

Your charity inspiring action for our environment

# **Tackling the litter emergency** Making the case for packaging EPR to include ground and binned litter

## Introduction

Litter is at an unacceptable level across Scotland.

Our latest <u>Scottish Litter Survey</u>, published last year, confirmed that 90% of those asked believe litter is a problem across the country - the highest number since research began. Furthermore our most recent ground litter report - <u>How clean are our streets?</u> - revealed that litter levels continue to significantly impact the cleanliness of our streets and roads with 75% of sites being littered and one in 10 were observed to have a significant presence adversely affecting the cleanliness of the area.

Much of the litter we record, volunteers log, and which is noticed by people across Scotland comes from single-use food and drink packaging. This includes commonly seen items like snack packets, cans and bottles

The UK, Scottish, and Welsh Governments are working on new environmental regulations. These include Extended Producer Responsibility for Packaging (pEPR) which is about making sure packaging producers take responsibility for the environmental impact of their products. It encourages them to make products that are less harmful to the environment and to use less packaging. It means companies that place packaging on the market will have to pay for dealing with the waste those products create. In Scotland and Wales, the proposals include litter on the ground and in bins.

This report combines our evidence, which shows a strong desire for action from the people of Scotland, with technical data from our ground litter surveys, and data collected by the public. This presents a compelling case for those that put packaging on the market to be held to account for the packaging they produce that becomes litter dropped on the ground and placed in bins, and calls for them to play their part and contribute financially to clean it up.



"Litter levels are unacceptable across Scotland and while we, our partners and many volunteers continue to tackle the litter emergency as best we can – we need urgent regulatory action now.

Barry Fisher Chief Executive

"We must seize the opportunity ahead to ensure the new UK Government commits to pEPR regulation reform and align with the Scottish and Welsh Governments to include ground and binned litter.

"Litter payments must form a key component of pEPR regulations reforms to ensure that single-use packaging producers are encouraged to design out such packaging and take financial responsibility if they don't, to secure additional funds for litter prevention, litter education, bins and waste management."





#### **Public polling**

71% agree with the general principle that producers should bear financial responsibility for managing packaging waste and litter.



#### **Our audits**

18.6% 42.7% 45% of litter in scope for pEPR of sites had at least one item of all litter counted was in scope that was in scope of pEPR for pEPR regulations. regulations is drinks related. regulations. 5.2% 6.5 of all litter recorded across items recorded nationally per items recorded nationally per Scotland was confectionery 100m<sup>2</sup> were within scope of pEPR 100m<sup>2</sup> were within scope of regulations. pEPR regulations in the most (sweets) packaging. deprived areas.



## The context

#### Litter levels matter to communities across Scotland. And, while street cleanliness improved slightly last year, litter levels are still unacceptable.

Our evidence and the strength of public feeling led us to declare a litter emergency and identify potential solutions and tools to tackle habits and behaviours.

Working with local authorities, communities and other stakeholders we have delivered actions outlined under the National Litter and Flytipping Strategy for Scotland. We continue to have impact, but we are realistic about what can be achieved against a backdrop of reducing central government funding, local government spending cuts and increased consumption of single-use food and drink packaging.

We will continue to inspire people to reduce their consumption and tackle the climate, litter and nature emergencies. But we are determined to see reform of pEPR regulations with implementation powers devolved to Scotland that could generate additional funds for litter prevention, infrastructure and waste management – putting prevention at the heart of any plan for a litter free nation. We have consistently said that tackling litter is a shared responsiblity and these regulations will ensure that producers play their part as well.

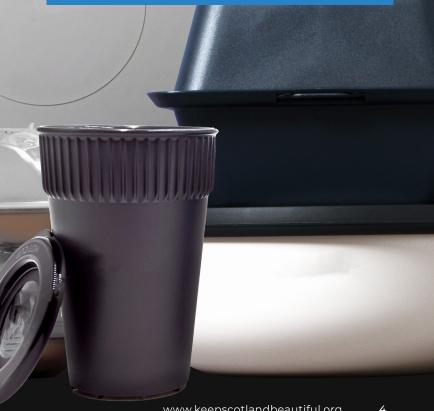
Since 2021 we've been working behind the scenes to make the case that packaging producers must take responsibility for single-use packaging litter. We've been involved in discussions with DEFRA, have responded to pEPR Consultations and have worked closely with other UK organisations to evidence the need for pEPR regulations to include ground and binned litter. Additionally, we've been evolving our national ground litter technical audits and have undertaken quantitative and qualitative research to back up our asks and call for alignment between proposals in Scotland and Wales and the rest of the UK.

With Scotland's Deposit Return Scheme (DRS) now delayed until 2027 at the earliest, and packaging litter making up a large percentage of the litter items being recorded and noticed across Scotland, we know that any further delay to either DRS or pEPR regulations will further exacerbate Scotland's problem with packaging litter.

"We're encouraged that pEPR is already working well in other countries where ground litter is included in scope. Our data clearly outlines why this is needed in Scotland and across the UK. and we can't afford not to push for bold regulation to ensure the polluter pays principle is delivered to help us tackle the litter emergency."



Catherine Gee **Deputy Chief Executive** 



# The evidence

To inform our view on how pEPR regulations should be implemented, we've been gathering qualitative and quantitative data and evidence from across Scotland.

We commissioned public polling, carried out detailed national technical audits of litter items currently in scope under pEPR regulations and engaged with volunteers to collect citizen science data through our national campaigns.

#### What do the public think?

All our qualitative data highlights that people are aware of the scale of packaging litter, and there is a strong public appetite for producers of packaging to be held to account and pay for clearing up litter and meeting the costs of activities aimed at changing behaviours and preventing waste.

Polling carried out in May 2024 by Diffley Partnership as part of their Understanding Scotland Series highlighted that people strongly support action to ensure producers of packaging play their part:

71%	strongly or somewhat agree with the general principle that producers should bear the financial responsibility for managing the waste and litter caused by their packaging.
67%	strongly or somewhat support the statement that producers should be responsible for meeting the specific costs of managing and clean up the waste and litter caused by the packaging they produce.
69%	strongly or somewhat support the statement that producers should be responsible for meeting the specific costs of activities aimed at changing behaviours and preventing waste and litter caused by the packaging they produce.

The <u>Scottish Litter Survey</u> published last year highlighted that the public report regularly seeing items of packaging litter across our country:

69%	see single-use food containers, wrappers and packaging littering our streets, parks, beaches, riversides and open spaces.
66%	see littered plastic drinks bottles.

65% see littered drinks cans.



### What does our technical data tells us?

Our expert team of surveyors carried out audits at 4,056 sites across 31 local authority areas between May 2023 - April 2024. At each 1000m<sup>2</sup> area site a count of 21 litter types, in scope for pEPR regulations, was conducted in the most littered 100m<sup>2</sup> area.

Across Scotland 47.1% of all litter counted is smoking related which is not currently in scope for pEPR regulations (excluding packaging and vapes). If smoking related litter is removed from counts, single-use packaging in scope for pEPR regulations makes up over a third (35.2%) of the litter left, and much of this is highly visible. Our public polling in 2023 highlighted that the most commonly seen littered items included food containers, wrappers and packaging (69%), plastic bottles (66%) and drink cans (65%).

Percentage of litter found if smoking related is removed:

35.2%	Items in scope for pEPR regulations (plastic and glass bottles, metal cans, cartons, snack packets, food on the go packaging and tobacco packaging).
64.8%	All other litter items (including receipts, newspaper, labels, bottle caps, ring pulls, fragments of packaging that would have been in scope for pEPR and other unidentifiable items.)

Our audits highlighted:

<b>42.7</b> %	of sites recorded at least one item in scope for pEPR regulations.
2.5	items recorded per 100m <sup>2</sup> were within scope of pEPR regulations.
18.6%	of all litter counted was in scope for pEPR regulations.
5.2%	of all litter recorded was confectionery (sweets) packaging.
4.2%	of all litter recorded was drinks cans.
3.5%	of all litter recorded was plastic bottles.
45%	of litter in scope for pEPR regulations is drinks related.

The presence and proportion of all litter of each litter type can be found in Appendix Item 1 and corresponds with data collected by volunteers and our public perception data.



The injustice of the litter emergency is highlighted by our data. Litter levels are significantly worse in the areas of highest deprivation with 23% of sites in the most deprived areas recording significant levels of litter, compared to only 3% in the least deprived areas. This follows through with litter in scope for pEPR regulations.

65%

of sites in the areas of highest deprivation have a presence of litter in scope for pEPR regulations compared to 30% in the areas ranked the least deprived.

6.5 items recorded per 100m<sup>2</sup> were within scope of pEPR regulations in the most deprived areas compared to 0.9 in the areas ranked the least deprived.

Full details can be found in Appendix Item 2.

And unsurprisingly there is a noticeable correlation between the presence of litter items in scope for pEPR regulations and population density. In the most densely populated areas 64% of sites have a presence of litter items in scope compared to that of the most sparsely populated areas at 29%. Moreover, the highest density of litter items in scope are in high density residential areas. Full details can be found in Appendix Item 3.

Our evidence also shows that there is a correlation between the presence of litter items in scope for pEPR regulations and rurality. Using the urban/rural classification in Scotland, 60% of sites in large urban areas have a presence of litter in scope compared to 18% in remote and rural areas. Full details can be found in Appendix Item 4.



## What the Citizen Science data highlights

Our technical data is collected from street surveys. Aware that there was a gap in our data set we invited volunteers to help us collect information from 100m<sup>2</sup> sections of parks, rivers, car parks, beaches, riversides and open spaces.

Data was collected during Spring Clean in April - May 2024, Upstream Battle<sup>®</sup> from December 2023 - February 2024 and our annual beach assessments in June – September 2023.



### Spring Clean 2024

Volunteers carried out 85 surveys for us collecting data on single-use packaging. Their commitment resulted in 8,910 items of litter in scope for pEPR regulations being recorded.

Key observations from the citizen science surveys include:

- 2,216 items were recorded by one volunteer in one survey area.
- Confectionary litter (sweets) (29.4%) and crisp packets (17.9%) were the most commonly recorded items by volunteers.
- Plastic bottles made up 12.9% of the items recorded.

The data collected during Spring Clean 2024 can be found in Appendix Item 5 and more information is available in our <u>Spring Clean</u> <u>Scotland 2024 Report</u>.



## Upstream Battle®

Volunteers carried out 185 surveys along 26 rivers and waterways across Scotland between December 2023 – February 2024.

Key findings include:

- Three out of the top five litter items recorded nationally were in scope for pEPR regulations. (plastic bottles (14.1%), snack packets (11.9%), drinks cans (7.7%).
- Plastic snack packets (from crisps and confectionary) are the third most recorded item nationally and consistently in the top 5 regionally.
- Plastic bottles and drinks cans were high in the top ten items recorded both nationally and regionally.

Data collected as part of Upstream Battle<sup>®</sup> can be found in our published <u>Upstream Battle<sup>®</sup></u> <u>Citizen Science Report</u>.



## Scotland's award-winning beaches

During the site visits for the 2023 Scotland's Beach Awards the trained volunteer assessors also carried out 42 surveys collecting data to evidence the need for pEPR regulations.

Key findings include:

- 18% of all litter was in scope for pEPR regulations.
- 52% of surveys recorded items in scope for pEPR regulations.
- Confectionery (sweets) packaging was counted the most, followed by takeaway packaging and plastic bottles.

## Our asks

Scotland needs urgent regulation to tackle litter. We believe that Extended Producer Responsibility Regulations, if bold enough, will push producers to create packaging less harmful to our environment and deliver a polluter pays principle, generating significant funds to help tackle our litter emergency.

#### We ask:

The new UK Government to stay on track and progress pEPR regulations, extending the scope to cover ground litter packaging and to ensure litter payments form a key component of reforms.

2

The Scottish Government to maintain its commitment and support for these regulations including extending the scope to cover ground litter packaging and ensuring it is in alignment with the polluter pays principle.

3

Single-use packaging producers to design out, where possible, the most problematic items where there is no established infrastructure to capture waste or litter, in particular snack packs and confectionery, or take financial responsibility for its destruction and support litter education, infrastructure and waste management.



# Appendix - our data

#### All data cited in this report has come from four sources.

- 1. Public polling carried out on our behalf by Diffley Partnership as part of the Understanding Scotland Series from 2-7 May 2024.
- 2. Citizen Science data collected by volunteers as part of Upstream Battle and Spring Clean in the past year.
- **3.** Technical ground litter surveys carried out by our trained auditors across Scotland.
- 4. Trained beach assessor surveys at Scotland's Beach Award winning sites in 2023.

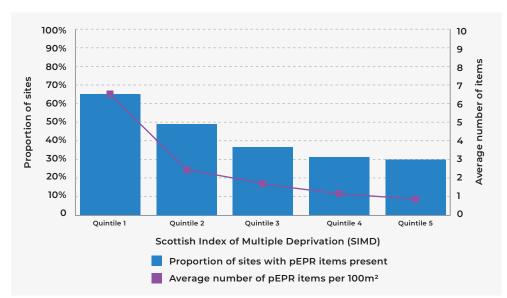
#### Item 1. Technical data collected by trained Ke

Technical data collected by trained Keep Scotland Beautiful auditors across more than 4,000 sites.

ltem	Presence (% of sites)	Proportion (% of all litter)
Plastic bottles (50ml-3L)	18.3%	3.5%
Metal can (drinks)	19.5%	4.2%
Glass bottles	2.4%	0.5%
Cartons <850ml	1.0%	0.1%
Pouch <400ml	1.4%	0.1%
Tobacco packaging	10.6%	1.4%
Confectionery <230g	22.4%	5.2%
Crisp packets <60g	6.6%	1.0%
Sandwich/ wraps	1.2%	0.1%
'Food to go' packaging	4.3%	0.6%
Quick service restaurant packaging	10.4%	1.9%

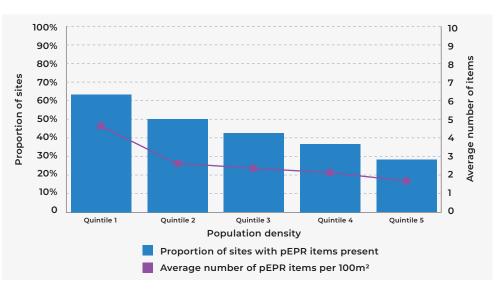
ltem 2.

Litter items currently in scope for pEPR regulations mapped across Scottish Index of Multiple Deprivation quintiles.



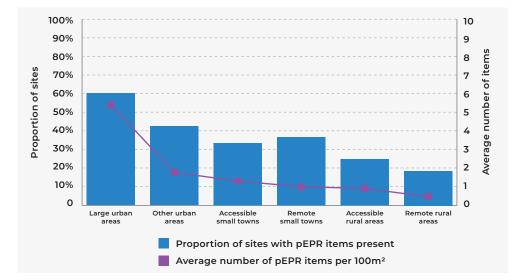
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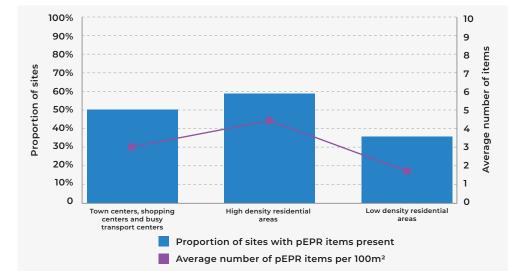
Litter items currently in scope for pEPR regulations mapped across population density quintiles.



#### Item 4.

Litter items currently in scope for pEPR regulations mapped across land use types.





Item 5.

Citizen Science data on littered items currently in scope for pEPR collected as part of Spring Clean 2024.

ltem	Total items counted per 100m2	Average per survey (mean)	Average per survey (median)	% of total items
Plastic bottles	1149	13.5	4	12.9
Metal cans	921	10.8	6	10.3
Glass bottles	290	3.4	1	3.3
Cartons	148	1.7	0	1.7
Pouch	105	1.2	0	1.2
Tobacco packaging	576	6.8	3	6.5
Confectionery (Sweets)	2619	30.8	9	29.4
Crisp packets	1596	19.0	7	17.9
Sandwich / wraps	327	3.8	0	3.7
Food to go packaging	452	5.3	0	5.1
Quick service restaurant packaging	727	8.6	3	8.2



Keep Scotland Beautiful is your charity for Scotland's environment. We work with you to help combat climate change, reduce litter and waste, restore nature and biodiversity and improve places. We aim to inspire changes in behaviour to improve our environment, the quality of people's lives, their wellbeing and the places that they care for.



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