

*5 March 2020*

**Ms Anna Bobo-Remijn**

Unit B3 - Waste Management & Secondary Materials  
Directorate-General for Environment

**European Commission**

Avenue de Beaulieu 9 – 5/111  
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**Dear Anna,**

## **Ensuring that resources are dedicated to behaviour change**

Never has the issue of litter been as high on the political agenda as it is today and this is in very large part due to the actions of the European institutions, notably the Commission. We are enormously grateful for that. Yet we are only at the beginning of the journey, not the end, with everything still to gain and potentially much to lose if we do not capitalise on this unprecedented opportunity. We would like to help in this regard.

Thank you for participating in the Clean Europe Network's workshop on implementation of the so-called single use plastics directive<sup>1</sup> that was hosted by Håll Sverige Rent (Keep Sweden Tidy) in Stockholm in January. We were delighted and thankful that you could make the trip.

Your briefing was most informative and your participation in our discussions constructive. We hope that you took something useful away with you. We hope to continue an exchange with you and other colleagues at the Commission as we all strive to tackle and eliminate the scourge of litter from all sources regardless of material (litter is not just a plastics issue) and especially the act of littering.

In that regard, I was delighted to participate in the workshop hosted by DG Environment on 25 February in its Beaulieu offices in Brussels on "Work Package 6" of the Single-Use Plastics Directive implementation programme. Thank you for the opportunity. We were pleased by the attention given to ensuring that awareness-raising campaigns are well-designed and efficient. But it is also important that they are adequately resourced, properly coordinated and, above all, effective. We would like to address this topic further in this letter.

Our interest and concerns as a network relate, in particular, to the provisions on awareness-raising measures as mentioned in Articles 8 and 10 of the directive:

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<sup>1</sup> DIRECTIVE (EU) 2019/904 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 June 2019 on the reduction of the impact of certain plastic products on the environment

## Article 8 - Extended producer responsibility

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...

3. *Member States shall ensure that the producers of the single-use plastic products listed in Sections II and III of Part E of the Annex cover at least the following costs:*

- (a) *the costs of the awareness raising measures referred to in Article 10 regarding those products;*

## Article 10 - Awareness raising measures

*Member States shall take measures to inform consumers and to incentivise responsible consumer behaviour, in order to reduce litter from products covered by this Directive, and shall take measures to inform consumers of the single-use plastic products listed in Part G of the Annex and users of fishing gear containing plastic about the following: .....*

Awareness-raising for the sake of awareness-raising is of no interest unless it is aimed at (and, hopefully, achieves) behaviour change. The goal must be to make littering as socially unacceptable as drink-driving, smoking and dog-fouling have become in many countries (even if there is much work still to be done on all of these).

The awareness-raising provided for in the Single-Use Plastics Directive must not be divorced from the broad obligations set down in the revised Waste Framework Directive. To move forward on the basis that the former takes precedence over the latter in regard to awareness-raising, would be a missed opportunity and perhaps a fatal error. We need to integrate the Single-Use Plastics Directive products into a broad-based approach to behaviour change, not isolate them.

Information, education and awareness-raising alone cannot solve the whole litter problem. An integrated approach is needed so that communication campaigns complement programmes for infrastructure investment, environmental cleansing, product and service design, and deterrents and sanctions. All these elements should be part of well-structured territorial litter strategies included in national waste management plans (WMPs), according to the requirements of the revised Waste Framework Directive.

We urge you to use the impetus behind the implementation of the Single-Use Plastics Directive to ensure that the litter prevention policy enshrined in the revised Waste Framework Directive takes off fully. It is essential, we feel, for policy-makers to take a long term view about changing littering behaviour in the broad sense and to act on it now, even if the main focus at the moment is on getting things done in the short term in the context of the Single-Use Plastics Directive through actions that are above all product-oriented, not consumer oriented.

The product-oriented approach must be balanced/complemented by a consumer-focused and situation-oriented approach to litter-related behaviour change. Great care must be taken to ensure that the measures in the Single-Use Plastics Directive do not result in an incoherent series of

product-specific initiatives (with potentially conflicting messages) that in practice add up to nothing impactful and lasting.

We are aware that there is a small but at times vocal school of thought that says awareness-raising and litter prevention campaigns do not work. Proponents of this view often justify it by taking examples of (the very few) long-term funded programmes in place in the world and asserting that these do not work because litter and littering has not been eliminated in the territories where the programmes have operated. Such assertions do not take account of a number of key factors:

- Lifestyles have changed in recent decades (and continue to change); there is more on-the-go consumption of many things and, as a consequence, the risk of littering has increased significantly over the years.
- If these prevention programmes were not in place, then the volume of litter might well be significantly higher.
- Each new generation needs to be educated to do the right thing in a way that resonates with them – in this sense, the awareness-raising and educational job is never finished.
- Presence of litter can also stem from deficiencies in waste management systems, but this does not mean that awareness-raising for the purpose of behaviour change is ineffective; there is plenty of evidence that demonstrates the contrary.

The vast majority of producers of items that often appear as litter do not and have never contributed in any significant way to litter prevention programmes. Even those who have made an effort tend to do so on an ad hoc basis, sponsoring short term projects or initiatives. So, it is no surprise that – with only a very few notable exceptions – there are no truly adequately-funded litter prevention programmes in Europe, no serious, sustained and coordinated effort at litter behaviour change. It is hard, therefore, to claim that prevention through the awareness-raising approach does not work.

It is very good news that awareness-raising measures are identified in the Single-Use Plastics Directive as one means to decrease the problem of littering. There should be clear objectives connected to this. Raising awareness and changing people's behaviour is a long term job that demands investment at scale. For example, consider the following:

- Every year a new generation is born. Hence, awareness-raising activities should be made on a continuous basis. In a sense, we are saying that the job is “never fully done”. The work should encompass learning activities as well as communication and complementing measures taken to nudge the citizen towards the correct behaviour. There are multiple different audiences that do not all react the same way. If this is done properly, the cost of cleaning should fall as less litter is dropped.
- Awareness-raising campaigns compete for “mindspace” with the huge mass of other communication that is being done today. To get heard and then listened to requires great sustained effort and, inevitably, is costly. This must be recognised. While we would be the first to assert that smart communication does not need to be the most expensive communication, the reality is that in most countries in Europe, there has never been adequate resource dedicated to litter prevention. With the right budget and smart communication a significant difference can be made.

- Because of this competition for “mindspace” from the mass of communication that already exists, we believe there is a need to align the communication on each market in order to create optimum efficiency. It is not helpful for different product groups to be competing with each other on litter prevention messaging (even if there is, of course, a place for some targeted messages to specific groups). Through its members, the Clean Europe Network has great knowledge, expertise and experience in how this should be done. We think it would be wise to use this on a member state level.

The Clean Europe Network wishes to ensure that:

- enough investments are made in order to make a difference → the Commission has a possibility to ensure that producers deliver a substantial and sustained solution;
- there is one communicating entity within each member state/relevant territory in order to ensure that the overall communication is coordinated and creates most impact;
- clear targets are defined in form of campaign awareness among consumers (given the difficulties in the short term in linking campaigns to actual reduction in littering behaviour) and ultimately to the reduced presence of litter (through national monitoring data)
- efficient and cost-effective monitoring of litter is carried out across the EU (data will play a vital role and it is evident that this is currently lacking in most countries and contexts)

The Clean Europe Network is organising a workshop in mid-May focused on EPR and effective litter prevention communication programmes. We aim to bring together our members to identify the key elements of an effective litter prevention communications programme. We would be glad to share with you the outcome of this workshop or, if you are interested, welcome you once again as guest participant.

Given the Clean Europe Network’s small resources, we find it difficult to bring our members together to create this precious common pool of expertise to share with the European institutions and other relevant actors. For this reason, if you were aware of any possibility for the Commission or other bodies to help us finance these efforts, we would be glad to hear your suggestions.

We would be happy to meet with you again soon to further elaborate on this, eventually with your colleagues dealing with the implementation of the revised Waste Framework Directive and the Packaging & Packaging Waste Directive, which have overlapping provisions on this vital topic of awareness raising.

Yours sincerely,



**Lise Keilty Gulbrandsen**  
*President of the Clean Europe Network*  
*CEO Hold Norge Rent*