

Welsh Government consultation: Fly Tipping strategy for Wales, 'A Fly Tipping Free Wales'.

General Comments

Natural Resources Wales purpose is to ensure our natural resources are sustainably managed for present and future generations. Fly tipping is a highly visible example of an unsustainable and undesirable activity.

We have specific responsibilities for regulating the waste industry. We are a principal adviser to Welsh Government, adviser to industry, the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources. Natural Resources Wales also manages a significant proportion of land in Wales.

Fly-tipping affects us all. Fly tipping adversely affects people, business and the environment. It is a serious crime that is visual, spoils our local neighbourhoods and can impact on the local community's quality of life. On occasions it can pose a threat to humans and wildlife through disease transmission, pollution, soil contamination, and can make areas more liable to drainage and flooding problems. It also undermines legitimate businesses who deal with their waste responsibly and creates a negative impact for visitors to Wales.

In addition to helping to develop a better evidence base through data sharing, we will remain a committed partner in the Fly Tipping Action Wales Fora. We also wish to be seen as an exemplar in how to understand and manage the risk of fly tipping on our own estate.

Consultation Questions.

We have the following observations to make in response to the consultation questions:

1. Do you think this strategy will help tackle fly tipping in Wales?

Yes – We welcome the actions presented in the strategy which will help to address fly tipping in Wales. The strategy is readily understood, has clear milestones and has been developed with input from a range of interested parties.

We recognise that to effectively tackle flytipping, it is essential that we develop and use good evidence and apply learning from experience. This is vital such that we can make good decisions, and direct resources to where they can most make a difference.

We agree that no individual body or group in Wales can tackle the fly tipping problem in isolation. We support the proposals to build on the existing partnership working and to work with local communities. We agree that this approach will help in the efforts to address this problem.

2. Do you agree with the proposed actions under each section of the strategy?

The strategy is an example of joined up thinking and positive action which links citizens, public, private and the voluntary sectors together in a sustainable approach. Its successes could also be used as a measure to assess progress against the aims of the Future Generations and Welfare bill.

We support the actions proposed and recognise that we have a significant role in contributing the delivery of actions in Outcomes 1 and 4 as well as the three cross cutting themes. Key points are highlighted below:

Cross Cutting Theme 1 – Improving data collection

It has historically been challenging to fully understand the overall scale of fly tipping in Wales. Data on incidents has focused primarily on Local Authority land with little or no information on incidents on private land. Our work developing a system to ensure all reports of fly tipping on land we manage are recorded, assessed and actioned will help to provide clarity on the wider picture in Wales.

Cross Cutting Theme 2 – Partnership Working

We consider partnership working to be the most effective way to explore new ways of working which makes best use of the resources available amongst partners.

Cross Cutting Theme 3 - Communications

The importance of the role of effective communications and community engagement is recognised in the strategy. Understanding the underlying root causes of fly tipping and working to establish the message in the public consciousness that fly tipping is socially unacceptable may prove to be more effective than more traditional regulatory and enforcement approaches. The proposed studies and focus in these areas is welcomed. Using the full range of social media will also help to stimulate and garner interest in a wider sector of our communities.

Outcome 1- All key Organisations in Wales commit to eliminating fly tipping – a commitment which is embedded in their strategies and day to day operations.

Natural Resources Wales' strategies already focus on ensuring that we manage our natural resources in a manner that is good for people, business and the environment. These will therefore support and help facilitate the outcomes in the Flytipping Strategy. We will continue to improve our day to day operations to ensure we apply best practice and share information with our partners in this work.

Outcome 4 –Anyone who fly tips is caught and punished

The development of the proposed shared intelligence system and the FlyMapper GIS system will improve our understanding of fly tipping in Wales on a strategic and tactical level. We will work with FlyTipping Action Wales to explore how data collected by Natural Resources Wales can be fed into these new systems to give a better understanding of the links between fly tipping and waste criminals who sometimes work across several local authority areas .

We agree with the proposals to develop an investigations manual and to develop a more robust enforcement model. It is vital that any investigation into fly tipping incidents is carried out in a way which does not compromise any subsequent enforcement actions that may need to be undertaken. The work to educate the magistrates circuits is also essential to ensure that any person or company caught fly tipping faces a penalty which should discourage further similar behaviour.

Outcome 3 – It becomes easier for people to deal with their waste responsibly.

We recognise that the proposed study considering the impact of varying waste facility provision on the levels of fly tipping will provide valuable evidence. This can be used to identify any improvements required to the Welsh Government Collections, Infrastructure and Markets and the Municipal waste sector plans.

3. Do you have any further actions you would like to see included and why?

We support the actions within the strategy to further the research undertaken in this area and support the greater level of understanding that will bring from the resulting improved evidence base.

Natural Resource Wales is moving towards a waste stream approach to explore what the most effective interventions are to tackle each type of waste, and this includes flytipping. This is a new way of working and should ensure that our approach to regulating waste is responsive to opportunities that we identify for waste reduction and ensuring it is managed in a more sustainable manner much earlier in the life cycle of a material. This has the potential to have a positive impact on the number of flytipping incidents in Wales.

4. Do you have any further comments on how the outcomes can be delivered?

Fly tipping can impact on a broad spectrum of organisations and communities. We support Welsh Government's view that the only way to tackle these is through partnership working, as no single body or group can address the problem individually. The only way such a partnership can be effective is if each of the partners is truly dedicated to tackling the problem, and to this end, we welcome the proposed action to raise the profile of fly tipping at the highest levels within organisations.

It is important that communication messages and campaigns on changing behaviour towards waste management are linked and provide the clear incentive to change how people perceive waste and resources, such that this eliminates flytipping at it's

very source. This will form only a part of the wider work which needs to be undertaken to ensure resources are used more efficiently for example through waste prevention, increasing reuse and recycling rates. By moving waste further up the Waste Hierarchy and promoting the wider benefits to be gained by this, we can ensure that less waste is generated, and that any waste generated retains a high value. This will not only help tackle fly tipping in Wales, it will also reduce the nations impact on Climate Change, helping to secure resources for the Welsh Economy, and delivering 'One Planet Living'.

5. Would you like to be involved in the working groups to help deliver the actions needed to achieve the outcomes?

We welcome the opportunity to be a key partner in the Fly Tipping Action Wales partnership. As a new organisation, we have new opportunities to inform and deliver the partnership. We will continue to support and liaise with Fly Tipping Action Wales to ensure that these opportunities are realised.

I trust you will find these comments useful. If you have further queries relating to our comments, please contact Gareth Lewis on Gareth.Lewis@naturalresourceswales.gov.uk

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