

The Role of Extended Producer Responsibility in Tackling Litter in the UK



environmental
services
association



Foreword

Extended Producer Responsibility (EPR) has been held up in recent years as a possible new means for funding recycling services in the UK. EPR is where the producers of products and packaging take responsibility for the management of what they produce at the end of its life. At ESA we believe that this offers a timely opportunity to relieve some of the burdens on the cash-strapped local councils which currently pay for household waste services. And – if we design the system right – EPR could in the longer term help to create a circular economy in the UK by improving design, engaging consumers, and efficiently recovering materials to be used in new products and packaging.

The European Commission's Circular Economy Package has also suggested that EPR could be used as a mechanism to cover the costs of clearing up litter. Whether the UK ends up in or out of the Single Market, we believe that EPR has the potential to help address this pervasive problem which costs Local Authorities huge amounts each year. ESA believes that applying EPR to the biggest and most intractable litter sources – cigarette butts, chewing gum and food and drink packaging in particular – could save councils around £300million per annum; a big help during difficult economic times for councils.

This policy paper explores the role that EPR could play both in tackling the significant cost to Local Authorities of clearing up litter, and also in engaging the public through funding anti-litter campaigns.

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The Problem

Cleaning parks and streets and closing highways to collect litter is costing Local Authorities in England around £800million¹ each year at a time when council budgets are under increasing pressure.

Around £300million of this total can be

attributed to the clear up cost of some of the most frequently littered items – cigarette butts, chewing gum and food and drink packaging.

This is money that Local Authorities could be spending on improving roads, looking after elderly people and delivering other vital services.

Statistics

Local Authorities spend around £800million per year on street cleansing, including emptying litter bins and picking up littered items.¹ Highways England, Network Rail and many other private land owners also clear up litter and the national bill is likely to be much higher.

73% of sites surveyed had smoking related litter on them.

It costs an estimated £140million² per year to clean up cigarette butts thrown away by UK smokers.

Chewing gum is costing Local Authorities in the region of £60million³ to clear up each year.

Fast food, drink and confectionary packaging are one of the commonest forms of litter affecting 80% of sites surveyed. We estimate the clean-up costs Local Authorities over £100million each year.

200,000 bags of litter weighing 7,500 tonnes are removed from England's major road network every year.⁴

Indirect costs of litter are estimated to be substantially higher, with potential for over £500million related to impacts on mental wellbeing and up to £348million related to impacts on crime.

Statistics from Keep Britain Tidy⁵ unless otherwise referenced



The Solution

Applying Extended Producer Responsibility (EPR) to some of the common components of UK litter could have a huge impact. Cigarette butts, chewing gum and fast food, drink and confectionary packaging are some of the most littered items in the UK and transferring the cost of preventing and clearing up these items from the public to the

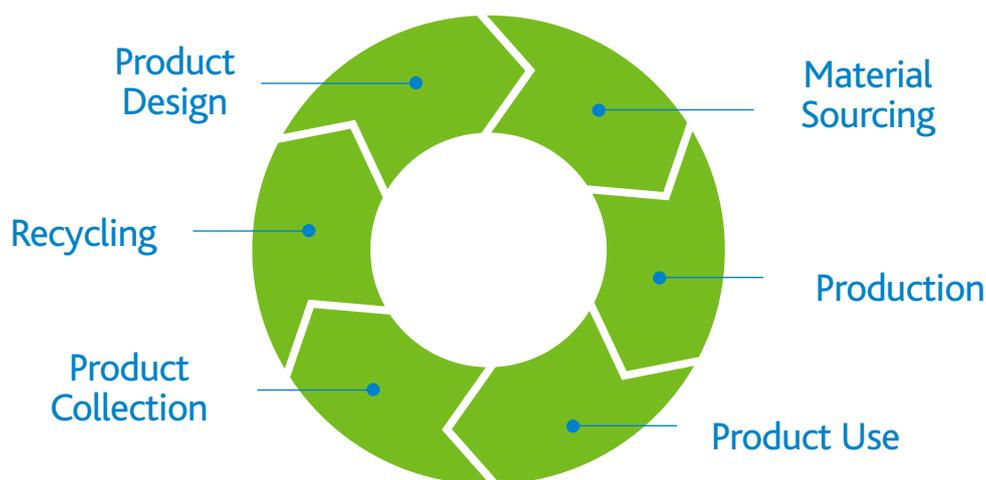
private purse could save Local Authorities in the region of £300million each year.

This policy paper considers the merits of the manufacturers of these items contributing to the multi-million pound clean-up costs associated with the littering of their products.

What is EPR?

EPR is used widely by governments around the world as an environmental instrument for the management of end-of-life products and wastes. It shifts responsibility upstream in the product life cycle to the producer, by implementing the polluter pays principle.

Under an EPR system, producers are individually or collectively responsible for their own products at end of life. In an EPR system, the costs borne by the producer should relate to the actual costs of dealing with their own products at end of their life.⁶



Litter Campaigners

Both Keep Britain Tidy and Clean Up Britain recognise the value of engaging a number of large corporations to help provide solutions to the litter problem in the UK.

Keep Britain Tidy's Litter Prevention Commitment⁷ looks to provide one solution to litter by preventing it in the first place. It asks businesses to commit to awareness raising initiatives, encourage responsible consumer behaviour, for example through product design and labelling, all of which to help to reduce the annual cost of clearing up litter.

Clean Up Britain asserts that: "Much of the litter that scars Britain's countryside has been produced by some of our most famous brands – McDonald's, Coca Cola, Red Bull, Pepsi, Walker's Crisps, KFC, Cadbury's, Carlsberg, Mars, Heineken, Starbucks, Imperial Tobacco, GSK, Costa Coffee, Wrigley's chewing gum and many others. These are enormously successful companies and they're a big part of the litter problem – we hope to persuade them to become a big part of the solution."⁸

According to their patron Jeremy Paxman "The Clean Up Britain (CLUB) campaign wants to work constructively with major corporations – whose brand names we see shrieking at us from street rubbish every day – to solve Britain's appalling litter problem".

Case Study 1

But me no Butts: Cigarette related litter

Around 122 tonnes of cigarette butts, matchsticks and other cigarette related litter are dropped every day across the UK. It costs an estimated £140million per year to clean up cigarette butts thrown away by UK smokers.² Smoking material is one of the most common types of litter found (73%) on UK streets.⁹

hypothecated and provided to local councils to pay for the cost of clearing cigarette-related litter”

According to Eunomia’s ‘Clean Sweep’ report³, extending this concept to a levy on cigarette manufacturers of 0.5p per cigarette sold would raise



“Tobacco attracts significant levies because of its lethal effects on health. Given the amount of cigarette-related litter, we strongly support the premise that a portion of these levies should be hypothecated and provided to local councils to pay for the cost of clearing cigarette-related litter.”



Six million cigarette butts are dropped on the City of London’s streets alone every year costing £3.8million in clean-up.¹⁰

The Communities & Local Government Committee’s inquiry into Litter and Flytipping¹¹ put forward a strong recommendation for using monies derived from existing cigarette levies to help tackle cigarette related litter:

“Tobacco attracts significant levies because of its lethal effects on health. Given the amount of cigarette-related litter, we strongly support the premise that a portion of these levies should be

£155million per annum in England based on sales of 31 billion cigarettes in the UK.¹² Monies raised could be distributed to local authorities to help clean up litter.

Recommendation

A ‘placed on the market’ fee that could be allocated to Local Authorities on an equitable basis to support clean-up of cigarette related litter.

As cigarettes are already heavily taxed, this would not have a dissuasive effect, but a ring-fenced EPR levy could raise funds to help fund litter clean up or large-scale campaigns to change behaviour.

The weight of

13

double-decker buses

in cigarette butts were collected from the streets in 2013⁵



Case Study 2

A sticky situation: Chewing Gum

Chewing gum is a serious problem for Local Authorities. It never biodegrades and once it is trodden into the pavement, it becomes an eyesore and requires specialised equipment to remove. The cost involved to remove this gum using high-powered washing means that councils are facing tough choices about how they prioritise their spending.

In 2014 the LGA called for a producer pays principle to apply such that gum manufacturers would pay for the cost of clean-up of gum spattered streets.³

The LGA estimated that the annual cost of removing pieces trodden into pavements across England had reached £60million, with around three million pieces of gum, equivalent to six tonnes, dropped in the West End of London alone each year.

Whilst it only costs around 3 pence to buy a piece of gum, LGA estimated that it costs Local Authorities around fifty times that figure (£1.50) to clean up each piece of discarded gum.

The LGA highlighted that in Manchester in 2013, nearly 800,000 pieces of gum were removed from the streets and enough pavement was jet-washed to cover a dozen football pitches.

The Government response to the Communities &

Local Government Committee's inquiry into Litter and Flytipping¹³ advised that littered chewing gum was a considerable concern and that this "was the last chance for the industry to put its house in order".

The committee recommended "that our successor committee revisit this issue in one year unless it sees the industry making a much larger contribution to the costs of removing gum and staining" and ... "we remain open to exploring other means of securing a proper contribution from the industry towards the costs imposed on the public purse by its products."

Annual sales of chewing gum are estimated to be approximately £300million.¹⁴ Similar to that suggested for cigarettes a levy on manufacturers could be set at a level to cover the £60million costs to Local Authorities of clearing up gum.

Recommendation

A 'placed on the market' fee that could be allocated to local authorities on an equitable basis to support the clean-up of chewing gum litter.

A further possibility would be a consumer information obligation similar to that for packaging which could be applied that would require a campaign for responsible disposal of gum to be funded by producers.

Approximately

800,000

pieces of gum were removed from the streets of Manchester in 2013



Case Study 3

The Big Whopper – Fast Food, drinks and confectionary packaging

Keep Britain Tidy's 'How Clean is England' report¹⁵ showed that 80% of sites surveyed in 2014/15 had some form of food and drink-related litter.

Littered items included snack packs, fast food-related litter, confectionary packaging, alcoholic and non-alcoholic drinks-related litter.

There is very little tonnage or cost data relating to clearing up food and drinks packaging. However, a very crude analysis suggests that if we assume

half the cost of Local Authorities annual litter and street cleansing bill relates directly to litter³ and that 27% of that relates to the clear up of food and drinks related litter¹⁶ then we can put forward a best estimate of over £100million.

Recommendation

A levy on manufacturers of fast food, drinks and confectionary packaging could be set at a level to cover the significant costs to Local Authorities of clearing up these items.

Government Action

The House of Commons Communities and Local Government Committee inquiry into litter and fly-tipping in the UK¹ and the Government's response¹³ clearly recognised the significant costs and the importance of tackling litter and appeared to open the door for EPR as a mechanism for both preventing littering and paying for it to be cleared up.

The Government's response was clear that, "Littering and fly-tipping are anti-social and unnecessary acts where the behaviour of a small number of individuals blights our landscapes and communities, and imposes costs on landowners and councils."

Whilst its response fell short of recommending any specific EPR mechanisms for tackling litter it did state

that the role of central government is ... "providing a clear legal framework of rights, responsibilities and powers, setting national standards, and (where possible) ensuring that the costs of dealing with litter issues are passed to those responsible for causing the problem".

The Government response also promised a comprehensive 'Litter Strategy' and a focus on collecting better data on litter.

Recommendation

The forthcoming Litter Strategy should consider in some detail the role that EPR could play in tackling the significant litter problem in England and the UK as a whole.

Conclusions

Clearing up litter places a huge cost burden on Local Authorities at a time when budgets are under exceptional pressure. The introduction of EPR to help clean up the litter from Britain's streets would

shift the responsibility from Local Authorities to the manufacturers of the littered products, thereby saving Authorities significant resources.

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Printed on 100% recycled paper

October 2016