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INTRODUCTION

For the past 25 years, NederlandSchoon has been actively involved when it comes to preventing and controlling litter.

In the past five years, NederlandSchoon has been one of the drivers of the Clean Europe Network, a European platform bringing together Europe's litter prevention organisations. One of the purposes is to be able to use sister organisations' knowledge and experience, but also to understand the position of the litter issue in other countries as well.

This report is about the manner in which a select number of countries in Europe are addressing litter, comparing their strategies to the Dutch alternative. It is by no means comprehensive, and yet it is as coherent and complete as possible.

First a brief introduction is given to the Clean Europe Network, stating the most relevant issues per country. Next is to study the European aspects of the file, bearing in mind the advent of the circular mindset. Then, a number of specific themes will be treated including the legal framework and enforcement, monitoring and street cleaning expenses. Individual attention is paid to other Pan-European initiatives regarding litter and litter prevention.

SUMMARY

European countries are addressing litter in many different ways. So far the Clean Europe Network has welcomed 15 countries and it is dedicated to the generation and exchange of knowledge. CEN's joint position is presented in Appendix A. The input of each inhabitant delivered through organisations similar to NederlandSchoon varies from hardly any ($\notin 0.01$) in Spain to $\notin 1,50$. Including payments to the municipalities, Belgium and the Netherlands scores highest at a total of $\notin 1.50$.

In most countries, litter prevention organisations focus not exclusively at litter. Particularly in the United Kingdom, the focus area covers several aspects of cleanliness. And even there where the (local) authorities have a bigger role (e.g. AVPU in France), cleanliness has a broader scope.

The funding methods also vary considerably, however in case of economically viable contribution to litter prevention, in most cases the business community is much (more) involved.

Within Europe, litter is starting to become increasingly relevant politically speaking. The draft directive that the European Commission put out on the 2nd of December 2015 emphasises from the perspective of the Circular Economy, that particularly Marine Litter needs to be addressed. The European Parliament is currently discussing the proposal and stricter requirements are expected to be urged in terms of pushing down the amount of marine litter.

Deposits on cans and bottles is a relevant theme in various European countries. Even though the European Commission adopting a view at the instrument level should not be taken for granted, one cannot but notice that this issue is heavily debated at various European forums.

Environmental legislation regulating litter is primarily taking place at the national level. When it comes to actual enforcement, statutory rules are also laid down at the regional and local level. In practice, effective enforcement in terms of what is causing litter cannot be determined. Penalties vary from € 30 to thousands of euros. In some countries penalty levels are partly determined by the place where pollution is caused.

Monitoring is not always equally structural. The CEN is currently finalising a monitoring system appropriate for Europe. The local authorities' costs of keeping outdoor spaces clean vary from approximately \notin 41 (Wales) to \notin 10 (Flanders) per capita.

In addition to country-related litter prevention organisations, several Pan-European initiatives exist as well dedicated to the litter issue.

THE CLEAN EUROPE NETWORK

In 2011, the then Supervisory Board of NederlandSchoon assumed that the litter problem in many other countries in Europe was similar to that in the Netherlands. Believing that without a single doubt a substantial amount of knowledge and experience could be gained, sister organisations were addressed. Previous attempts had been made to contact sister organisations in other countries, however they were not permanently successful.

After contacting Pack2Go, the European trade organisation of manufacturers of disposable crockery and last-minute packaging, a solid base presented itself quite rapidly welcoming a first group of countries. Also thanks to the support of Pack2Go's secretariat office (Eamonn Bates Enterprise) the Network succeeded in developing a more permanent character.

In the past five years, the European Commission also became quite interested in the litter issue and today the CEN is considered a respectful and knowledge-worthy Pan-European organisation.

So far approximately 15 European countries have joined the Clean Europe Network and new members are welcome. Below is an overview of the existing organisations, the majority of which are members of the Clean Europe Network. It includes other focus areas besides litter.

Country	Organisation	Recycling	Graffiti	Dog ex- crement	Dumping
Belgium (1)	Vlaanderen Mooi - Mooimakers	No	No	No	Yes
Belgium (2)	BeWaPP – Wallonie Plus Propre	No	No	No	Yes
Denmark	Hold Denmark Rent	No	No	No	No
Germany	Duales System Deutschland	Yes	No	No	No
Estonia	Hoia Eesti Merd	No	No	No	No
France (1)	Vacance Propre	Yes	No	No	Yes
France (2)	AVPU	Yes	Yes	Yes	Yes
Ireland	An Taisce	Yes	No	No	Yes
The Netherlands	NederlandSchoon	No	No	No	No
Norway	Hold Norge Rent	Yes	No	No	No
Austria	Reinwerfen statt Wegwerfen*	Yes	No	No	No
Spain	Paisaje Limpio	Yes	No	No	Yes
England	Keep Britain Tidy	Yes	Yes	Yes	Yes
Scotland	Keep Scotland Beautiful	Yes	Yes	Yes	Yes
Wales	Keep Wales Tidy	Yes	Yes	Yes	No
N-Ireland	Keep Northern Ireland Beautiful	Yes	Yes	Yes	Yes
Sweden	Håll Sverige Rent	Yes	No	Yes	No
Switzerland	Interest Group Clean Environment	Yes	No	No	No

The size and position of the organisations vary enormously. As far as budget and organisational shape are known, it turns out that the Dutch situation is a rather exceptional one. By virtue of the Packaging II Framework Agreement, € 1.50 is spent annually per capita, divided over NederlandSchoon and Zwerfafvalvergoeding.

Country	Organisation	Abbreviati on	Year budget	Per capita	# FTE on ZA
The Netherlands	NederlandSchoon	NLS	5,500	€ 0.32	15
	Zwerfafvalvergoeding	ZAV	20,000	€1.18	
Belgium	Mooi Vlaanderen	MV	9,600	€ 1,50	10
Belgium	Be WaPP	BW	5,400	€ 1,50	8
Sweden	Håll Sverige Rent	HSR	3,500	€ 0.35	24
N-Ireland	Keep Northern Ireland Beautiful	KNIB	450	€0.25	4.5
Wales	Keep Wales Tidy	KWT	300	€0.10	8
Estonia	Hoia Eesti Merd	HEM	<100	€ 0.07	
Ireland	An Taisce	AT	250	€ 0.06	
Scotland	Keep Scotland Beautiful	KSB	1.000	€ 0.06	12
Norway	Hold Norge rent	HNR	250	€ 0.05	
France	Vacance Propre	VP	380	€0.01	2.5
England	Keep Britain Tidy	КВТ	2.000	€ 0.04	4
France	Ass. des Villes pour la Proprete Urbaine	AVPU	<100	€ 0.00	1.5
Spain	Paisaje Limpio	PL	<100	€ 0.00	2

The actual size of some of the organisations mentioned above exceeds that presented in the overview. Usually the focus area is beyond litter, in which case litter prevention is combined with more efficient separate collection. Also several organisations are committed to issues such as dog excrement, graffiti, clean air, climate change, sustainable development, environmental education, clean air and so on.

COUNTRY-SPECIFIC INFORMATION

Belgium/Flanders/Wallonie

- Mooimakers and BeWapp/ CEN membership
- Implemented by Fost Plus/OVAM
- Year budget: € 15 million (100% by the packaging business community, directly or indirectly)

Cooperation between the packaging business community and the authorities is ensured in the campaign formerly known as 'Indevuilbak" (In the litterbin), currently as 'Mooimakers' (Making it Beautiful) and BeWapp. Fost Plus (on behalf of the packaging business community), OVAM (on behalf of the authorities) and VVSG (on behalf of the municipalities) jointly carry out this campaign programme. A most extensive program was launched halfway through 2016 which should have serious impact in 2017.

<u>Denmark</u>

- Hold Denmark Rent /CEN membership
- Year budget: € 0.25 million (> 50% of which is through corporate sponsorship)

For quite some time now Denmark has been familiar with deposits on cans and small bottles. This country is struggling particularly with discarded cans and bottles that are not covered by a deposit system (import).

<u>Germany</u>

- Duales System Deutschland e.a. / no CEN membership
- Year budget: not applicable

As many management and maintenance policy aspects of public areas are addressed by states and large cities, insufficient initiatives are visible as far as litter prevention is involved. Also the dispersion of manufacturers' responsibility in terms of collection and recycling of packaging material by nine dual organisations does not help ensure a national structure. A previous attempt towards a comprehensive setup has gained shape on <u>www.littering.de</u>. The introduction of deposits on cans and bottles in 2003 also resulted in the business community putting less emphasis on litter prevention. Although many local initiatives also do exist.

England

- Keep Britain Tidy / CEN membership
- Year budget: approximately € 1.8 million dedicated to litter prevention activity (derived from self-earned income from services, corporate partnerships and grant making foundations)

Keep Britain Tidy has been a frontrunner from the very beginning. Many insights were developed through it and in the UK, an interesting structure was born with KBT advising the municipalities and delivering various services (e.g. monitoring, educational programmes). The central government's contribution dropped significantly since 2010 and the charity is now entirely self-financing. The charity delivers a number of new initiatives, including the Great British Spring Clean and develops new innovation through its Centre for Social Innovation.

<u>Estonia</u>

- Hoia Esti Merd / CEN membership
- Year budget: < € 0.1 million

It is based on a campaign called "Let's do it". In 2008 it suffered heavily particularly from waste disposed of in an unlawful manner, including white goods, end-of-life vehicles and household waste incineration. Ever since more attention has been dedicated to information and education, also by the Ministry of the Environment, as well as intensification of cooperation with the packaging industry, focussing on clean seas.

<u>France</u>

- AVPU and Vacances Propres / both are members of the CEN
- Year budget AVPU < € 0.1 million (through affiliated municipalities)
- Year budget Vacances Propres € 0.3 million (from the business community)

Since year-end 2015, France has positioned itself as a leading country when it comes to climate. First it banned disposable crockery ad cutlery, putting a huge emphasis on Retail's role in preventing food wastage. AVPU is clearly geared towards the local authorities. Vacances Propres focusses on prevention with communication campaigns and a collection disposal for municipalities to facilitate good behaviour of citizens. It's financed by the business community and the EPR company.

<u>Italy</u>

- Legambiente / no CEN membership
- Year budget: unknown

Main focus is now on collecting and recycling household waste. Insufficient clues were found that might indicate a national priority to address litter. In the country's large cities, many awareness campaigns do exist. Enforcement is strengthened since this year, however interestingly enough the main focus is on chewing gum and cigarette butts. CONAI, the primary executor of producer responsibility in Italy, does not currently have an initiating role when it comes to litter. Legambiente is a broadly based environmental movement with still limited activities in terms of litter.

Northern Ireland

- Keep Northern Ireland Beautiful / CEN membership
- Year budget € 0.45 million (25% authorities, 50% municipalities, 25% business community project)

KNIB focuses on litter as well as waste dumping, dog excrement, graffiti etc. problems in public areas. However, the main focus is on litter (total budget = € 0.75 million).

<u>Austria</u>

- Reinwerfen statt Wegwerfen / no CEN membership
- Budget unknown (100% funded by the business community)

A few years ago, Austria launched an initiative called "Reinwerfen statt Wegwerfen". It was set up by a number of supermarket chains, the Chamber of Commerce and various materials

organisations. Focus is on information, clean-up initiatives and support of events. Also a subsidy is available for addressing litter specifically.

Scotland

- Keep Scotland Beautiful / CEN membership
- Budget € 1.0 million (30% donations, 10% municipalities, 10% business community, 50% otherwise)

Within the United Kingdom, KSB is the organisation focussing specifically on Scottish issues. KSB is a "broad" environmental organisation with a total budget of \in 14 million. Litter prevention work is contained within its Local Environmental Quality Programme where KSB works extensively with communities and municipalities. This programme addresses the behaviours associated with all environmental incivilities as well as empowering people into positive environmental action. Its campaigns mobilise people in their thousands to do clean ups and KSB engages all of Scotland's schools on litter prevention education.

<u>Spain</u>

- Paisaje Limpio / CEN membership
- Budget < € 0.1 million

Paisaje Limpio is an environmental organisations with a national coverage, in which also litter prevention is part of the scope. On its website, the Spanish implementing organisation is focussing primarily on Marine Litter, along the line of 5 goals: 1) more (efficient) recycling, 2) intensified plastic circularity, 3) eco-design, 4) education and clean-up initiatives 5) packaging innovation. It cooperated with the Ministry of the Environment during a marine litter exhibition recently held in Madrid.

<u>Wales</u>

- Keep Wales Tidy / CEN membership
- Budget € 0.3 million (funded primarily by the national authorities)

KWT is more than 40 years and generally it is dedicated to clean outdoor areas. The majority of total budget (approx. € 3 million) is spent on local projects and educational programmes.

<u>Sweden</u>

- Håll Sverige Rent / CEN membership
- Budget € 3.5 million (45% business community, 20% postcode lottery, 25% project-based government and EU funding).

The least densely populated country measured in the number of people per square kilometre (22 versus 409 in the Netherlands). Relatively strong focus on litter through Håll Sverige Rent, which also manages sustainable teaching programs with approximately 2.700 attending schools.

Switzerland

- Interest Group Clean Environment (IGSU) / CEN membership
- Budget € 1 million (100% business community funding)

Image of being the cleanest country in Europe. Important role for major retailers (Migros, Coop, McDonalds Switzerland and Recycle Companies) in recycling and addressing litter (through IGSU). Switzerland already has extensive experience with collecting PET with no deposits. IGSU organises educational programmes dedicated to litter and recycling. It campaigns and provides promotional material.

LITTER AND CIRCULARITY

So far the European Commission or European Parliament dedicating specific attention could not be taken for granted. Although for quite some time now, serious thoughts have been given to packaging material and waste. In the past 18 months, the litter issue has been discussed more specifically.

Directives

In recent years, the European Commission issued a number of "directives", emphasising more effective packaging recycling:

- > 1994: Packaging Directive
- > 2004: Packaging and Packaging Waste Directive
- > 2008: Waste Framework Directive
- > 2015: Circular Economy Proposal (CEP)

In the latter document, the litter problem was discussed for the first time, mainly from the "Marine Litter/Plastic Soup" perspective.

In the first – *already withdrawn* – draft version of the CEP, manufacturers' responsibility in terms of litter was seriously intensified, passing on litter removal costs (30% as an indication) to manufacturers within a so-called EPR structure. The updated draft (from which these previous expansions have been removed)¹ is now being discussed at various platforms.

Marine Litter

It appears that EP will urge firmer commitments to litter prevention measures, particularly from the perspective of reduced "Marine Litter". Concrete targets to push down the amount of Marine Litter are the topic of discussion. In practice, realising well-defined objectives, to the extent that they can be formulated in the first place, is not an easy thing to do because one does not have a specific understanding of the nature and scope of the problem in Europe. Nevertheless, one needs to bear in mind more pressure on the litter file, especially given the large impact plastic packaging and product residuals seem to have on the marine environment².

¹ Upon the release of the first draft proposal, CEN members jointly prepared a "*position paper*" (appendix A), stressing that to simply pass on costs to the manufacturing industry will not offer a solution to the litter problem and might even have a counterproductive impact. Instead, CEN members suggested dedicating attention to prevention, stating that the business community should definitely be involved in a financial as well as material sense. Back then, this vision was presented to the staff of EU Commissioner Vella.

² Appendix B provides an overview of various views adopted by organisations with regard to Marine Litter.

The Clean Europe Network is currently investigating how litter in Europe is entering the seas. It is generally assumed that 80% comes from land. This mainly involves waste flowing from landfills into countries that have a poor waste management infrastructure.

Deposits on cans and bottles

The European Parliament does not express its views on the manner in which member states should realise objectives in order to ensure the recycling percentages envisaged. Hence the European Parliament is not expected to make a direct plea for deposits on cans and bottles, for this would suggest a focus on instruments.

Latest developments in various countries:

- Belgium: in 2015 discussions were triggered by the ministers of the Flemish and Walloon region. Fost Plus is currently working on a litter programme. It will be evaluated at yearend 2017.
- Denmark: under EU pressure, in 2002 a previous ban on cans was converted into a deposit system (now it also applies to small PET bottles).
- *Germany:* in 2003 a deposit system for small bottles and cans was launched.
- Estonia: collection of PET and cans, under the guidance of the "Estonian Deposit System" with the aid of Reverse Vending Machines (RVMs), inside and outside supermarkets through so-called "external operators."
- Sweden: collection of drinks packaging (PET and aluminium) by Returpack Sweden since 1983.
- Switzerland: no deposits on cans and PET bottles. in March 2015 a motion to collect PET bottles using a deposit system was rejected, referring to the successful collection results of the 25-year old corporate initiative PET-Recycling Schweiz (82% collection versus a target of 75%).
- > France: no deposits on cans and PET bottles.
- Italy: no deposits on cans and PET bottles.
- Spain: no deposits on cans and PET bottles.
- Scotland: no deposits on cans and PET bottles.
- > England: no deposits on cans and PET bottles.
- Wales: no deposits on cans and PET bottles.
- > Northern Ireland: no deposits on cans and PET bottle

Plastic bags

An estimated 8 billion single use carrier bags are distributed/sold in Europe every single year. Some of them end up as litter, others end up in the sea. Free bags are no more available in the Netherlands (since January 2016), meeting the European directive to use fewer plastic carrier bags. This directive came into force on 26 May 2015. EU member states must push down the number of bags used to 90 per resident in 2019 (by introducing a mandatory price as from 2018 or any other measures) and 40 in the year 2025 (currently each resident is using 200 bags annually).

Banning plastic plates, cutlery etc. in France

Despite the lack of European policy, recently France decided to ban plastic disposable crockery and cutlery. As from 2020, all disposable plates and cups in France must consist of at least 50% biodegradable home compostable material. By the year 2025, plates and cups should be at least 60% degradable.

The French measure is covered by a more extensive French environmental plan set up after the climate conference in Paris towards the end of 2015, which was supposed to make France the "world's leading country" in mitigating climate change. Quite a number of legal questions exist when it comes to the "feasibility" of this measure.

Circular Economy

The draft Directive that the European Commission presented on 2 December 2015 is called "Circular Economy Package". Unseparated waste and litter are both considered raw material components that are not available for reuse. This leak should be stopped. This approach helped lay a solid link between litter and recycling.

LITTER-RELATED THEMES

Studying the setup of litter reduction programmes, there are a number of permanent themes that are worth discussing separately. The first one is the *legal framework* used to proceed and which also presents the base for *use of the enforcement strategy*. The manner in which litter is being *monitored* is another important subject. Street-cleaning *costs* are often discussed as well as the position of *non-packaging related litter*. Finally, attention is dedicated to *Marine Litter*", also addressed as "Plastic Soup" in the Netherlands.

Legal framework

Attention is paid to the legal framework on the basis of which various European countries proceed, in the light of the European Commission's proposal dated 2 December 2015. This proposal, which is mainly about reusing scarce raw materials with a circular mindset, also pleads for a more structured approach to litter at the national level. Member states are addressed to include litter in their mandatory waste management plans. Manufacturers are invited to adopt a (more) active role when it comes to using preventive measures and even residents are involved by emphasising their individual responsibility.

As a result of this setup, wherever this is not yet the case, countries will obviously add a litter prevention plan to their national frameworks and/or programs and adopt it in deliberation with relevant stakeholders (companies and municipalities). Recently CEN's team extensively studied the existing legal structure of each country.

- Each country in Europe has its own litter (prevention) legislation, at the national and/or regional-local level. Although this theme is defined in many different ways.
- In most countries the responsibility to keep outdoor areas clean lies with the local authorities.
- 23 countries (21 EU members + Norway and Switzerland) maintain a legislative form at the national level.
- In most cases, national legislation is the base for local legislation (16 out of 23 cases).
- Seven countries do not apply any national regulations, although litter is addressed at the regional/local level.
- In most cases, litter in Europe is discussed bearing in mind the environment, waste management, clean and liveable outdoor spaces and those causing litter. Quite often, different perspectives are involved.

- All member states have access to the Waste Management Plans (pursuant to Article 28 of the European Waste Framework Directive) at the national as well as the regional/local level. Within the EU member states, 49 plans were found discussing litter 21 times³.
- Referring to enforcement as a priority instrument in any country does not mean intensive enforcement is a fact in daily practice. Countries/regions mentioning enforcement quite explicitly in their Waste Management Plan are: Austria, Czech Republic, Flanders, France, North Rhine-Westphalia, Saxony and Thuringia.

Due to major diversity, a sound comparison across Europe is very complicated. The main conclusions are the following:

- A uniform definition of litter across Europe does not exist.
- National/regional litter-specific prevention plans hardly exist.
- The statutory Waste Management Plans hardly cover any measures geared towards active litter prevention.

Enforcement

In order to understand how various European countries enforce legislation, the most objective detail would be "the number of fines imposed". Unfortunately little information is available when it comes to that (not easy to obtain). Information is only provided on UK organisations' websites. It is still unclear whether this information involves litter specifically. In England the Government reports on fly-tipping fines, not on litter.

Often a general law article exists at the national level, by virtue of which causing litter can be sanctioned. But there are also many other legal elements, usually targeting specific fields/circumstances in which imposing litter fines is also perfectly possible. For instance, Belgium has the national option to fine a person who disposes of waste in the water, river, canal etc. This is laid down in Article 539 of its national law, with risk of 8-day to 3-month imprisonment and/or a fine of \pounds 156 up to \pounds 1,800. In practice this will mainly involve unlawful discharges etc., although a theoretical possibility exists to address those causing litter as well. In addition, each Belgian region has its own articles of law.

Within the scope of this analysis, an impression is provided below of the fines that exist at the national level. A more specific search for numbers would probably help understand things much better.

³ The countries involved are Austria, Croatia, Czech Republic, Finland, France, Luxemburg, Malta, the Netherlands, Norway, Poland, Slovenia, Sweden, Belgium, Germany, United Kingdom. The three latter countries also have plans at the regional level.

Country	Authority	Fine
Belgium (Flanders)	Police	Max € 350
Belgium (Wallonia)	Authorised inspectors appointed by the municipality	€ 100 / € 150
Belgium (Brussels)	Police	€ 250
Denmark	Police (highest fines in the forest)	€ 36/ € 1,040
Germany (Berlin region)	Litter inspectors	€ 30 / € 180
Estonia	Police (fine based on location and polluted surface area)	€ 36/€9,600
France	Municipal police	€ 68 / € 450
Ireland	National police	€ 150
Italy	Police (and foresters)	€ 30 / € 450
The Netherlands	Police and Special Investigating Officers	€ 140
Norway	Municipal enforcers	€ 55
Austria	Municipal Inspectors of public areas	€ 36 - € 1,00 + 4-day imprisonment
Spain	Municipal enforcers	€ 300 / € 6,000
United Kingdom (4)	Municipal litter enforcers	Around € 80
Sweden	Municipal police	€ 80
Switzerland	Municipal police	€ 40 -100

Monitoring

The Clean Europe Network is currently finalising a European widely applicable monitoring system. This is a condition in order to have a European benchmark dedicated to litter prevention. First, existing methods have been compared, searching for similarities as well as differences. Some of the countries still do not have a regular method to determine the "cleanliness level". And only a limited number is using a national monitoring programme.

In most cases, the municipalities will find a monitoring method for steering clean-up services. Often they will use image examples on the basis of which the actual situation is scored. The Netherlands is using a method developed by NederlandSchoon and CROW; it distinguishes coarse and fine litter, to then determine the score on a 5-point scale.

Scores correspond with the amount of litter found on a specified measurement area of $100m^2$ ($1m^2$ in case of fine litter):

A+	>	0 pieces
Α	>	1-3 pieces
В	>	4 - 10 pieces
С	>	11-25 pieces
D	>	more than 25 pieces

Country	Organization	Objective monitoring (grade or counting)	Data collection	Information	Subjective monitoring (perception of public by street surveys or panels)	Data collection	Information
The Netherlands	NederlandSchoon	Grading and counting of ±1000 locations around the country 3 times a year	Private firm, commissioned by Rijkswaterstaat	http://www.rwsl eefomgeving.nl/o nderwerpen/afva l/afvalcijfers/	Two separate panel studies: One by NederlandSchoon with a total of 3400 respondents yearly. One by Rijkswaterstaat with a total of 2000 respondents yearly.	Private firms, commissioned by NederlandScho on and Rijkswaterstaat	http://www.kenn iswijzerzwerfafva l.nl/document/m onitoringsboekje- zwerfafval- 201320142015- samen-voor-een- schone-omgeving
Belgium / Vlaanderen	Mooimakers	Counting of litter in different habitat types. Last large scale counting was in 2006, new counting study planned for 2018	Subcontracter, commissioned by Mooimakers		No		
France	AVPU	No			No		
Britain	Keep Britain Tidy	No. The last national survey in 2014/15 but funding was then withdrawn. For the 2014/15 survey, 7.200 sites across England were surveyed and it was nationally representative.	Keep Britain Tidy on behalf of central government (Defra)	A copy of the 2014/15 survey report can be found here: http://www.keep britaintidy.org/D ocuments/Files/L EQSE%202015/K BT%20LEQSE%2 OReport%202015 %20web.pdf	KBT run a nationally representative public perception survey approximately every 2 years, but this is a Keep Britain Tidy survey and is not commissioned by government. No central government survey of this nature.	Survey is designed by Keep Britain Tidy but is run by a private third party organisation to ensure that it is nationally representative and unbiased.	2012: http://www.keep britaintidy.org/th e-view-from-the- street/173/20/1 /1550/43/0/3fa3 6755-1564-4606- ae8c- 5b232c66c394
Scotland	Keep Scotland Beautiful	Grading of around 12.000 transects across Scotland	2/3 of data collected by local authorities, 1/3 validation audit by KSB (paid for by the local authorities)	http://www.keep scotlandbeautiful. org/local- environmental- quality/local- environmental- quality- network/leams/	Questions about local environmental quality are asked as part of the Scottish Household Survey (31.000 households) every two years	The Scottish Government	http://www.gov.s cot/Topics/Statis tics/16002/Surve yDetails
Wales	Keep Wales Tidy	Every local authority in Wales. Survey 6% of streets in 22 local authority regions each year. Currently Funded by the	Keep Wales Tidy	https://www.kee pwalestidy.cymru /policy- research/environ mental-quality- surveys/leams	Not as part of the surveys but as part of research projects where applicable	Keep Wales Tidy	Research links at: https://www.kee pwalestidy.cymru Ĺ

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		Welsh Government.					
Sweden	Hall Sverige Rent	Grading & counting in 20 municipalities in Sweden. Mostly urban areas.	The municipalities	http://www.hsr.s e/kommun/mat- nedskrapning- och-attityder	No		
Denmark	Hold Danmark Rent	Grading and counting of 368 locations across Denmark (monitoring is done as a service for our member municipalities)	Hold Danmark Rent	National report publicized by Hold Danmark Rent.	The monitoring methodology includes public street interviews. Approx. 2500 interviews a year (monitoring is done as a service for our member municipalities)	Hold Danmark Rent	http://www.hold danmarkrent.dk/ Page/2233-HDR- Analyse/
Spain	Paisaje Limpio	Grading and counting of around 100 locations this year.	Paisaje Limpio Association and Vertidos Cero Association.		No		

In Belgium, the United Kingdom, Denmark and Sweden monitoring activities are performed annually by local litter-prevention organisations under the supervision of the central government. Especially in the UK, cleanliness scores are perfectly visible.

In Ireland a while ago the IBAL (Irish Business Against Litter) proceeded to "competitively compare" the cleanliness levels between Irish cities. Below are some of the rankings published in 2015:

25	momonagate/ ourryowen	clean to European Norms		
30	Cork city	Clean to European Norms		
31	Tallaght	Moderately Littered		
32	Midleton	Moderately Littered		
33	Galway city	Moderately Littered		
34	Monaghan	Moderately Littered		
35	Dublin Airport Environs	Moderately Littered		
36	Portlaoise	Littered		
37	Dublin North Inner City	Littered		
38	Athlone	Littered		
39	Dublin City	Littered		
40	Farranree (Cork city)	Littered		

In Germany, insofar traceable, an objective monitoring programme is not carried out at the national level. Also no examples were found at state level. Nevertheless, various municipalities are rating the cleanliness levels based on questionnaires for residents among other things.

AVPU in France is encouraging French municipalities to test their policy using the OIC-grid (Objective Indicators of Cleanliness).

In 2003, Switzerland and Austria invited the Universities of Basel/Vienna to study at length the existence of litter in public areas. For the period after that, national information was not available. As far as Italy and Spain are involved, no information was found that allowed a national insight into the cleanliness level of outdoor areas. However cities like Rome and Barcelona are performing their own cleanliness surveys on the basis of which the cleaning policy in particular is put to the test.

Cleaning costs

In the Netherlands, in 2010 an extensive study was performed to find out how much municipalities were actually spending to clean up outdoor areas and remove litter. Interestingly, expenses turned out to be quite different, anywhere from several euros to more than \notin 30 per capita.

To the extent any information is available, below is an overview of costs per country/municipality:

Country	Source	Amount per resident
Spain	Paisaje Limpia	€ 54
Wales	Bridgend (city with 40,000 residents)	€ 41
Denmark	Estimate based on Sweden	€ 40
Sweden	Keep Sweden Tidy 2005	€ 40
France	According to AVPU	€ 40
Germany	Berliner Morgenpost	€ 33
N-Ireland	KNIB	€ 29
Scotland	8 largest cities	€ 23
Switzerland	OFEV – 2011	€ 22
England	Keep Britain Tidy	€14
The Netherlands	Deloitte 2010	€ 14.70
Belgium	K+V: regards Flanders	€ 9.60

According to the Clean Europe Network, European countries are spending an average of € 25 per resident per year to keep pubic areas clean. In the Netherlands, the amount involved back then amounted to approximately € 14.70.

PAN-EUROPEAN INITIATIVES

In addition to all national litter prevention programmes, initiatives also exist at the European level. Some of them are specifically geared towards litter, sometimes as a follow-up to a European structure within which litter is included in the package. Some of these initiatives are touched upon below.

<u>ACR+ - Association of Cities and Regions for Recycling and sustainable Resource Management:</u> An international network mainly of municipalities and regional structures sharing the joint goal to promote smart resource use and waste management based on the 3Rs (Reduce, Reuse, Recycle). One of the organisers of the European Week for Waste Reduction.

Clean up the World

This initiative came into being in Australia back in 1993 and is associated with the United Nations Environmental Programme (UNEP). It is now active in 130 countries. In 2016 the global "Clean up the World" environmental campaign was held on 18 and 19 September.

Environmentalists for Europe

An action group based in England, championing European legislation to ensure a deposit system for plastic drinking bottles across Europe.

Europa Week for Waste Reduction

An initiative under the financial flag of the Life+ programme. Coordinated for the Netherlands by NVRD (national waste management association). In November for a whole week, attention is paid to waste reduction, scrutinising litter prevention initiatives.

Every Can Counts

This is an initiative of the aluminium industry to promote collection and recycling of aluminium. *"Every Can Counts is a non-commercial brand, which allows all sectors of our industry to work in partnership to promote and encourage recycling without a direct link to a commercial plan, backed by major players in the drinks packaging industry".*

Fishing for Litter

Bottom fishermen's nets pick up litter others have dumped into the sea or which have entered the sea through rivers and land. In the "Fishing for Litter project", these fishermen voluntarily carry litter ashore, making sure it is collected, carried away, monitored and processed. To be able to store waste on board the ship, they use big-bags. Back at the harbour, these big-bags are placed at the quay for waste collectors to remove and process them. This way the fishermen avoid picking up the same litter time and again, sparing the beaches at the same time.

Let's clean up Europe

Europe's clean-up week in May, under the same parties who are responsible for organising the European Week for Waste Reduction.

<u>Let's do it</u>

This initiative came about in Estonia in 2008. It was about removing dumping and litter across the country in a single day. Today it is organising actions in about 150 countries. The very next action day will be on 8 September 2018.

Surf Riders Foundation

Launched in Malibu (California) in 1984 and today it is a global organisation, with offices in the Netherlands, France, Spain and Ireland. It is dedicated to keeping the beach clean and accessible, preventing water pollution, protecting the oceans, making sure beaches do not wash away and preventing plastic pollution.

Waste Free Oceans

WFO is an industry-led initiative seeking to push down the amount of floating debris on the beaches. It invites fishermen to clean up the waters, allowing debris to be sorted and recycled after they have delivered it onshore. Parties supporting WFO include Plastics Recyclers Europe, Tomra, European Plastics Converters, the University of Vienna, etc.

Zero Waste Europe

A Network of European cities supporting Zero Waste's objectives, exchanging knowledge and views on how these targets could be reached. Focus on a cultural turnaround among the general public and the manufacturing industry, involving the community in reducing litter and adapting infrastructure (especially active in countries with poor waste separation results).

Prevention is the Cure for Europe's Litter Challenge

Expert Opinion

June 2015

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 <u>better litter prevention</u>.

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 <u>sustained</u> 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

2. PREVENTION IS THE CURE FOR EUROPE'S LITTER CHALLENGE

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 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.

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 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.

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.

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

Reducing or eliminating the antisocial 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.

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.

3. PREVENTION IS THE CURE FOR EUROPE'S LITTER CHALLENGE

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.

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. 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

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 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.

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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Appendix B: Marine Litter

We have known for many years that huge amounts of waste have entered the seawaters. This was already confirmed in the first reports presented in late 1980. After we found out that plastic waste has entered incredibly large areas of our oceans, discussions really took off. In the Netherlands they are supervised by the Plastic Soup Foundation (chaired by former minister Cramer) and the European Parliament further to the draft directive "Circular Economy Package". In the European political arena, litter is hardly addressed based on the impact on public areas, but mainly given the negative consequences of plastic ending up in the marine environment.

Some of the views:

Packagers: EUROPEN

"Marine litter is essentially a waste management infrastructure and societal behavioural problem and needs to be addressed at the appropriate high and multi-stakeholder level"

Producer responsibility organisations: EXPRA

"Focusing on lightweight plastic bags is a very limited way to approach plastic litter, because they only constitute a tiny part of overall waste and littering in Europe"..... Efforts to achieve environmental improvements should include voluntary agreements between government and industry".

Bioplastics manufacturers: European Bioplastics

"Bioplastics should not be considered as a solution to the problem of marine litter. Littering should never be promoted or accepted for any kind of waste, neither on land or at sea, including all varieties of plastic.

Nature movements: European Environmental Bureau

"The EEB demands a binding 50% reduction target ... and to consider waste prevention measures targeting the specific materials that predominate in marine litter ... preventing single-use plastics and packaging."

Shipping industry: European Community Shipowners' Associations

"ECSA welcomes all the European Union (EU) and Member States (MS) actions towards the reduction of marine litter, however, supports that no other initiative should target maritime transport".

European municipalities concerning recycling: ACR+

"ACR+ believes a 50% reduction target is feasible if coupled with adequate policy measures. With weak targets, weak measures are likely; with ambitious targets, ambitious measures become more likely".