

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Cadwch Gymru'n Daclus	Response from Keep Wales Tidy
EB 04	EB 04





Keep Wales Tidy's submission of evidence to the Environment & Sustainability Committee on the Proposals for the Environment (Wales) Bill

Keep Wales Tidy (KWT) is an independent National Voluntary Organisation with Charitable Status. We are one of Wales' largest and most effective environmental charities, covering the whole country and influencing a wide range of organisations and communities. **Our approach leads to sustainable change:** influencing behaviour and enabling individuals, groups and schools to take their own actions. **Our focus is on people** and their connections with the environment. **We deal with far more than litter:** our work encompasses biodiversity, access and recreation, health improvement, food growing, beach awards, Eco Schools, and so forth. **Our work is underpinned by research and policy work** including; Local Environmental Quality Surveys and developing advice for Government and other stakeholders.

Keep Wales Tidy welcomes the opportunity to submit evidence to the committee. Our response to these proposals remains largely the same as to the previous White Paper as our initial thoughts were not included in the amendments.

We have contributed to Wales Environment Link's (WEL) response, but have set out below more detailed response to **Parts 3 & 4** of the Bill which we feel is one of our priority issues and most appropriate to our organisation's specific area of work and expertise.

Part 3: Charges for carrier bags

The Single Use carrier Bag Charge was introduced in Wales in October 2011 in order to reduce the number of plastic bags and their associated impacts on the Wales environment such as:

- The blight on our landscape and contamination caused by non-biodegradable materials
- The significant resource used in their manufacture and distribution
- The negative impact on our countryside, wildlife, biodiversity and marine life

KWT strongly supports the levy and its introduction as outlined in previous proposals as a temporary charge with the **ultimate aim of long-term behaviour change.**

KWT recognises the positive reduction in SUCB use since the levy introduction and the indicative studies which indicate a 'strong and positive' effect on behaviour change.

In relation to extending the Welsh Ministers powers to enable them to set a charge on other types of carrier bags:

1. A WRAP Study on the subject of bag use since the SUCB charge was introduced identified that whilst the number of thin-gauge carrier bags (in the grocery sector) fell by 81% between 2010-2012, the number of 'bags for life' increased by 120-130% (WRAP, 2013) and is continuing to rise.

2. Both SUCB's and Bags for Life have a detrimental impact on the environment and are resistant to biodegradation. Therefore, KWT supports the extension of the levy to other types of carrier bags for the reasons set out in the explanatory memorandum.

In relation to the duty on retailers to donate the proceeds from the sale of carrier bags to good causes:

KWT supports the SUCB levy going to environmental causes as a temporary measure with the key aim of affecting long term behaviour change in order to reduce waste, litter and the negative impact on the environment as per the existing guidelines. However, we do not agree with the proposal to widen the criteria to other good causes for the following reasons:

3. The driving force of the SUCB was to reduce the negative impact of the product on the environment. The current donations to environmental causes serves to maximise the effectiveness of the levy and ultimately goes toward addressing the impacts of plastics on the environment whilst additionally supporting those organisations who are working to affect behaviour change in that area.
 - i. By broadening out the cause criteria, the *raison d'être* of the levy will be diluted in public perception and will make the ultimate aim (of behaviour change) that much harder to achieve.
 - ii. According to Dr Carl Hughes of the Wales Centre for Behaviour Change, Bangor University, "*the change pushes reuse and environmental impact to front of mind, raises awareness and reminds at every checkout. This wider impact and the creation of a new social norm have yet to be quantified but achievable change in incremental steps is crucial*".
 - iii. There is increasing evidence that 'nudging' default or habitual behaviour can lead to long term behaviour change, this has been recognised by the UK government and policy makers in the creation of the *Behavioural Insights Unit*.
 - iv. A study on the SUCB in Wales found changes in self-reported environmental identity that could produce positive behavioural 'spill-over' effects in the longer term (*Poortinga, Whitmarsh 2013*).
 - v. A study by Spence et al (*2014*) indicates that broader environmental goals may guide other behaviours in the environmental domain.
 - vi. 'Environmental identities' are often associated with pro-environmentally conscious behaviour, although any spill-over effects may be inhibited by a 'lack of perceived environmental relatedness' (*Whitmarsh, 2010; Thøgersen 2004*).
 - vii. **This relatedness is currently reinforced by the SUCB charge going to environmental causes.**
4. KWT recognise that the SUCB is ideally a temporary levy with the ultimate aim of long term behaviour change and a significant decrease in the supply, demand and production of plastic bags in Wales. The possible adverse effect of the inclusion of social criteria would be to create a new social norm that would associate buying plastic bags with 'doing good'.
 - i. Various studies have shown that the most effective behaviour change interventions are values-based and the creation of social norms are one of the most powerful tools that can be used to affect sustained behavioural change. This change can be positive or negative.
 - ii. For example, Huber & Mills (*2005*) warn that energy efficiency measures cannot save energy if they encourage people to use more energy that they would not have used otherwise. Likewise, the SUCB charge cannot claim to reduce harm if it encourages people to contribute to their production and demand by associating their purchase with social good.

5. Whilst social issues may be more emotive and attractive in the public eye for charity giving, environmental charities have a much greater wider social and economic reach that is often gone unrecognised. Environmental Charities have a direct (and indirect) social and economic impact, as well as contributing to the natural environment. Projects (often based in some of the most deprived areas of Wales) have delivered much wider benefits including:

- Projects that contribute to the local and national economies as well as enhancing the natural environment such as local business support, tourism initiatives and destination management
- Delivery of education programmes such as Eco-Schools which contribute to the wider behaviour change agenda
- Projects in communities which contribute to improved physical and mental wellbeing
- Development of inter-generational activities
- Skills and training within communities
- Behaviour Change projects
- Research work and policy information relating to the natural and built environment and communities of Wales

Despite this, environmental causes receive just 3% of public charity donations compared to Medical research (20%) and Children (15%). (CAF/NCVO 2009). We believe that there is a strong chance that the wider criteria would ultimately lead to the SUCB charge going to non-environmental causes. Whilst this may have an impact on some families in Wales, it would not have the reach or the impact that many environmental charities can prove.

6. KWT and many other environmental charities, have experience and expertise in delivering small grants and funding, as well as working with community groups on an all-Wales basis. The Third Sector can therefore make direct links between the levy and the environmental benefit, as well as providing education and changing behaviour.

- i. Through this direct link with communities and the environment, environmental charities are also in the best place to provide 'on the ground' evidence of the success of the levy on the environment.
- ii. KWT already provide evidence to this end through regular LEQ monitoring and community-based development projects in 'problem' areas.
- iii. A 'single-cause' criteria also has the additional benefit of being easier to monitor overall.

9. Many supermarkets opt to give donations to UK based charities as they are not bound by geographical remit. KWT are concerned that relaxing the guidelines will also lead to the SUCB charge being spread further afield outside Wales as many of the affiliated charities will not be bound to Wales.

- i. Whilst KWT does not have access to evidence on how the SUCB charge have been spent by other organisations, **KWT can confirm that 100% of our total received funds has remained in Wales.**

10. The rationale in the explanatory memorandum to broaden the cause criteria due to existing relationships that supermarkets may have with charities does not address the above concerns and ultimately, the overall aim of the levy.

Behavioural Insights Unit (Ltd): (UK Cabinet Office / NESTA)
<http://www.behaviouralinsights.co.uk/>

CAF / NCVO. (2010). *The impact of the recession on charitable giving in the UK*. <https://www.cafonline.org/PDF/UKGivingReport2009.pdf>

Huber & Mills (2005). *The Bottomless Well*. USA: Basic Books

Poortinga, W; Whitmarsh, L. (2015). The introduction of a single-use carrier bag charge in Wales: Attitude change and behavioural spillover effects. *Journal of Environmental Psychology*. 36, 240-247.

Spence et al. (2013). Engaging with energy reduction: Does a climate change frame have the potential for achieving broader sustainable behaviour? *Journal of Environmental Psychology*. 38 (1), 17-28

Thøgersen, J. (2004). A cognitive dissonance interpretation of consistencies and inconsistencies in environmentally responsible behavior. *A cognitive dissonance interpretation of consistencies and inconsistencies in environmentally responsible behavior*. 24 (1), 93-103.

Wales Centre for Behaviour Change : (University of Bangor)
<http://behaviourchange.bangor.ac.uk/> / <http://goo.gl/QVsijf>

WRAP. (2013). *Effect of charging for carrier bags on bin-bag sales in Wales*. <http://www.wrap.org.uk/sites/files/wrap/Effect%20of%20charging%20for%20carrier%20bags%20on%20bin-bag%20sales%20in%20Wales.pdf>

Whitmarsh, L; (2010), Green identity, green living? The role of pro-environmental self-identity in determining consistency across diverse pro-environmental behaviours. *Journal of Environmental Psychology*, 30, 305-314

Part 4: Collection & Disposal of Waste

In relation to the proposed changes to Waste collection and disposal:

KWT supports existing Welsh Policy in regard to Recycling and Recovery of Waste through:

- Towards Zero Waste
- Programme for Government.
- The Environment and Climate Change Strategies for Wales.
- The principles of the European Framework Directive and European Union 7th Environment Action Programme

11. KWT supports the proposals to segregate waste at the source by the public sector and businesses and the ban on energy from waste for the reasons set out in the White Paper. However, in order to address any potentially negative impacts we would urge the committee to consider the consequences of the proposals in terms of practical implications which KWT have been made aware of by individuals and local authorities.

- i.** **The current requirements for storage provision for waste /recycling in some existing premises are insufficient**, and when planning permission or Change of Use is granted for new business, the area required does not always meet the need for all the storage necessary for the different types of recycling. This can lead to public health issues with collections on highways and negative public opinion. Whilst source segregation of waste is now seen as best practice, 'inconvenience' is still cited as the biggest cause for people not recycling waste.(*e.g.; Koger, S, 2010*)
- ii.** KWT recognises the significant progress made by the Waste and Fly-Tipping Strategies in recent years but it is still the case that some fly-tipping is a result of businesses not complying with current waste disposal regulations, and extra requirements with regard to recycling may add to this problem. **If**

solutions are going to work for these small businesses they need to be inexpensive and easy to use.
(UCL, 2006)

- iii. We also note that reducing waste isn't mentioned in the same context as re-use and recycling in the White Paper, and would suggest that reduction should be considered. According to the Welsh Audit Office, the Welsh Government will not reach its target of a 75 per cent reduction in the ecological footprint of waste by 2050 **if Wales does not significantly reduce waste production** as well as increase recycling rates. (WAO,2012)
- iv. Awareness and understanding are consistently cited as the most significant barriers that prevent people from recycling, as such, KWT strongly supports a '**national restatement on the importance of recycling**' to accompany these proposed changes, as recently highlighted by the NAW Inquiry last year. (NAW, 2014)

On the ban of food waste to sewer:

12. KWT supports the proposals to ban food waste to sewer by businesses but would encourage an awareness campaign across Wales (to include householders not currently covered by the Bill) in order to promote understanding of the relation of food waste and other items and the damage to sewers and water courses.

Koger, S ; Winter, D (2010). *The Psychology of Environmental Problems*. USA: Psychology Press

National Assembly for Wales. (2014). *Inquiry into Recycling in Wales*.<http://www.senedd.assembly.wales/mglssueHistoryHome.aspx?Ild=9794>

UCL. (2006). *Fly-Tipping: Causes, Incentives and Solutions. A good practice guide for local authorities*. <http://www.flytippingactionwales.org/files/6513/4857/1834/flytipping-good-practice-guide.pdf>

Wales Audit Office. (2012). *Public Participation in Waste Recycling*.<http://www.audit.wales/publication/public-participation-waste-recycling>

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