

## Annex A - Consultation response form

Your name:

Organisation (if applicable):

E-mail/telephone number:

Your address:

Our Litter & Fly-tipping plan

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

The majority of the Farmers' Union of Wales responses did not support dealing with litter and fly tipping as one plan.

Members explained that littering was inexcusable and a blight on our landscapes, but was not as serious as some fly tipping incidents and should not therefore be dealt with under one plan.

Members were confident that the majority of the general public are aware of littering in streets, rivers, canals and beaches, but they are not aware of the scale of the problem of fly tipping, and probably only came across fly tipping on the occasional news bulletin.

Members pointed out that on occasions, tons of harmful materials were fly tipped and some were toxic chemicals which could pollute surface and groundwater sources. Other materials, such as asbestos, found in fly tipped building waste is a serious threat to human health. Members also commented that toxic substances are expensive to dispose of legally.

Members also noted that failure to prevent fly tipping threatened the existence of legal waste collectors' businesses, which compounded efforts to legally recycle waste materials.

Members also noted that the collection and recycling of conventional household and business waste was funded from tax revenues or rate payers' contributions and that this shared the costs across most of society. In contrast, fly tipped waste deposited on private land became the financial burden of a single landowner and allied to the extra costs associated with the type and quantity of this waste, this could amount to substantial sums of money.

2. Do you agree with themes we have chosen? Do you think they will help us achieve our ambitions? If not, what other themes do you think need to be included? The FUW agree with the themes identified in the consultation but the themes have

not been drawn together to form a plan of action over time to tackle either fly tipping or littering.

Notwithstanding members' majority view that the fly tipping and littering should be managed as separate plans, the FUW do not disagree with the themes of waste reduction, evidence, enforcement, and delivery listed in the consultation.

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

Members agreed with most of the actions listed in the consultation.

They commented that all too often animal feed delivered on pallets to farms was wrapped in vast layers of plastic which was unnecessary.

They commented that although an action to reuse or repair items was laudable, in reality we operate in a global free trade economy and any policies we might introduce in Wales to deliver this action, could be undermined by cheap imported, new products from countries like China.

If the fly tipping data held by local authorities can identify that over 70% of the incidents involve household waste, then there may be an opportunity to label white goods etc. with PAT like testing labels at source, which could be traced back to the purchaser if the product was fly tipped. This would act both as a deterrent and enforcement mechanism.

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.

FUW farmer members welcomed the reintroduction of schemes to recycle farm plastics, both by collecting at the farm and from collection centres. Exporting farm plastics abroad to land fill sites was never a sustainable, responsible option.

Members believed there was scope to extend this scheme to include plastic barrels and jars, feed containers which could be recycled as horticultural containers or reconstructed into other items.

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

Members welcomed the proposals under Theme 2 to record littering and fly-tipping incidents on both public and private land for reasons explained in question 1 above.

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.

No other actions were put forward.

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

Whilst agreeing with the themes identified earlier, some members commented that using education as a means to achieve waste reduction, less plastic usage, deployment of refill stations and food education were all positive themes to assist in the process, but members felt that these themes into practice was going to be particularly difficult to achieve.

Members commented that although they accepted that teaching children from an early age about recycling was beneficial, they felt there was an over reliance on our schools to deliver on too many issues. Parental responsibility and leadership was crucial in developing children's attitude in formative years.

Members suggested the following measures to improve householder awareness:

1. Information leaflets and videos to demonstrate the economic and environmental cost of not acting responsibly.
2. Inform through a variety of social media streams

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

No further actions were suggested.

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

FUW members agreed with the actions of the enforcement scheme but wondered why Local Authorities operated different enforcement approaches when a national approach would communicate unacceptable practices more consistently.

Repeat

offenders would not then be able to cross local authority boundaries to take

advantage of more lenient approaches in neighbouring local authorities.

Members also welcomed the proposals under Theme 4 to enhance fly-tipping enforcement capabilities on both public and private land.

Members thought there was benefit from publicising how many offenders have been caught and punished as a deterrent to others and this also gives an opportunity to monitor trends.

The FUW believes that more can be done to facilitate engagement through helping farmers through the process of disposing of fly-tipped waste and removing the responsibility of private landowners being responsible for the waste fly-tipped on their land if reported within an appropriate time.

Members suggested that a joined up approach to tackle many issues of rural crime, including fly tipping, might benefit from installing infra-red cameras at access points to hot spots for fly tipping (e.g. common access land), livestock rustling and rural theft. Members commented that outdoor cameras can be discreetly attached to posts or gates, are capable of recording vehicle licensing plates under cover of darkness, are relatively cheap to purchase and run. They are also light and portable so that they can be moved to new locations periodically to keep serial offenders guessing.

Much of the litter experienced related to fast foods outlets and it was suggested that these outlets could be charged more rates, employ more people to collect the packaging outside their premises. As a consequence, litter bins in the local vicinity would be emptied regularly and litter being discarded randomly outside the premises would not be being blown into the surrounding areas.

Members also suggested that the printing of number plates on bags given out at drive through restaurants could help to reduce the amount of fast food rubbish being thrown out of vehicles.

Members thought that there was a need for educating the public on the costs and risks to society of passing their wastes to unauthorized persons. This lack of caring comes from ignorance of the consequences and that this should be tackled through early aged education to instil behaviour change in future generations. However when an individual or company unlawfully remove waste on behalf of someone through taking advantage of their lack of knowledge they should be held responsible.

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.

Members were particularly interested in an idea shared at the Private Land Working Group whereby private land managers, normally without the resources to take on fly tippers through the courts, might be assisted to bring about a private prosecution of fly tippers. It was suggested that a group of lawyers interested in delivering this service might build up expertise in this area, and their services contracted to private land managers at a subsidised cost with the aim of facilitating the uptake of prosecutions.

It was suggested that enforcement notices to review practices of fast food outlets could be considered, and the council could monitor, review and ensure that compliance takes place. It was conceded that local authorities should also provide additional disposal bins and greater collection times.

Our Anglesey response highlighted the local authority intended to raise the costs of recycling garden waste to £35 per bin per annum, to a maximum of 3 bins. We understand that this policy is already in situ with many LAs across Wales. Therefore, some believed that some local authorities should be actioned to reduce charges for recycling as there was a fear that increased costs would lead to an increase in fly tipping.

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

There was no disagreement expressed to the actions listed in the operational delivery scheme.

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.

It was recalled by a member, how a local voluntary group had collected a large quantity of rubbish from a small stretch of road around the outskirts of a small village, highlighting the value of collaborative working. However there was a need to ensure that local councils do not abrogate their responsibilities by passing these obligations onto voluntary groups, but rather they should work collaboratively with them. The key to stopping the fly tipping is by all organisations working together to attack the issue.

Fly Tipping is a general issue all over the country and one reason for this is that people aren't hiring skips, and this is also down to hire costs. Members also believed that the re-opening of the recycling centres was essential, especially for dealing with commercial waste, as it is this waste that largely

contributes to toxic chemicals and industrial waste being disposed of, wherever they see fit!

Members also believed that possibly a larger increase of buy back schemes would benefit the waste disposal issue.

The continuing rise of criminal fly tipping on both public and private land is wholly unacceptable. If nothing is done about the situation then more offences are inevitable. It was noted that poor performing waste centres will only exacerbate the fly tipping issue.

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

The FUW believe that a collaborative approach, working with local authorities, land managers including utilities, housing associations, voluntary sector, and town councils, to deliver the actions identified is the best approach.

Clearly, if, as the FUW believe, fly tipping should be managed as a separate plan then the key players are Local Authorities to deliver the actions and the Welsh Government to design a national plan which is sufficiently resourced to meet the objectives.

Welsh language questions

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

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

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.

Encourage Local Authorities to comply with the Welsh Language Act 1993 and produce bilingual signage at recycling centres and encourage staff to converse

through the medium of Welsh when required.

#### Other comments

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

In conclusion, a main concern for members involved the costs and removal of the rubbish dumped. The process of removing these items was costly with many hazardous substances being dangerous to health and the environment, with additional enforcement of offenders being costly.

A uniform approach to the collation and dissemination of information in relation to offenders and methods of enforcement ,would ensure a consistent uniform approach and would draw upon best practices from all councils.

Best practices would be relevant for all the themes identified in the consultation, in particular enforcement. This sharing of information should not be localised to Wales but consideration to best practices within the UK

A former police sergeant, now working at the FUW recalls policing in Milford Haven at a local estate, which had a problem with graffiti and general untidiness. Some research had concluded that making the area look clean and tidy had a positive impact on the residents where they felt more empowered to look after the area. The council then painted the whole area and covered the graffiti. Prior to leaving he can recall this having a positive impact. Drawing on this experience, it is apparent that good practice begets good practice and poor practice begets poor practice and the lessons of this should be used to manage litter and fly tipping incidents across Wales.