication platform to help better promote any successful enforcement outcomes. It was felt this would help raise awareness, show that Local Authorities were working hard to improve issues and share best practice.

Actions to deal with offences on private or common land

Responses from the Farmers’ Union Wales, National Farmers’ Union Cymru and other landowner organisations welcomed the inclusion of actions aimed at addressing fly-tipping on private land. However, some respondents highlighted the ongoing costs incurred by private landowners when clearing fly-tipping and the perceived unfairness of this approach. It was argued changes were needed to who should be responsible for clearing private land or at least changes to ease the current financial burden. Others suggested more collaborative working was required to tackle the issue, particular in rural and remote areas, noting successes elsewhere in dealing with other rural crime issues. A number of Local Authorities suggested additional guidance was required in dealing with fly-tipping incidents on private land to help improve consistency in approaches across Wales.

Actions needed to strengthen enforcement action

As with the other questions in this consultation, responses from the public often included a request for stronger enforcement action when it came to littering and fly-tipping. This approach was often supported by those both in favour of the actions included in the Plan as well as those opposed to them (on the basis the current actions were too “soft”). Common requests to strengthen enforcement included increasing fine amounts, ensuring prison sentences for those found guilty and greater use of surveillance equipment to catch offenders in the act.

However, a smaller number of respondents questioned the effectiveness of enforcement action when it came to littering and suggested preventing the offence in the first place should be the focus of the Plan. One respondent noted there should be a balance between education and enforcement (using both “carrot and stick”).

Other respondents either opposed the use of enforcement for littering (on the basis it was considered divisive – “us versus them”) or opposed the use of private enforcement companies.

Specific enforcement actions

Under this question other specific actions were identified as requiring priority in the Plan, these included allowing Natural Resources Wales to issue fixed penalties for fly-tipping on their land, more actions focussed on dog fouling and improving the waste carriers’ licence regime. Others suggested prioritising alternative approaches to dealing with littering officers by young people.

Newport City Council noted their support for action EE(6) (exploring the use of innovative solutions and new technology to fight litter/fly-tipping), however they suggested there was limited expertise in Local Authorities to take forward such work. To address this, it was suggested the Welsh Government could develop a framework where different technologies and their uses were tested and trialled, with examples and best practice provided to Local Authorities.

Indicative quotes

*No. To achieve sufficient evidence for a prosecution, not only do fly tippers have to be stupid enough to leave evidence of their name and address, which will mostly blow away on the wind, but also the costs and time for the numbers of officers involved to secure a prosecution is ridiculous. That money could be better spent on a sustainable scheme for taking all waste, 24 hours a day in centres across Wales. Landowners are unable to even set up CCTV to catch fly tippers under current legislation without warning the tippers they are being filmed. Ridiculous! Fines are also laughable too even if a successful conviction is made. **Anonymous response***

*Enforcement should always be a last resort for citizens, businesses should be heavily fined, but offering services that don’t cost extortionate prices would make a big difference to fly tipping and providing enough bins / dog poo disposal would do a lot of good reducing litter. In my area you can travel nearly a mile between bins. **Anonymous response***

*Yes, generally. However, I feel that it is important to achieve the most effective balance between carrot and stick; also, in respect of fly-tipping, that enforcement is targeted at those who are profiting from illegal dumping; and, further, that support is available to people who are unknowingly using unlicensed waste removers to dispose of their unwanted goods and who (if identified) become criminalised, even where there is no criminal intent. **Anonymous response***

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.

Q10				
	Yes	No	Not stated but provided response/ Did not know	No answer/ Not answered question
Numbers	186	33	6	130
Percentage	52%	9%	2%	37%

In addition to the views and comments provided under Question 9, a number of further actions were suggested. These included:

- Introducing legislation or guidance which would require businesses to take greater responsibility for the cleanliness of the areas outside of their premises. One respondent noted such a scheme already operated in Germany. Alternatively, it was suggested additional powers could be used to take action against those businesses found to be persistently contributing to the littering problem in their area.
- Keep Wales Tidy recommended commissioning a study to assess the effectiveness of enforcement measures and the various models of enforcement before additional resources were allocated by the Welsh Government and/ or Local Authorities.
- To include actions which would help strengthen legal expertise in Local Authorities as it was noted some legal departments may not have sufficient experience in dealing with environmental crimes. A similar sentiment was shared in relation to magistrates' courts, with several Local Authorities expressing frustration at the apparent leniency in sentencing environmental offences.
- A number of respondents suggested actions to help increase the amount of funding and resources dedicated to enforcement action. A response from Henllys Community Council queried whether there was an opportunity to access alternative sources of funding, for example, through money recovered via the Proceeds of Crime Act 2002⁶.
- One respondent requested specific actions to deal with fly-posting.
- Actions to enable Local Authorities and Natural Resources Wales to become more proactive with their enforcement action. Examples provided included more duty of care checks on businesses, test purchase operations and regular waste carrier stop checks.

⁶ [Proceeds of Crime Act 2002](#)

- A small number of respondents felt there should be more focus on incentivising or rewarding the public for reporting fly-tipping offences. Others felt it should be made easier for people to report offences (particularly fly-tipping) or challenge those caught offending (in relation to littering).
- A number of respondents queried whether there should be greater alignment with the police (particularly in relation to fly-tipping) and especially wider community policing activities. There was also support for utilising probation services to assist with community clean-ups.
- Actions to improve the use of technology to track the movement of waste.
- Improvements to how waste businesses are required to operate to help drive out illegal operations, for example, through the creation of a scoring system similar to the Food Hygiene ratings.
- Responsibility for removal of litter and fly-tipping on all dual carriageway trunk roads come under the Trunk Road Agency rather than individual Local Authorities.
- The creation of other enforcement options in addition to Fixed Penalty Notices to ensure enforcement officers have a range of tools available to tackle offences.

Indicative quotes

*Fines should be higher and should link more to vehicles, stop these people driving [sic] simple, dumping from a car, littering from a car, its distracted unsafe driving they need points on their licence and police involvement. **Anonymous response***

*Yes. Also positive enforcement is needed, not just negative [sic] reinforcement by fines. Encourage people to recycle by, eg. giving cash incentives for recycling certain things. **Anonymous response***

*More enforcement officers are needed, maybe along the lines of Police Special Constables. **Christopher Jones***

*Households generally need more information about their responsibility for trade waste generated by their contractors being disposed of correctly and not fly tipped. Campaigns across all media to explain this would help. Many people don't have cars to take their bulky items to household amenity sites. Occasionally having a council skip over a couple of days in streets where there is a problem with rubbish being left outside / dumped would make it easier for residents to deal with this problem. And having it in a skip would be cost-effective compared with council staff having to clean it up of the streets and remove it. **Mold Plastic Reduction***

Welsh Government response (Questions 9 & 10)

Enforcement was one of the main focal points for a large number of respondents to this consultation, with numerous calls from the public in particular to introduce “tougher” penalties or provide more resources to support enforcement action. The Welsh Government acknowledges the frustration behind these sentiments and sympathises with these views. As noted in the consultation we are supportive of enforcement action, provided it is done sensibly, is enforced even-handedly and is seen as a response to genuine problems. We also recognise this approach is just one part of the equation and needs to operate in conjunction with other interventions such as education, to be fully effective. A commitment has been given in the Plan to review how enforcement is currently undertaken across Wales and this will be taken forward once the Plan is finalised.

A number of powers and actions being called for in the consultation are already available to enforcement authorities. For example, vehicles can be confiscated from those found guilty of fly-tipping and there is the potential for unlimited fines or a prison term of five years if a conviction is secured in the Crown Court. We recognise there is some frustration amongst enforcement authorities when sentences provided by the courts do not appear to reflect the scale and cost of dealing with some fly-tipping incidents. As the criminal justice system is a non-devolved matter, we continue to work with our UK Government counterparts to identify areas of improvement, particularly in relation to the existing sentencing guidelines.

Under the Plan, we also intend to explore ways of improving how successful enforcement is communicated to the public and how other enforcement authorities across the UK raise awareness of their activity. Work will also be undertaken to identify how best to support enforcement action for fly-tipping offences committed on private and common land.

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

Q11				
	Agree	Disagree	Not stated but comments provided/ Did not know	No answer/ Not answered question
Numbers	182	11	38	124
Percentage	51%	3%	11%	35%

The majority of respondents to this question either agreed with the proposed actions under this theme or did not provide an answer. Of the small number who opposed the actions, a lack of ambition, limited resources available and a perceived vagueness in detail were often cited as the reasons for disagreeing with the proposals. Some respondents expressed reservations to specific actions, for example, both Flintshire County Council and LARAC raised concerns over the high level of waste contamination that occurs with separate recycling bins and, therefore, questioned the inclusion of action EOD(8) in the Plan. Others disagreed with the emphasis on charities and community groups, noting more should be done to encourage private sector involvement in supporting communities. The National Farmers' Union Wales expressed disappointment with the lack of firm action to address the burden placed on landowners when dealing with fly-tipped waste.

Of those who agreed, a small number of respondents provided additional comments and suggestions. These included:

- Adequate resources and working with private sector – A number of respondents noted actions attributed to charities and community groups, however, it was felt there was little detail on how these resources could be supported financially in order to provide support. A similar sentiment was expressed in relation to Local Authorities and Town & Community Councils i.e. efficient operational delivery could only occur if adequately funded. On this basis, some respondents suggested greater emphasis should be placed on engaging private companies to encourage involvement in either operational activities or direct support to communities. This type of approach was welcomed by the Association of Convenience Stores as it was noted smaller stores often played a key role in communities and provided an opportunity for engaging with the public.
- Houses in Multiple Occupation (HMOs) – Several respondents noted the current difficulties in developing positive interventions in areas where communal waste collection points were commonplace and welcomed actions to address this. However, it was felt further evidence gathering was necessary and LARAC recommended developing best practice guidance to help support authorities with this issue.
- Code of Practice for Litter & Refuse (CoPLAR) – Gwynedd Council suggested potential changes to the existing guidance, including the potential to include

digital mapping systems which could link with operational frequencies and real-time performance monitoring. Keep Abergavenny Tidy also noted the need to standardise its use across Wales.

- Responsibility for clearing roadside litter – Several respondents noted the need for further clarification around who was responsible for clearing trunk roads if any actions on this issue were to succeed, and one Local Authority sought a review on the matter. Another Local Authority challenged the interpretation of responsibility referenced in the document and suggested the Welsh Government should lead by example in this area. Some respondents also felt there was a need for improved communication between the various Trunk Road Agencies and Local Authorities to allow clean-ups to take place when roads were closed for other purposes (for example, road maintenance or tree felling).
- Improving access to recycling facilities – In relation to action EOD(10) there were mixed views. Some respondents welcomed the potential for new initiatives that would help people to dispose of waste more easily (particularly bulky items for those with no transport), however others expressed concerns about the cost effectiveness of this approach. For example, Caerphilly County Borough Council commented it already had an adequate amount of Household Waste Recycling Centres which were open all year round for residents to dispose of and recycle their waste. It noted the authority had moved away from the operation of mini recycling centres as they were prone to misuse and led to more environmental degradation.

Indicative quotes

No. Too much emphasis on inefficient public sector solutions. Get voluntary and private sector doing more. **Anonymous response**

Yes, however a lot of the actions stated will require further investment by local authorities, which is not always possible under budget constraints. We therefore recommended a step change in funding to Local Authorities to dramatically enhance the enforcement response in Wales. As a result of the COVID pandemic, we have noticed an increase in the amount of litter. This could be a result of people generating more waste. But also, people's unwillingness to touch the lids of litter/dog fouling bins. Development of innovative solutions to stop litter escaping from litterbins would be most welcome. Although, as stated above this would require investment from local authorities which may not always be possible.

We would like to add that CCBC has a more than an adequate number of Household Waste Recycling Centres that are open all year round for our residents to dispose of and recycle their waste. The authority has moved away from the operation of mini recycling centres and from our experience of community schemes, we are averse to introducing such a service again as both offers were prone to misuse and led to more environmental degradation. It is extremely difficult to ensure these types of sites have the correct supervisor. Without constant supervision, they are prone to abuse as stated above. **Caerphilly County Borough Council**

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.

Q12				
	Yes	No	Not stated but comments provided/ Did not know	No answer/ Not answered question
Numbers	126	54	4	171
Percentage	35%	15%	2%	48%

The majority of respondents either did not respond to this question or did not provide any additional actions. Of those who did, the actions were broadly similar to comments made under Question 11 and throughout the document. A number of respondents also took the opportunity to welcome the recognition of the hard work of volunteers and community included in the document. The main areas for further actions included the following:

- Operational changes to Household Waste Recycling Centres (HWRCs)/ Local Authority waste policies – As with responses elsewhere in the consultation, there were numerous suggestions on how to improve how existing recycling centres and Local Authority waste policies operated. This included improving access to HWRCs, changes in how bulky goods were collected and improvements to street cleansing services (for example, the frequency of litter bin emptying). The Chartered Institute for Waste Management Cymru suggested consideration should be given by Local Authorities to adapting some recycling facilities to allow commercial waste from small businesses and local traders to be accepted at a proportionate cost.
- Volunteers and community groups – Whilst a number of respondents welcomed the increasing involvement of communities in improving the quality of their local environment, some felt there was a risk Local Authorities could become too reliant on this approach and not fulfil their statutory duties. On this basis it was felt any actions in the Plan on this issue should ensure partnership working was truly collaborative and prevent any burden being placed on the volunteers. One Voice Wales suggested a national standard could be developed for Local Authorities to follow when supporting volunteer groups.
- Bins and infrastructure - The Chartered Institute for Waste Management Cymru also recommended the Welsh Government adapt or adopt existing “binrastructure”⁷ guidance produced by WRAP for the UK Government to support Local Authorities in Wales. Keep Wales Tidy highlighted the importance of communicating the “right bin, right place” message to both

⁷ [Right bin in the Right Place Final.pdf \(wrap.org.uk\)](#)

Local Authorities and Town & Community councils and made a series of recommendations to help improve the management of bins. A number of respondents made suggestions in relation to improving the collection and separation of waste for recycling “on-the-go”.

- Pooling of resources or centralisation of information – Ceredigion County Council called for support to help Local Authorities coordinate resources when helping community groups and volunteers, for example, insurance cover for groups, single standard risk assessment and guidance documents for use. Friends of the Earth recommend the creation of a new information hub or one-stop-shop for all waste related issues in Wales such as re-use, recycling, food waste, composting and bulky waste collection rather than have different organisations and different websites hosting this information.
- Greater role for businesses – A small number of respondents noted the actions in this section focused primarily on Local Authorities, other public bodies and volunteers. It was felt there was a need for a greater role of businesses in supporting operational matters. Monmouthshire County Council suggested including an action to explore how businesses could contribute to operational delivery, particularly in relation to the planning process and ensuring their businesses would not contribute to any littering issues.
- Actions focused on riverine litter – Two respondents asked for more operational actions in relation to litter entering rivers, especially given the existence of the Welsh Government *Marine Litter Action Plan*.
- Greater use of technology - A number of respondents felt operational delivery could potentially be made more efficient or cost effective through the greater use of technology. Ideas included designing litterbins so they could inform Local Authorities when they were full and apps to inform the public where the next nearest litterbin was. Other respondents suggested improvements or investment in the equipment used by street cleansing teams (as opposed to manual cleansing). However, Mold Plastic Reduction noted “low tech”, simple solutions should not be overlooked when dealing with issues.

Indicative quotes

*Use of technology for litter services as well as intelligence reports for fly tipping including access to insurance database. Cardiff Gov app for reporting but using this data to allocate resource etc/ litter bin emptying rounds based on monitoring. Improving access to recycling centres. **Cardiff City Council***

Welsh Government response (Questions 11 & 12)

The use of new and innovative technology is a key focus for the Welsh Government in delivering this Plan. We recognise more can be done in this area and intend to strengthen our links with the Welsh Government's Digital Strategy and other organisations, to identify potential opportunities.

In relation to operational practices, as noted elsewhere in the document we continue to work with Local Authorities and other partner organisations to help share best practice to manage our waste. This includes how Local Authorities operate their street cleansing services and work is ongoing to update the *Code of Practice for Litter & Refuse* (CoPLAR).

We can also confirm Natural Resources Wales has begun to review and update the existing fly-tipping protocol. It is hoped by refreshing the existing framework in collaboration with partners this will provide greater clarity on who is responsible in dealing with certain waste offences.

We also acknowledge the calls for stronger actions to tackle riverine littering and will work closely with Natural Resources Wales and other partners to review the existing actions in this Plan.

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.

Responses to this question varied. Some respondents identified a specific action which they felt was of high priority, for example, *EOD(6) Work with partners to support existing education/ training programmes and to identify gaps/ opportunities for new ones*, whilst others identified a number of actions. Where multiple actions were provided, some respondents provided a list in order of priority (giving a level of “weighting” to each one), whilst others did not state a particular preference.

A number of respondents suggested priorities relating to a specific theme, for example, they may have stated education as being a priority for Welsh Government. A large number of respondents also made general references to areas they felt were of priority rather than specifically refer to the Plan, however, these often related to actions or themes included in the Plan and, therefore, these suggestions were counted against these actions or themes. For example, if a respondent stated action on plastics was a priority, one “vote” was allocated against the Waste Reduction Theme as this includes several actions on single use plastic.

To help with the analysis process, we have counted the number of responses under each specific theme or action and ranked them in order of preference based on the total amount of “votes”. A brief overview is also provided where a large number of specific “votes” were allocated to an action.

Education and Behaviour (EBC) – Highest priority

A large number of respondents felt education and behaviour change should be considered a priority area under the Plan. In total, 101 “votes” were received for the actions in this theme. Respondents often did not identify a specific action, rather stating “education”, “education and behaviour change” or “research in behaviour change” should be a focus for the Welsh Government. This was on basis that long term change could only be achieved if people understood the impact of littering and fly-tipping and changed their behaviour accordingly. However, a number of respondents often noted this was a long term aim and that any action in this area needed to be supported by adequate enforcement action as this was considered necessary to deal with the issues “now”. It was often cited as needing to provide both a “carrot and stick” approach to the problem.

Where respondents did identify a specific action under this theme, they were prioritised as follows:

- EBC(2) We will develop, with partners, a national awareness raising campaign for littering. **(8 votes)**
- EBC(9) Continue to support community led action. For example, Surfers Against Sewage Plastic Free Communities network, Keep Wales Tidy and other volunteer action. **(8 votes)**

- EBC(5) Work with businesses to develop targeted initiatives aimed at prevention, awareness and behaviour change. **(5 votes)**
- EBC(6) Gather evidence and trial specific behaviour change measures to help address roadside litter (including litter from fast food outlets). **(5 votes)**
- EBC(4) We will continue to work with young people to identify suitable communication platforms to improve engagement and help instil positive environmental behaviours at an early stage. **(4 votes)**
- EBC(10) Work with the construction industry and landlords to explore opportunities for reducing fly-tipping associated with these sectors. **(4 votes)**

The remaining actions included in this theme received two “votes” or less.

One respondent noted the need for several of the actions to be developed in parallel so as to ensure a national approach was taken to messaging, ensuring this was standardised and linked to other areas. This would then allow for everyone to understand the impact of their actions on society and the environment.

Effective Enforcement (EE) – Second highest priority

The majority of respondents who identified this as a priority area often made general references for the need for enforcement action or “tougher” action in dealing with offenders. In total enforcement was “voted” for by 84 respondents. A small number of respondents often cited the need for actions which were not included in the Plan, for example the need for greater surveillance or use of CCTV cameras. Where specific actions were identified, they were prioritised as follows:

- EE(6) Explore the use of innovative solutions to help improve litter and fly-tipping enforcement action across Wales, for example using new technology. **(7 votes)**
- EE(5) Explore the introduction of legislation to help reduce littering from vehicles. **(6 votes)**
- EE(7) Explore proposals to help support fly-tipping enforcement action across Wales including undertaking action on private land. **(3 votes)**
- EE(1) Review existing enforcement capabilities across Wales and the current fixed penalty amounts available for littering and fly-tipping offences with a view to increase levels if needed. **(3 votes)**

The remaining actions under this theme received two “votes” or less.

Efficient Operational Delivery (EOD) – Third highest priority

A larger number of respondents, predominantly members of the public, identified actions to improve waste collection services as being the main priority area. This included improvements in how litter is currently collected, for example, the provision of more bins or more street cleansing. Others identified the need to improve how the public was able to dispose of their waste, for example, for more Household Waste Recycling Centres or changes to existing sites to make it easier for people to access. Changes to bulky waste collection, kerbside recycling and disposal costs were also suggested. A total of 79 “votes” were allocated to this theme.

Where specific actions were identified, they have been ranked as follows:

- EOD(13) Work with Housing Associations and Local Authorities to identify best practice on designing/ improving shared waste storage areas in resident buildings with multiple occupancy. **(5 votes)**
- EOD(10) Explore options/ trials to improve access to recycling facilities e.g. mobile Household Waste Recycling Centres. **(4 votes)**
- EOD(8) Identify opportunities for improving “on-the-go” recycling provision across Wales. **(4 votes)**
- EOD(1) Review and update the existing Code of Practice on Litter and Refuse (COPLAR) guidance with a view to identifying opportunities to improve cleansing activities. **(3 votes)**
- EOD(4) Work with partners to identify innovative, cost effective measures to prevent and remove roadside litter and fly-tipping. **(3 votes)**
- EOD(11) Work with Local Authorities to identify and promote examples of good practice and consistency. **(3 votes)**
- EOD(12) Develop new and innovative solutions to reduce the escape of litter from litterbins. **(3 votes)**

Those actions which received two votes or less have not been included in the above.

Waste Reduction (WR) – Fourth highest priority

As with the analysis above, respondents often provided broad responses with regards to priorities, for example, general waste reduction measures, reducing packaging or actions to tackle single use plastics. Several respondents highlighted the need for actions to deal with roadside litter originating from fast food outlets. A total of 60 “votes” were received for these actions.

Where specific actions were identified, they are ranked as follows:

- WR(5) We will introduce a Deposit Return Scheme to help reduce the amount of drinks containers being littered. **(13 votes)**
- WR(11) We will introduce an Extended Producer Responsibility scheme which will help incentivise more environmentally friendly packaging and provide potential funding for anti-littering measures. **(12 votes)**
- WR(4) We will work with Welsh businesses and manufacturers to develop innovative and sustainable alternatives to single use plastic. **(5 votes)**

Those actions which received two votes or less have not been included in the above.

Evidence, Monitoring and Evaluation (EME) – Considered of least priority

Actions under this theme attracted the lowest amount of “votes”, with most respondents suggesting there was a need to either improve existing data collection mechanisms or improve the understanding as to why these offences were taking place.

- EME(1) We will establish a Task & Finish Group to evaluate the existing evidence base, identify international best practice and to present a range of potential options for improving how littering is reported in Wales. **(5 Votes)**
- EME(2) We will work with Fly-tipping Action Wales and Local Authorities to improve fly-tipping data recording and reporting in Wales. **(4 Votes)**
- EME(3) We will work with other land managers, owners and businesses to improve the recording and reporting of littering and fly-tipping on private land **(3 Votes)**

Those actions which received two votes or less have not been included in the above.

Other comments and priorities

A number of respondents (17) suggested all actions should be considered a priority as they were interconnected and that a holistic approach was required if the Plan was to be successful. In conjunction with this viewpoint, respondents also felt greater prioritisation was needed to develop partnership working and this was particularly important when engaging with communities. Other comments noted included:

- Prioritising fly-tipping **(8 votes)**
- Prioritising dog fouling **(6 votes)**

- Separating litter and fly-tipping (**4 votes**)
- Roadside litter particularly in rural areas (**3 votes**) and trunk roads (**3 votes**)

Indicative quotes

As highlighted at the beginning of the consultation litter and fly-tipping need to be tackled using a holistic approach. Concentrating on any of the themes alone will not prevent the problem. To tackle this issue in the long term, every one of us needs to value and respect our communities and value waste as a resource. To reach this point it is important to understand why a minority of people do not value and respect their communities, and then to put in place interventions that make it easy for people to do the right thing whilst also encouraging people to reduce waste.

We recommend that this action plan is linked to, and clearly promotes the aims of the Welsh Government Beyond Recycling Strategy. It is also important that the evidence base is improved, and the opportunity is taken to learn through open and honest discussions with people that commit these offences. For these reasons we would recommend prioritising, in the short term, the Evidence, Monitoring and Evaluation theme of the plan. **Natural Resources Wales**

It is difficult to prioritise the themes of the plan, as each strand of activity is dependant (sic) on the others for its success. Developing an accurate evidence-base is crucial to ensure that the correct interventions are being progressed under all themes. **Wrexham County Borough Council**

Really difficult question as all the themes seem to be mutually dependent for success. You have to change attitudes and this needs to be a mix of education, engagement and (sadly) enforcement for the most resistant. However, you also have to have systems and processes in place to encourage attitude change and to sustain that change, once the decision to change has been made. So with education as the core focus, I think that working with stakeholders at community levels is critical to success and would prioritise actions such as EBC 4,5,6,9 & 10 in particular.

Anonymous response

Welsh Government response (Question 13)

Whilst respondents focused heavily on actions included under the education and enforcement themes, the introduction of a Deposit Return Scheme for drinks containers and introduction of an Extended Producer scheme for packaging were considered the highest priority with 13 and 12 “votes” respectively. We would like to take this opportunity to reaffirm the Welsh Government’s commitment to delivering both of these actions and anticipate both of these schemes will be operational by the end of 2024. Importantly, these game-changing reforms will be accompanied by other actions such as, phasing out unnecessary single-use items and supporting more repair and re-use that will aim to change culture and behaviour and how we use materials.

Other high-level priority actions identified by respondents included several under the Education and Behaviour theme. Again, this matches Welsh Government ambition in this area with continued development of awareness raising campaigns on social media related to litter and fly-tipping. This includes our funding of the *Caru Cymru* programme which will deliver national messages on dog fouling, roadside litter and encouraging people to take their litter home if a bin is full. We also continue to fund the Fly-tipping Action Wales’ “*It’s your duty to care*” campaign which aims to raise awareness of the need for people to check whether the person removing their waste has a licence to do so.

Another key priority identified was the need to support communities and volunteers in undertaking local environment improvement projects across Wales. Again this is something the Welsh Government is keen to support and work is ongoing to determine how best to achieve this.

In light of comments and suggested actions received, we now intend to review our actions and prioritise those elements of the Plan accordingly.

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

This question did not ask for a yes or no response, therefore, a table has not been included in our analysis. The majority of respondents (264) did not respond to this question and of those who did, a large number were unable to identify any impacts, either positive or negative. However, a number of respondents felt by producing a plan and any supporting material bilingually this would help promote the use of the Welsh language. This included the need to ensure any awareness raising campaign messages were clear and consistent in both languages. A small number of respondents felt the Welsh language was irrelevant in relation to litter and fly-tipping and questioned the need for it to be considered.

Indicative quotes

Personally I can't see that the plan will have any effect on the Welsh language. I would expect all literature and any information/signage/logos to be bi-lingual, so that each language is used in equal measure, as is done currently. **Anonymous response**

I would assume that the outputs of any actions would be available in Welsh and English, including reporting systems. That being the case I hope there would be no negative effects on the Welsh language. **Anonymous response**

Bilingual encouragement and education is always a plus. Nothing negative can come of that, only positive. The Welsh language should be encouraged and supported just as much as the whole 'littering and fly tipping action plan'. **Anonymous response**

Although on the face of it there is little relationship with litter and flytipping [sic], anyone learning, or with an interest in, Welsh will seize any opportunity to delight in translation and interpretation of any subject into Welsh. Bilingual campaign posters will attract interest and this will help to spread the anti-littering message. Materials could be shared with Welsh learners (school-age and adult). Conversely, posters etc need to be carefully designed so as not to deter the target audience from reading and absorbing their message. **Presteigne Area Community Development Group**

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.

This question did not ask for a yes or no response, therefore, a table has not been included in our analysis. As with Question 14, the vast majority (237) of respondents did not answer this question or referred to comments made under the previous question (Question 14). Of the respondents who provided an answer, the majority were of the opinion that our plan did not treat the Welsh language less favourably than the English language.

One respondent noted it was unclear from the Plan whether the Welsh language had been considered in its development and this made it difficult to assess. However, the respondent advocated for the Plan, as a minimum, to look to provide opportunities for the public to use the Welsh Language in each activity and all partner organisations should be required to actively promote its use for all campaigns/activities.

One respondent suggested the Welsh Government insist manufacturers who supply goods to sellers in Wales via the internet, to use and promote the Welsh language on their sites or on packaging labelling. Another suggested the Plan should include English and Welsh in the same document (rather than translated separately) to help people learn the language.

Indicative quotes

Ensure all communications can be launched in English and Welsh and are as accessible as possible with images to support the key messages. **Wales Safer Communities Network, WLGA**

We recently ran a schools project, based in a Welsh medium school to create a series of anti litter signs for a local park. The children incorporate both languages into their signs so that they would be understood by all. As a community organisation we feel it is very important that both languages are used in the material that we produce, and feedback has shown that people are appreciative of this. **Anonymous response**

Why would any of this negatively impact the Welsh language? I know, and agree, everything needs to be replicated in Welsh but as long as it is I don't see how it could be detrimental to the Welsh language. **Anonymous response**

Welsh Government response

Respondents did not identify any negative impacts on the Welsh language and the Welsh Government would like to reaffirm its commitment to promoting its use. All communication campaigns, associated documents and supporting materials will be produced bilingually and options to communicate in Welsh offered in any public engagement.

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.

This question did not ask for a yes or no answer, therefore, a table has not been included. There were 134 responses to this question and these covered a wide range of issues, comments and suggestions. A large number of respondents reiterated points and views that had already been discussed elsewhere in the consultation. For the purposes of our analysis, these views are summarised in the following broad categories:

- **Enforcement** - A number of respondents again advocated for a tougher stance on littering and fly-tipping (for example higher fines), or for more action to be taken in this area, for example greater use of CCTV.
- **Local Authority waste management practices and/ or policies** – As with the consultation in general, a number of respondents used this question to either criticise existing Local Authority waste services or suggest changes were needed in order to reduce litter and fly-tipping. This included improving access to Household Waste Recycling Centres or making it easier/ cheaper for businesses to dispose of their waste. A number of calls were also made to ensure Local Authorities provided enough bins or bins suitable to deal with increased demand (for example in tourist hotspots). One respondent advocated following a model used in Australia, where three items were taken away annually without charge by the authorities. Another suggested greater investment in community “Bring Sites”.
- **Funding** – Several respondents took the opportunity either to express concerns over whether the Plan would be adequately funded, or to advocate for greater resources to be made available to tackle litter and fly-tipping.
- **Implementation of the Litter & Fly-tipping Prevention Plan – Keep Wales Tidy** commented on the need for further strengthening of how the actions would be monitored and reviewed, suggesting there was a need for an annual report to be published.
- **Greater focus on awareness raising and communication** – Using celebrities to raise awareness of the issues was suggested by three respondents, particularly the use of sports stars to help engage with young people. One respondent suggested there was a need for more materials and information to help those who may not speak English, or where English was not their first language.
- **Concerns over the disposal of specific items** – A small number of respondents identified the need for action on specific items and these included vehicle tyres, wet wipes and agricultural products like silage wraps. Some respondents supported further action on single use plastics and promoting re-usable or environmentally sustainable alternatives.

- Dog fouling – Several respondents reiterated the need to include actions on dog fouling and for the Plan to focus more on this issue.
- Roadside litter – Action to address roadside litter also coincided with suggestions to improve the accountability of fast food companies or for greater enforcement action against offenders. Some respondents supported the introduction of including car registration details on packaging.

Other comments

A number of respondents highlighted areas that they felt were either missing from the Plan or required strengthening. These included:

- fly-camping;
- the need for improved support for private landowners (in particular those in the farming community);
- action to address fly-tipping in woodlands;
- *Wales Safer Communities Network* advocated stronger links with Wellbeing Plans and Community Safety Strategic Assessment as littering and fly-tipping were often linked to how safe people felt in their local community; and
- the creation of a Litter Prevention Fund to help support the development of new and innovative solutions.

Indicative quotes:

Fly tipping is disgusting and stealing land and killing wildlife. It needs to be stopped.
Shay Holland

Include dog mess in your campaigns. Explain [sic] the threat of hydatid cysts in children's playgrounds. Explain how children, toddlers, the elderly and partially or unsighted people cannot see dog mess either in town or in the countryside and dog owners need to leave footpaths and pavement clean. **Anonymous response**

Responses to the Easy Read Version of the consultation

Question 1: Do you think the Plan will help stop litter and fly-tipping in Wales?

Q1 – Easy Read				
	Y	N	Don't Know or not answered question directly	No answer
Numbers	8	7	4	3
Percentage	36%	32%	18%	14%

Of the 19 respondents who answered this question, just over half felt the proposed Plan would help prevent litter and fly-tipping, with four respondents stating they were unsure if it would. One respondent noted that a preventative approach was the only way to address these issues, welcoming the focus on reducing packaging waste and supporting recycling/ re-use initiatives. Working with manufacturers and producers was also welcomed by another respondent.

The scale of the issue was highlighted by both those who agreed and disagreed with the Plan, with some respondents noting that despite regular clean ups the litter quickly returns. However, there was optimism from a small number of responses that the proposed actions would help bring about longer lasting changes, in particular, the proposal for a Deposit Return Scheme for drinks containers. Another respondent approved of the Plan queried whether it would result in significant changes as it suggested actions similar to what was already in place and this was not working.

Of those who opposed, most did so on the grounds they felt the Plan was bureaucratic, or too focussed on obtaining further information rather than dealing with the problem directly. Two respondents disagreed with combining litter and fly-tipping, suggesting these were different offences and required different approaches. Another respondent agreed with the joint approach as this encouraged partnership working.

Indicative quotes

*No, because it proposes unnecessary consultations and over-fussy research. As everyone knows what the problems are, we call for action. **Anonymous response***

*Yes, the plan promotes fly tipping and litter prevention as well as outlining measures for dealing with the existing issues in communities. This is where the idea of targeting prevention at the source is so important as well as partnership working and education. In Wrexham there are particularly strong volunteer groups focussing on litter and plastic free initiatives and these groups are to be encouraged and supported. Incentives to encourage recycling and repair are excellent, more funding for Repair Cafes would be welcome for example. Fly tipping and litter need to be covered under one plan as they are interconnected and part of a wider strategy around reducing waste and encouraging recycling. **Anonymous response***

Question 2: Do you have any ideas to stop littering and fly-tipping in Wales?

This question did not ask for a yes or no response, therefore, a table has not been included in our analysis. However, there were 20 responses to this question and a range of additional actions were suggested. These have been placed into common themes and summarised below.

Changes to Local Authority waste management policies and infrastructure

Over half of respondents to this question (12) made suggestions that related to how Local Authorities either collected waste from their residents, or the services they provided to allow residents to dispose of their waste legally. A common request was for Household Waste Recycling Centres or “Tips” to become more “user friendly”, with some respondents expressing frustration as to how some currently operate, or the distances they needed to travel to access one. Others suggested the charges applied to small businesses to dispose of their waste should either be scrapped or reduced, as it was felt this was a potential reason why building and business waste was being fly-tipped.

One respondent suggested one approach should be adopted in Wales towards recycling rather than allowing individual Local Authorities to adopt different schemes. Other respondents referred to the need for more litterbins, or larger domestic waste bins. Another respondent commented on the amount of packaging material being littered by bin lorries after emptying domestic waste bins. Two respondents suggested the use of Litter Wardens to help tackle littering.

A small number of respondents were supportive of plans to introduce a Deposit Return Scheme for drinks containers. However, others felt other items should also be included, for example non-rechargeable batteries.

Actions to improve enforcement

A number of respondents expressed the need for more enforcement action to help tackle these issues. This included the greater use of CCTV, requiring those caught offending to be involved in local clean ups and publicising how many people had been caught. One respondent suggested the seizure of vehicles and driver’s licences revoked for one year if caught fly-tipping, although this punishment would be increased if the offender operated a waste business.

Actions to address fast food and roadside litter

As with responses to the main consultation document, respondents identified fast food and take-away businesses as a source of littering that needed addressing. Ideas put forward included for the Welsh Government to require all take-away businesses to make their packaging biodegradable, introducing regulations to require the printing of car registration details on takeaway packaging and greater responsibility on businesses to keep their local areas clean.

Two respondents recommended the Welsh Government introducing a charging scheme which drive-through and takeaways would have to pay depending on the amount of their packaging found. This would then cover the clean-up costs incurred by Local Authorities.

Other financial initiatives included the introduction of a single use plastic tax, or litter tax and temporarily increasing car tax by £50 to help fund CCTV cameras and enforcement.

Awareness raising and education

Several respondents referred to the need to improve awareness raising of the impacts of littering and fly-tipping on the environment. One respondent felt more messaging should be focussed on those who littered from their vehicles and another suggested a campaign similar to those used to make drink driving unacceptable. Others felt that more signs were required to highlight the issue.

Three respondent felts there was a need for more education in schools to encourage positive environmental behaviour at an early age.

Indicative quotes

*Anyone caught littering made to do litter picking in bright orange overalls, any caught fly-tipping to have their vehicles seized and driver's license (sic) revoked for a minimum of a year. If they are business licensed to remove rubbish, their business and driving license (sic) is revoked for a minimum of five years, vehicles seized and a custodial sentence imposed. Hit them hard, don't be soft. Anyone caught fly-tipping to be made to clear up all the rubbish in the area. All litterers and fly-tippers that are convicted to be named and shamed. **Anonymous response***

Making household recycling sites more user-friendly would help too - each one in Swansea takes a different range of waste and they are all drive though - what do people without cars do? We should be encouraging more cycling and public transport to these sites or increasing the range of types of recycling collected from the doorstep (polystyrene, drinks cartons, crisp packets etc). Also bring in a single, system of household recycling and waste across the country rather than the ad-hoc system at present, based on best practice across Wales and beyond.

*Litter picking hubs in all communities - maybe based at libraries and community centres - with equipment to borrow would help enable communities to help deal with the problem. And if communities visibly take ownership of the problem, it would help discourage littering through social pressure. If it is seen as the council's or the government's problem, people are less likely to comply. **Anonymous response***

Welsh Government Next Steps

The large number of responses received through the consultation process and the strong sentiment within those responses, demonstrates that litter and fly-tipping are issues which are very important to people in Wales. The consultation has provided valuable input and useful recommendations which will help strengthen the existing draft Plan.

We will continue to work with our stakeholders and partners, to ensure the outputs of the consultation is fully reflected within the Litter and Fly-tipping Prevention Plan when it is published later this year.

ANNEX 1

Fly-tipping Action Wales - Consultation workshops



Litter & Fly-tipping Prevention Plan

Feedback from the FtAW Working Groups & team comments:

Fly-tipping Action Wales has engaged with partners that attend our Land Management, Communities and Enforcement working groups, to provide this informal feedback on the Litter & Fly-tipping Prevention Plan.

Detail has been kept to a minimum for ease of review, although FtAW are happy to elaborate on any of the points made. Comments and consensus from the working groups has been highlighted in boxed italic text.

This feedback is separate to the formal consultation response provided by Natural Resources Wales (who host & coordinate the FtAW partnership). FtAW have also fed into and support the response provided by Natural Resources Wales.

As this was not a formal consultation response, it has not been structured under the specific questions, however it was felt necessary to provide a response to Question 1 that asked:

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

- There was a consensus in the Enforcement Working group that litter and fly-tipping should be kept separate due to the criminal nature of fly-tipping. Many felt the specific actions required to combat each issue were very different in terms of enforcement approach.
- There was a mix of views expressed in both the Communities Group and Landowners Working Group - some felt it was good to combine the two issues and others felt they should remain under separate plans.

Theme 1: Waste Reduction

- WR (5) There was consensus from the Communities Working Group that the Deposit Return Scheme should be a priority to tackle litter.

Theme 2: Evidence, monitoring & evaluation

The following are general comments provided by the Working Groups on Theme 2:

- How do we measure the success? Successful prosecutions?
- LEAMS is not a good measure - doesn't capture real issues e.g. cigarettes in specific areas. Arterial / trunk and rural roads.
- Fly-tipping - how do we measure changes in attitudes / changes in behaviour.
- How to measure fly-tipping on Housing Association (HA) land as Local Authorities' (LAs) not clearing.
- Fire Service ask HA to clear fly-tipping on their land. Fire element. Better recording of waste items set on fire - won't know if it was small or large amount (recorded by crew at incident - often recorded rubbish fire and not fly-tipping).

Theme 3. Education & behaviour change

The following are general comments expressed by the Working Groups on Theme 3:

- Expectation of the public vs what LAs / Natural Resources Wales can actually do – need to bridge the gap.
- Acknowledgement of volunteer effort – but not there just to do other people's 'dirty work'.
- Educating residents & councillors on what they can do with regards to taking evidence from waste - makes it difficult for LAs to then take forward.
- Housing Association managed land is an issue & often under reported.
- Can use warning letter in first instance - (opportunity for consistent letters for use by all). Bulky item collection can be expensive. Conflict with clearing waste - people then abuse this by putting stuff out > as gets cleared.
- Some LAs have dedicated FT teams

- Cigarette litter & enforcement against it needs to be considered - people see it differently, don't see it as litter – education
- Support for both under one plan as all issues relate to respect for environment where you live - even if need different approach to tackle / team all together in the council already so already has them under one strategy.
- LA has separate litter and dog fouling team, also does parking. Budgets are separate > this need consideration.
- Fire Service - more concerned about what gets set on fire - e.g. litter and FT in public bins.
- Private enforcement teams are often criticised / not well received by public - sometimes focus on certain offenders / groups (easy wins). Easier / less confrontational to tackle parking than people dropping litter.
- Public opinion gathered would suggest keeping litter and FT together in one document. Although he thought there were some very different issues. FT more complex and this needed to be reflected.
- Urban streets should be a priority within the Plan – not just roadside litter.
- Danger of duplication and losing focus on fly-tipping.
- Love your lane campaign – focussing on back lanes in built up areas. Letter drops, signs and publicity to raise awareness of fly-tipping and emphasise it's a good place for children to play. 2-month campaign in 4 FT hotspots (lanes). Has seen good success in reducing FT.
- Dog fouling also needs to be included in the prevention plan, as does chewing gum.

Theme 4. Effective Enforcement

The following are general comments made by the Working Groups on Theme 4.

- The issue I have is WG need to make it legislation to issue penalty to registered keeper without liability enquiries. England have this Wales they refused (*comment was we believe regarding littering from vehicles*).
- If roadside litter is the main issue it's from a vehicle so give us the tools to enforce it! using traffic cams to pass on reg plate of vehicles littering on high speed routes.
- Cross boarder intelligence forums – sharing cases and intelligence Formally – ready for rogue trader stop and search days.
- PACE partnership – having partners from Natural Resources Wales or police force in the interviews for joint working and shared knowledge.
- Priorities – enforcement and enforcement resources, but needs to be looked at holistically
- Intel sharing between Local Authorities (PCN access). Needs to be addressed Nationally with consistency across the board.
- Use of all technology that is available.
- Barrier to enforcement is org / staff not being sure on the data protection act
- Rubbish from cars is a problem – legislation needed - DVLA heavily audit you on this
- LA feeling is that public want to see more enforcement. Number of FPN's not paid - big court delays at the moment.
- Also chasing non-payment and not clear on court dates. Prevention - prices going up again for collection by LAs, public being tempted by potentially illegitimate operators / Facebook / online advertising.
- Fire Service - Enforcement needs to be prioritised, and there should be better working with the police.

Theme 5. Operational Delivery

The following are general comments received from the Working Groups on Theme 5:

- “Waste reduction is key”.
- “Broken window effect - if you don’t remove promptly then people will add to it”.
- Fire Service can only give advice / request support from LAs / Natural Resources Wales etc. Feel more reactive than pro-active in terms of dealing with fly-tipping at present - after it has been burnt”.
- “More partnership work between organisations is needed. More joined up working within councils to tackle fly-tipping – i.e. Environment Health and Pollution prevention”
- “Waste Carrier Licence – need background checks before a licence is issued – check address / character of person – fit and proper procedure for the licence like RSW landlord testing”.
- Also have e-learning with assessment (multiple choice) before licence is granted to ensure understanding and accountably like a disclaimer”
- “Require cross-boundary sharing of best practice and consistency”
- “Not keen on combining the plan together given how different the solution, reasons and barriers are very different”
- “Free bulky waste collection services would put huge pressure on waste collection services (manpower/ time resource)”.
- “Additional free collections of bulky goods end of term in Bangor to tackle student waste. Cardiff do this too & good results”.