



PREVENTION IS THE CURE FOR EUROPE'S LITTER CHALLENGE

Expert Opinion

June 2015



The Clean Europe Network is the leading pan-European network fighting every day for a litter-free Europe

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General

The Clean Europe Network welcomes the fact that the EU Commission has recognised the European and international dimensions of the litter challenge. After all, litter crosses borders. The Commission is right to demand that performance is improved and that litter reduction targets are set all across the EU. That said, our experience tells us that solutions must in practice be developed at local level adapted to local situations.

Who we are

An Taisce (IE)

AVPU-Association des Villes pour la Propreté Urbaine (FR)

IGSU-Interessengemeinschaft für eine saubere Umwelt (CH)

Indevuilbak (BE/VL)

Hål Sverige Rent (SE)

Hoia Eesti Merd (EE)

Hold Danmark Rent (DK)

Hold Norge Rent (NO)

Keep Baltic Tidy (EE)

Keep Britain Tidy (UK/ENG)*

Keep Northern Ireland Beautiful (UK/NI)

Keep Scotland Beautiful (UK/SCO)

Keep Wales Tidy (UK/WAL)

Nederland Schoon (NL)

Paisaje Limpio (ES)

Vacances Propres (FR)



Our Key Point

Urban and rural cleansing programmes cost billions across the EU – essentially to collect and handle litter that should not be there in the first place. A significant portion of this cost could be avoided by better litter prevention.

Litter is the result of thoughtless or deliberately anti-social behaviour by citizens and organisations, or may occur as a result of inadequate waste management systems. We can prevent much of this if everyone takes their rightful share of responsibility in changing this behaviour. This is the key to stopping litter on a permanent basis.

While effective and intelligent cleansing programmes are essential, it is our experience that one of the most important ways to reduce and even stop littering is to devote adequate and sustained resources to communication and education aimed at changing people's behaviour. There is much existing experience that bears witness to this.
<http://www.cleaneuropenetwork.eu/en/membership/aug/>

Responsibilities

Citizens should keep public spaces clean by disposing of their rubbish properly; government and law enforcement agencies should apply appropriate remedies against those who offend; those producers whose products or services are a source of litter should share in the responsibility for promoting litter prevention and designing products and systems which reduce the risk of littering; and public authorities should ensure that the cleansing and waste management for which they are responsible is efficient and effective.

In our experience, voluntary approaches to engage the majority of relevant producers in effective, sustained litter prevention efforts have not worked, although there are notable exceptions. Such exceptions only serve to underline the fact that, across the EU, only a minority contributes, albeit in small measure, while so far the majority ignore the issue. Further reflection is required on how to ensure that the responsibility for litter prevention is more evenly shared.

On the other hand, shifting the financial burden of litter collection to producers misses the point entirely. This approach will do nothing to prevent people littering. On the contrary, integrating the cost of litter collection in the product price will send the wrong message to consumers – that they have paid for the "right" to drop their rubbish in the towns and countryside to be collected by someone else.

* Keep Britain Tidy does not support all aspects of this Expert Opinion

The Circular Economy initiative and litter

For too long, litter and littering has been ignored by both the EU and most of the member state authorities as a serious policy issue, yet all the recent research shows what a devastating impact it has on the environment, health and society. Indeed, our organisations, which are at the forefront of promoting litter prevention in our territories, have been saying this for years.

The Barroso II Commission placed the challenge of litter and littering centre-stage in its proposal to amend the EU waste legislation as part of the so-called July 2014 "Circular Economy Package".

Meanwhile, these proposals have been withdrawn and a new "more ambitious" package is awaited. We encourage all the stakeholders at EU and national level to exploit the

ongoing debate and possible proposals regarding a circular economy in Europe to promote better litter prevention.

There is an opportunity to ensure that the valuable resources currently ending life as litter (in practice, the lowest form of waste) are brought back into the productive circle as a valuable resource.

The nature of littering

It is important when talking about the litter challenge to appreciate a crucial fact. **Litter** - and all the nasty impacts that it can have - **is the symptom and not the core problem to address.**

The core problem is twofold – firstly, preventing the act of littering by individuals or groups of people and, secondly, ensuring that our waste management systems are not susceptible to rubbish escaping and becoming litter.

Litter is any item that is discarded outside the confines of a controlled waste management system. It is the result of thoughtless or deliberately anti-social behaviour by citizens and organisations or may occur as a result of inadequate waste management systems.

Littering can leave urban areas untidy and dirty, the countryside unsightly, and the natural environment and wildlife compromised, both on land and in the fresh waterways and seas.

Clean communities, on the other hand, contribute to better quality of life, to safer societies and a better, healthier environment.

Reducing or eliminating the anti-social behaviour of littering enhances the self-esteem of less privileged communities and helps them move forward. Research shows that areas that are clean and free of litter are likely to remain that way.

People are key to achieving a culture of cleanliness in Europe.

A societal problem

Littering is a societal problem that can be best addressed through **shared societal responsibility.**

Above all, it is essential to recognise that individual people must take their own responsibility and behave the right way. EU law can never deliver that but more (and better) education and communication will make the difference, especially when adapted to local or regional situations.

The responsibility extends, among others, to businesses that provide products that end up as litter or services that may contribute to littering; public authorities that are responsible for cleansing (such as

local authorities; roads & highways services; national park or forestry administrations; and educational authorities); and civic society groups that can facilitate education and communication with citizens about litter prevention.

Our member organisations have countless examples of how to promote behavioural change for the better. However, we also know that **efforts to promote sustained behavioural change require sustained resourcing** of the information, communication and education activities that are central to the prevention effort. Almost always, sufficient resources are lacking.

On the other hand, more substantial investment in litter prevention would significantly reduce the cost of cleansing activities needed to address the litter once it is there.

Today, cleansing litter on the land costs around €25 per person per annum—adding up to an EU total in the range of €11 to €13 billion annually. This figure does not take account of marine litter or of the less easily quantifiable societal costs that accompany litter. While there will always be a need for some cleansing, a significant portion of the current cost burden could be avoided and spent on more productive uses in society if we prevented much or all of the littering in the first place.

Litter prevention

By placing products on the market which can be a source of litter there is, in our view, a consequent responsibility for the producer to inform and educate consumers about the appropriate thing to do with that product when it reaches the end of its useful life.

Some companies across Europe – which recognise that their products are part of the litter problem created by people – have contributed to litter prevention efforts in a variety of ways. However, the vast majority that should also contribute do not support litter prevention in any meaningful way.

In practice, this would mean supporting more and better information, consumer education, and communication aimed at changing the behaviour of citizens around the EU to act responsibly and dispose of their rubbish in the right way and not drop litter.

Ideally, producers should participate in developing relevant action plans to tackle the litter prevention challenge. In practice, the criteria for defining what are "relevant" action plans for litter prevention will need to be developed locally using a subsidiarity approach, working with those who are experienced in the field to do so. It will be appropriate

for producers also to define the way they will manage and benchmark such action plans moving forward.

The **Clean Europe Network** is ready to make available its very relevant practical experience in litter prevention to inform the work of producers and other stakeholders in developing such local litter prevention action plans. Our current membership covers about 16 countries/territories in Europe. We are in an ideal position to advise on the essential elements of effective prevention programmes – a sort of litter prevention "tool box" could be developed – that could then be adapted to local situations.

Litter collection

In our opinion, it is not appropriate to require producers or extended producer responsibility schemes to pay on a mandatory basis for collection of litter and its subsequent management.

Transferring financial responsibility for cleansing from local authorities to producers risks suggesting that a solution has been found to the litter challenge when, in fact, nothing could be further from the case.

The act of littering is the unacceptable action of an individual or of groups of individuals, or of a failing in the waste management infrastructure and systems. As a general rule, it is not caused by companies.

Making producers pay for collection of litter would send the wrong message to society. In effect, such action would undermine the litter prevention effort entirely by suggesting that the cost of litter

clean-up is included in the product price, thereby conferring on the consumer a certain "right to litter" because they have "paid for" someone to clean it up.

On the other hand, there should be no obstacle to producers contributing financially to the collection of litter on a voluntary basis, should they so wish.

About our organization

Our Vision **A litter free Europe by 2030**

Our Mission **To work towards a litter-free Europe by:**

- **Changing behaviour and reducing litter at all levels within Europe;**
- **Stimulating greater litter prevention activity - focusing particularly on younger generations; and,**
- **Encouraging the application of greater resources to this end in EU member states and across wider Europe.**

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