

National Litter and Flytipping Strategy

Island Communities Impact Assessment

July 2023

ISLAND COMMUNITIES IMPACT ASSESSMENT

Name of Policy, Strategy or Service: National Litter and Flytipping Strategy

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1. Background, policy objectives and intended outcomes

Litter and flytipping are well-documented indicators of local environmental quality and have significant social, environmental and economic impacts, and health implications.

Litter and flytipping are defined as follows:

- Litter is waste in the wrong place: the wider environment. The Environmental Protection Act (1990) defines littering as ‘throwing down or dropping an item in any public open space’.¹
- Flytipping is illegal dumping of waste - from a bin bag of household waste to large quantities of domestic, commercial or construction waste.²

Research indicates that at least 15,000 tonnes of litter is disposed of into our urban and rural environment and is subsequently cleared by local authorities every year. This is composed of around 250 million easily visible items.³

A further 26,000 tonnes of waste is flytipped each year and dealt with by local authorities, with over 60,000 incidents occurring per year. This estimate excludes the vast majority of cases on private land.⁴ For both litter and flytipping these figures are likely to represent an underestimate due to data limitations.

Litter and flytipping have both direct and indirect costs for society. Scotland spends at least £60 million of public money on litter and flytipping each year in direct costs (for clearance, education and enforcement activities). Indirect costs are the negative impacts or consequences of litter that impact on society more widely, for example

¹ Environmental Protection Act 1990 – Section 87
<https://www.legislation.gov.uk/ukpga/1990/43/section/87>

² Environmental Protection Act 1990 – Section 33
<https://www.legislation.gov.uk/ukpga/1990/43/section/33>

³ Zero Waste Scotland (2013) – Scotland’s Litter Problem: Quantifying the scale and cost of litter and flytipping <https://www.zerowastescotland.org.uk/resources/scotlands-litter-problem>

⁴ Zero Waste Scotland (2013) – Scotland’s Litter Problem: Quantifying the scale and cost of litter and flytipping <https://www.zerowastescotland.org.uk/resources/scotlands-litter-problem>

encouraging other crimes, mental health and wellbeing. Further indirect costs due to environmental, economic and social impacts to the terrestrial and marine environments were estimated to exceed £196.7 million in 2019 according to recent research undertaken to update the figures referenced in the previous strategy on the cost and scale of litter and flytipping in Scotland.⁵ The availability of data, which is often limited and inconsistently collected or reported, was a significant barrier to this research project and so these overall figures have to be treated with some caution. However, based on available evidence, these are the best estimate of the scale and cost of litter and flytipping in Scotland.

The new strategy builds upon the previous five-year strategy 'Towards A Litter-Free Scotland: A Strategic Approach to Higher Quality Local Environments'.⁶ A review of this National Litter Strategy was completed in 2019, summarising the activities that took place within the first five years of the strategy.⁷ Whilst progress has been made, litter and flytipping still pose significant challenges.

The National Litter and Flytipping Strategy is intended to present a new approach to litter and flytipping prevention – one which considers the whole life cycle of commonly littered and flytipped items in recognition of the loss of resources from the circular economy and the resulting contribution to the twin crises of climate and biodiversity loss.

The overarching ambition of the Strategy is to prevent littering and flytipping behaviour in Scotland. This will be achieved through the application of a systems approach, to identify where the necessary incentives are not in place to ensure a product is disposed of legally and in a way which maximises the value of that product or the materials within it. This involves looking at the entire lifecycle of products in question and those actors who are involved in influencing individuals at the point of disposal. Engagement and partnership working with key stakeholders has been central to the development of this Strategy and will be crucial for effective delivery of its outcomes and specific objectives going forward.

Actions are then based on the Individual, Social and Material (ISM) model, which identifies the need to address a broad range of influences on behaviour in order to achieve behaviour change. For the purposes of the strategy these are divided into the following themes:

- Behaviour change

This theme recognises the need for improved communications and engagement, but also the need to take a holistic approach to behaviour change; understanding key audiences, issues and developing a framework to identify solutions that enable behaviours to be changed. It should also be noted that the key behaviours related to

⁵ Eunomia (2023) – Scale and Cost of Litter and Flytipping Scotland
<http://www.gov.scot/ISBN/9781805251538>

⁶ Scottish Government (2014) – Towards a litter-free Scotland: a strategic approach to higher quality local environments
<https://www.gov.scot/publications/towards-litter-free-scotland-strategic-approach-higher-quality-local-environments/>

⁷ Scottish Government (2021) - Litter Strategy – five years on: review
<https://www.gov.scot/publications/five-years-review-scotlands-national-litter-strategy/>

littering will differ from those for flytipping. Successful measures under this theme would improve the accessibility, consistency and nature of messaging that motivates people to change their behaviour.

- **Services and infrastructure**

In order for prevention of litter and flytipping to be effective there need to be services and infrastructure in place to support people to behave responsibly. This includes services offered by local authorities, but also more widely looking to businesses and community groups. Successful measures under this theme would ensure Scotland's services and infrastructure are fit for purpose and prioritise action and innovation that proactively prevents litter and flytipping and supports a circular economy.

- **Enforcement**

Enforcement and deterrents have been identified as an important link in the chain for achieving the prevention of litter and flytipping, identified from numerous stakeholder calls to review the enforcement process, procedures and to understand if alternative solutions are available (such as education or volunteering for those who cannot afford to pay fines) with collaborative measures seen as crucial. Success in relation to this theme would ensure there is a strong and consistent enforcement model across Scotland that acts as a proportional deterrent.

Underpinning any next steps, improved data and evidence are crucial to successfully understanding the root causes of the issue, evaluating the success of any interventions, collaborating successfully and monitoring progress. This includes reporting of issues by the public and communities, national reporting and monitoring, citizen science and measurable outcomes. Success would include an improved understanding of the behaviours, attitudes and drivers behind both littering and flytipping behaviours and developing an evidence base that can facilitate the implementation and monitoring of effective interventions.

The Strategy has a lifespan of six years. It will be reviewed at its mid-point and at the end of its lifespan. It will be published with an associated Action Plan, which will be reviewed annually through a Governance and Delivery Framework which will comprise of a high-level strategy delivery group to drive implementation, agree priorities, review progress and adapt plans. This will be supported by topic-focused delivery working groups and other mechanisms for engaging key stakeholders and sectors to ensure a wide level of input into and scrutiny of future Action Plans.

2. Gathering data, identifying evidence gaps and identifying stakeholders

As the majority of marine litter originates from land-based sources, the National Litter and Flytipping Strategy is closely aligned with the recently refreshed Marine Litter Strategy which has links to the Scottish Islands Federation for the purpose of developing solutions to tackle marine litter.

A recent study by Marine Scotland suggests that more than 90% of plastic in Scottish seas comes from Scottish littering on land. Scottish littering puts about 1,000 tonnes of macro plastic into Scottish seas each year (uncertainty range 700 to

2,500 tonnes).⁸ Island communities may be disproportionately impacted by beach litter, firstly as a significant proportion of the population lives close to beaches, and secondly as beaches are an attraction for tourists, who contribute to the local economy. There are potential impacts on health and well-being, as well as wider considerations for the economy, biodiversity and the local environment. Actions related to the strategy which bring about a reduction in litter could have a positive impact. Marine sourced litter will be considered as part of the dedicated Marine Litter Strategy, which includes litter on beaches.⁹

We are also aware of the impact of litter on tourism. Tourism is a significant industry for the islands. Prior to Covid, Highlands and Islands Enterprise indicated an average annual visitor spend of £1.5bn in the region and 3,200 registered tourism businesses. Tourism jobs represented up to 43% of the workforce in some areas.¹⁰ The environment and wildlife are significant drivers in attracting visitors, who want to enjoy an unspoilt landscape and coast. The presence of litter has an impact on their enjoyment of this environment, and therefore any reduction in litter could have positive impacts in attracting more tourists and spending for local businesses.

Work undertaken for previous ICIA has identified that island authorities face higher costs per capita in collecting, transporting and disposing of waste. This is in part because the rural nature of collection routes means they are less efficient: the Scottish Government Urban Rural Classification highlights that the majority of the island authorities have high proportions of their populations in very remote small towns and rural areas.¹¹ Additional costs are incurred because waste must often be transported off island for processing as there are a limited number of operational landfill sites located on islands. Measures associated with the strategy could impact on the volumes of waste collected.

People living in island communities may face additional barriers to responsibly disposing of items. There is less consistency in kerbside recycling collections and the density of household waste recycling centres is much lower than on the mainland. The Highlands and Islands also have higher rates of community ownership of land, an estimate in 2017 indicated that there were 547,690 acres in community ownership in Scotland, with 70% of that total (384,980 acres) located in the Western Isles.¹² In these communities there may be additional challenges associated with waste management and responsibility for clearing flytipping. However, it should be noted that we do not currently have evidence to indicate the scale of the litter and flytipping problem on the islands, which will be critical for determining the potential impact.

⁸ W.R. Turrell (2020) - Estimating a regional budget of marine plastic litter in order to advise on marine management measures, Marine Pollution Bulletin, Volume 150

<https://www.sciencedirect.com/science/article/pii/S0025326X19308811>

⁹ Scottish Government (2022) – A Marine Litter Strategy for Scotland

<https://www.gov.scot/publications/marine-litter-strategy-scotland-2/>

¹⁰ Highlands and Islands Enterprise: Tourism

<https://www.hie.co.uk/our-region/our-growth-sectors/tourism/>

¹¹ Scottish Government (2018) – Urban Rural Classification 2016

<https://www.gov.scot/publications/scottish-government-urban-rural-classification-2016/>

¹² Islands Revival <https://islandsrevival.org/normalising-community-land-ownership-some-policy-lessons-from-the-western-isles/>

Access to broadband and 4/5G may be important, if the strategy results in monitoring, communications or interventions which are delivered digitally. Access to digital services and internet speeds on islands have improved significantly in recent years, but there is space for further improvement.¹³ There is also considerable variation between different islands, a 2019 study found that Shetland and Orkney had the lowest speeds (6.7Mbps and 3Mbps respectively) in a survey of Scottish Local Authorities¹⁴. Additionally, people living on islands and in remote rural locations require elevated household budgets to achieve a minimum acceptable standard of living. These budgets were found to be 10- 40% higher than elsewhere in the UK and in some more remote island locations, these additional costs could exceed 40%.¹⁵ This may be relevant to consideration of the connectivity costs for islands dwellers, particularly where there are cumulative impacts with social deprivation.

Whilst setting a clear direction of travel, both the strategy and the 2023-24 Action Plan are high level in nature and as such cannot be assessed in detail. The scale of impacts in the areas highlighted above across different island communities will be determined by the detailed design and implementation stage of individual actions set out in the high level annual Action Plans. The Governance & Delivery Framework has been designed to oversee delivery of the Strategy and Action Plans and will support mitigation of these impacts by:

- Incorporating consideration of impacts on island communities in the design and implementation of individual actions;
- Considering impacts on island communities in the identification of actions for incorporation in Action Plans;
- Engaging with Island representatives to support both of these requirements both as part of the Governance & Delivery Framework and through specific consideration as part of a stakeholder engagement plan.

3. Consultation

A Scottish Government public consultation, which included a partial ICIA, was delivered in 2022 and responses were analysed to establish if any impacts on islands were identified. This analysis, combined with the data outlined in section two, outlined the potential for actions under the Strategy to have an impact in the following four areas:

- Beach litter
- Tourism
- Waste collection and transportation
- Digital inclusivity

¹³ Scottish Government (2019) – The National Plan for Scotland’s Islands
<https://www.gov.scot/publications/national-plan-scotlands-islands/pages/9/>

¹⁴ BBC News (2019) Scottish areas with 'best and worst' broadband [accessed June 2023]
<https://www.bbc.co.uk/news/uk-scotland-highlands-islands-46945879>

¹⁵ HIE (2016) – A minimum income standard for remote rural Scotland: A policy update
<https://www.hie.co.uk/media/6441/aplusminimumplusincomeplusstandardplusforplusremotepusruralplusscotlandplus-plusapolicyplusupdateplus2016.pdf>

Establishing whether these impacts exist and, if required, ensuring appropriate steps are taken will be a key function of the Governance and Delivery Framework, which is a critical piece of the delivery infrastructure to ensure successful delivery of the Strategy's vision. The Framework will ensure that Island communities are engaged throughout the design and implementation stages of individual actions as well as the development of future Action Plans.

4. Assessment

We anticipate that the overall vision of the Strategy to prevent and reduce litter and flytipping will have a positive impact on Scotland's people and environment, irrespective of geographical location.

The Strategy sets out a vision and set of outcomes and objectives to reduce litter and flytipping in Scotland with an accompanying Action Plan that outlines how we will achieve this vision over the strategy's six-year lifespan. The purpose of publishing the Strategy is to provide a framework through which actions will be identified, designed and implemented.

The wide scope of the Strategy and associated Action Plans will impact on a range of individuals and organisations that engage in activities that contribute to littering and flytipping. The Strategy will be implemented across Scotland, but does not itself specify target geographical areas or sections of society. At this stage it is not apparent to what extent geographic location would be impacted, however the implementation of the Strategy is not anticipated to have a significantly disproportionate impact on island communities. Impacts on island communities in the possible areas outlined in **Section 2** have not been identified in the 2023-24 Action Plan, which was informed by engagement through a full public consultation and completion of a partial Islands Communities Impact Assessment in 2022.

It is not yet clear how the systems approach to litter and flytipping prevention will differ in application across islands. If there is any differentiation, this will be identified and mitigated during the design and implementation stages of individual actions and the development of future Action Plans, which will be overseen by the Governance and Delivery Framework to ensure a wide range of input from stakeholders, amongst which island representation will be included. Any policy interventions would be subject to further proportionate impact assessment.

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