

Welsh Government CCERA Committee – Inquiry on Waste

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seneddclimate@senedd.wales



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

CONTACT: Jemma Bere Jemma.Bere@Keepwalestidy.cymru

Keep Wales Tidy, written evidence to the Welsh Government Climate Change and Infrastructure Committee regarding progress towards delivery of the Welsh Government's circular economy strategy, Beyond recycling (March 2021).

Keep Wales Tidy (KWT) is an independent environmental charity working across Wales to improve our environment for the benefits of people and wildlife alike. We have decades of experience in working with communities on Local Environment Quality (LEQ) issues and work in partnership with local authorities, businesses, schools, eNGO's and other stakeholders to achieve our vision of a beautiful Wales that is cared for and that can be enjoyed by everyone.

This evidence response is informed by our work with local partnerships and communities across Wales, many years of collected data and our expertise in the field of environmental behaviour change and campaigns.

Keep Wales Tidy are grateful for the opportunity to give evidence to the Committee regarding the progress of the Beyond Recycling strategy and hope that the following information will provide a useful platform for the evidence session on the 13th June 2024.

Key points in this paper:

- **Keep Wales Tidy believes that the ambition to move beyond recycling is not yet reflected in practice. To truly take a preventative approach we need to consider reviewing and expanding current recycling targets accordingly.¹**
- **There are currently no statutory targets to reduce waste outside of the household waste stream (eg; litter prevention) and are therefore increasingly neglected due to budget cuts. There may be an opportunity to introduce this through the Litter & Fly-tipping Prevention Plan expected this year.**

¹ Consideration could be given to a Waste prevention plan with reduction targets such as that implemented by the Scottish Government in their Waste Prevention Plan, 2013.

<https://www.gov.scot/policies/managing-waste/>

- **A medium-long-term plan for phasing in consistency for recycling *and related services* across Wales would be beneficial to public participation and understanding and expansion of services.**
- **Adopting the overall aspiration to make recycling as convenient as possible for people in Wales and enabling them to ‘do the right thing’. This could, for example, include a standardisation of HWRC rules and removing the charge for bulky item collection.**
- **We would like to see a sector-by-sector approach to incentivising new infrastructure and increasing circular economy activity which also considers the challenges of specific materials, building on the Single Use Plastics Act.**
- **Keep Wales Tidy are fully supportive of the current Extended Producer Responsibility (EPR) proposals and are encouraged that Welsh Government (along with the Scottish Government) did not roll back on the commitment to extend Producer Responsibility to items commonly littered despite the additional complexity that this has brought.**
- **Similarly, Keep Wales Tidy are pleased that a Deposit return Scheme (DRS) will finally be introduced and whilst disappointed at further delays, it is positive that Wales has remained committed to keeping glass in the scheme after significant opposition and a renegeing by the UK Government from the original proposal.**
- **The UKIMA has had a chilling effect on environmental policy and the environmental sector across the UK are keen for a review which gives more power to the devolved governments to act on environmental policy in particular, respecting current constitutional agreements and providing clarity for policy makers.**

Firstly, it is important to state that the ambition of the Welsh Government’s Circular economy plans has been truly positive and has placed Wales far ahead of other UK nations in this area. It is also important to recognise the excellent progress that has been made in regard to household recycling which has led to Wales being world-leading.

Whilst we expect some continued challenges in regard to implementation, we are also very pleased to see that Wales has implemented the recycling regulations for non-domestic premises. After an expected period of transition and challenge, this will undoubtedly lead to an exceptional rate of waste being diverted from landfill in the long-term. In the short -term however, local councils are preparing for a period of increased fly-tipping and misuse of public bins.

These policies, and continued efforts by Welsh Government and Local Councils have undoubtedly led to our current success. However, we believe that the primary focus of Local Authority activity, driven by Welsh Government targets, is still very much focused on recycling material and we have yet to move ‘beyond’ recycling as the key driver. That is not to say that there has not been significant effort and interest by Welsh Government to support and advance the narrative and activity around the circular economy but that the main drivers ‘on the ground’, both within councils and much of the public, remain focused on recycling and not prevention. In addition, recycling is not a commonplace activity outside the home and therefore current efforts are less aimed at addressing litter and fly-tipping which of course, are part of the same problem.

Whilst local councils have a statutory duty to clear litter and fly-tipping on public land, there are currently no statutory indicators or targets to address waste that is dealt with outside of household waste collection, this includes any measures to measure / increase repair or reuse or to ensure clean(er) public spaces. It is also important to note that, much like litter picking, a lot of the circular economy activity in Wales is being delivered by the voluntary sector. There is a significant risk that if

funding is discontinued, much of the activity will also come to an end and will be a challenge to restart.

Related policies in Wales such as the Single Use Plastic ban (again, the most ambitious in the UK) and pending restrictions on the sale of single use vapes,² will contribute significantly toward prevention and can potentially go further to address many other unnecessary or difficult to recycle items. Our ambition currently matches the very comprehensive Circular Economy roadmap at an EU level but we should be aware of divergence and the risk of falling behind many of our neighbouring countries as they implement the large scale actions from the legislation in the coming years. Unless we fully embrace DRS and other initiatives, we will fall behind in our current world-leading status very quickly.

The recently announced Deposit Return Scheme will have a significant impact on both recycling rates and litter but will also crucially lead to an investment in domestic infrastructure for secondary materials.

In our original consultation response to the Beyond Recycling consultation, we suggested the following additions:

- **Review the prioritisation given to recycling versus the need for overall reduction** as the key driver for the strategy including amendments to (or addition of) Local Council targets.
- Highlighting the significant **cross-sector opportunities** within the proposal and strengthening these through the inclusion of overarching, ambitious cross-sector targets that would, for example, make the ambition of **'Zero Waste Wales' our destination offer** to the world. We suggested a **sector-by-sector** approach across Welsh Government, similar to the Decarbonisation Strategy as a useful way to approach this.
- Consideration of any **unintended consequences** and the impact of 'greenwashing'. In regard to recycling and waste minimisation, we would welcome the inclusion of **an underlying principle of 'creating an enabling environment for people to do the right thing'** which would also extend to minimising any negative economic impacts of participation.

In the original consultation, we also strongly supported a national, consistent approach across waste. **Keep Wales Tidy has done significant research with stakeholders across Wales and have found that the inconsistency in approaches to waste (including litter and enforcement as well as recycling) is so considerably variable that it hinders effective communication and makes regional and national collaboration almost impossible.** Increasing consistency will also help to support businesses operating across local authority borders and would help efforts significantly towards recycling 'on the go' which is currently extremely challenging and prone to much confusion, resulting in high levels of contamination. The 3-year RDP funded programme 'Caru Cymru' (2019/20-2022/23), a partnership between Keep Wales Tidy and all local authorities was arguably the only programme that Wales has seen which has demonstrated the scale of ambition required to deliver this effectively.

Our Fly-tipping research considered for the first time the behavioural drivers around fly-tipping in Wales and found a lack of information by councils in regard to repair, reuse and waste disposal as well as a number of unnecessary restrictions around waste sites which are contributing to public confusion and incorrect waste disposal. The disparity of approaches within councils across all aspects

² In 2023/24 litter surveys Keep Wales Tidy found disposable vapes present on over 10% of streets, this equates to around 6733 disposable vapes present on our streets alone (ie; not including parks and beaches) at any given time.

of the waste system is significant, whether it is the approach to litter, enforcement, recycling or bulky item disposal.

It is essential to recognise that without binding targets for waste reduction, litter prevention and related circular economy measures, all efforts within local councils are going to be affected by budgetary decisions. At a local level currently decisions around infrastructure, litter messaging and even bins are inevitably leading to unintended consequences of increasing these issues whilst trying to make budgets meet. Through our litter surveys, we have already seen a general increase in litter and fly-tipping in previously well-performing areas since the new financial year. We also know that many local authorities are removing bins due to maintenance costs. The recycling rates in Wales have been driven by binding targets and we would suggest that new measures are needed in order to truly move beyond recycling and towards a more circular economy.

EPR and DRS

We are disappointed about the delay to the Deposit Return Scheme after it was first committed to by the UK Government 8 years ago. However, we are very pleased that Welsh Government has remained committed to the inclusion of glass and have been encouraged by their approach which considered the carbon impact and potential consequences of an exemption through a preventative lens.

Table 4: All Wales percentage presence and value of DRS categories for 2023-24. These figures represent streets only at any given time (taken from Keep Wales Tidy’s EPR Report).

| DRS Item | Percentage of streets (%) | Number of items | Extrapolated to 100% of streets | Total value at 10p per item |
|-----------------|----------------------------------|------------------------|--|------------------------------------|
| Plastic Bottles | 13.6 | 591 | 19,700 | £1,970 |
| Cans | 18.1 | 927 | 30,900 | £3,090 |
| Glass Bottles | 5.2 | 216 | 7,200 | £720 |
| Total | 28.2 | 1,734 | 57,800 | £5,780 |

We are also pleased that Wales (and Scotland) remain committed to extending EPR to litter and KWT have been working with the other Tidy Group members in the UK to support this policy and help to develop the thinking as to how the payments can be maximised. It is important to us and the many thousands of volunteers in Wales who work to tackle litter every day that there are no more delays to these proposals and that the cost of dealing with waste is transferred to producers.

The biggest challenge for us in regard to the EPR litter payments is to try to ensure that volunteer efforts are recognised in the scheme for the valuable, if not critical contribution they make to cleansing in Wales and preventing the harm caused by litter and other waste which has been disposed of improperly.

Additionally, if we truly want to see an impact from EPR and subsequent litter payments we are very keen to see that any payments are an addition to local authority budgets, not an ‘instead of’. Noting that many authorities have already moved to reactive cleansing, creating a greater disparity between

affluent areas (which are more likely to complain to their council if standards are not met) and more deprived areas.

Table 3: All Wales percentage presence and value of pEPR categories for 2023-24. These figures represent streets only at any given time (from Keep Wales Tidy's EPR Report).

| EPR Category | Percentage of streets (%) | Number of items | Extrapolated to 100% of streets |
|---------------------|---------------------------|-----------------|---------------------------------|
| Takeaway | 21.6 | 1,131 | 37,700 |
| Sandwich or Wrap | 2.0 | 74 | 2,467 |
| Sweets or Chocolate | 37.9 | 2,818 | 93,933 |
| Single Portion | 5.9 | 222 | 7,400 |
| Crisps | 5.3 | 201 | 6,700 |
| Total | 47.7 | 4,446 | 148,200 |

During the 2023/24 LEAMS surveys in Wales, food pEPR items were found on 47.7% of streets across Wales, and DRS items (cans, plastic bottles and glass bottles) were found on 28.2% of streets. Collectively, they were found on 55.4% of streets which shows that there is often an overlap where this packaging is found.

Many of these items represent a significant amount of 'lost resources' as once they are littered they often become quickly contaminated or degraded which means they can no longer be recycled. The longer the delays to a DRS are, the more resources that could be recovered are being lost or sent to landfill.

UKIMA

The introduction of the UKIMA has had a 'chilling' effect on environmental policy across the UK and many of our environmental ambitions have been delayed or not taken forward as a result. Minimally, it has created confusion and has proved difficult for the sector to engage on some issues due to lack of clarity of relevance and responsibility. Most notably this has applied to the introduction of a Deposit Return Scheme, with Scotland being a key case in point, but we are also aware of a number of policy interventions and / or proposals where the UKIMA still continues to create diversion, delay or confusion. For example, it is our understanding that our ambitions to ban single use plastic items which go further than the rest of the UK and is already set in legislation still requires the granting of exemption through the UKIMA.

Keep Wales Tidy, along with many other eNGO's across the UK have called for a review of the UKIMA to protect and clarify constitutional agreements in devolved areas where the Act applies, allowing for environmental ambition to be achieved in all areas of the UK without the need to seek exemptions. Sector agreements could effectively replace the intention of the IMA but if that were not possible, the IMA needs to minimally, respect current constitutional agreements. It could also be developed to include social and environmental considerations, not just business interests, and to bring all UK nations to the highest ambition and not, as is currently the case, the lowest denominator.

For Keep Wales Tidy specifically, this has had an operational impact on our work as it means that policy development has taken a great deal longer than expected and / or cannot be clarified at all. This is a challenge for communications with our community groups and volunteers due to the added

layers of complexity. It has also meant that we have needed to engage more with DEFRA to try to find answers and this has been a challenge.